

WORK SESSION AGENDA ITEM SUMMARY

City Council



STAFF

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SUBJECT FOR DISCUSSION

Mobile Home Park Oversight and Enforcement

EXECUTIVE SUMMARY

The purpose of this item is to provide an overview of current oversight and enforcement mechanisms for mobile home park issues in Fort Collins; highlight enforcement gaps; and seek Council direction on potential strategies to preserve housing affordability; improve livability, habitability, and safety; and promote resident awareness and empowerment. The discussion will include a review of the Colorado Mobile Home Park Oversight Program (MHPOP), which handles state-level enforcement, the City's current role in mobile home park enforcement, and existing gaps and overlap in enforcement.

Staff will outline key challenges faced by MHP residents, including aging infrastructure, resident awareness of and access to resources, and jurisdictional limitations. The session will also explore possible strategies for closing enforcement gaps, including improved coordination with MHPOP, streamlined referral processes, enhanced educational activities, and expanded local oversight mechanisms.

GENERAL DIRECTION SOUGHT AND SPECIFIC QUESTIONS TO BE ANSWERED

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 / DISCUSSION

Mobile home parks ("MHPs") represent an important housing choice in Fort Collins. They are a significant form of private, unsubsidized, "naturally-occurring" affordable housing. The approximate 3,500 mobile homes in the city and Fort Collins' Growth Management Area ("GMA") represent nearly the same inventory as the city's subsidized affordable housing stock of 4,000 units.

Despite their affordability, mobile home parks create systemic challenges for both residents and homeowners. Unlike traditional homeownership, mobile home park residents may own their home, but the land it sits on is owned by the mobile home park. This leaves residents vulnerable to rising lot rents,

evictions and lease terminations, infrastructure neglect, and potential displacement if park owners choose to sell. Lower-income households face restrictive mortgage lending practices due to high down payment requirements and limited financing options.

Mobile home parks are private property, as are their streets, water infrastructure, and most fencing and safety lighting. MHP owners are responsible for maintenance, repair, and assessment of their property's infrastructure, which leads to inconsistency across MHP neighborhoods, raising concerns over habitability and safety when compared to other neighborhood types with City oversight of infrastructure. Additionally, MHP neighborhoods in Fort Collins are home to some of the largest concentrations of historically underserved populations who are less likely to contact the City for assistance or resources, including non-English speakers, lower-income households, and senior citizens.

Within Fort Collins city limits there are 10 mobile home parks and approximately 1,400 home sites. An additional 14 communities and approximately 2,100 home sites exist within the Fort Collins' GMA as illustrated in Attachment 1. Five of these neighborhoods in the GMA are immediately adjacent to City limits and in areas where long-range planning discussions about annexation are currently underway, like the Mulberry Corridor.

Council identified mobile home park preservation and resident protections as priorities in 2019 and provided staff with guidance on programs and initiatives to improve mobile home park livability and viability as a housing option in Fort Collins. Between 2020 and 2023, nine of the mobile home parks in Fort Collins were rezoned to preserve existing mobile home parks under a new zone type.

The cross-departmental MHP Residents' Rights Team supports Council priorities around housing stability and affordable housing meets monthly to implement projects that improve transparency and accessibility of resources, encourage collaboration among City departments working in the mobile home park and affordable housing spaces, provide a support network for residents, and develop or enhance enforcement mechanisms. To help address financial barriers, the City offers mini-grants, emergency assistance, and upcoming mobile home improvement grants (2025-2026). Policy and Code enforcement efforts focus on strengthening habitability protections through maintenance responsibility Code updates, Municipal Code enforcement, and increased billing transparency for utilities. Additionally, the City continues to assess and recommend policy improvements at both the local and state levels to ensure long-term protections for mobile home park residents.

Current City of Fort Collins Mobile Home Park Activities

Due to the wide range of issues experienced in mobile home parks, unique demographic and socioeconomic status of residents, and breadth of housing affordability work, City departments in six Service Areas carry out work in mobile home parks. At least 29 separate City teams have ongoing projects within mobile home parks. The major challenges to this decentralized work include the lack of a singular point of contact for residents, unstructured and inconsistent reporting across departments, related budget offers developed in a vacuum instead of packaged together, and non-existent overarching strategic plan for local MHP work.

The activities in the table below include completed and ongoing projects in three outcome areas: improving living conditions, promoting resident empowerment, and preserving mobile home parks as an essential part of the affordable housing landscape in Fort Collins. Involvement of external partners are indicated where the City provides staffing or funding support for those activities. (See Attachment 2 for completed and ongoing project descriptions.)

Table 1: MHP Activities, Status, and Associated City Department Involvement

Status	Activity	City Departments Involved
Completed – Promote Resident Awareness & Empowerment	MHP Webpage	Communications & Public Involvement Office (“CPIO”) Neighborhood Services
	MHP Mini-Grants	Environmental Services Department Fort Collins Utilities – Water Conservation Healthy Homes Neighborhood Services
	Local Complaint System (Access Fort Collins)	Neighborhood Services CPIO
	MHP Handbook	Neighborhood Services
In Progress/Ongoing – Promote Resident Awareness & Empowerment	Neighborhood Liaisons & Community Consultants (highest need parks)	Neighborhood Services
	Education & Outreach	Conflict Transformation Works Cultural Services Economic Health Office Environmental Services Department Equity Office FC Moves Fort Collins Utilities Healthy Homes Natural Areas Neighborhood Services Park Planning Parks Department Planning & Development Review Police Services Transfort Urban Renewal Authority
	Resident Association & Organizing Assistance	Equity Office Neighborhood Services
	Targeted Community Mediation & Community Mediators/Promotoras Program	Conflict Transformation Works External - Community Partners

Status	Activity	City Departments Involved
	Community Conversations Focus Group	Equity Office
	Grocery Rebate Program	Social Sustainability Department
Completed – Improve Livability, Habitability, & Safety	Section 18 Residents’ Rights Updates	City Attorney’s Office Code Compliance Neighborhood Services
	Limitation of Required Upgrades	Neighborhood Services
	Local Nuisance Code Proactive Enforcement Rollout	Code Compliance Neighborhood Services
In Progress/Ongoing – Improve Livability, Habitability, & Safety	Enforcement of Municipal Code (Section 18)	Code Compliance Forestry** Neighborhood Services
	Complaint-Based Inspections & Enforcement	Building Services Rental Housing Zoning Services
	Local & State Policy Analysis & Recommendations	City Manager’s Office Neighborhood Services Social Sustainability Department
	Broadband Infrastructure & Income-Qualified Service	Fort Collins Connexion
	Transportation Access Planning & Projects	FC Moves
Completed – Preserve Housing Affordability	Utility/Water Services Billing Transparency Code & Process Changes	City Attorney’s Office Fort Collins Utilities Neighborhood Services
	Maintenance Responsibilities Code Changes	City Attorney’s Office Neighborhood Services

Status	Activity	City Departments Involved
In Progress/Ongoing – Preserve Housing Affordability	Larimer Home Improvement Program & Emergency Grants	External - Loveland Housing Authority
	Partner/Contractor Projects - CARE; LCCC	Fort Collins Utilities External - Larimer County External - Energy Outreach Colorado
	MHP Home Improvement Grants (limited to building envelope work for 2025-2026)	Environmental Services Department Healthy Homes Neighborhood Services
	Eviction Legal Fund Trainings & MHP Resident/Landlord Support	External - Community Partners Neighborhood Services

** Enforcement Limited to trees adjacent to public streets.

Current Colorado Mobile Home Park Oversight Program Activities Supporting Fort Collins

The Mobile Home Park Oversight Program (“MHPOP”) began operating in May 2020, allowing mobile homeowners, property managers, and owners to file complaints with the department rather than using the judicial system to resolve issues and to register MHPs. Over time, MHPOP expanded its complaint system to allow submissions from renters, local governments, and nonprofit organizations, though anonymous complaints are still not accepted. Additionally, MHPOP requires mobile home park owners to register annually and maintains a statewide database of registered parks.

MHPOP’s investigatory tools and enforcement mechanisms are outlined in the MHP Oversight Act and Administrative Rules. MHPOP has subpoena power for records related to their investigations, ability to levy monetary penalties for violations of the Act, power to issue cease and desist orders, and authority to determine legal enforceability of lease terms and park rules. MHPOP also has a collaborative agreement with the Colorado Attorney General’s Office for interpretation of lease agreement terms, enforceability of park rules, and assistance with enforcement of the Act. The program has received a total of 318 complaints from Fort Collins residents since 2020 and has issued seven Notices of Violation and 29 Notices of Non-Violation. Notices of Violation and Non-Violation are issued by MHPOP upon determination of whether a law was violated and by which party. Notices of Violation also include the steps necessary to correct a violation, sets deadlines to cure, and outlines penalties for failure to comply. 11 Fort Collins cases remain open and under investigation. All other cases were closed due to lack of jurisdiction or inability to reach the complainant, MHPOP declining to investigate, consolidation with other complaints, or resolution by the parties.

Fort Collins mobile home park resident complaints to MHPOP from 2020 through 2024 are summarized in the figures below.

Figure 1: Number of Fort Collins MHPOP Complaints and Enforcement Outcomes by Category 2020-2024

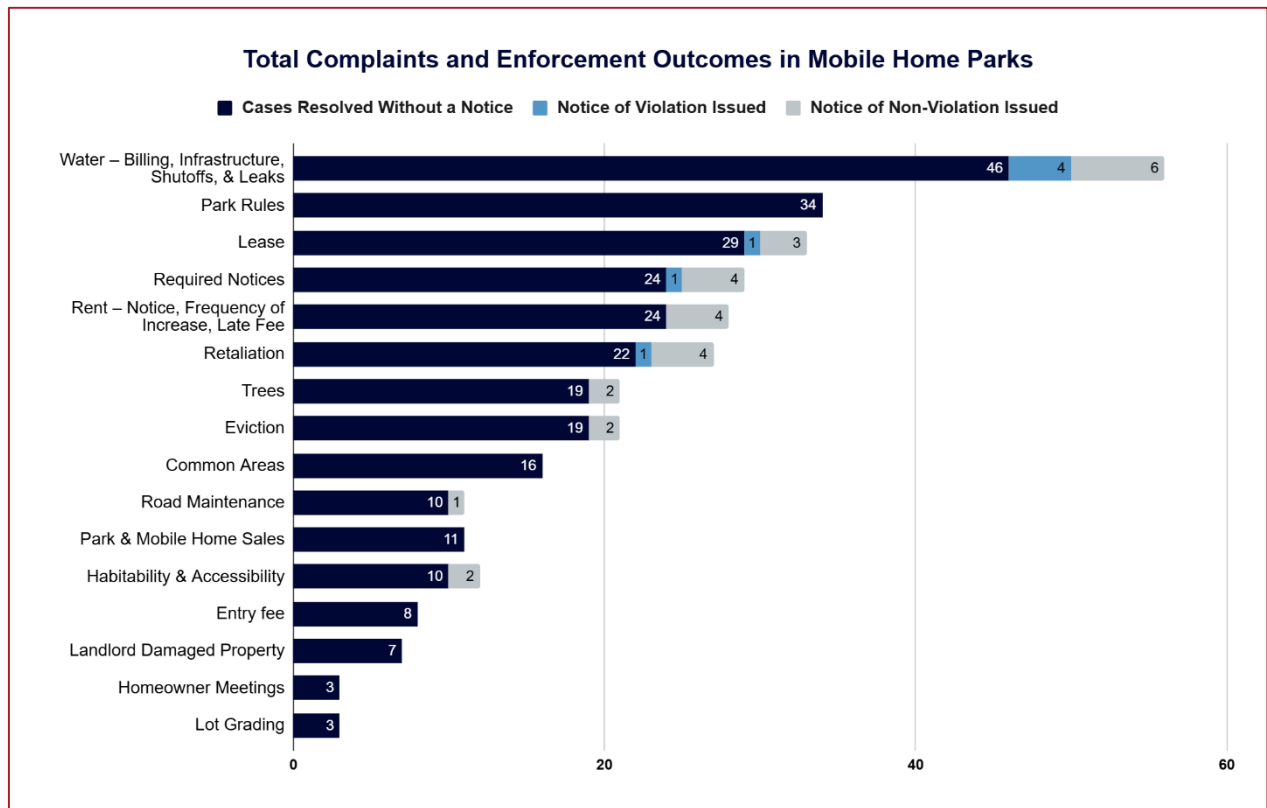
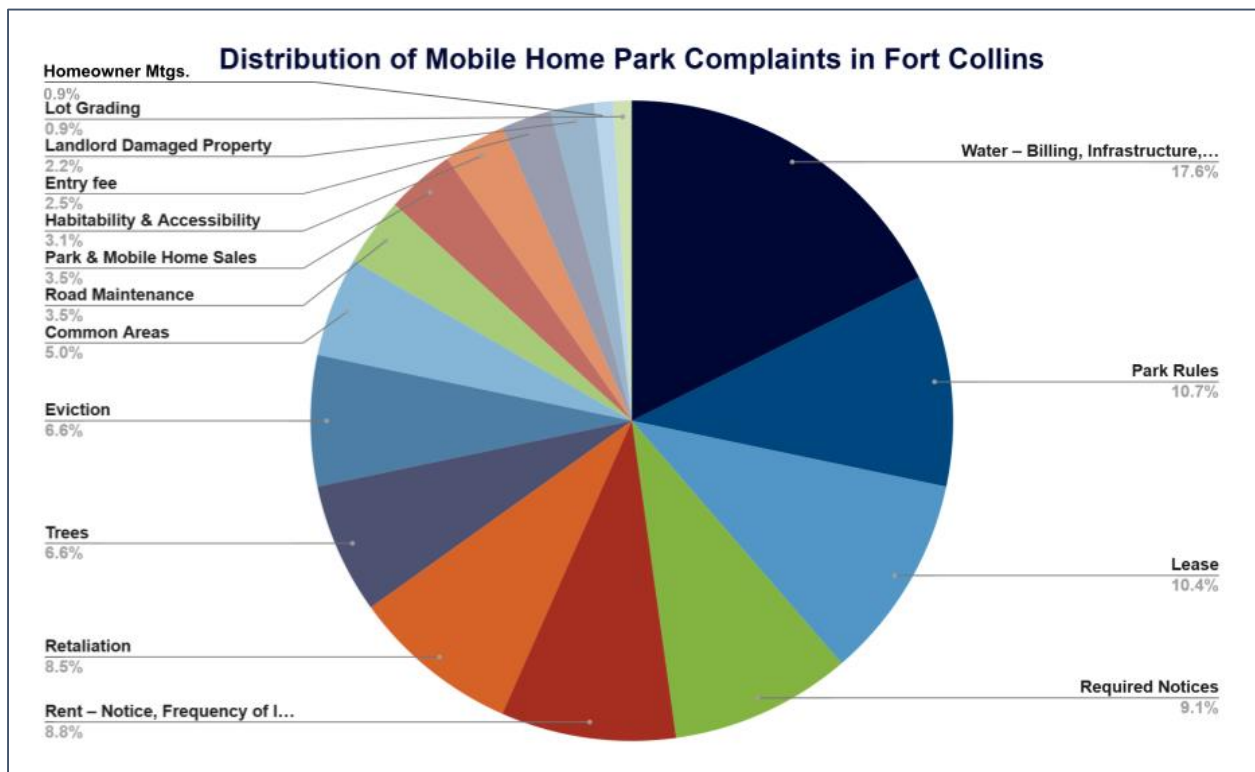


Figure 2: Distribution of Fort Collins MHPOP Complaints by Category 2020-2024




































Discussion – Overlap and Gaps in Enforcement





Overlap exists between City of Fort Collins and MHPOP enforcement of some issues. **Table 2** below lists the categories of complaints and enforcement responsibilities for mobile home parks in Fort Collins. These categories derive from both MHPOP data, Fort Collins Access cases, and public engagement input.

For mobile home park issues that require legal advice, opinions, or analysis, Neighborhood Services staff refers residents to free attorney advice clinics or legal services through the Eviction Legal Fund and MHPOP, as staff does not give legal advice to the public.

Table 2: Mobile Home Park Enforcement

Issue	No City Staff Enforcement – Refer to MHPOP & Eviction Legal Fund	City Department Enforcement	No MHPOP or City Staff 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		 Neighborhood Services	
Fences			
Lease*			
Required Notices			
No Emergency Contact Information Posted		 Neighborhood Services	
Rent - Notice, Frequency of Increase, Late Fee*			
Retaliation*			
Trees			

Issue	No City Staff Enforcement – Refer to MHPOP & Eviction Legal Fund	City Department Enforcement	No MHPOP or City Staff Enforcement
		Neighborhood Services	
Eviction*			
Common areas		 Code Compliance	
Road maintenance			
Park & Mobile Home Sales			
Habitability		 Rental Housing	
Entry fee			
Landlord Damaged the Property*			
Homeowner Meetings		 Neighborhood Services	
Lot grading		 Building Services	
Speed Limits			
Security Lighting			
Availability of Management			
Language Access & Barriers	 <i>New in 2024</i>		
Frequent Changes in Management			
Inadequate Communication Channels			
Homeowner’s & Renter’s Insurance Requirements			

Issue	No City Staff Enforcement – Refer to MHPOP & Eviction Legal Fund	City Department Enforcement	No MHPOP or City Staff Enforcement
Parking & Towing			
Neighbor-to-Neighbor Disputes		 Neighborhood Services	
Animal Control		 NOCO Humane	
Water - Quality		 Fort Collins Utilities & CDPHE	

* Resolution requires substantial legal analysis or opinion for determination of a violation or non-violation.

Enforcement Gaps

Staff from the Mobile Home Park Oversight Program, Department of Local Affairs, and City of Fort Collins met twice since Q3 2024 to discuss partnership opportunities, challenges, progress, and the future of the program. MHPOP has jurisdiction over several categories of complaints but not the on-the-ground specialists or funding for these specialists crucial to investigation. For example, MHPOP does not have access to arborists to assess dangerous trees or stormwater experts for to evaluate drainage or lot grading concerns. New state legislation effective in June 2025 will require MHP owners to clear walkways and streets of snow, but without dedicated inspectors, MHPOP must rely on complaints, videos, and photographs for enforcement.

Despite the establishment of MHPOP, significant challenges persist in mobile home parks, particularly regarding infrastructure maintenance. Many parks struggle with aging water and sewer lines, road maintenance, and inconsistent park rule enforcement for safety, which require technical experts to assess for possible enforcement actions. Because these parks are privately owned, the responsibility for maintaining infrastructure falls on property owners. Water quality issues in mobile home parks involve multiple entities, including local water providers, MHP managers, MHPOP, the Colorado Department of Public Health and Environment (CDPHE), and certified water operators. A new grant program through CDPHE assists with testing and mitigation efforts statewide, but the lack of centralized coordination remains a barrier.

Not all mobile home parks face the same challenges, and many concerns remain underreported to MHPOP or the City due to fear of retaliation, limited access to the complaint process, or lack of awareness of enforcement mechanisms. Frequent turnover in property managers further exacerbates these challenges, leading to inconsistent communication, disruptions in voluntary compliance efforts, and difficulties in resolving complaints. Poor communication and lack of transparency in park management often leave residents uncertain about their rights and responsibilities. Additionally, language barriers further hinder non-English-speaking residents from accessing available resources.

Due to the complexity of the processes both within the City and among various regulatory and enforcement bodies, MHP residents are often unclear about where to report or request assistance for issues and may receive inconsistent direction.

While some of these concerns overlap with MHPOP's jurisdiction, many remain unaddressed due to limited enforcement capabilities at both the state and local levels. Addressing these ongoing challenges will require stronger coordination between agencies, increased funding for investigative resources, and improved mechanisms for ensuring compliance within mobile home parks.

NEXT STEPS

Next steps to achieve outcomes that enhance conditions in local mobile home parks and strengthen connections focus on staff research and evaluation. Potential solutions for exploration by outcome area are discussed below and outlined in Attachment 3.

Suggestions for additional Staff evaluation are divided by the potential cost of implementation: those that are low-cost or could be achieved through tradeoffs for existing resources and those likely to require additional resources.

Options for next steps:

1. Activities that are low-cost or could be tradeoffs for existing resources:
 - Technical assistance, education, or other tools to assist with infrastructure issues. *(Not including repair or replacement of infrastructure.)*
 - Evaluate 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.
 - Enhance coordination and strategic planning of MHP work in Fort Collins to better address existing concerns, emerging issues, and available resources.
 - Expand of existing trainings and educational opportunities to specifically apply to mobile home parks.
 - Strengthen external language access requirements and enforcement for MHPs under the new State law.
 - Update Municipal Code to mandate participation in MHP manager certification and training
 - Update Municipal Code to allow fences in MHPs
2. Staff evaluation of these activities that would likely require future allocation of resources to implement:
 - 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.
 - Dedicated work group for mobile home park coordination and strategic planning for internal and external stakeholders.
 - 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 set penalties

- Establish water rebilling methodology and disclosures for MHPs that charge for rent with “water included” or work with MHPOP to close the loophole
 - Establish enforceable timeline for water infrastructure leak repairs and penalties for non-compliance
 - 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
 - Establish the right of entry for educational assessments (upon resident request) of infrastructure such as road and traffic safety, street lighting, and tree maintenance
 - Adopt State requirements and local enforcement for MHP notices like notice of landlord entry onto the lot, intent to sell the MHP, changes to park rules, and homeowner rights
3. Continued monitoring of MHPOP complaints and resolution following 2024 program improvements to guide future local work.
 4. Regular reports to Council on local MHP activities and issues.

ATTACHMENTS

1. Locations Map (Fort Collins & Growth Management Area)
2. Residents’ Rights Team Completed & Ongoing Projects 2019-2025
3. Potential Solutions for Exploration by Issue
4. Presentation