

# AGENDA ITEM SUMMARY

City Council



## **STAFF**

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JC Ward, Community Engagement Manager, Housing and Community Vitality

## **SUBJECT**

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**First Reading of Ordinance No. 014, 2026, Amending the Code of the City of Fort Collins to Revise Requirements Relating to Mobile Home Parks.**

## **EXECUTIVE SUMMARY**

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The purpose of this item is to present City Code updates related to mobile home park licensing, proper operation, and enhanced oversight of issues identified by mobile home park residents, property managers, and owners. This item also addresses analysis of unmet needs in the State of Colorado Mobile Home Park Oversight Program.

Staff recommends including the following Code changes:

- Requiring mobile home park (“MHP”) owners to provide potable water and access to sanitary services for water outages lasting more than 12 hours;
- Requiring MHP owners to maintain trees and remove hazards caused by trees and branches that threaten life or property; aligning minimum standards with existing standards for other property types;
- Requiring MHP owners to maintain streets and mitigate hazards;
- Requiring MHP owners to repair water infrastructure leaks, breaks, or malfunctions in the City Water Utility service area; aligning minimum standards with existing standards for other property types;
- Authorizing abatement of hazardous trees, water infrastructure leaks or repairs, and pavement conditions by the City with cost recovery from MHP owner;
- Prohibiting MHP owners from charging costs of hazard mitigation, abatement by the City, penalties, and other costs associated with licensing or enhanced enforcement program to residents;
- Aligning penalty structure for MHP licensing and oversight with existing penalties for non-compliance of hazardous conditions and administrative requirements;
- Removing requirement for proactive rental inspections for mobile homes to align with the Rental Housing complaint-based inspection policy; and
- Creating a MHP licensing program, requirements, and fees with annual renewal that requires:
  - Disclosure of:
    - Infrastructure assessment results, maintenance schedules, and repairs
    - Water outage and boil notice frequency and duration

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- Water rebilling methodology
- Average lot rent, lot rent increase amount and frequency, line-item description of all rent increases
- Speed limits and enforcement standards
- Current community rules
- MHP property manager certification and continuing education
- Compliance with minimum property maintenance and hazard mitigation standards set forth in Code

## **STAFF RECOMMENDATION**

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Staff recommends adoption of the Ordinance on First Reading.

## **BACKGROUND / DISCUSSION**

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Mobile home parks (“MHPs”) represent an important housing choice in Fort Collins. They are a significant form of private, unsubsidized, “naturally-occurring” affordable housing. There are nine mobile home parks within the city limits with 1,400 homes and 14 mobile home parks with 2,100 total units in the Fort Collins Growth Management Area. 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.

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.

Oversight of portions of mobile home park habitability, livability, and safety is vested in the State of Colorado’s Mobile Home Park Oversight Program (“MHPOP”), six City of Fort Collins’ Service Areas, Larimer County, Colorado Department of Health and Environment (“CDPHE”), U.S. Department of Housing and Urban Development, and MHP owners. MHP residents and owners can file complaints with MHPOP or the City for assistance with concerns under their jurisdiction.

### **Purpose and Intent**

The purpose of these proposed Code changes and the Mobile Home Park (“MHP”) Licensing Program they would create is to establish clear, consistent, and enforceable standards for the operation and maintenance of mobile home parks in recognition of their unique ownership structure and shared, privately owned infrastructure that directly affects public health, safety, and habitability. Because residents typically own their homes but not the land or essential systems, while park owners control roads, utilities, trees, and common areas; this program is intended to align responsibility with control and close regulatory gaps not addressed by other housing regulations. The licensing and enforcement framework provides routine inspection, proactive oversight, corrective timelines, and accountability for shared infrastructure, including water systems, streets, and trees, to prevent avoidable emergencies, protect residents, preserve affordable housing, and ensure mobile home parks function as safe, stable neighborhoods comparable to other residential areas without providing preferential treatment.

## **City Policy Alignment**

Mobile home park licensing and enforcement work aligns with housing, equity, and water efficiency strategies for:

- Affordable, healthy, stable housing
  - Fort Collins 2024 Strategic Plan NCV 1
  - Housing Strategic Plan, Strategy 2
- Equitable access to programs and services; inclusive engagement
  - Fort Collins 2024 Strategic Plan NCV 3
  - Equity 2023 Plan, Goal 2
- Supporting MHP community organizing efforts
  - Housing Strategic Plan, Strategy 24
- Supporting Code enforcement efforts for blighted properties
  - City Plan, Strategy SC-1b
  - Urban Forest Strategic Plan, Growth Strategy 3 (GS3)
- Enhancing water efficiency programs
  - Our Climate Future Plan, Strategy CRC3
- Improving infrastructure in low-income neighborhoods
  - Our Climate Future Plan, Strategy HAH8

## **Unique Regulation for Mobile Home Parks**

Mobile home parks (MHPs) require different regulation than other housing types due to their unique ownership, infrastructure, and public health conditions. Residents typically own their homes but not the land or shared systems, while park owners control roads, utilities, drainage, trees, and common areas that directly affect health, safety, and habitability. This split responsibility creates a regulatory gap that requires tailored standards to align accountability with control.

MHPs also rely on privately owned, community-wide infrastructure—such as water, wastewater, and internal roadways—that can pose serious public health and safety risks if not properly maintained. Residents lack the authority or capacity to address system failures, making proactive oversight and owner accountability essential.

Differentiated regulation is not preferential treatment, but risk-based governance that protects residents, preserves affordable housing, and prevents avoidable emergencies. Clear, tailored standards ensure mobile home parks remain safe, stable, and comparable to other residential neighborhoods, while reducing displacement and strain on public resources.

## **Importance of a Mobile Home Park Licensing and Enforcement Program**

Without a licensing and enforcement program, mobile home parks can experience chronic infrastructure neglect due to limited inspections, unclear standards, and weak accountability, allowing shared systems to deteriorate until failures create safety risks and emergency responses. Fragmented oversight leaves residents with few options to resolve issues they do not control and allows substandard conditions to persist. A licensing and enforcement program provides clear standards, predictable oversight, and accountability, enabling early intervention, protecting public health, preserving affordable housing, and ensuring mobile home parks function as safe, stable neighborhoods.

## **Trees**

Trees within mobile home parks are part of the park's shared infrastructure and directly affect public safety, emergency access, and habitability. Because residents do not own the land or have authority to maintain trees, responsibility appropriately rests with park owners. However, while current City code requires owner maintenance, it lacks inspection authority, abatement mechanisms, enforceable timelines, and cost recovery for hazardous conditions or resulting damage.

Without a local licensing and enforcement program, the City relies on state enforcement that has limited inspection capacity and no abatement authority. A licensing program would establish clear standards, routine inspections, corrective timelines, and penalties, ensuring hazardous trees are addressed proactively and mobile home parks are maintained as safe, livable neighborhoods.

## **Water Infrastructure**

Water infrastructure in mobile home parks is privately owned and operated by park owners and functions as a shared, community-wide system that directly affects public health, fire protection, and habitability. Failures in these systems can result in contamination, service disruptions, boil orders, or fire suppression deficiencies that impact entire neighborhoods and require immediate public response. Residents lack access to water system data, testing results, leak detection, and maintenance records, limiting their ability to identify problems, prevent improper charges, or advocate for timely repairs.

While Code recognizes owner responsibility for private MHP water systems, it does not expressly provide clear authority or for routine inspections, corrective action, or cost recovery in enforcing these responsibilities. A licensing and enforcement program would establish clear standards, inspection protocols, corrective timelines, and penalties, enabling proactive oversight and local intervention. Without such a program, oversight remains largely deferred to state agencies with limited, reactive authority that does not address ongoing operational compliance or timely mitigation of local health and safety risks.

## **Streets and Pavement**

Streets and access ways within mobile home parks are privately owned and maintained by park owners and function as shared neighborhood infrastructure essential for safe mobility and emergency access. The proposed program grants clear legal authority to repair or maintain these surfaces, to assure owner accountability. Poorly maintained pavement creates safety hazards, vehicle damage, and barriers to emergency response that can affect entire communities.

While Code assigns maintenance responsibility to MHP owners, it does not expressly grant the City clear authority for routine inspections, enforcement, abatement, or cost recovery. A licensing and enforcement program would establish minimum standards, inspection protocols, corrective timelines, and penalties, ensuring consistent maintenance and safe access. Without such a program, oversight remains limited, complaint-driven, and insufficient to address conditions that threaten safety and accessibility.

## **PROPOSED PROGRAM DESIGN**

Over the last seven years of discussion on mobile home park policy in Fort Collins, MHP residents, property managers, and Council agreed that the focus for the work is health and safety of mobile home park residents, promoting safe and stable housing for residents, and improving the overall neighborhood livability. The following program components for Council's consideration were developed through a community-centered approach that includes input from previous engagement efforts; public comment; guidance from Council, and inputs from nonprofit community partner organizations. If the program moves forward, additional collaborative work on program implementation will continue with stakeholders.

## **1. Mobile Home Park Licensing**

The proposed Mobile Home Park Licensing Program would require MHP owners to apply for/obtain a mobile home park license to operate annually beginning January 1, 2027. The MHP Licensing Program would apply to mobile home parks with five or more lots within the city limits of Fort Collins.

To obtain and maintain a mobile home park license, park owners would be required to:

- Submit a complete annual licensing application or renewal application with all required information and documentation
- Comply with all applicable federal, state, and local laws
- Pay an annual licensing fee set by the City Manager based on program costs, assessed on a per-lot basis, capped at \$50 per lot. Licensing fees are intended to recover the City's administrative costs associated with managing the program.
- Conduct required infrastructure assessments and provide associated reports
- Maintain and implement infrastructure maintenance schedules based on assessment findings
- Employ a certified mobile home park property manager

## **2. MHP Manager Certification**

To support compliance under the Mobile Home Park Licensing Program and improve health, safety, and livability in mobile home parks, all mobile home park managers are required to obtain and maintain City certification. The program includes initial training, ongoing continuing education, and professional development opportunities designed to promote consistent management practices, proactive maintenance, and effective communication with residents. Certification fees of up to \$1,000, to be set by the City Manager under their administrative fee-setting authority, would cover program administration and instructional costs.

To obtain and maintain MHP Manager Certification, property managers would:

- Complete required initial training
- Participate in ongoing annual continuing education
- Maintain compliance with applicable standards
- Renew certification annually
- Pay a certification fee set by the City Manager to cover program costs, of up to \$1,000

## **3. Improved Enforcement and Oversight**

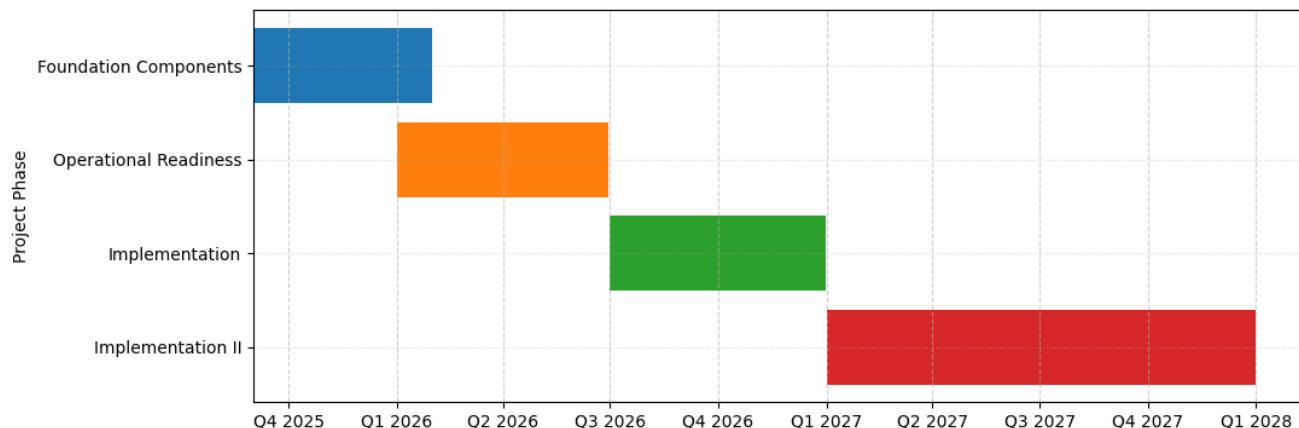
Through the Mobile Home Park Licensing Program and related Code changes, the City would have clear authority to inspect, require corrective action, and abate hazardous conditions in mobile home parks when necessary. If an owner fails to address identified hazards, the City could perform abatement and recover costs from the park owner, without allowing those costs to be passed on to residents. This framework shifts oversight from complaint-driven response to proactive intervention, improving safety, transparency, and accountability while reducing preventable emergencies.

Key areas of enhanced oversight and enforcement include:

- Hazardous trees and branches
- Lack of access to water or sanitary services during long water outages
- Hazardous pavement and roadway conditions
- Water infrastructure leaks, repairs, and maintenance in the City Water Utility service area
- Ongoing transparency through required disclosures

- Abatement of hazardous conditions by the City; charging abatement costs to MHP owners
- Prohibiting MHP owners from charging costs for licensing, manager certification, abatement, compliance, and noncompliance penalties to residents

### MHP Licensing & Enforcement Program Timeline



#### **Foundation Components** *Sept. 2025-Jan. 2026*

Code Change Draft  
Data Dashboard Development  
Internal Staffing Inventory  
Funding Options Assessment

#### **Operational Readiness** *Jan.-June 2026*

Data Dashboard Launch  
MHP Licensing Outline  
MHP Handbook Updates  
Penalty & Compliance Processes  
Outreach  
MHP Work Group Established

#### **Implementation** *July-Dec. 2026*

Manager Certification Developed  
Emergency Response SOP's  
Administrative Compliance SOP's  
Enforcement Standards Set  
Voluntary Compliance Assessment  
Contracting & Vendor Mgmt.

#### **Implementation II** *Jan.-Dec. 2027*

MHP Licensing Required  
MHP Manager Certification Training  
Administrative Compliance Launch  
MHP Residents' Training  
MHP Owner Training  
Quarterly Meetings with City Staff

## Staffing

Program coordination and implementation would be supported through the recent redeployment of an existing Public Engagement position from Neighborhood Services, repurposed as a Senior Mobile Home Park Specialist within Housing and Community Vitality. This position would oversee the Mobile Home Park Licensing Program and centralize management of City mobile home park-related work across departments by establishing shared priorities and coordinating compliance, engagement, and enforcement activities. The Senior Mobile Home Park Specialist would also lead program evaluation, data tracking, and reporting to support accountability and informed decision-making, while serving as a single point of contact for park owners, managers, residents, and partner agencies. This approach ensures consistent program oversight and reporting without adding new staff or increasing overall staffing levels. The position is currently vacant and in the recruitment process.

The Senior Mobile Home Park Specialist would also maximize the effectiveness of existing City staff working in the mobile home park space by coordinating and streamlining cross-departmental efforts. This includes reorganizing the current Mobile Home Park Residents' Rights Team into a Mobile Home Park Work Group focused on shared priorities, clear roles, and coordinated action. The MHP Work Group would ensure staff time is used efficiently while strengthening alignment across departments and supporting consistency.

## CITY FINANCIAL IMPACTS

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There is no appropriation request for additional funding. The primary costs of the program are for staffing to carry out program coordination, investigation, and enforcement, which has been addressed through strategic redeployment of an existing engagement position in Housing and Community Vitality, previously focused on neighborhood programs. Additional staffing efficiencies resulting from realignment of ongoing mobile home park work throughout multiple City departments assist with the budget conscious staffing model for the program.

MHP Licensing fees are expected to generate \$70,000 in revenue per year beginning in 2027 based on the assumptions of 1,400 lots in eligible mobile home parks in Fort Collins and assuming fees are set at \$50 per lot. MHP Manager Certification fees are anticipated to generate \$9,000 in 2027 (initial certification) and \$1,800 annually thereafter assuming fees set at \$1,000 for initial certification costs for the managers of all 9 eligible mobile home parks in Fort Collins and \$200 in continuing education fees per manager per year after initial certification. Some employee turnover in mobile home parks each year may increase the projection as new managers would be required to take the initial certification, assuming initial certification fees of \$1,000 in fees each.

Penalties for non-compliance and administrative fees associated with abatements would generate revenue to support the program; however, these amounts are difficult to project. Revenue will depend on compliance rates, which are expected to be lower during initial implementation as mobile home parks transition to the new standards. During this period, compliance timelines and penalty assessments would be structured to balance the need for timely risk mitigation with the City's goals of minimizing displacement and preserving housing affordability.

Program revenue, fees, and penalties would be restricted for use by the MHP Licensing Program for enforcement, assistance with voluntary compliance, offsets of administrative costs, and other related programmatic expenses.

## BOARD / COMMISSION / COMMITTEE RECOMMENDATION

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The Affordable Housing Board passed a motion in support of the staff recommendation and proposed MHP Licensing and Enforcement Program.

Informational presentations were made to the Housing and Human Services Funding Board and the Affordable Housing Board.

## **PUBLIC OUTREACH**

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Targeted outreach to develop and assess proposed Code changes was conducted with residents of the City's existing mobile home parks, as well as consultation with local housing and human services-focused partner organizations who provide information and services to MHP residents over the last year. Feedback was provided by residents and nonprofit partners at numerous events such as MHP resource fairs, workshops, and neighborhood events regarding current conditions, resident concerns, and ideas for enforcement program components.

## **ATTACHMENTS / LINKS**

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1. Proposed City Code Changes and Rationale
2. MHP Enforcement Work Session Agenda Item Summary, September 23, 2025
3. Affordable Housing Board Meeting Minutes, February 5, 2026
4. Presentation
5. Ordinance No. 014, 2026