



City of Woodland

Meeting Agenda

Manufactured Home Fair Practices Commission

City Hall
Council Chambers
300 First Street
Woodland, CA 95695

January 29, 2026
6:00 PM

Please Note: The numerical order of items on this agenda is for the convenience of reference; items may be taken out of order. No new items shall begin after 10:30 pm unless unanimous consent exists to continue.

A. CALL TO ORDER

B. ROLL CALL

C. STAFF AND COMMISSIONER COMMENTS

This is an opportunity for the Commission members and staff to make comments and announcements to express concerns, or to request Commission's consideration of any items a Commission member would like to have discussed at a future Commission meeting.

D. COMMUNICATIONS FROM THE PUBLIC

This is an opportunity for the public to speak to the Commission on any item other than those listed on this agenda. Speakers are requested to use the microphone in front of the Commission and to begin by stating their name, whether they reside in Woodland and the name of the organization they represent if any. The Chair may impose a time limit on any speaker depending on the number of people wanting to speak and time available for the rest of the agenda. In the event comments are related to an item scheduled on the agenda, speakers may be required to wait to make their comments until that item is considered. The option to submit a public comment via voicemail is no longer available. Written Public Comments Members of the public are welcome to submit written comments prior to the meeting. Comments should be submitted by email to planningcommissionmeetings@cityofwoodland.org. Written Comments received at least two (2) hours prior to the scheduled start time of the Commission meeting will be provided to the Commissioners and posted to the City website as part of the official record of the meeting but will not be read into the record. Written Comments received within two (2) hours of the scheduled start time of the Commission meeting and during the meeting will be provided to the Commissioners the day following the Commission meeting. If you are submitting written comments on a particular item on the agenda, please identify the agenda item number and letter. If you are submitting written comments on an item not listed on the agenda, please identify your e-mail/comment as a General Public Comment. Note: Public comments at special meetings are limited to items on the agenda only.

E. APPROVAL OF MINUTES

1. SUBJECT: Manufactured Home Fair Practices Commission Meeting Minutes of June 30, 2025

RECOMMENDATION FOR ACTION: Staff recommends that the Manufactured Home Fair Practices Commission receive and approve the Meeting Minutes of June 30, 2025.

F. BUSINESS ITEMS

2. SUBJECT: 2025 Annual Permissive Adjustment to the Space Rent Ceiling - Bell's Trailer Village (1.94% increase)

RECOMMENDATION FOR ACTION: Staff recommends that the Manufactured

Home Fair Practices Commission adopt a Resolution: 1) Approving the 2025 Annual Permissive Adjustment application to the Space Rent Ceiling for Bell's Trailer Village in the amount of 1.94%; and, 2) Approving the requested exemptions for Space Nos. 10, 13, 33, and 35 on the basis that the City's space rent provisions do not apply to recreational vehicles (RVs) parked in manufactured home spaces within the City.

3. SUBJECT: Net Operating Income (NOI) Adjustment Application for Bell's Trailer Village

RECOMMENDATION FOR ACTION: Staff recommends that the Manufactured Home Fair Practices Commission:

1. Find that Harmony Communities' Net Operating Income (NOI) Annual Adjustment Application for Bell's Trailer Village has been submitted in accordance with Chapter 5.36 of the Woodland Municipal Code and accept the application as complete;
2. Adopt a Resolution approving an NOI-based space rent ceiling adjustment of 27.55% for the 39 regulated spaces at Bell's Trailer Village, based on the finding that the park's Base Year net operating income is less than fifty percent (50%) of gross income and does not provide a just and reasonable return, and that the NOI adjustment has been calculated consistent with Chapter 5.36; and
3. Direct staff to prepare a final schedule of new space rent ceilings for each regulated space (Attachment 4 / Resolution Exhibit A) by applying the 27.55% increase to each space's December 2024 base rent, and implement the new NOI-based space rent ceilings on a date no earlier than twelve (12) months after the effective date of the most recent annual permissive adjustment for Bell's Trailer Village, consistent with Woodland Municipal Code § 5.36.080(C)(3).

4. SUBJECT: Idle Wheel Mobile Home Park – 2024 Annual Registration and 2025 Annual Permissive Adjustment to the Space Rent Ceiling (154 Spaces); Consideration of 14 Space Exemption Requests

RECOMMENDATION FOR ACTION: Staff recommends the Manufactured Home Fair Practices Commission adopt a Resolution to:

1. Receive and file the 2024 Annual Registration for Idle Wheel Mobile Home Park; and
2. Approve the 2025 Annual Permissive Adjustment to the Space Rent Ceiling for Idle Wheel Mobile Home Park applicable to the park's 154 spaces, consistent with the City's Ordinance and the park's submitted application; and
3. Deny Idle Wheel's request to exempt 14 spaces from the City's space rent ceiling provisions on the basis that the prior "long-term lease" exemption was tied to former Civil Code section 798.17, which was repealed effective January 1, 2025, and therefore there is no longer a qualifying exemption under the Ordinance; and
4. Direct staff, following Commission action, to notify Idle Wheel in writing of the denial of the 14-space exemption request and require a written response from park ownership/management identifying: (a) whether any space rent increases or rent practices since 2023 were implemented in reliance on long-term lease exemptions, (b) the spaces impacted, and

(c) a proposed remedy and timeline to cure any noncompliance with the City's Ordinance, consistent with the conclusion that long-term lease exemptions expired with the repeal of Civil Code section 798.17.

G. STAFF OR COMMISSIONER COMMENTS

H. ADJOURNMENT

The Manufactured Home Fair Practices Commission of the City of Woodland encourages all parties interested in a matter scheduled to be reviewed, discussed and acted on at a meeting, to participate in the public discourse, which may include the submission of written comments and materials. The Manufactured Home Fair Practices Commission notifies the public that those materials received less than 24hours before a meeting date and time may not be able to be considered completely. Further, the Manufactured Home Fair Practices Commission encourages interested parties to attend the meeting to discuss any matter of concern and to explain their comments more fully.

City of Woodland
City Hall
Council chambers
300 First Street
Woodland, CA 95695



Manufactured Home Fair Practices (MHFP) Commission —

Monday, June 30, 2025

6:00 PM

CALL TO ORDER

Commissioner Paul Kramer called the meeting to order at 6:00 P.M., June 30, 2025. The meeting was held in the City Council Chambers at Woodland City Hall (300 First Street, Woodland, CA 95695).

ROLL CALL

The following MHFP Commissioners and staff were present/absent:

Present: Paul Kramer, Member
Stacie Lewis, Member
Kathy Trott, Member
Franklin Cui, MHFP Commission Staff
Erika Bumgardner, CDD Dept. Director

Absent: Dick Cronin, Member

PLEDGE OF ALLEGIANCE

Pledge of Allegiance led by Commissioner Kramer.

APPROVAL OF MINUTES

- 1. **SUBJECT:** MHFP Commission Meeting Minutes of August 21, 2024

RECOMMENDATION FOR ACTION: Staff recommends that the MHFP Commission receive and approve the MHFP Commission Meeting Minutes of August 21, 2024.

On motion by Commissioner Trott and seconded by Commissioner Lewis, MHFP Commission Members voted to approve the MHFP Commission Meeting Minutes of August 21, 2024.

Ayes: Trott, Lewis, Kramer

Noes: None

Absent: Cronin

STAFF AND COMMISSIONER STATEMENTS AND REQUESTS

- Cui provided a verbal update that staff has received a net operating income (NOI) adjustment application from Bell’s Trailer Village, and staff are currently reviewing the application for completeness.
- Trott reaffirmed a request for a potential second annual meeting later in the year (closer to December) in order to address tenant questions, comments, and issues at the various mobile home parks throughout the City.
- Kramer requested that staff schedule a study session with the City Attorney’s Office later in the year to give the Commission a refresher on the Manufactured Home Space Rent Control Ordinance, California Civil Code, and any applicable laws that apply to manufactured home parks in Woodland.
- Trott expressed the concern that members of the public might feel under-represented. Kramer requested that all future meetings be notated on the City of Woodland’s Meetings & Agendas calendar.

- Trott asked what other steps does City Staff take to ensure that members of the public are notified of MHFP Commission meetings. Cui responded that previous interested parties for meetings are all sent a notification of the next meeting in conjunction with the notification to the Commission. Kramer and Trott both expressed concern that this may not be sufficient to reach all members of the public that have an interest in attending these meetings. Kramer suggested the introduction of a future listserv notifying all members of the public of MHFP Commission meetings to subscribers.
- Trott requested further clarity on the regulatory authority of the Commission, in particular with regards to fire safety codes and protections from such hazards. Cui responded that these regulatory requirements for design and construction are the jurisdiction of the California Department of Housing & Community Development (HCD). Cui agreed that the regulatory authority for the Commission versus that of HCD for important aspects such as these safety standards should be ironed out for clarity, which should be a point of further discussion with the City Attorney.

PUBLIC COMMENT

- None.

REGULAR AGENDA

A. SUBJECT: Introduction of new and returning MHFP Commission Members and Alternates

- Commissioners provided brief introductions.

The current membership of the Commission is:

4 Regular Members (3-year terms):

<u>Name</u>	<u>Term Expires</u>
Stacie Lewis	6/30/25
Paul Kramer	6/30/26
Dick Cronin	6/30/27
Kathy Trott	6/30/28

1 Newly Appointed Member (3-year term):

<u>Name</u>	<u>Term Expires</u>
Noemi Vitela	6/30/28

2 Alternate Members (2-year terms)

<u>Name</u>	<u>Term Expires</u>
Vacant	n/a
Vacant	n/a

B. SUBJECT: Review and Approve Annual Commission Report to City Council for 2024

- A draft of the *Annual Commission Report to City Council for 2024* was circulated and reviewed. The Annual Report provides the City Council with “a comprehensive written report concerning the

Commission's activities, holdings, actions results of hearings and all other matters pertinent to this chapter....," as required by the Ordinance, for program year 2024.

- Commissioners shared information regarding the report.
- Kramer requested a revision to Idle Wheel Estates' 2024 Activity By Park to include the details regarding the pending response to the July 15, 2024 exemption denial letter for previously requested exempted units (space 134 in 2023 and spaces 12, 37, 68, 134, and 204 in 2024) from the City's MHFP Commission Space Rent Control Ordinance.
- Staff will make this adjustment prior to submission to City Council.

RECOMMENDATION FOR ACTION: Staff recommends that the MHFP Commission review and approve the *Annual Commission Report to City Council for 2024*, including the revision to the Idle Wheel Estates' section of the report to reflect the pending response to the July 15, 2024 exemption denial letter.

On motion of Commissioner Trott, seconded by Commissioner Lewis, the draft report was approved for transmission to the City Council.

Ayes: Trott, Lewis, Kramer

Noes: None

Absent: Cronin

C. SUBJECT: Review and Approve Annual Park Registrations/Exemption Claims for the following:

1. Bell's Trailer Village

Last year, Bell's registered 39 spaces, all month-to-month tenancies. In 2024, Bell's was granted a 2.4% increase to the space rent ceiling.

This year, Bells registered 39 spaces, all month-to-month tenancies. The park owner paid \$1,170 in registration fees. Staff stated that reported rent levels for all spaces appeared to be within the adjusted space rent ceiling for the space rent increase approved for Bell's in 2024 (2.4%).

2. Leisureville

There are 150 spaces at Leisureville. Management from Leisureville sent the Commission correspondence indicating that there are no space renters at the park, and that all residents have an ownership interest in the park. The Commission reviewed the information provided by Leisureville Management regarding the park's exemption from the Ordinance and approved the 2024 park registrations.

3. Idle Wheel Estates

Last year, Idle Wheel reported and registered 153 spaces. In 2024, Idle Wheel was granted a 2.4% increase to the space rent ceiling.

This year, Idle Wheel reported and registered 154 spaces. The park owner paid \$4,620 in registration fees.

However, Idle Wheel has not responded to the July 15, 2024 exemption denial letter for previously requested exempted units (space 134 in 2023 and spaces 12, 37, 68, 134, and 204) from the City's MHFP Commission Space Rent Control Ordinance. Moreover, further review of the aforementioned spaces is required for adherence to space rent regulatory requirements.

4. Royal Palm Estates

Last year, Royal Palm reported and registered 131 spaces. In 2024, Royal Palm was granted a 2.4% increase to the space rent ceiling.

This year, Royal Palm again reported and registered 131 spaces. The park owner paid \$3,930 in registration fees. Staff stated that reported rent levels for all spaces appeared to be within the adjusted space rent ceiling.

5. CHOC/Casa del Sol

Community Housing Opportunities Corporation submitted an annual registration showing that 156 of the 157 park spaces at Casa del Sol, the one park space not listed is used for the park manager. Of the 156 units, 138 are subject to recorded affordable housing covenants which restrict tenancies to low- and very-low income households and require rents affordable to residents at those income levels. The remaining 18 units are held out for median income households and claimed by CHOC to be exempt under Cal. Civil Code section 798.17, a state law preempting local rental control for spaces under specified long-term leases (greater than one year). As a result, registration fees were not paid for these spaces, but CHOC is required to annually re-confirm the exemption for the spaces.

RECOMMENDATION FOR ACTION: Staff recommends that the Commission review and approve the 2024 Annual Park Registrations and Exemption Claims for Bell's Trailer Village, Leisureville, Royal Palm Estates, and CHOC/Casa del Sol, and continue the registration claim for Idle Wheel Estates to the next meeting pending further staff review.

On motion of Commissioner Trott, seconded by Commissioner Lewis, the annual park registrations/exemption claims were approved for Bell's Trailer Village (39 spaces), Leisureville (150 spaces, exemption), Royal Palm Estates (131 spaces), and CHOC/Casa del Sol (156 spaces, exemption).

The annual registration claim for Idle Wheel was tabled for review by City Staff and will be brought back for discussion at the next meeting.

Ayes: Lewis, Kramer, Trott

Noes: None

Absent: Cronin

D. SUBJECT: Review Manufactured Home Park Annual Inspection Reports

- Prior to considering applications for annual permissive adjustments, park owners are required to pass park inspections conducted by the City. This year the inspections were conducted on June 17, 2025, by Franklin Cui, Housing Analyst II. All ten (10) categories of items were inspected in Bell's Trailer Village, Idle Wheel Estates, Royal Palm Estates, and CHOC/Casa del Sol.
- Kramer requested an update to the forms denoting the date of the inspections.

RECOMMENDATION FOR ACTION: Staff recommends that the Commission review and accept the 2025 Manufactured Home Park Annual Inspection Reports for Bell's Trailer Village, Idle Wheel Estates, Royal Palm Estates, and CHOC/Casa del Sol.

On motion of Commissioner Trott, seconded by Commissioner Lewis, the Commission accepted the inspection reports.

Ayes: Kramer, Trott, Lewis

Noes: None

Absent: Cronin

E. SUBJECT: Review CPI Data and Available Annual Permissive Adjustments

- Staff provided the Commission with data showing the Consumer Price Index for All Urban Consumers in the West Urban Area, including all items and not seasonally adjusted, as reported by the Bureau of Labor Statistics, U.S. Department of Labor, with the base period of 1982-84 = 100. The data revealed that the 12-month period ending February 2025, adjusted by the 75% multiplier would produce a 1.94% permissive adjustment (2.59% increase in CPI x 75% = 1.94%); therefore, the increase for all applications filed by March 1, 2025 is 1.94%. The Space Rent Control Ordinance limits a permissive space rent increase to the lesser of the change in the CPI or 3.0%.

RECOMMENDATION FOR ACTION: Staff recommends that the Commission review and approve the 2025 Consumer Price Index (CPI) data and the resulting 1.94% annual permissive adjustment, as calculated in accordance with the Space Rent Control Ordinance.

On motion of Commissioner Lewis, seconded by Commissioner Trott, the Commission reviewed and approved the CPI Data and Available Annual Permissive Adjustments.

Ayes: Kramer, Trott, Lewis

Noes: None

Absent: Cronin

F. SUBJECT: Approve Annual Permissive Adjustments to Space Rent Ceilings for:

The Commission discussed the three (3) applications received for Annual Permissive Adjustments to the Space Rent Ceilings.

- Bell's Trailer Village requested exemptions for 4 spaces denoted as recreational vehicles.
- Idle Wheel Estates requested further exemptions for 14 spaces for long term leases.
- Royal Palm Estates requested no exemptions.

RECOMMENDATION FOR ACTION: Staff recommends that the Commission review and take action on the 2025 Annual Permissive Adjustment applications to the Space Rent Ceilings, including approval of the 1.94% increase for Royal Palm Estates, and continue discussion regarding the requested exemptions for Bell's Trailer Village and Idle Wheel Estates to the next meeting.

On motion of Commissioner Lewis, seconded by Commissioner Trott, the Commission approved the CPI calculation provided by staff and a 1.94% increase to the space rent ceilings at Royal Palm Estates. Approval of Annual Permissive Adjustments to space rent ceilings for Bell's Trailer Village was tabled to the following meeting. Further discussion is needed to review the exemption statuses of both Bell's Trailer Village and Idle Wheel Estates.

Additionally, City Staff will further deliberate with the City Attorney's office regarding AB2782 and its resulting effect of repealing Civil Code 798.17, and the corresponding ramifications for the cessation of long-term lease exemptions.

Ayes: Kramer, Lewis, Trott

Noes: None

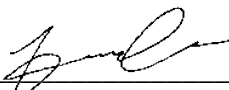
Absent: Cronin

G. Set Next Meeting

The Commission set the next meeting for August 11, 2025 at 6:00 p.m.

ADJOURNMENT

Meeting adjourned at 7:36 p.m.



Franklin Cui, Housing Analyst II
MHFP Commission Staff



TO: THE MEMBERS OF THE COMMISSION
AGENDA: Manufactured Home Fair Practices Commission
DATE: January 29, 2026
ITEM #: F.2
SUBJECT: 2025 Annual Permissive Adjustment to the Space Rent Ceiling - Bell's Trailer Village (1.94% increase)

Recommendation for Action: Staff recommends that the Manufactured Home Fair Practices Commission adopt a Resolution: 1) Approving the 2025 Annual Permissive Adjustment application to the Space Rent Ceiling for Bell's Trailer Village in the amount of 1.94%; and, 2) Approving the requested exemptions for Space Nos. 10, 13, 33, and 35 on the basis that the City's space rent provisions do not apply to recreational vehicles (RVs) parked in manufactured home spaces within the City.

Staff Contact:

Erika Bumgardner, Deputy Community Development Director, (530) 661-5886, erika.bumgardner@cityofwoodland.gov

Report in Brief:

Bell's Trailer Village submitted a 2025 Annual Permissive Adjustment application dated May 20, 2025, seeking to adjust the park's Space Rent Ceiling by 1.94%. The Commission tabled action on June 30, 2025, to allow staff additional time to evaluate the park's request to exempt 4 of 39 park spaces that were occupied by RVs (Spaces 10, 13, 33, and 35) from the permissive adjustment calculation.

Since the June 30, 2025 meeting, staff consulted with the City Attorney, who advised that the space rent provisions of the Ordinance do not apply to recreational vehicles parked in manufactured home parks within the City. Based on that guidance, staff recommends approval of the 1.94% annual permissive adjustment and approval of the requested exemptions for the four RV-occupied spaces identified above.

Background:

Manufactured Home Space Rent Regulation and Annual Adjustments

The City's manufactured home rent stabilization framework establishes a Space Rent Ceiling intended to provide predictable rent regulation and protect residents from unreasonable increases while still allowing park owners to keep pace with typical inflationary cost increases.

Within this framework, the Ordinance provides an Annual Permissive Adjustment process. In general terms, the annual permissive adjustment:

- Is a standard, once-per-year adjustment to the Space Rent Ceiling, tied to a defined inflation indicator (e.g., Consumer Price Index) for a specified 12-month period identified in the Ordinance;
- Requires the park owner to submit an application to the City demonstrating the requested annual adjustment consistent with the Ordinance;
- Is distinct from a "fair return" or other extraordinary adjustment process (which typically involves more detailed financial evaluation and a different evidentiary showing); and

- Results in an updated maximum allowable space rent ceiling, meaning the ceiling is adjusted and the park may adjust rents up to (but not above) the approved ceiling, subject to requirements in the Ordinance.

In June 2025, city staff provided the Commission with data showing the Consumer Price Index (CPI) as reported by the Bureau of Labor Statistics, U.S. Department of Labor. The data revealed that the 12-month period ending February 2025, adjusted by the 75% multiplier would produce a 1.94% permissive adjustment (2.59% increase in CPI x 75% = 1.94%); therefore, the increase for all applications filed by March 1, 2025 is 1.94%. The Space Rent Control Ordinance limits a permissive space rent increase to the lesser of the change in the CPI or 3.0%.

Discussion:

2025 Annual Permissive Adjustment Request (Bell’s Trailer Village)

On May 20, 2025, Bell’s Trailer Village submitted its 2025 Annual Permissive Adjustment application requesting an increase to the Space Rent Ceiling of 1.94% consistent with the Commission approved 2025 annual permissive adjustment calculation. Staff reviewed the application and confirmed the requested percentage is consistent with the annual adjustment methodology referenced in the Ordinance and approved by the Commission for the applicable period.

June 30, 2025, Meeting – Item Tabled for RV Space Exemption Review

At the June 30, 2025, MHFPC meeting, the Commission tabled this item because staff needed additional time to evaluate the park’s request for exemptions for 4 of 39 spaces occupied by RVs:

- Space No. 10
- Space No. 13
- Space No. 33
- Space No. 35

The key issue was whether those RV-occupied spaces are subject to the City’s manufactured home space rent provisions and therefore should be included in the permissive adjustment application and calculations.

Following the June 30, 2025 meeting, staff consulted with the City Attorney regarding the applicability of the Ordinance to RVs. The City Attorney advised that the Space Rent provisions of the Ordinance do not apply to recreational vehicles parked in manufactured home parks within the City.

Based on this legal guidance, staff finds that the requested exemptions for the four RV-occupied spaces are appropriate, and the City is willing to approve Bell’s Trailer Village’s exemption request for Spaces 10, 13, 33, and 35 as part of the permissive adjustment application.

Conclusion:

Staff recommends that the Manufactured Home Fair Practices Commission adopt a Resolution: 1) Approving the 2025 Annual Permissive Adjustment application to the Space Rent Ceiling for Bell's Trailer Village in the amount of 1.94%; and, 2) Approving the requested exemptions for Space Nos. 10, 13, 33, and 35 on the basis that the City’s space rent provisions do not apply to recreational vehicles (RVs) parked in manufactured home spaces within the City.



Attachments:

1. RESOLUTION
2. Bells Trailer Village Annual Permissive Adjustment Application

RESOLUTION NO. MHFPC 26-01

A RESOLUTION OF THE MANUFACTURED HOME FAIR PRACTICES COMMISSION OF THE CITY OF WOODLAND APPROVING THE 2025 ANNUAL PERMISSIVE ADJUSTMENT TO THE SPACE RENT CEILING FOR BELL’S TRAILER VILLAGE IN THE AMOUNT OF 1.94% AND APPROVING EXEMPTIONS FOR SPACES 10, 13, 33, AND 35 (RECREATIONAL VEHICLES)

WHEREAS, The City of Woodland has adopted regulations governing space rent adjustments for manufactured home parks, including an annual permissive adjustment process to adjust the Space Rent Ceiling in accordance with the City’s manufactured home rent stabilization ordinance (“Ordinance”); and

WHEREAS, Bell’s Trailer Village (“Park Owner”) submitted a 2025 Annual Permissive Adjustment application dated May 20, 2025, requesting approval of an increase to the Space Rent Ceiling in the amount of 1.94% (“Application”); and

WHEREAS, The Manufactured Home Fair Practices Commission (“Commission”) considered the Application at its meeting of June 30, 2025, and tabled action to allow staff additional time to evaluate the Park Owner’s request for exemptions for four (4) of thirty-nine (39) park spaces that were occupied by recreational vehicles (RVs), specifically Space Nos. 10, 13, 33, and 35; and

WHEREAS, Following the June 30, 2025 meeting, City staff consulted with the City Attorney, who advised that the space rent provisions of the Ordinance do not apply to recreational vehicles parked in manufactured home parks within the City; and

WHEREAS, City staff reviewed the Application and determined that the requested 1.94% annual permissive adjustment is consistent with the annual permissive adjustment methodology established by the Ordinance for the applicable period; and

WHEREAS, The Commission conducted a duly noticed public meeting on January 29, 2026 to consider the Application and staff’s recommendation.

NOW, THEREFORE BE IT RESOLVED, by the Manufactured Home Fair Practices Commission of the City of Woodland as follows:

1. Findings. The foregoing recitals are true and correct and are incorporated herein by this reference.
2. Approval of Annual Permissive Adjustment. The Commission hereby approves the 2025 Annual Permissive Adjustment to the Space Rent Ceiling for Bell’s Trailer Village in the amount of 1.94%, consistent with the Application dated May 20, 2025 and the Ordinance.
3. Approval of Exemptions for RV-Occupied Spaces. Based on consultation with the City Attorney and the determination that the space rent provisions of the Ordinance do not apply to recreational

vehicles parked in manufactured home parks within the City, the Commission hereby approves the Park Owner's request to exempt the following RV-occupied spaces from the permissive adjustment application and calculation:

- Space No. 10
 - Space No. 13
 - Space No. 33
 - Space No. 35
4. Implementation and Notice. The Commission directs City staff to implement the approved adjustment by finalizing the updated Space Rent Ceiling documentation for Bell's Trailer Village and confirms that any rent increase applied pursuant to this Resolution shall be implemented in accordance with the Ordinance's noticing and effective-date requirements.
 5. CEQA. The Commission finds that this action is an administrative regulatory action that does not involve physical changes to the environment and is therefore not a project under CEQA, or alternatively is otherwise exempt from CEQA pursuant to applicable CEQA provisions.
 6. Effective Date. This Resolution shall take effect immediately upon adoption.

PASSED AND ADOPTED by the Manufactured Home Fair Practices Commission of the City of Woodland at a regular meeting held on the 29th day of January, 2026, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

Paul Kramer, Chairperson

ATTEST:

Erika Bumgardner, Deputy Community Development Director

**City of Woodland
Manufactured Home Fair Practices Commission
2025 ANNUAL PERMISSIVE ADJUSTMENT APPLICATION**

Instructions: By submitting this completed application, the applicant requests an Annual Permissive Adjustment as provided by Section 5.36.080(c)(1) of the Woodland City Code. Information contained in the park's Annual Registration (except as updated in Part IV of this form) will be used to calculate the Annual Permissive Adjustment for each non-exempt manufactured home space.

I. Manufactured Home Park Information

1. Park Name: Bells Trailer Village
2. Park Address: 1224 E. Gum Ave, Woodland, CA 95776

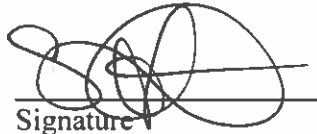
II. Applicant Information

1. Name of Applicant: Bells Trailer Village, LLC
2. Business Address: 6653 Embarcadero Dr. Ste C
Stockton, CA 95219
3. Telephone: (209) 932-8747 Facsimile: (209) 451-1297
4. Applicant's relationship to Park: OWning LLC

III. Verification

1. I hereby certify that I am authorized to submit this application and supporting documentation on behalf of the owner of the manufactured home park identified above in Part I.
2. I declare under penalty of perjury under the laws of the State of California that the information provided on this application, including Part IV "Exemption Update", if attached hereto, is true and correct to the best of my knowledge.

Sherrie Johnston
Name (print)


Signature

COO
Capacity

5/20/25
Date



TO: THE MEMBERS OF THE COMMISSION
AGENDA: Manufactured Home Fair Practices Commission
DATE: January 29, 2026
ITEM #: F.3
SUBJECT: Consideration of 2025 Net Operating Income (NOI) Adjustment Application for Bell's Trailer Village

Recommendation for Action: Staff recommends that the Manufactured Home Fair Practices Commission:

1. Find that Harmony Communities' Net Operating Income (NOI) Annual Adjustment Application for Bell's Trailer Village has been submitted in accordance with Chapter 5.36 of the Woodland Municipal Code and accept the application as complete;
2. Adopt a Resolution approving an NOI-based space rent ceiling adjustment of 27.55% for the 39 regulated spaces at Bell's Trailer Village, based on the finding that the park's Base Year net operating income is less than fifty percent (50%) of gross income and does not provide a just and reasonable return, and that the NOI adjustment has been calculated consistent with Chapter 5.36; and
3. Direct staff to prepare a final schedule of new space rent ceilings for each regulated space (Attachment 4 / Resolution Exhibit A) by applying the 27.55% increase to each space's December 2024 base rent, and implement the new NOI-based space rent ceilings on a date no earlier than twelve (12) months after the effective date of the most recent annual permissive adjustment for Bell's Trailer Village, consistent with Woodland Municipal Code § 5.36.080(C)(3).

Staff Contact:

Erika Bumgardner, Deputy Community Development Director, (530) 661-5886,
erika.bumgardner@cityofwoodland.gov
Katharine Apicella, Housing Analyst Fellow, (530) 661-2019 Katharine.apicella@cityofwoodland.gov

Background:

Manufactured Home Fair Practices Commission (MHFPC) Responsibilities

The Manufactured Home Fair Practices Commission (MHFPC) was established by the City of Woodland to oversee implementation of the Manufactured Home Space Rent Control Ordinance. The Commission is composed of five regular members and two alternates, all resident electors of the City, with restrictions to ensure independence from manufactured home ownership, park management, or large rental property interests. Members are nominated by the City Council and Mayor and are appointed with Council approval, serving three year terms for regular members and two years for alternates.

The Commission's primary duties include registering manufactured home parks, reviewing and approving space rent ceiling adjustments, conducting hearings and investigations, adopting administrative rules, and reporting semiannually to the City Council on its activities.

Manufactured Home Park Information

There are five mobile home parks within the City of Woodland: Bell's Trailer Village, Leisureville, Idle Wheel Estates, Casa del Sol, and Royal Palm Estates. In 2024, the City recorded a total of 630 manufactured home spaces, of which 341 spaces are subject to the registration and rent ceiling provisions of the City of Woodland's Manufactured Home Space Rent Control ordinance.

Under Woodland Municipal Code § 5.36.080, space rent ceilings for manufactured home parks may only be increased through specific adjustments reviewed by the MHFPC. A central component of the ordinance is the requirement that property owners be afforded a "fair return" on their investment while also providing predictable and reasonable rent stability for residents. In § 5.36.090(A), it is presumed that where the Net Operating Income (NOI)

is less than 50% of gross income in the base year, the park owner was receiving less than a just and reasonable return on the manufactured home park.

Park owners are entitled to an annual permissive adjustment of gross space rental income, which allows them to raise space rents annually by a limited amount. The increase is equal to the lesser of either a 3% increase or an increase equal to 75% of the percentage increase in the CPI during the full 12 calendar months immediately preceding the date of the application as reported by the Bureau of Labor Statistics (City of Woodland Municipal Code § 5.36.080(C)(1)).

Overview of the NOI Adjustment Procedure

In the event a park owner believes he or she would not receive a just and reasonable return on his or her investment in the park after receiving the maximum permissive adjustment provided for above, a park owner may file an application with the Commission for an alternative adjustment of the space rent ceiling based upon the park's net operating income (NOI). (Net Operating Income or NOI means Gross Income less Operating Expenses, as outlined in detail in this report, below.) An NOI Annual Adjustment to the space rent ceiling is allowed only as provided by Chapter 5.36 of the Woodland City Code. For the convenience of assessment and calculation, the city provides a detailed calculation worksheet as part of the NOI Adjustment application to allow for clear assessment and determination of allowable space rent ceiling adjustment and subsequent allowable increase in base rent for each park space (see Attachment 2).

The NOI Annual Adjustment provides for an adjustment to a manufactured home park's space rent ceiling, and individual space rents, based upon the percentage increase in the Consumer Price Index (CPI) during the full twelve calendar months immediately preceding the application date (also known as the "Base Year").

Under the MHFPC, an NOI Adjustment is generally measured by comparing:

- NOI in that preceding 12-month period,
- Applies the 50% rule (if NOI < 50% of gross),
- Uses CPI to calculate how much that NOI should be allowed to increase, and
- Works backward to figure out how much space rent would need to rise to reach that Target NOI (after unbundling utilities).

The purpose of an NOI Adjustment is to determine whether, after accounting for inflation and allowable costs/expenses, the owner's current net operating income is at least equivalent in real terms to the base year NOI. Or to state it another way, given what it actually costs to run the park in the last year, is the rent coming in enough to reasonably cover those costs, keep up with inflation, and leave a modest margin so the park can be maintained and kept safe over time?

Ensuring a reasonable return is critical because:

- It supports ongoing park operations, including management, maintenance, and compliance with health and safety standards.
- It incentivizes reinvestment in park infrastructure such as utility systems, roads, lighting, and common areas.
- It reduces the risk of deferred maintenance, which can negatively impact health, safety, and quality of life for residents.

When a reasonable return is not achieved, the park's NOI, as determined from the "gross income" and "operating expenses" (as outline below) during the prior 12-month period, is adjusted upward by the increase in the CPI multiplied by the smaller of (a) the percentage of the CPI that represents the housing component of the CPI, or (b) 40%. Once the Base Year NOI is adjusted, the park's estimated operating expenses are added to the adjusted NOI to determine the allowable Adjusted Gross Income. Finally, all park income other than from space rents is deducted from the allowable Adjusted Gross Income for the park, resulting in the park's Adjusted Space Rent Ceiling. The amount of the increase in the space rent ceiling is distributed equally to all spaces subject to the space rent ceiling.

These formula mechanisms have been calculated to balance affordability for residents with financial viability for park owners, while requiring Commission oversight to maintain fairness and transparency.

NOI applications must be accompanied by an affidavit from the park owner declaring that copies of the application have either been personally served on each manufactured home or mailed first class postage prepaid to each manufactured home residence within the park (City of Woodland Municipal Code § 5.36.140(A)(2)).

Upon receipt of a complete application, including the health and safety inspection, for an NOI Adjustment, under Section 5.36.090(D), the Commission shall conduct a hearing to act upon the application in accordance with the provisions of this chapter.

The secretary to the Commission must notify the park owner, or other person designated on the park's registration, and the park residents of the time, date and place of the hearing. Such notice shall be mailed at least 15 days prior to the scheduled hearing date (City of Woodland Municipal Code § 5.36.140(C)(1)-(2)).

2024 Park Activity for Bell's Trailer Village

- All 39 spaces at Bell's Trailer Village were registered with the Commission.
- Registration fees of \$1,170 were paid to the City in December 2024.
- All regulated space rents as of December 31, 2024 appeared to be within the 3.0% increase (permissive adjustment) in the space rent ceiling previously approved by the Commission in 2023.
- Bell's completed its annual re-registration process on time and requested a permissive adjustment in 2024.
- The Commission approved a permissive adjustment increase to the space rent ceiling of 2.4% in 2024

Discussion:

In February 2025, Harmony Communities submitted an NOI Annual Adjustment Application for Bell's Trailer Village in accordance with the requirements of the MHFPC. The application included:

- Base year income and expense statements
- Documentation of allowable operating expenses
- Current rent roll and occupancy data
- Affidavit declaring that copies of the application have either been served on each manufactured home or mailed first class postage prepaid to each manufactured home residence within the park

Staff has concluded its review of the application, applying the statutory presumptions and CPI-based formulas, and reached a determination consistent with the requirements of the code. The NOI Adjustment Application is essentially a 42-step mathematical formula used by City staff to confirm that space rent adjustments are reasonable when an NOI application is submitted. Each component of the calculation was hand-verified by City staff and cross-checked using a digital spreadsheet.

NOI Adjustment Calculation and Reasonable Return Findings

As previously noted, the NOI adjustment analysis looks at Bell's Trailer Village's actual income and operating expenses over the most recent 12-month "Base Year" period (January–December 2024) and asks whether that income provides a just and reasonable return under the City's ordinance. If it does not, the ordinance provides a formula to calculate how much the park's space rent ceiling may be increased. The following section provides a summary of the adjustment analysis based on the information provided by Bell's Trailer Village beginning with a summary of eligible income and operating expenses as defined by the city's ordinance.

Gross income (GI)

The NOI applicant must consult the terms of Chapter 5.36 directly to determine whether and to what extent various expenses and sources of income may be claimed on the NOI application worksheet. All sources of income must be reported in the application. The park's NOI, as determined by "gross income" and "operating expenses" on the manufactured home park consists of:

For purposes of the City of Woodland Municipal Code § 5.36.120 the gross income (GI) of a manufactured home park shall equal the following:

- Gross space rents, computed as gross space rental income at 100% occupancy; plus
- Other income generated as a result of the operation of the park, including, but not limited to, laundry and recreational vehicle storage; plus
- Revenue received by the park owner from the sale of gas and electricity to park residents where such utilities are billed individually to the park residents by the park owner, which revenue shall equal the total cost of the utilities to the residents minus the amount paid by the park owner for such utilities to the utility provider; minus
- Uncollected space rents due to vacancy and bad debts to the extent that the same is beyond the park owner's control. Uncollected space rents in excess of 3% of gross space rents shall be presumed to be unreasonable unless established otherwise and shall not be included in computing gross income. Where uncollected space rents must be estimated, the average of the preceding three year's experience shall be used, or some other comparable method.

Harmony communities submitted the following documents in support of gross income for Bell's Trailer Village:

- Yolo County 2023-2024, 2024-2025 Property Taxes
- Property Manager/Cash Flow Statements
- Bills Binder
- Property Insurance Declaration Page

Operating Expenses (OE)

Amounts for operating expenses specifically allowed by Chapter 5.36 are entered on the lines designated in the application worksheet (lines 13 - 25).

For purposes of the City of Woodland Municipal Code § 5.36.130, the operating expenses (OE) of a manufactured home park shall include the following:

- Real Property Taxes and Assessments.
- Management expenses, including the compensation of administrative personnel (may include the value of any manufactured home space offered as part of compensation for such services), reasonable and necessary advertising to ensure occupancy only, legal and accounting services as permitted herein, and other managerial expenses. Management expenses are presumed to be not more than five percent of gross income, unless established otherwise.
- Normal repair and maintenance expenses for the grounds and common facilities, including, but not limited to, landscaping, cleaning, repair of equipment and facilities.
- Owner-performed labor in operating and/or maintaining the park.
- Operating supplies such as janitorial supplies, gardening supplies, stationery and so forth.
- Insurance premiums prorated over the life of the policy.

- Other taxes, fees and permits.
- Reserve for replacement of Necessary Capital Improvements. This amount shall not exceed five percent of gross income. The reserve shall be documented.
- Necessary Capital Improvement Costs Exceeding Reserves for Replacement. A necessary capital improvement shall be an improvement required to maintain the common facilities and areas of the park in a decent, safe and sanitary condition or to maintain the existing level of park amenities and services.

Expenditures for capital improvements to upgrade existing facilities or increase amenities or services shall be an allowable operating expense only if documented and only if the park owner has:

a) Consulted with the park residents prior to initiating construction of the improvements regarding the nature and purpose of the improvements and the estimated cost of the improvements.

b) Obtained the prior written consent of at least one adult resident from a majority of the manufactured home rental spaces to include the cost of the improvement as an operating expense.

In the event that the capital improvement expenditure is necessitated as a result of an accident, disaster or other event for which the park owner receives insurance benefits, only those capital improvement costs otherwise allowable exceeding the insurance benefits may be calculated as operating expenses.

- Involuntary Refinancing of Mortgage or Debt Principal.
- Increases in Rental Payments Made on Leases of Land Entered Into On or Before the Space Rent Ceiling.

Harmony communities submitted the following documents in support of operating expenses for Bell's Trailer Village:

- Income Statement
- Rent Statements
- Property Manager/Cash Flow Statements

CALCULATION

Section 1. Base Year NOI

The first step is to determine the park's Base Year Net Operating Income (NOI) for the 12-month period immediately preceding the application.

For Bell's Trailer Village, the Base Year financials show:

- Base Year Gross Income (space rents + eligible other income): \$210,411.03
- Total Base Year Operating Expenses: \$126,524.57

Actual Base Year NOI is calculated as:

Base Year NOI (actual) = Gross Income – Operating Expenses
→ \$210,411.03 – \$126,524.57 = \$83,886.46

This actual NOI represents about 39.9% of gross income, which is less than 50%.

Under Woodland Municipal Code § 5.36.090(B), when a park's NOI is less than 50% of gross income during the Base Year, the ordinance requires that, for purposes of determining the Base Year NOI, the park's gross income be adjusted upward to twice the Base Year operating expenses.

In worksheet terms, Base Year NOI is the larger of:

- Line 26 – Actual Base Year NOI: \$83,886.46, or
- Line 27 – Total Base Year Operating Expenses: \$126,524.57

Because the ordinance requires use of the larger figure when NOI is below 50% of gross, the Base Year NOI for the NOI adjustment is:

- Base Year NOI (for adjustment): \$126,524.57

This effectively normalizes the Base Year so that NOI is treated as at least 50% of gross income.

Section 2. Adjusted NOI (Target NOI)

The second step is to determine how much this Base Year NOI is allowed to increase based on inflation, using the CPI formula in the ordinance.

The ordinance provides that the allowable NOI increase rate is the smaller of:

1. The percentage increase in the CPI over the Base Year, multiplied by the percentage of the CPI attributable to housing; or
2. 40% of the percentage increase in the CPI over the Base Year.

For Bell's Trailer Village, the applicable CPI data produce an allowable increase factor of approximately 0.0089 (0.89%). Applying this to the Base Year NOI:

Adjusted (Target) NOI = Base Year NOI × (1 + allowable CPI factor)
→ \$126,524.57 × (1 + 0.0089) ≈ \$127,650.64

This Target NOI represents the level of net operating income the park is entitled to earn for the Base Year period under the NOI adjustment provisions.

Section 3. Adjusted Space Rent Ceiling

The third step is to translate the Target NOI into an annual space rent ceiling. This involves determining how much total income the park would have needed to generate during the Base Year to reach the Target NOI, given its expense structure, and then isolating the space-rent portion of that income.

Using the NOI worksheet and applying the ordinance rules (including treatment of uncollected rent and certain utility adjustments):

- Allowable Adjusted Gross Income needed to support the Target NOI: \$255,670.90

From this adjusted gross income, the calculation removes ("unbundles") non-space-rent income, such as:

- Resale of natural gas
- Separately billed electricity
- Laundry income
- Water, sewer, and trash charges

These charges are generally treated as cost-recovery items and are not regulated in the same way as space rent. After subtracting this Other Income:

- Other Income (utilities and services): \$46,133.52
- Adjusted Space Rent Ceiling (total annual space rent):
 $\$255,670.90 - \$46,133.52 = \$209,537.38$

This \$209,537.38 represents the total annual space rent that would have been needed during the Base Year to achieve the Target NOI, after separating out utility and other non-space-rent charges and applying the ordinance’s vacancy/uncollected rent factor.

Section 4. Distribution of the Space Rent Ceiling Adjustment

The final step is to compare this Adjusted Space Rent Ceiling to the park’s current Base Year gross space rents and express the difference as a percentage.

- Adjusted Space Rent Ceiling (annual): \$209,537.38
- Base Year Gross Space Rents (annual): \$164,277.51

The total Space Rent Ceiling Adjustment is:

$$\$209,537.38 - \$164,277.51 = \$45,259.87$$

The percentage increase in the space rent ceiling is:

$$\begin{aligned} \text{Percentage Increase} &= \text{Space Rent Ceiling Adjustment} \div \text{Base Year Gross Space Rents} \\ &\rightarrow \$45,259.87 \div \$164,277.51 \approx 0.2755 \end{aligned}$$

Expressed as a percentage, this is:

- 27.55% increase in the space rent ceiling.

Based on the NOI application formula calculations, staff has determined that the four-digit percentage increase in the space rent ceiling for Bell’s Trailer Village is 0.2755, or approximately 27.55%. Upon approval of the application, this percentage will be applied to the current base rent for each regulated space to establish a new space rent ceiling for each space, consistent with the ordinance and the timing limitations on annual adjustments.

Reasonable Return Findings

The NOI adjustment analysis shows that, prior to this adjustment:

- Bell’s Trailer Village’s actual Base Year NOI was significantly below the level treated as reasonable under the ordinance (less than 50% of gross income); and
- Even after applying the ordinance’s normalization and CPI-based NOI increase, the park required a substantial increase in space rent-based income to reach the Target NOI.

This indicates that the park was not receiving a just and reasonable operating income under existing rent ceilings. Without an NOI adjustment, the park's ability to:

- Cover reasonable operating costs,
- Reserve for capital repair and replacement, and
- Maintain the property in good, safe condition would remain constrained.

Adjustment Timing

Pursuant to Woodland Municipal Code § 5.36.080(C)(3), the space rent ceiling increase approved under this NOI Adjustment shall not become effective until at least twelve (12) months after the effective date of the most recent annual permissive adjustment for Bell's Trailer Village. Based on the park's last permissive adjustment effective on July 1, 2025, the NOI adjustment shall become effective no earlier than July 1, 2026.

Public Notice

The NOI Adjustment Application was processed in accordance with the notification requirements of the MHFPC. The application was accompanied by an affidavit from the park owner declaring that copies of the application have either been personally served on each manufactured home or mailed first class postage prepaid to each manufactured home residence within the park, as required in the City of Woodland Municipal Code § 5.36.140(A)(2)).

Prior to the hearing date for the NOI Adjustment Application, notices indicating the time, date and place of the hearing (City of Woodland Municipal Code § 5.36.140(C)(1)-(2)) were provided to:

- All affected park residents of Bell's Trailer Village (attached notice mailed on December 22, 2025)
- The park owner, or other person designated on the park's registration

Conclusion:

Staff recommends that the Manufactured Home Fair Practices Commission:

1. Find that Harmony Communities' Net Operating Income (NOI) Annual Adjustment Application for Bell's Trailer Village has been submitted in accordance with Chapter 5.36 of the Woodland Municipal Code and accept the application as complete;
2. Adopt a Resolution approving an NOI-based space rent ceiling adjustment of 27.55% for the 39 regulated spaces at Bell's Trailer Village, based on the finding that the park's Base Year net operating income is less than fifty percent (50%) of gross income and does not provide a just and reasonable return, and that the NOI adjustment has been calculated consistent with Chapter 5.36; and
3. Direct staff to prepare a final schedule of new space rent ceilings for each regulated space (Attachment 4 / Resolution Exhibit A) by applying the 27.55% increase to each space's December 2024 base rent, and implement the new NOI-based space rent ceilings on a date no earlier than twelve (12) months after the effective date of the most recent annual permissive adjustment for Bell's Trailer Village, consistent with Woodland Municipal Code § 5.36.080(C)(3).

Prepared by: Katharine Apicella, Housing Analyst Fellow

Reviewed by: Erika Bumgardner, Community Development Deputy Director



Attachments:

1. RESOLUTION
2. Resolution Exhibit A - Bells Trailer Village - Rental Rates and 27.55% NOI Adjustment
3. Bell's Trailer Village NOI Adjustment Application
4. Public Meeting Notice

RESOLUTION NO. MHFPC 26-02

A RESOLUTION OF THE MANUFACTURED HOME FAIR PRACTICES COMMISSION OF THE CITY OF WOODLAND ACCEPTING AS COMPLETE AND APPROVING A NET OPERATING INCOME (NOI) ADJUSTMENT APPLICATION FOR BELL’S TRAILER VILLAGE (HARMONY COMMUNITIES) AND ESTABLISHING NEW SPACE RENT CEILINGS

WHEREAS, the City of Woodland has adopted Chapter 5.36 of the Woodland Municipal Code, the Manufactured Home Space Rent Control Ordinance, to regulate space rent increases in manufactured home parks within the City while ensuring that park owners are afforded a fair and reasonable return on their investment; and

WHEREAS, the Manufactured Home Fair Practices Commission (“Commission”) was established to administer and enforce Chapter 5.36, including reviewing and acting upon applications for space rent ceiling adjustments, conducting hearings, and ensuring compliance with the ordinance; and

WHEREAS, Bell’s Trailer Village (“Park”) is a manufactured home park located within the City of Woodland and is subject to the registration and space rent ceiling provisions of Chapter 5.36, with 39 regulated spaces currently subject to the space rent ceiling; and

WHEREAS, Harmony Communities, on behalf of Bell’s Trailer Village, submitted an NOI Annual Adjustment Application to the Commission in February 2025, including required financial documentation, rent roll information, and the affidavit of resident notice required by Woodland Municipal Code § 5.36.140(A)(2); and

WHEREAS, the Base Year for the NOI Annual Adjustment Application is the twelve (12) month period from January 1, 2024 through December 31, 2024, as provided under Chapter 5.36; and

WHEREAS, the Commission, with the assistance of City staff, reviewed the Base Year income and expense information and determined that the Park’s actual Base Year NOI was less than fifty percent (50%) of gross income, thereby triggering the presumption in Woodland Municipal Code § 5.36.090(A) that the park owner is receiving less than a just and reasonable return; and

WHEREAS, consistent with Woodland Municipal Code § 5.36.090(B), staff applied the ordinance’s required methodology, including the 50-percent NOI floor, the CPI-based adjustment to Base Year NOI, and the calculation of an adjusted gross income and adjusted space rent ceiling using the City’s NOI worksheet and applicable instructions; and

WHEREAS, staff has determined, based on the completed NOI worksheet and ordinance formulas, that the NOI Adjustment entitles Bell’s Trailer Village to an increase of 27.55% in the space rent ceiling for each regulated space; and

WHEREAS, staff has concluded that this NOI Adjustment is necessary to restore a just and reasonable operating income for the Park, given its Base Year income and expense structure, and that without such an adjustment the park’s ability to cover reasonable operating costs, maintain the property

in a safe and sanitary condition, and plan for capital repair and replacement would remain constrained; and

WHEREAS, the Commission has reviewed the NOI Adjustment Application, verified the calculation steps, and determined that the application is complete and consistent with the requirements of Chapter 5.36; and

WHEREAS, notice of the public hearing on the NOI Adjustment Application was mailed to the park owner (or designated representative) and to all affected residents of Bell's Trailer Village at least fifteen (15) days before the hearing, in accordance with Woodland Municipal Code § 5.36.140(C)(1)–(2), and the Commission conducted a duly noticed public hearing at which staff, the park owner, residents, and interested parties were provided an opportunity to present information and testimony; and

WHEREAS, based on the staff report, NOI worksheet, public testimony, and the entire record, the Commission finds that Bell's Trailer Village is not receiving a just and reasonable operating income under the existing space rent ceilings and that the NOI Adjustment calculated under the ordinance is necessary to restore a fair and reasonable return while maintaining rent stabilization protections for residents.

NOW, THEREFORE BE IT RESOLVED, by the Manufactured Home Fair Practices Commission of the City of Woodland as follows:

Section 1. Acceptance of Application as Complete

The Commission hereby finds and determines that the NOI Annual Adjustment Application for Bell's Trailer Village, submitted by Harmony Communities, is complete and has been prepared and processed in accordance with Chapter 5.36 of the Woodland Municipal Code.

Section 2. Approval of NOI Adjustment

The Commission hereby approves the NOI Adjustment for Bell's Trailer Village as calculated under Chapter 5.36 and the City's NOI worksheet, and specifically finds that:

1. Bell's Trailer Village's Base Year NOI for the January 1, 2024 through December 31, 2024 period was less than fifty percent (50%) of gross income, triggering the presumption that the park owner is not receiving a just and reasonable return;
2. Application of the ordinance's required NOI normalization and CPI-based adjustment formulas yields an adjusted (Target) NOI for the Park; and
3. When converted to an adjusted space rent ceiling consistent with Chapter 5.36, the resulting increase in the space rent ceiling is 27.55% over the current base rents for the regulated spaces.

The Commission therefore determines that a 27.55% increase in the space rent ceiling is necessary and appropriate to provide Bell's Trailer Village with a just and reasonable net operating income consistent with the fair return provisions of the Manufactured Home Space Rent Control Ordinance.

Section 3. Establishment of New Space Rent Ceilings

The Commission hereby directs that the space rent ceiling for each regulated space at Bell's Trailer Village shall be increased by 27.55% over that space's current base rent. The resulting new space rent ceilings for each regulated space shall be set forth in a schedule attached hereto as Exhibit A and incorporated herein by this reference.

City staff is authorized and directed to:

1. Prepare and finalize the schedule of new space rent ceilings for each regulated space as Exhibit A, consistent with this Resolution and the NOI calculation; and
2. Provide a copy of this Resolution and Exhibit A to the park owner and to residents in accordance with Chapter 5.36 and applicable noticing requirements.

Section 4. Effective Date and Timing of Adjustment

The space rent ceiling adjustment approved by this Resolution shall become effective on the date and in the manner provided by Chapter 5.36 of the Woodland Municipal Code, including, without limitation, the requirement in § 5.36.080(C)(3) that no annual adjustment shall become effective if a previous annual adjustment became effective within the preceding twelve (12) months. The NOI Adjustment approved herein shall not become effective until at least twelve (12) months after the effective date of the most recent annual permissive adjustment for Bell's Trailer Village.

Section 5. Findings of Reasonable Return

The Commission hereby finds that:

1. Under the existing space rent ceilings, Bell's Trailer Village's Base Year NOI is presumptively less than a just and reasonable return under Woodland Municipal Code § 5.36.090;
2. The NOI Adjustment has been calculated strictly in accordance with the formulas and standards prescribed in Chapter 5.36, including the 50-percent NOI floor, the CPI-based adjustment, and the unbundling of utility and other non-space-rent income; and
3. The approved 27.55% increase in the space rent ceiling is necessary to restore a just and reasonable operating income, support ongoing park operations, maintenance, and reinvestment, and ensure the long-term viability of the Park, while the rent stabilization framework continues to protect residents from arbitrary or excessive rent increases.

Section 6. Severability

If any section, subsection, clause, or phrase of this Resolution is for any reason held to be invalid or unconstitutional, such decision shall not affect the validity of the remaining portions of this Resolution. The Commission hereby declares that it would have adopted this Resolution and each section, subsection, clause, or phrase thereof, irrespective of the fact that any one or more sections, subsections, clauses, or phrases be declared invalid or unconstitutional.

PASSED AND ADOPTED by the Manufactured Home Fair Practices Commission of the City of Woodland at a regular meeting held on the 29th day of January, 2026, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

Paul Kramer, Chairperson

ATTEST:

Erika Bumgardner, Deputy Community Development Director

Bell's Trailer Village Rental Rates Per Unit with New Space Rent After 27.55% NOI Adjustment

Unit	Unit Type	Rent Roll from NOI Application	27.55% Adjust to Rent	New Space Rent
7	Space	\$372.77	\$102.70	\$475.47
8	Space	\$338.10	\$93.15	\$431.25
9	Space	\$361.65	\$99.63	\$461.28
10	RV	\$372.77	\$102.70	\$475.47
11	Space	\$346.76	\$95.53	\$442.29
12	Space	\$355.45	\$97.93	\$453.38
13	RV	\$357.32	\$98.44	\$455.76
14	Space	\$359.83	\$99.13	\$458.96
15	Space	\$338.10	\$93.15	\$431.25
17	Space	\$372.77	\$102.70	\$475.47
18	Space	\$372.77	\$102.70	\$475.47
19	Space	\$368.47	\$101.51	\$469.98
20	Space	\$354.87	\$97.77	\$452.64
21	Space	\$338.10	\$93.15	\$431.25
22	Space	\$346.76	\$95.53	\$442.29
23	Space	\$367.60	\$101.27	\$468.87
24	Space	\$367.60	\$101.27	\$468.87
25	Space	\$367.60	\$101.27	\$468.87
26	Space	\$368.47	\$101.51	\$469.98
27	Space	\$360.16	\$99.22	\$459.38
28	Space	\$312.10	\$85.98	\$398.08
29	Space	\$372.77	\$102.70	\$475.47
30	Space	\$376.26	\$103.66	\$479.92
31	Space	\$328.60	\$90.53	\$419.13
32	Space	\$338.10	\$93.15	\$431.25
33	RV	\$338.10	\$93.15	\$431.25
34	Space	\$338.10	\$93.15	\$431.25
35	RV	\$338.10	\$93.15	\$431.25
36	Space	\$338.10	\$93.15	\$431.25
37	Space	\$367.60	\$101.27	\$468.87
38	Space	\$328.60	\$90.53	\$419.13
39	RV	\$380.45	\$104.81	\$485.26
40	RV	\$358.99	\$98.90	\$457.89
42	RV	\$372.77	\$102.70	\$475.47
43	RV	\$366.97	\$101.10	\$468.07
44	RV	\$372.77	\$102.70	\$475.47
45	RV	\$303.42	\$83.59	\$387.01
46	RV	\$372.77	\$102.70	\$475.47
47	RV	\$375.34	\$103.41	\$478.75

City of Woodland
Manufactured Home Fair Practices Commission
NET OPERATING INCOME
ANNUAL ADJUSTMENT APPLICATION

Park Name: Bells Trailer Village

Owner/Authorized Representative: Jason Dilday

Mailing Address: 6653 Embarcadero Drive, Suite C, Stockton, CA 95219

Telephone: 209-932-8747 Facsimile: _____

PART I

THE NOI ANNUAL ADJUSTMENT FORMULA

Section 1: Overview of the NOI Adjustment and Procedure

(a) In general, the Net Operating Income (NOI) Annual Adjustment provides for an adjustment to a manufactured home park's space rent ceiling, and individual space rents, based upon the percentage increase in the Consumer Price Index (CPI) during the full twelve (12) calendar months immediately preceding the application date (also known as the "Base Year"). The park's NOI, as determined from the "gross income" and "operating expenses" (as defined) during that 12-month period, is adjusted upward by the increase in the CPI multiplied by the smaller of (a) the percentage of the CPI that represents the housing component of the CPI, or (b) 40%. Once the Base Year NOI is adjusted, the park's estimated operating expenses are added to the Adjusted NOI to determine the allowable Adjusted Gross Income. Finally, all park income other than from space rents is deducted from the allowable Adjusted Gross Income for the park, resulting in the park's Adjusted Space Rent Ceiling. The amount of the increase in the space rent ceiling is distributed equally to all spaces subject to the space rent ceiling.

(b) An NOI Annual Adjustment to the space rent ceiling is allowed only as provided by Chapter 5.36 of the Woodland City Code. This application and worksheet have been provided for the convenience of the applicant. Applicants should consult the terms of Chapter 5.36 to determine whether and to what extent various expenses and sources of income may be claimed on the worksheet below. Some cross-references to Chapter 5.36 have been provided in the worksheet, but the applicant should rely only on the provisions of Chapter 5.36 directly.

(c) To be eligible for an NOI Annual Adjustment, an original and ten (10) copies of the completed application, including supporting documentation, must be submitted to the City Clerk's office no later than March 1 of the year in which the adjustment is sought. Applicants may contact the staff of the City of Woodland Manufactured Home Fair Practices Commission for assistance in completing the application.

(d) Applicants must provide documentation for the gross income and operating expenses claimed on the application worksheet. Under Chapter 5.36, many of those items require information and documentation beyond that requested in this application. It is the applicant's

responsibility to attach all documentation required by Chapter 5.36 to support claimed items of income and expense.

(e) The application must be accompanied by an affidavit from the park owner or his/her designee declaring that copies of the application have either been personally served on each manufactured home resident (service on one adult member of a manufactured home household shall constitute service on each adult member thereof) or mailed first class postage prepaid to each manufactured home residence in the park. (*See Part V, "Affidavit of Service".*)

(f) The application also must be accompanied by two (2) sets of 4"x 10" envelopes with first class postage affixed, pre-addressed to each manufactured home residence in the park.

(g) The City Clerk shall not accept an NOI Annual Adjustment application for filing unless it is accompanied by the affidavit of service or mailing, the required envelopes, and payment of the NOI Hearing Fee as established by resolution of the Woodland City Council.

Section 2: Gross Income

(a) Gross income includes both space rents and all other income generated by the park. All sources of income must be reported in the application.

(b) Gross space rent includes all rental income generated by the park assuming 100 percent occupancy. Thus, the applicant should initially include as income the rents of all spaces in the park, even rent for vacant spaces and uncollected rents from occupied spaces. Deduction from gross income is then provided for unrealized space rents due to vacancy and bad debts to the extent the same are beyond the park owner's control. Uncollected space rents in excess of three percent (3%) are presumed unreasonable unless established otherwise and must be included in the park's gross income.

(c) Gross income also includes "other income" generated as a result of the operation of the park, including but not limited to laundry and recreational vehicle storage. Other income also includes gross receipts for services actually rendered, as well as for utility services that are separately billed to residents *other than* gas or electricity.

(d) With respect to submetered gas and electrical services, the *net* income to the park resulting from the sale of natural gas and electricity separately billed to the residents of the park is treated as a component of gross income. The amount of income from such sale is the difference, if any, between what the park owner charged the residents for gas or electrical service and what the utility company charged the park owner for the same services.

Section 3: Operating Expenses

(a) Amounts for operating expenses specifically allowed by Chapter 5.36 should be entered on the lines designated in the application worksheet. Many of these claimed expenses are limited by the terms of Chapter 5.36. Applicants should consult Chapter 5.36 in connection with completing the "operating expenses" portions of the application worksheet.

(b) To be claimed, other operating expenses not expressly enumerated in Chapter 5.36 must be specifically described and documented. Utility service fees and charges may be claimed as “operating expenses” only if for services included in the space rent (*i.e.*, not separately charged to residents) or for utility services *other than* natural gas or electricity which are separately billed to residents (*e.g.*, sewer, water, garbage, cable television, etc.)

(c) Chapter 5.36, Section 130(B) expressly excludes certain costs from being claimed as operating expenses even though actually paid. The applicant must not attempt to claim those prohibited costs as operating expenses on the application worksheet.

Section 4: Determining the NOI Adjustment

(a) The actual NOI is calculated by subtracting operating expenses from gross income during the previous twelve full months. However, where the actual resulting NOI was less than fifty percent (50%) of gross income, as defined, Chapter 5.36 establishes a presumption that the owner was not receiving a fair and reasonable return on the investment in the park. In such a case, the actual NOI is adjusted upward to equal the operating expenses.

(b) The NOI Annual Adjustment allows a park owner to increase the park’s space rent ceiling to the extent necessary to increase the park’s NOI of the prior 12-month period by a specified portion of the increase in the CPI during the same period.

(c) To determine the percentage increase in the CPI during the 12-month Base Year period, subtract the CPI figure reported for the month immediately preceding the Base Year from the reported monthly CPI figure for the last full month prior to the date of the application. Then divide the result by the reported CPI for the month immediately preceding the Base Year. The Commission staff will provide the appropriate CPI figures upon request, including the appropriate percentage increase.

(d) Next, multiply the percentage increase in the CPI from (c) above by the *smaller* of (1) the percentage of the CPI representing the housing component of the CPI, or (2) 40 percent. The result is the allowable percentage adjustment to the Base Year NOI.

(e) Multiply the allowable percentage adjustment from (d) above by the Base Year NOI to determine the size of the NOI Adjustment. Then, add the NOI Adjustment, the Base Year NOI, and the Estimated Operating Expenses to determine the new allowable “Adjusted Gross Income.”

(f) Finally, to determine the Adjusted Space Rent Ceiling, subtract from the Adjusted Gross Income all “other income,” and add an allowance for vacancies and bad debts at the rate applicable to the preceding 12 full months, subject to a maximum of three percent (3%). The result is the Adjusted Space Rent Ceiling that includes the NOI Adjustment. The percentage increase of the entire park’s Adjusted Space Rent Ceiling is then applied to the space rent ceiling for each individual space subject to space rent control.

Worksheet begins on following page.

PART II

NOI ANNUAL ADJUSTMENT WORKSHEET

Section 1 Base Year NOI

To determine the Base Year NOI, complete the following information in Section 1 using data from the full twelve (12) calendar months immediately preceding the date of this application (the "Base Year"). First, specify the first and last months of the Base Year:

First month: January, 2024

Last month: December, 2024

A. Base Year Gross Income

- | | |
|---|---------------------|
| 1. Space rents actually collected from tenants | <u>\$164,277.51</u> |
| 2. Uncollected space rents due to vacancy beyond the park owner's control | <u>\$0</u> |
| 3. Uncollected space rents due to bad debts beyond the park owner's control | <u>\$0</u> |
| 4. Gross space rents. Add lines 1 through 3 and enter result here. | <u>\$164,277.51</u> |
| 5. <i>Net</i> income from sale of natural gas separately billed to park residents [<i>See</i> Sec. 5.36.120(c)] | <u>\$3,320.11</u> |
| 6. <i>Net</i> income from sale of electricity separately billed to park residents [<i>See</i> Sec. 5.36.120(c)] | <u>-\$6,477.98</u> |
| 7. All other gross income generated by operation of the park (including payments for utility fees and charges billed separately to park residents by park management).
[<i>See</i> Sec. 5.36.120(b)] Specify each source of income: | |
| a. <u>Laundry</u> | <u>\$506.90</u> |
| b. <u>Water</u> | <u>\$12,442.93</u> |
| c. <u>Sewer</u> | <u>\$15,994.00</u> |
| d. <u>Trash</u> | <u>\$20,347.56</u> |
| e. _____ | |

Enter total 7a – e : \$49,291.39

8. **Total other income.** Add lines 5, 6 and 7 and enter result here. \$46,133.52

9. Enter sum of lines 2 and 3.	<u>\$0</u>	
10. Multiply line 4 by .03 (3 percent).	<u>\$4,928.33</u>	
11. Allowable uncollected space rents. Enter the <i>smaller</i> of lines 9 or 10 as a <i>negative</i> number [See Sec. 5.36.120(d)].		<u>\$0</u>
12. Base Year Gross Income. Enter the sum of lines 4, 8 and 11.		<u>\$210,411.03</u>

B. Base Year Operating Expenses

13. Real property taxes and assessments	<u>\$9,875.71</u>	
14. Management expenses, not to exceed 5% of line 12 [See Sec. 5.36.130(A)(2)]	<u>\$10,520.55</u>	
15. Normal repair and maintenance [See Sec. 5.36.130(A)(3)]	<u>\$17,724.98</u>	
16. Reasonable value of uncompensated owner-performed labor, not to exceed 5% of line 12 [See Sec. 5.36.130(A)(4)]	<u>\$0</u>	
17. Operating supplies [See Sec. 5.36.130(A)(5)]	<u>\$0</u>	
18. Insurance premiums [See Sec. 5.36.130(A)(6)]	<u>\$4,242.59</u>	
19. Other taxes, fee and permits	<u>\$2,165.05</u>	
20. Deposit to reserve for replacement of necessary capital improvements, not to exceed 5% of line 12 [See Sec. 5.36.130(A)(8)]	<u>\$10,520.55</u>	
21. Expenditures for necessary capitol improvements exceeding reserves for replacement [See Sec. 5.36.130(A)(9)]	<u>\$0</u>	
22. Involuntary refinancing of mortgage or debt principal [See Sec. 5.36.130(A)(10)]	<u>\$0</u>	
23. Increased payments on lease of park land [See Sec. 5.36.130(A)(11)]		<u>\$0</u>

24. Other operating expenses

24.1. Unbundled Utility Expenses. Utility service fees and charges which are assessed by the utility and separately billed to park residents for the following services, if applicable:

Liquid propane gas	\$0
Water	\$20,210.39
Reduction of Unit 4	-\$1,066.07
Garbage or refuse service	\$19,198.61
Sewer service	\$28,206.33

Enter subtotal of 24.1: \$66,549.26

24.2. Bundled Utility Expenses. Service fees and charges for utilities which are provided to park residents at no additional charge. Specify:

- a. None _____
- b. _____
- c. _____

Enter subtotal of 24.2: _____

24.3. All other operating expenses. [*But see* Sec. 5.36.130(B)]. Specify:

- a. Meters \$5,051.80
- b. Bad Debt \$0
- c. Reduction of Unit 4 -\$125.92
- d. _____
- e. _____

Enter subtotal of 24.3: \$4,925.88

Line 24 total [add 24.1, 24.2, and 24.3 subtotals]: \$71,475.14

25. Total Base Year Operating Expenses. Enter sum of lines 13 through 24: \$126,524.57

C. Resulting Base Year NOI

26. Subtract from line 12 the amount in line 25.
 Enter here as the actual base year NOI. \$83,886.46

27. Enter the amount from line 25. \$126,524.57

28. Base Year NOI.
 Enter the *larger* of lines 26 or 27. [*See* Sec. 5.36.090(b)] \$126,524.57

Section 2 Determining the Adjusted NOI

29. Enter the reported monthly CPI for the full month
 prior to the date this application was submitted.
 [Provided by Commission staff] \$334.08

30. Enter the monthly CPI reported for the month
 immediately preceding the 12-month period
 specified in Section 1 (page 4).
 [Provided by Commission staff] \$325.93

31. Subtract line 30 from line 29 and enter here. 8.15

32. Divide line 31 by the number in line 30 to determine
 the percentage increase in the CPI. Enter as a four-
 digit decimal (*e.g.*, 0.0678). .0250

33. Multiply line 32 by the *smaller* of (a) the percentage
 of the CPI that represents the housing component
 of the CPI (provided by Commission staff) or
 (b) 40%, to determine the allowable percentage
 increase of the Base Year NOI. Enter as a four-
 digit decimal (*e.g.*, 0.0271). .0089

34. Multiply line 28 by line 33 to determine the dollar
 amount of the allowable NOI adjustment. \$1,122.37

35. Adjusted NOI. Add lines 28 and 34, and
 enter the result here. \$127,646.94

Section 3 Determining the Adjusted Space Rent Ceiling

36. Estimated Operating Expenses. If the subtotal on line 24.1 is greater than zero, leave this line 36 blank and skip ahead to line 36.1 now. If the subtotal on line 24.1 is blank or zero, multiply the Base Year Operating Expenses on line 25 by the sum of 1 plus the percentage increase in the CPI found on line 32 (e.g., $1 + 0.0678 = 1.0678$), enter the result here, and skip to line 37: \$0

36.1. If the subtotal on line 24.1 is greater than zero, subtract the amount on line 24.1 from the Total Base Year Operating Expenses found on line 25, enter the result here, and continue to line 36.2: \$59,975.31

36.2. Multiply line 36.1 by the sum of 1 plus the percentage increase in the CPI found on line 32 (e.g., $1 + 0.0678 = 1.0678$), enter the result here, and continue to line 36.3: \$61,474.70

36.3. Add the subtotal on line 24.1 to the amount on line 36.2, and enter here: \$128,023.96

37. Allowable Adjusted Gross Income.

Add the Adjusted NOI found in line 35 to the Estimated Operating Expenses found either on line 36 (applicable only when specified utility service fees and charges are *not* separately billed to park residents) or on line 36.3 (applicable only when specified utility service fees and charges *are* separately billed to park residents): \$255,670.90

38. Subtract from line 37 the amount of “other income” found on line 8 and enter result here as the new gross space rent ceiling before allowance for uncollected space rents. \$209,537.38

39. Divide line 1 by line 4. Enter here as a four-digit decimal (e.g., 0.9876). 1.000

40. Adjusted Space Rent Ceiling.

Divide line 38 by line 39 or “.97”, whichever is larger, and enter result here. \$209,537.38

Section 4 Distribution of the Space Rent Ceiling Adjustment

41. Space Rent Ceiling Adjustment.

Subtract from the Adjusted Space Rent Ceiling
on line 40 the base year gross space rents on line 4. \$45,259.87

42. Divide line 41 by line 4 and enter result here as
a four-digit percentage increase in the space rent
ceiling (*e.g.*, 0.0475). .2755

43. Upon approval of this application, the Commission
will provide a schedule of the new space rent ceiling
for each space in the park that is not exempt from the
rent ceiling, by increasing the current base rent for
each park space by the percentage on line 42.

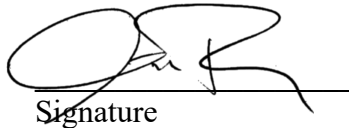
PART III

VERIFICATION

1. I hereby certify that I am authorized to submit this application and supporting documentation on behalf of the owner of the manufactured home park identified above.
2. I declare under penalty of perjury under the laws of the State of California that the information provided on this application, including Part IV "Documents Submitted In Support Of Application", attached hereto, is true and correct to the best of my knowledge.

Jason Dilday

Name (print)



Signature

Authorized
Representative

Capacity

09/26/2025

Date

*Please see next page to itemize
attached documentation.*

PART IV

DOCUMENTS SUBMITTED IN SUPPORT OF APPLICATION

In order for an NOI Annual Adjustment application to be approved, applicants must submit documentation in support of all figures entered on the NOI worksheet.

As support for the claimed gross income, applicants should submit an income statement for each time period relevant to that portion of the application. All income generated by the park, as defined by Chapter 5.36, must be specifically itemized. As support for claimed operating expenses, the applicant must submit documentary evidence for each item claimed, or part of item claimed. Supporting documentation should be in the form of a standard business record, *e.g.*, receipts, copies of cancelled checks, *etc.* that indicates that the amount claimed was paid by the park for the purpose stated on the worksheet.

The Commission is authorized to request additional documentation in the event it determines that the evidence submitted is inadequate.

DOCUMENTS SUBMITTED IN SUPPORT OF GROSS INCOME

1. In addition to an income statement for the 12 full calendar months immediately preceding the date of this application, I have submitted the following additional or other documents in support of my claim of gross income during that period:

- (a) Attachment A - Income Statement
- (b) Attachment B - Rent Statements
- (c) Attachment C - Property Manager/Cash Flow Statements
- (d) _____
- (e) _____
- (f) _____
- (g) _____
- (h) _____
- (i) _____

PART V

AFFIDAVIT OF SERVICE

I, Jason Dilday, declare that I am either the park owner or his/her authorized designee for purposes of filing the within NOI Annual Adjustment application with the City of Woodland Manufactured Home Fair Practices Commission.

I further declare that on February 26, 2025, I served copies of the within application:

- by personally serving a copy thereof on at least one adult member of each manufactured home household within the park.
- by placing a copy thereof in a sealed envelope with first class postage thereon fully prepaid in the United States mail at Stockton, California, addressed to each manufactured home residence within the park.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed this ___ day of _____, 20___, at _____, California.

Signed: _____

Print name: Jason Dilday



PUBLIC NOTICE

Manufactured Home Fair Practices Commission
Public Meeting
January 29, 2026

NOTICE IS GIVEN HERewith that the Manufactured Home Fair Practices Commission (MHFPC) of the City of Woodland will hold a public meeting on **Thursday, January 29, 2026, at 6:00 PM**, at 300 First Street, Woodland, CA, in the City Council Chambers, to review and consider the staff report and supporting information regarding a Net Operating Income (NOI) Adjustment Application for Bell's Trailer Village.

PROJECT PROPOSAL: Bell's Trailer Village ("Applicant") has submitted an NOI Annual Adjustment Application (enclosed) requesting an adjustment to the space rent ceiling at Bell's Trailer Village under Woodland Municipal Code Chapter 5.36.

The NOI process is intended to evaluate whether the park's current net operating income provides a just and reasonable (fair) return, after accounting for inflation and allowable costs.

Based on the NOI application formula calculations, staff determined a proposed space rent ceiling adjustment percentage of 27.55% is permissible, as outlined in the City's Municipal Code and based on a presumption that where the NOI is less than 50% of gross income in the base year (the 12-month period immediately preceding the space rent ceiling date applicable to that park), the park owner was receiving less than a just and reasonable return on the manufactured home park.

The Commission will consider the information in the staff report, the NOI Adjustment Application materials, and any public testimony, and may take action to accept the application as complete and approve, modify, or deny the requested NOI adjustment on January 29, 2026.

Authorized Representative: Bell's Trailer Village
Park Location: 1224 E. Gum Avenue, Woodland CA 95776
Assessor's Parcel Number (APN): 066-160-022-000
Recommended MHFPC Action:

1. Accept Harmony Community's NOI Adjustment Application for Bell's Trailer Village as complete;
2. Approve the requested NOI Adjustment for Bell's Trailer Village based on the finding that the current net operating income does not provide a just and reasonable return relative to the established base-year NOI; and
3. Provide a schedule of the new space rent ceiling for each space in the park, by increasing the current base rent for each park space by the final percentage calculated in the application (27.55%).

PUBLIC NOTICE: In accordance with the City of Woodland Municipal Code Section 5.36.140, Hearings on Application for NOI or Special Adjustment: *The secretary shall notify the park owner, or other person designated on the park's registration, and the park residents of the time, date and place of the hearing. Such notice shall be mailed at least 15 days prior to the scheduled hearing date.* As such, public notice is hereby given that a decision to approve or deny this application is expected to be made by the City of Woodland MHFPC on January 29, 2026.



PUBLIC NOTICE

Manufactured Home Fair Practices Commission
Public Meeting
January 29, 2026

PUBLIC COMMENTS: The public meeting is open to all interested persons. Residents may provide comments in person at the hearing and/or in writing in advance. Written comments should be submitted to Erika Bumgardner, Deputy Community Development Director, at Erika.bumgardner@cityofwoodland.gov, or to:

Erika Bumgardner
Community Development Department
300 First Street
Woodland, CA 95695

To ensure distribution to Commissioners, please submit written/email comments by January 28, 2026.

AVAILABILITY OF DOCUMENTS: Copies of materials, including the project staff report and application, will be available at the Community Development Department, City Hall, 300 First Street, Woodland, CA 95695 on January 9, 2026.

Documents will also be available online beginning January 9, 2026, at: <https://www.cityofwoodland.gov/654/Meetings-Agendas>. Please scroll down the page until you find the January 29, 2026, Manufactured Home Fair Practices Commission Meeting and click on that box/link for a copy of the meeting agenda packet.

Pursuant to State Government Code Section 65009(b)(2), if you challenge any of the above project in court, you may be limited to raising only those issues you or someone else raised by the date of determination described in this notice or in written correspondence delivered to the City, at or prior to, this date of determination.

SUBSCRIBE TO RECEIVE FUTURE MEETING NOTICES AND AGENDA

You can sign up to receive email notification of all future Manufactured Home Fair Practices Commission meetings by going to the City of Woodland website (www.CityofWoodland.gov) and clicking the “Email Updates” box located toward the top center of the page, or visit: www.CityofWoodland.gov/list.aspx



TO: THE MEMBERS OF THE COMMISSION
AGENDA: Manufactured Home Fair Practices Commission
DATE: January 29, 2026
ITEM #: F.4
SUBJECT: Idle Wheel Mobile Home Park – 2024 Annual Registration and 2025 Annual Permissive Adjustment to the Space Rent Ceiling (154 Spaces); Consideration of 14 Space Exemption Requests

Recommendation for Action: Staff recommends the Manufactured Home Fair Practices Commission adopt a Resolution to:

1. Receive and file the 2024 Annual Registration for Idle Wheel Mobile Home Park; and
2. Approve the 2025 Annual Permissive Adjustment to the Space Rent Ceiling for Idle Wheel Mobile Home Park applicable to the park’s 154 spaces, consistent with the City’s Ordinance and the park’s submitted application; and
3. Deny Idle Wheel’s request to exempt 14 spaces from the City’s space rent ceiling provisions on the basis that the prior “long-term lease” exemption was tied to former Civil Code section 798.17, which was repealed effective January 1, 2025, and therefore there is no longer a qualifying exemption under the Ordinance; and
4. Direct staff, following Commission action, to notify Idle Wheel in writing of the denial of the 14-space exemption request and require a written response from park ownership/management identifying: (a) whether any space rent increases or rent practices since 2023 were implemented in reliance on long-term lease exemptions, (b) the spaces impacted, and (c) a proposed remedy and timeline to cure any noncompliance with the City’s Ordinance, consistent with the conclusion that long-term lease exemptions expired with the repeal of Civil Code section 798.17.

Staff Contact:

Erika Bumgardner, Deputy Community Development Director, (530) 661-5886, erika.bumgardner@cityofwoodland.org

Report in Brief:

Idle Wheel Mobile Home Park is subject to the City’s Manufactured Home Space Rent Control Ordinance (WMC Chapter 5.36). The Commission is asked to (1) receive and file Idle Wheel’s 2024 Annual Registration, and (2) approve the 2025 Annual Permissive Adjustment to the Space Rent Ceiling for the park’s 154 spaces.

Action on the 2025 permissive adjustment was tabled at the June 30, 2025 meeting to allow staff time to review Idle Wheel’s request to exempt 14 spaces based on “long-term lease” claims. Since that time, staff reviewed the City Attorney’s legal analysis confirming that Woodland’s long-term lease exemption language was expressly tied to former Civil Code section 798.17 and expired with the statute’s repeal effective January 1, 2025, leaving no independent exemption under the City Ordinance.

Accordingly, staff recommends that the Commission deny the requested exemptions for 14 spaces.

Background:

The City's annual registration process is used to:

- Maintain an up-to-date inventory of regulated parks and spaces (including ownership/management and contact information);
- Confirm the number of spaces subject to the City's ordinance and related rent ceiling administration;
- Support transparent administration of space rent ceiling records and adjustment processing; and
- Ensure the City and residents have a reliable, current baseline for compliance and communications (e.g., notices, filings, hearings, and determinations).

Annual Permissive Adjustment

The Ordinance provides an annual permissive adjustment process to update the Space Rent Ceiling using the methodology established by the Ordinance. Specifically, "a park owner shall be entitled to an annual permissive adjustment of gross space rental income equal to the lesser of a three percent increase or an increase equal to 75% of the percentage increase in the CPI during the full 12 calendar months immediately preceding the date of the application as reported by the Bureau of Labor Statistics. The percentage increase in the CPI during the 12-month period shall be calculated by comparing the CPI reported for the last month of the 12-month period with the CPI reported for the month immediately preceding the 12-month period," per Ordinance Sec 5.36.080. This process is intended to provide a predictable annual rent ceiling adjustment mechanism that is separate from any extraordinary "fair return" petition process.

In June 2025, city staff provided the Commission with data showing the Consumer Price Index for All Urban Consumers in the West Urban Area, as reported by the Bureau of Labor Statistics, U.S. Department of Labor. The data revealed that the 12-month period ending February 2025, adjusted by the 75% multiplier would produce a 1.94% permissive adjustment (2.59% increase in CPI x 75% = 1.94%); therefore, the increase for all applications filed by March 1, 2025 is 1.94%. The Space Rent Control Ordinance limits a permissive space rent increase to the lesser of the change in the CPI or 3.0%.

Discussion:

2024 Annual Registration – Idle Wheel Mobile Home Park

Idle Wheel submitted its 2024 annual registration materials and accompanying fees for City review. Based on staff's review, the submittal is adequate for registration purposes, and staff recommends approval of the park's annual registration of 154 spaces, noting that the city does not agree with the 13 claimed exemptions reported in Part III of the application.

2025 Annual Permissive Adjustment

At the June 30, 2025, MHFPC meeting, the Commission tabled the 2025 permissive adjustment item to allow staff to evaluate Idle Wheel's request to exempt 14 spaces from the rent ceiling provisions based on asserted "long-term lease" exemptions.

Recommended Denial of Long Term Lease Exemptions

Staff recommends denial of Idle Wheel's 14-space exemption requests based on further discussion with the City Attorney and as outlined in the attached correspondence between the City Attorney and the park managing entity, Harmony Communities.

In November 2001, Woodland voters approved Measure T, establishing the City's manufactured home space rent control framework. Following voter adoption, the City implemented the program through the Municipal Code (formerly Chapter 16B). In 2002, following a subsequent vote of the people, the City Council adopted Ordinance No. 1362, which amended Chapter 16B refining the implementing provisions of the ordinance. As part of those early "implementation" updates, the City removed certain park-resident noticing provisions that had been tied to the long-term lease exemption, based on the understanding that the terms and notices for long-term leases are governed by State law under the Mobilehome Residency Law and are therefore subject to state preemption if a local ordinance attempts to impose separate or conflicting requirements.

Consistent with that approach, the City's current ordinance does not create a stand-alone local long-term lease exemption; instead, it expressly limits any exemption to tenancies "covered by a rental agreement meeting all of the requirements of Section 798.17 of the California Civil Code." In other words, the local exemption is written to track (and depend on) the existence of the State exemption.

AB 2782 amended and ultimately repealed Civil Code § 798.17, and provides that as of January 1, 2025, the section is repealed and any exemption pursuant to it expires. Because the City's exemption is expressly tied to leases meeting the requirements of Civil Code § 798.17, and because the State exemption has now expired by operation of law, staff concludes the requested long-term lease exemptions are no longer available under the City's ordinance.

Accordingly, staff recommends the Commission approve the 1.94% permissive adjustment for 154 park spaces, but deny Idle Wheel's requests to exempt 14 spaces based on long-term lease agreements.

Post-Approval Compliance Follow-Up

If the Commission approves the registration and permissive adjustment and denies the exemptions, staff recommends a clear follow-up step to ensure compliance and address any past rent practices that may have relied on the repealed exemption framework.

It is recommended that the Commission direct staff to provide written notice to Idle Wheel of:

- The denial of the 14-space exemption requests; and
- A requirement for Idle Wheel to submit a written response within 30 days of the written notification, identifying any rent increases or rent practices since 2023 that were implemented in reliance on long-term lease exemptions, and a proposed remedy (including any rent roll corrections, credits, or other corrective actions as appropriate) and a timeline for bringing the park into compliance with the Ordinance in light of AB 2782 and ultimately the repeal of Civil Code section 798.17.

Conclusion:

Staff recommends the Manufactured Home Fair Practices Commission adopt a Resolution to:

1. Receive and file the 2024 Annual Registration for Idle Wheel Mobile Home Park; and
2. Approve the 2025 Annual Permissive Adjustment to the Space Rent Ceiling for Idle Wheel Mobile Home Park applicable to the park's 154 spaces, consistent with the City's Ordinance and the park's submitted application; and
3. Deny Idle Wheel's request to exempt 14 spaces from the City's space rent ceiling provisions on the basis that the prior "long-term lease" exemption was tied to former Civil Code section

798.17, which was repealed effective January 1, 2025, and therefore there is no longer a qualifying exemption under the Ordinance; and

4. Direct staff, following Commission action, to notify Idle Wheel in writing of the denial of the 14-space exemption request and require a written response from park ownership/management identifying: (a) whether any space rent increases or rent practices since 2023 were implemented in reliance on long-term lease exemptions, (b) the spaces impacted, and (c) a proposed remedy and timeline to cure any noncompliance with the City's Ordinance, consistent with the conclusion that long-term lease exemptions expired with the repeal of Civil Code section 798.17.



Attachments:

1. RESOLUTION
2. Idle Wheel 2024 Annual Registration
3. Idle Wheel 2025 Annual Permissive Adjustment Application
4. Letter Correspondence

RESOLUTION NO. MHFPC 26-03

A RESOLUTION OF THE MANUFACTURED HOME FAIR PRACTICES COMMISSION OF THE CITY OF WOODLAND APPROVING THE 2024 ANNUAL REGISTRATION FOR IDLE WHEEL MOBILE HOME PARK; APPROVING THE 2025 ANNUAL PERMISSIVE ADJUSTMENT TO THE SPACE RENT CEILING FOR ONE HUNDRED FIFTY-FOUR (154) SPACES; DENYING REQUESTED EXEMPTIONS FOR FOURTEEN (14) SPACES; AND DIRECTING NOTICE AND COMPLIANCE FOLLOW-UP

WHEREAS, the City of Woodland (“City”) regulates space rent ceilings and rent adjustments for manufactured home parks pursuant to Chapter 5.36 of the Woodland Municipal Code (“Ordinance”), administered in part by the Manufactured Home Fair Practices Commission (“Commission”); and

WHEREAS, the Ordinance provides for (i) annual registration of manufactured home parks to maintain current information regarding park ownership/management, contact information, and the number of spaces subject to the Ordinance, and (ii) an annual permissive adjustment process to adjust the Space Rent Ceiling consistent with the methodology established by the Ordinance; and

WHEREAS, Idle Wheel Mobile Home Park (“Park”) submitted materials requesting approval of its annual registration, and submitted an application for the 2025 Annual Permissive Adjustment to the Space Rent Ceiling applicable to the Park’s 154 spaces (“Application”); and

WHEREAS, the Commission considered the Park’s 2025 Annual Permissive Adjustment at its meeting of June 30, 2025, and tabled action to allow staff to review the Park’s request to exempt fourteen (14) spaces from the Space Rent Ceiling provisions based on asserted “long-term lease” exemptions; and

WHEREAS, since the June 30, 2025 meeting, staff reviewed the Park’s exemption request and consulted the City Attorney, including review of the legal summary explaining that Civil Code section 798.17 (relating to long-term lease treatment under state law) was repealed effective January 1, 2025, and that the City’s Ordinance does not provide a continuing, independent long-term lease exemption following that repeal; and

WHEREAS, The Commission conducted a public meeting on January 29, 2026 to consider (i) the Park’s annual registration, (ii) the 2025 Annual Permissive Adjustment to the Space Rent Ceiling, and (iii) the Park’s request to exempt fourteen (14) spaces from the Space Rent Ceiling provisions.

NOW, THEREFORE BE IT RESOLVED, by the Manufactured Home Fair Practices Commission of the City of Woodland as follows:

1. Findings. The foregoing recitals are true and correct and are incorporated herein by this reference.

2. Approval of Annual Registration. The Commission hereby approves the Park’s annual registration for Idle Wheel Mobile Home Park, subject to any ministerial finalization steps customarily performed by staff to complete the registration file.
3. Approval of Annual Permissive Adjustment. The Commission hereby approves the 2025 Annual Permissive Adjustment to the Space Rent Ceiling for Idle Wheel Mobile Home Park applicable to the Park’s one hundred fifty-four (154) spaces, consistent with the Ordinance and the Park’s submitted Application.
4. Denial of Fourteen (14) Requested Space Exemptions. The Commission hereby denies the Park’s request to exempt fourteen (14) spaces, as identified in the Park’s exemption request and Application submittal, from the Space Rent Ceiling provisions of the Ordinance. This denial is based on the determination that the asserted “long-term lease” exemption was tied to former state law (Civil Code section 798.17), which was repealed effective January 1, 2025, and therefore does not provide a continuing basis for exemption under the Ordinance.
5. **Notice to Park and Required Response Regarding Prior Rent Practices.** Following adoption of this Resolution, the Commission directs staff to provide written notice to Idle Wheel Mobile Home Park of the Commission’s action, including:
 - Notice of the denial of the fourteen (14) requested exemptions; and
 - A requirement that the Park submit a written response (within a timeframe specified by staff consistent with the Ordinance and administrative practice) describing:
 1. whether any rent increases, rent adjustments, or rent practices since 2023 were implemented in reliance on the asserted long-term lease exemption;
 2. the spaces, tenancies, and time periods affected (if any); and
 3. a proposed remedy and timeline to address and cure any rent adjustments implemented in a manner not in compliance with the Ordinance, consistent with the repeal of Civil Code section 798.17 effective January 1, 2025.
6. Implementation and Notice. The Commission directs staff to implement the approved annual permissive adjustment by finalizing updated Space Rent Ceiling documentation for Idle Wheel Mobile Home Park. Any rent increase applied pursuant to this Resolution shall be implemented in accordance with the Ordinance’s noticing and effective-date requirements.
7. CEQA. The Commission finds that this action is an administrative regulatory action that does not involve physical changes to the environment and is therefore not a project under CEQA, or alternatively is otherwise exempt from CEQA pursuant to applicable CEQA provisions.
8. Effective Date. This Resolution shall take effect immediately upon adoption.

PASSED AND ADOPTED by the Manufactured Home Fair Practices Commission of the City of Woodland at a regular meeting held on the 29th day of January, 2026, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

Paul Kramer, Chairperson

ATTEST:

Erika Bumgardner, Deputy Community Development Director

**City of Woodland
Manufactured Home Fair Practices Commission
2024 ANNUAL REGISTRATION**

**Part I.
Park Information**

- a. Park Name: Idle Wheel MHP
- b. Park Physical Address: 907 Bourn Dr., Woodland, CA 95774
- c. Park Telephone No: 209-932-8747
- d. Month and year the park originally opened, regardless of current ownership: 1971
- e. List the name and contact information of each individual or legal entity (e.g., a corporation) possessing an ownership interest in the park, and the nature of the interest:

Name: <u>Idle Wheel MHP, LLC</u>	Name: _____
Address: <u>1653 Embarcadero Dr.</u>	Address: _____
<u>Stockton, CA 95219</u>	<u>STC</u>
Tel. No: <u>209-932-8747</u>	Tel. No: _____
Nature of Interest: <u>OWNER</u>	Nature of Interest: _____

Name: _____	Name: _____
Address: _____	Address: _____
_____	_____
Tel. No: _____	Tel. No: _____
Nature of Interest: _____	Nature of Interest: _____

(If necessary, attach additional sheets for additional park owners and check here)

- f. For each park owner listed above that is not a natural person (e.g., a legal entity), if any, please attach a roster of the entity's officers, including names, addresses and telephone numbers, and check here .

**Part II.
 Park/Spaces Subject to the Ordinance**

Please complete the following to determine whether the park is subject to the space rent control ordinance, and if so, the number of spaces which must be registered:

a. Total number of <u>all</u> spaces for manufactured homes in the park:	154
b. Total number of spaces in the park occupied by residents who own both the manufactured home in which they reside <u>and</u> an ownership interest in the park: **	0
c. Total number of spaces in the park (other than those already counted in line (b) above) that are subject to recorded affordable housing covenants which restrict tenancies to low- and very-low income households and require rents affordable to residents at those income levels: **	0
d. Add lines (b) and (c), above:	0
e. Subtract line (d) from line (a), and enter here:	154
f. If line (e) above is <u>less than two (2)</u> , this park is not subject to the space rent control ordinance and no Registration Fee is required -- you may skip to Part VI on page 7. If line (e) is equal to two (2) or more, carry that number forward to Part III, line (a), and continue.	

** For spaces claimed to not be subject to the space rent control ordinance (lines (b) or (c) above), please attach a letter or other narrative signed by the Authorized Representative (see Part VI) describing the facts which support those claims.

**Part III.
 Park Spaces**

Please complete the following summary. Claimed exemptions must match information appearing in the Exemption Schedule (Part V), below:

a. Total number of spaces subject to the rent control ordinance (enter from Part II, line (e)):	154
b. Total number of spaces claimed to be exempt from the Space Rent Ceiling <u>only</u> pursuant to California Civil Code §798.17:	0
c. Total number of spaces claimed to be exempt from the Space Rent Ceiling for any reason <u>other than</u> Civil Code §798.17:	13
d. Total number of manufactured home rental spaces <u>not</u> claimed to be exempt from the Space Rent Ceiling:	141

NOTE: The combined total of lines (b), (c), and (d) should equal the number in line (a).

Rent Roll Analysis

Property: Idle Wheel MHP, LLC
As of 12/15/24

Tenant Name	Unit	Unit Type	Sq Ft	Market Rent	Rent	Vacancy Loss	Misc Charges	Total Charges	Balance	Security Deposit	Increase Amount	Last Rent Increase	Move In	Move Out	Lease End
Idle Wheel MHP, LLC															
Ocegüera, Hector	1	Space	0	0.00	468.55	0.00	57.25	525.80	-3.00	0.00	10.98	07/01/24	1/13/60		
Naranjo, Ruben	2	Space	0	0.00	479.97	0.00	57.25	537.22	0.00	0.00	11.25	07/01/24	1/13/60		
Bunch & Lemire, G. 3	3	Space	0	0.00	475.58	0.00	57.25	532.83	0.00	0.00	11.15	07/01/24	1/21/19	2/6/25	
Ayala, Eliasar	4	Space	0	0.00	470.12	0.00	57.25	527.37	0.00	0.00	11.02	07/01/24	1/13/60		
Villareal, Rosita	5	Space	0	0.00	478.17	0.00	57.25	535.42	0.00	0.00	11.21	07/01/24	1/13/60		
Ayala, Maria	6	Space	0	0.00	480.68	0.00	57.25	537.93	0.00	0.00	11.27	07/01/24	11/1/18		2/29/44
Whitebear, Shelly	7	Space	0	0.00	470.13	0.00	57.25	527.38	0.00	0.00	11.02	07/01/24	1/13/60		
Rodriguez, Deborah	8	Space	0	0.00	470.04	0.00	57.25	527.29	0.00	0.00	11.02	07/01/24	1/13/60		
Lopez, Ricardo	11	Space	0	0.00	477.01	0.00	57.25	534.26	-59.56	0.00	11.18	07/01/24	1/13/60		
Akhtar/Marab, Huss	12	Space	0	0.00	462.46	0.00	57.25	519.71	0.00	462.46	462.46	02/01/24	1/8/24		12/31/44
Garcia, Susana & L	13	Space	0	0.00	471.99	0.00	57.25	529.24	0.00	0.00	11.06	07/01/24	1/13/60		
Magdeleno, Maribel	14	Space	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		2/1/23		
Duarte, Anna	15	Space	0	0.00	468.69	0.00	57.25	525.94	0.00	468.69	468.69	06/01/24	4/17/24		3/31/44
Martinez, Robin	16	Space	0	0.00	477.59	0.00	57.25	534.84	0.00	0.00	11.19	07/01/24	1/13/60		
Marab & Shafaq, Ai	17	Space	0	0.00	473.77	0.00	57.25	531.02	0.00	0.00	11.10	07/01/24	5/1/18		
Martinez, Maricela	18	Space	0	0.00	468.64	0.00	57.25	526.89	49.94	0.00	11.01	07/01/24	1/13/60		
Michel, Moises & N	19	Space	0	0.00	461.00	0.00	57.25	518.25	0.00	0.00	10.80	07/01/24	1/13/60		
Ayala, Laura	20	Space	0	0.00	473.31	0.00	57.25	530.56	0.00	0.00	11.09	07/01/24	1/13/60		
Sandoval, Daniel	21	Space	0	0.00	465.18	0.00	57.25	522.43	0.00	0.00	10.90	07/01/24	1/13/60		
Chavez De La Torre	22	Space	0	0.00	469.75	0.00	87.25	557.00	0.00	0.00	11.01	07/01/24	1/13/60		
Nunez, Benjamin	23	Space	0	0.00	483.82	0.00	57.25	541.07	0.00	0.00	11.34	07/01/24	1/13/60		
Shafiqat, Mansoor	24	Space	0	0.00	465.00	0.00	57.25	522.25	0.00	0.00	10.90	07/01/24	1/13/60		
Garcia & Flores, Rc	25	Space	0	0.00	476.75	0.00	57.25	534.00	-0.65	0.00	11.17	07/01/24	1/1/21		
<VACANT>	26	Space	0	0.00	0.00	0.00	57.25	57.25	0.00	0.00	0.00				
Chaudhry, Farhana	27	Space	0	0.00	459.60	0.00	57.25	516.85	0.00	0.00	10.77	07/01/24	1/13/60		
Ruelas, Eduardo	28	Space	0	0.00	478.48	0.00	57.25	535.73	0.00	0.00	11.21	07/01/24	1/13/60		
Baro & Sanchez, Ft	29	Space	0	0.00	462.41	0.00	57.25	519.66	-4.23	0.00	10.84	07/01/24	1/13/60		
Johnson, Mikael	30	Space	0	0.00	481.75	0.00	57.25	539.00	0.00	0.00	11.29	07/01/24	1/13/60		
Ybarbo, Richard	31	Space	0	0.00	461.19	0.00	57.25	518.44	0.00	0.00	10.81	07/01/24	1/13/60		
Dimas, Ana + Luis	32	Space	0	0.00	471.49	0.00	57.25	528.74	-48.83	471.49	0.00		9/24/24		8/31/44
Hoffman, Merlita	33	Space	0	0.00	485.99	0.00	57.25	543.24	0.00	0.00	11.39	07/01/24	1/13/60		
Mendoza, Gracia	34	Space	0	0.00	482.19	0.00	57.25	539.44	0.00	0.00	11.30	07/01/24	1/13/60		
Tunstall, Marie	35	Space	0	0.00	478.02	0.00	57.25	535.27	0.00	0.00	11.20	07/01/24	1/13/60		
Pike, Kelly	36	Space	0	0.00	481.23	0.00	57.25	538.48	-0.93	0.00	11.28	07/01/24	1/13/60		
Oppold / Garcia, Mt	37	Space	0	0.00	466.11	0.00	57.25	523.36	-1.18	0.00	13.58	07/01/23	1/13/60		11/30/43
Gutierrez, Maricela	38	Space	0	0.00	488.29	0.00	57.25	545.54	0.00	0.00	11.44	07/01/24	12/17/19		
Cazares/Gutierrez,	39	Space	0	0.00	474.05	0.00	57.25	531.30	-10.42	0.00	11.11	07/01/24	1/13/60		
Lewis, Wayne	40	Space	0	0.00	469.44	0.00	132.25	601.69	0.00	0.00	11.00	07/01/24	1/13/60		

Tenant Name	Unit	Unit Type	Sq Ft	Market Rent	Rent	Vacancy Loss	Misc Charges	Total Charges	Balance	Security Deposit	Increase Amount	Last Rent Increase	Move In	Move Out	Lease End
Carrera, Isidro	41	Space	0	0.00	475.99	0.00	57.25	533.24	0.00	0.00	11.16	07/01/24	1/13/60		
Perez Garcia & Lop	42	Space	0	0.00	491.30	0.00	57.25	548.55	-0.25	0.00	11.51	07/01/24	12/17/19		
<VACANT>	43	Space	0	0.00	0.00	0.00	57.25	57.25	0.00	0.00	0.00				
Pimentel, Jessica &	44	Space	0	0.00	476.55	0.00	57.25	533.80	0.00	0.00	11.17	07/01/24	1/13/60		
Hilyard, Lewis & An	45	Space	0	0.00	489.20	0.00	57.25	546.45	2.50	0.00	11.47	07/01/24	1/13/60		
<VACANT>	46	Space	0	0.00	0.00	0.00	57.25	57.25	0.00	0.00	0.00				
Torres, Lourdes	47	Space	0	0.00	500.38	0.00	57.25	557.63	0.00	0.00	11.73	07/01/24	1/13/60		
Jalil & Deeba, Amir	48	Space	0	0.00	483.44	0.00	57.25	540.69	0.00	0.00	11.33	07/01/24	1/13/60		
Corral Navar, Angel	50	Space	0	0.00	476.19	0.00	57.25	533.44	0.00	0.00	11.16	07/01/24	1/13/60		
Bermudez, Angela	51	Space	0	0.00	480.75	0.00	57.25	538.00	602.81	0.00	11.27	07/01/24	1/21/19		
Vidales, Salvador	52	Space	0	0.00	449.63	0.00	57.25	506.88	0.00	0.00	10.54	07/01/24	1/13/60		
Brooks, Christina	53	Space	0	0.00	487.35	0.00	57.25	544.60	0.00	0.00	11.42	07/01/24	1/13/60		
Michel, Marcos	54	Space	0	0.00	472.10	0.00	57.25	529.35	0.00	0.00	11.06	07/01/24	1/13/60		
Bonilla Vera, Juan	55	Space	0	0.00	487.48	0.00	57.25	544.73	0.00	0.00	11.43	07/01/24	1/13/60		
Bali, Daryll	56	Space	0	0.00	466.18	0.00	57.25	523.43	0.00	0.00	10.93	07/01/24	1/13/60		
Long, Billy & Lynda	57	Space	0	0.00	479.10	0.00	57.25	536.35	0.00	0.00	11.23	07/01/24	1/13/60		
Cotton, Robert	58	Space	0	0.00	476.00	0.00	57.25	533.25	0.00	0.00	11.16	07/01/24	1/13/60		9/30/44
Ruelas & Rodriguez	59	Space	0	0.00	486.17	0.00	87.25	573.42	0.00	0.00	11.39	07/01/24	1/13/60		
Carrillo, Juan Carlos	60	Space	0	0.00	494.02	0.00	57.25	551.27	0.00	0.00	11.58	07/01/24	1/13/60		
Rodriguez, Benito	61	Space	0	0.00	473.57	0.00	57.25	530.82	0.00	0.00	11.10	07/01/24	1/13/60		
Herrera, Rodolfo	62	Space	0	0.00	469.88	0.00	57.25	527.13	0.00	0.00	11.01	07/01/24	1/13/60		
Minear, Dorothy	63	Space	0	0.00	475.70	0.00	57.25	532.95	0.00	0.00	11.15	07/01/24	1/13/60		
Chavez, Alfredo	64	Space	0	0.00	479.80	0.00	57.25	537.05	0.00	0.00	11.25	07/01/24	1/13/60		
Bustamante, Melchi	65	Space	0	0.00	491.55	0.00	57.25	548.80	0.00	0.00	11.52	07/01/24	1/13/60		
Christensen, Robert	66	Space	0	0.00	485.15	0.00	57.25	542.40	0.00	0.00	11.37	07/01/24	1/13/60		
Velezquez, Francisr	67	Space	0	0.00	467.08	0.00	132.25	599.33	0.00	0.00	10.95	07/01/24	1/13/60		11/30/43
Vanderlaan, Ann	68	Space	0	0.00	473.46	0.00	257.25	730.71	-1,157.38	0.00	13.79	07/01/23	1/13/60		
Gutierrez, Rigobert	69	Space	0	0.00	491.48	0.00	57.25	548.73	0.00	0.00	11.52	07/01/24	1/13/60		
Avina/Ruiz, Adriana	70	Space	0	0.00	479.85	0.00	57.25	537.10	0.00	0.00	11.25	07/01/24	1/13/60		
Ayala, Francisco &	79	Space	0	0.00	474.08	0.00	57.25	531.33	0.00	0.00	11.11	07/01/24	9/4/19		
Saldana, Filemon	80	Space	0	0.00	473.45	0.00	57.25	530.70	0.00	0.00	11.10	07/01/24	1/13/60		
Duran, Fernando	81	Space	0	0.00	465.40	0.00	57.25	522.65	0.00	0.00	10.91	07/01/24	1/13/60		
Hernandez, Mania +	82	Space	0	0.00	485.27	0.00	57.25	542.52	0.00	0.00	11.37	07/01/24	1/13/60		
Naranjo, Roberto	83	Space	0	0.00	461.07	0.00	57.25	518.32	0.00	0.00	10.81	07/01/24	1/13/60		
Soria, Francisco	84	Space	0	0.00	466.44	0.00	132.25	598.69	0.00	0.00	10.93	07/01/24	1/13/60		
Johannek, Sandra	85	Space	0	0.00	471.06	0.00	57.25	528.31	0.00	0.00	11.04	07/01/24	1/13/60		
Loreto/Martinez, Ma	86	Space	0	0.00	492.72	0.00	57.25	549.97	-5.00	0.00	11.55	07/01/24	12/11/15		
Izquierdo, Jose	87	Space	0	0.00	477.59	0.00	57.25	534.84	0.00	0.00	11.19	07/01/24	1/13/60		
Gomez Franco, Enri	88	Space	0	0.00	467.19	0.00	57.25	524.44	0.00	0.00	10.95	07/01/24	1/13/60		
Melendres, Adriana	89	Space	0	0.00	474.07	0.00	57.25	531.32	-0.64	0.00	11.11	07/01/24	1/11/17		
Ortega/Diaz, Juan/	91	Space	0	0.00	463.95	0.00	457.25	921.20	49.90	0.00	10.87	07/01/24	1/13/60		
Ibarra & Pimentel,	92	Space	0	0.00	457.20	0.00	57.25	514.45	0.00	0.00	10.72	07/01/24	1/13/60		
Medina, Luis & May	94	Space	0	0.00	463.46	0.00	57.25	520.71	0.00	0.00	10.86	07/01/24	1/13/60		
Choudhry, Noor + It	95	Space	0	0.00	490.54	0.00	57.25	547.79	0.00	0.00	11.50	07/01/24	1/13/60		
Ruelas, Ambrosio	96	Space	0	0.00	475.48	0.00	57.25	532.73	0.00	0.00	11.14	07/01/24	1/13/60		
Gutierrez, Arturo	97	Space	0	0.00	485.71	0.00	57.25	542.96	0.00	0.00	11.38	07/01/24	1/13/60		

Tenant Name	Unit	Unit Type	Sq Ft	Market Rent	Rent	Vacancy Loss	Misc Charges	Total Charges	Balance	Security Deposit	Increase Amount	Last Rent Increase	Move In	Move Out	Lease End
Del Carmen Ibarra, 98	98	Space	0	0.00	476.77	0.00	57.25	534.02	-0.70	0.00	11.17	07/01/24	2/1/16		
<VACANT>	99	Space	0	0.00	0.00	0.00	57.25	57.25	0.00	0.00	0.00				
Frescas, Pedro	100	Space	0	0.00	469.32	0.00	57.25	526.57	0.00	0.00	11.00	07/01/24	8/1/18		
All, Shaqat	101	Space	0	0.00	480.53	0.00	57.25	537.78	0.00	0.00	11.26	07/01/24	1/13/60		
Olivares/Martinez N	102	Space	0	0.00	487.28	0.00	57.25	544.53	0.00	0.00	11.42	07/01/24	1/13/60		
Lopez, Barios	103	Space	0	0.00	473.97	0.00	57.25	531.22	0.00	0.00	11.11	07/01/24	1/13/60		
Padilla, Sylvia	104	Space	0	0.00	463.44	0.00	57.25	520.69	0.00	0.00	10.86	07/01/24	1/13/60		
Gonzalo Ortiz, Jesu	105	Space	0	0.00	472.70	0.00	57.25	529.95	0.00	0.00	11.08	07/01/24	1/13/60		
Medina, Patricia	106	Space	0	0.00	486.56	0.00	132.25	618.81	-61.15	0.00	11.40	07/01/24	1/13/60		
Cardenas, Javier	107	Space	0	0.00	464.79	0.00	57.25	522.04	0.00	0.00	10.89	07/01/24	1/13/60		
Morris, Sherman	108	Space	0	0.00	479.14	0.00	57.25	536.39	0.00	0.00	11.23	07/01/24	1/13/60		
Torres/Hernandez, .	109	Space	0	0.00	476.45	0.00	57.25	533.70	-0.23	0.00	11.17	07/01/24	1/13/60		
Alcantar & Ramos, I	110	Space	0	0.00	459.24	0.00	57.25	516.49	0.00	0.00	10.76	07/01/24	1/13/60		
Miranda-Sanchez, I	111	Space	0	0.00	462.55	0.00	57.25	519.80	0.00	462.55	462.55	04/01/24	3/20/24		2/29/44
Solorio, Reinaldo	112	Space	0	0.00	473.73	0.00	57.25	530.98	0.00	0.00	11.10	07/01/24	1/13/60		
Passmore, Wilma	113	Space	0	0.00	488.92	0.00	57.25	546.17	0.00	0.00	11.46	07/01/24	1/13/60		
Estrada, Mario	114	Space	0	0.00	469.93	0.00	57.25	527.18	0.00	0.00	11.01	07/01/24	1/13/60		
Singh, Fakir & Kaur	115	Space	0	0.00	464.09	0.00	57.25	521.34	0.00	0.00	10.88	07/01/24	1/13/60		
Cazares, Rafael	116	Space	0	0.00	439.20	0.00	57.25	496.45	0.00	0.00	10.29	07/01/24	1/13/60		
Perez & Mendoza, I	117	Space	0	0.00	477.80	0.00	57.25	535.05	0.00	0.00	11.20	07/01/24	1/13/60		
Carrillo, Francisco	118	Space	0	0.00	472.28	0.00	57.25	529.53	0.00	0.00	11.07	07/01/24	1/13/60		
Aceves Cisneros, J	119	Space	0	0.00	479.35	0.00	57.25	536.60	0.00	0.00	11.23	07/01/24	1/13/60		
Singh, Jasbinder	121	Space	0	0.00	475.72	0.00	57.25	532.97	0.00	0.00	11.15	07/01/24	1/13/60		
Lopez & Stiles, Edg	122	Space	0	0.00	475.72	0.00	57.25	532.97	-0.03	0.00	11.15	07/01/24	4/20/22		
Brannan & Goss, Tl	123	Space	0	0.00	490.34	0.00	57.25	547.59	0.00	0.00	11.49	07/01/24	10/1/21		
Duque Barajas, Jes	124	Space	0	0.00	493.45	0.00	57.25	550.70	0.00	0.00	11.50	07/01/24	1/13/60		
Chavez, Marbin & k	125	Space	0	0.00	480.73	0.00	57.25	538.00	0.00	0.00	11.57	07/01/24	1/13/60		
Lopez, Salvador/Lyr	126	Space	0	0.00	474.32	0.00	132.25	606.57	0.00	0.00	11.12	07/01/24	1/13/60		
Chavez, Adriana	127	Space	0	0.00	478.30	0.00	57.25	535.55	0.00	0.00	11.21	07/01/24	1/13/60		
Duran, Miguel	128	Space	0	0.00	473.02	0.00	57.25	530.27	0.00	0.00	11.09	07/01/24	1/13/60		
Munoz, Joseph & J	129	Space	0	0.00	469.10	0.00	57.25	526.35	0.00	0.00	10.99	07/01/24	5/26/21		
Acosta, Armando	130	Space	0	0.00	470.05	0.00	57.25	527.30	0.00	0.00	11.02	07/01/24	1/13/60		
Anaya, Yolanda	131	Space	0	0.00	475.20	0.00	57.25	532.45	0.00	0.00	11.14	07/01/24	1/13/60		
Coyazo & Ochoa, J	132	Space	0	0.00	506.08	0.00	57.25	563.33	-70.07	200.00	11.86	07/01/24	6/24/19		
Neuenschwander &	133	Space	0	0.00	501.65	0.00	57.25	558.90	0.00	0.00	11.76	07/01/24	6/20/22		
Macias, Aldo	134	Space	0	0.00	603.06	0.00	57.25	660.31	0.00	569.52	33.54	01/01/24	11/22/22		10/31/42
Tovar, Mitham	135	Space	0	0.00	490.69	0.00	57.25	547.94	-0.80	0.00	11.50	07/01/24	1/13/60		
Pelayo, Cecilia	136	Space	0	0.00	476.23	0.00	57.25	533.48	0.00	0.00	11.16	07/01/24	5/20/22		
Covarrubias, Salvat	137	Space	0	0.00	497.39	0.00	57.25	554.64	-20.00	0.00	11.66	07/01/24	1/13/60		
Lopez, Juan & Mari	199	Space	0	0.00	470.10	0.00	57.25	527.35	0.00	0.00	11.02	07/01/24	1/13/60		
Gonzalez Ruiz, R	200	Space	0	0.00	503.23	0.00	57.25	560.48	0.00	0.00	11.79	07/01/24	1/13/60		
Marindale, John	201	Space	0	0.00	491.05	0.00	57.25	548.30	0.00	0.00	11.51	07/01/24	1/13/60		
Reyes, Miguel	202	Space	0	0.00	469.28	0.00	57.25	526.53	0.00	0.00	11.00	07/01/24	1/13/60		
Cazres, Juan & Aur	203	Space	0	0.00	491.19	0.00	57.25	548.44	0.00	0.00	11.51	07/01/24	1/13/60		
Moreno, Jacqueline	204	Space	0	0.00	869.00	0.00	57.25	926.25	0.00	869.00	869.00	02/01/24	1/4/24		12/31/43
Levers, Brian	205	Space	0	0.00	499.44	0.00	102.25	601.69	-2,279.27	0.00	11.71	07/01/24	1/13/60		

Tenant Name	Unit	Unit Type	Sq Ft	Market Rent	Rent	Vacancy Loss	Misc Charges	Total Charges	Balance	Security Deposit	Increase Amount	Last Rent Increase	Move In	Move Out	Lease End	
Cazares, Abel, Raq	206	Space	0	0.00	503.72	0.00	57.25	560.97	0.00	0.00	11.81	07/01/24	1/21/19			
Garcia, Maria	207	Space	0	0.00	483.41	0.00	57.25	540.66	0.00	0.00	11.33	07/01/24	1/13/60			
Paul & Hogan, Aarc	208	Space	0	0.00	495.96	0.00	57.25	553.21	-1.99	0.00	11.62	07/01/24	11/1/17			
Iqbal, Amin+, Miha	209	Space	0	0.00	509.80	0.00	57.25	567.05	0.00	0.00	11.95	07/01/24	4/27/20			
Ibarra, Amelia & Se	210	Space	0	0.00	502.94	0.00	57.25	560.19	-890.84	0.00	11.79	07/01/24	1/13/60			
Choudhry, Hira	211	Space	0	0.00	483.56	0.00	57.25	540.81	0.00	0.00	11.33	07/01/24	1/1/21			
Kasmire, Pamela	251	Space	0	0.00	475.82	0.00	57.25	533.07	-0.06	0.00	11.15	07/01/24	1/13/60			
Godinez, Benjamin	252	Space	0	0.00	498.49	0.00	57.25	555.74	0.00	0.00	11.68	07/01/24	1/13/60			
Ocegueda, Leticia	253	Space	0	0.00	487.19	0.00	57.25	544.44	0.00	0.00	11.42	07/01/24	1/13/60			
Ocegueda, Ivan & S	254	Space	0	0.00	471.72	0.00	57.25	528.97	0.00	0.00	11.06	07/01/24	12/9/19			
Cazares, Gema	255	Space	0	0.00	481.76	0.00	57.25	539.01	0.00	0.00	11.29	07/01/24	1/13/60			
Ibarra, Josefina	256	Space	0	0.00	479.13	0.00	57.25	536.38	0.00	0.00	11.23	07/01/24	1/13/60			
Chavez, Licea	257	Space	0	0.00	481.57	0.00	57.25	538.82	0.00	0.00	11.29	07/01/24	1/13/60			
Beck, Deborah	258	Space	0	0.00	482.39	0.00	57.25	539.64	0.00	0.00	11.31	07/01/24	1/13/60			
Diaz, Ermilio/Ernes	260	Space	0	0.00	446.66	0.00	132.25	578.91	0.00	0.00	10.47	07/01/24	1/13/60			
Guzman, Norberto	261	Space	0	0.00	481.33	0.00	57.25	538.58	0.00	0.00	11.28	07/01/24	1/13/60			
Cervantes & Cervar	262	Space	0	0.00	468.87	0.00	57.25	526.12	0.00	0.00	10.99	07/01/24	1/13/60			
Gutierrez, Juan	263	Space	0	0.00	509.75	0.00	57.25	567.00	0.00	0.00	11.95	07/01/24	7/1/09			
Barajas, Maria	264	Space	0	0.00	468.44	0.00	57.25	525.69	-0.54	0.00	10.98	07/01/24	1/13/60			
Gonzalez, Juan	265	Space	0	0.00	471.38	0.00	57.25	528.63	0.00	0.00	11.05	07/01/24	1/13/60			
Camacho, Alma	266	Space	0	0.00	461.00	0.00	57.25	518.25	0.00	0.00	10.80	07/01/24	1/13/60			
Canillo Rubalcava, I	267	Space	0	0.00	447.54	0.00	57.25	504.79	0.00	447.54	447.54	07/01/24	5/20/24		4/30/44	
Mustafa, Ghulam	268	Space	0	0.00	450.34	0.00	57.25	507.59	0.00	0.00	10.55	07/01/24	1/13/60			
<VACANT>	STOR 1	Storage	0	0.00	0.00	0.00	57.25	57.25	0.00	0.00	0.00					
Totals for Idle Wheel MHP, LLC					0	0.00	71,128.62	81,042.87	-3,912.60	3,951.25	4,327.49					

Sq Ft	Market Rent	Rent	Vacancy Loss	Misc Charges	Total Charges	Balance	Security Deposit	Increase Amount
0	0.00	71,128.62	0.00	9,914.25	81,042.87	-3,912.60	3,951.25	4,327.49

Report Summary

Detail	Value
Total Possible Rent	71,128.62
Vacancy Rent	0.00
Occupied Unit Rent	71,128.62
# of Units	154
Vacant Units	5
Occupancy	96.75%

VI. Authorized Representative

Please provide the name and contact information of the person designated to receive all required notices and correspondence for the owner(s) regarding this park:

Name: Ron Ubaldi
 Address: 4653 Embarcadero Dr Ste C
 City: Stockton State: CA Zip: 95219
 Tel. No.: 209-932-8747
 Facsimile No.: _____

VII. Certification

I certify that I am authorized to submit this Annual Registration on behalf of the above-named manufactured home park owner(s), and I hereby declare, to the best of my knowledge and under penalty of perjury, that the foregoing statements are true and correct.

Ron Ubaldi [Signature] LLC manager 12/15/24
 Name (print) Signature Capacity Date

VIII. Registration Fee

The Registration Fee must be submitted at the time of filing this Annual Registration. Receipt of the Registration Fee is to be acknowledged on this form by the Woodland City Clerk or his/her designee.

a. Number of manufactured home rental spaces <i>not</i> exempt from the Registration Fee (add lines (c) and (d) of Part III):	<u>154</u>
b. Registration Fee at \$30 per space:	<u>\$30.00</u>
c. Multiply lines (a) and (b) above. Enter result here:	<u>4620.00</u>

Receipt of \$ 4,620.00, paid by check number 1038, is hereby acknowledged by the Woodland City Clerk or his/her designee:

Franklin Cui [Signature] Housing Analyst II 2/28/25
 Name (print) Signature Title Date

**City of Woodland
Manufactured Home Fair Practices Commission
2025 ANNUAL PERMISSIVE ADJUSTMENT APPLICATION**

Instructions: By submitting this completed application, the applicant requests an Annual Permissive Adjustment as provided by Section 5.36.080(c)(1) of the Woodland City Code. Information contained in the park's Annual Registration (except as updated in Part IV of this form) will be used to calculate the Annual Permissive Adjustment for each non-exempt manufactured home space.

I. Manufactured Home Park Information

1. Park Name: Idle Wheel MHP, LLC
2. Park Address: 907 Bowen Dr. Woodland, CA 95776

II. Applicant Information

1. Name of Applicant: Idle Wheel MHP LLC
2. Business Address: 6653 Embarcadero Dr. Ste C
Stockton, CA 95219
3. Telephone: (209) 932-8747 Facsimile: _____
4. Applicant's relationship to Park: Owner

III. Verification

1. I hereby certify that I am authorized to submit this application and supporting documentation on behalf of the owner of the manufactured home park identified above in Part I.
2. I declare under penalty of perjury under the laws of the State of California that the information provided on this application, including Part IV "Exemption Update", if attached hereto, is true and correct to the best of my knowledge.

Ronald Ubaldi
Name (print)

[Signature]
Signature

LC manager
Capacity

3/15/25
Date

IV. Exemption Update

Instructions: Please refer to Part V "Exemption Schedule" of the most recent Annual Registration for this manufactured home park. Provide the information requested below only for any space that (1) was previously exempt but is no longer claimed to be exempt from the Space Rent Ceiling, or (2) was previously non-exempt but an exemption is now claimed. Please update the status of such spaces by indicating the current Term of the rental agreement, its Expiration Date, and whether an exemption is currently claimed by the park owner(s). For each space newly claimed to be exempt from the Space Rent Ceiling, supporting documentation MUST be attached.

LTL = long term lease

Space No.	Term of rental agreement	Expiration date of rental agreement	Claimed exemption from the Space Rent Ceiling? (If yes, provide reason and attach supporting documentation)
7	20	2/29/44	LTL
12	20	2/3/44	LTL
15	20	3/31/44	LTL
32	20	8/31/44	LTL
37	20	11/30/43	LTL
58	20	9/30/44	LTL
68	20	11/30/43	LTL
111	20	2/29/44	LTL
134	20	10/31/42	LTL
204	20	12/31/43	LTL
267	20	4/30/44	LTL
3	20	1/31/45	LTL
26	20	11/30/44	LTL
115	20	2/28/45	LTL



BBK
BEST BEST & KRIEGER LLP
ATTORNEYS AT LAW

Jessica K. Lomakin
Partner
(909) 483-6643
jessica.lomakin@bbklaw.com

File No. 82093.00006

January 9, 2026

VIA E-MAIL AND U.S. MAIL

Jason Dilday
Harmony Communities
6653 Embarcadero Dr. Ste. C
Stockton, CA 95219
Jason@harmonycom.com

Re: City of Woodland - Idle Wheel Space Rent Exemptions

Dear Mr. Dilday:

Thank you for your email dated October 30, 2025, regarding the applicability of Woodland Municipal Code (“WMC”) Chapter 5.36 to the long-term rental agreements identified at Idle Wheel. The City has reviewed your correspondence and respectfully maintains its position as set forth in my October 24, 2025, letter regarding Idle Wheel space rent exemptions.

As stated in that letter, the City continues to find that WMC section 5.36.030(B)’s long-term lease exemption is expressly tied to Civil Code section 798.17, and that the exemption terminated with the repeal of Civil Code section 798.17. As you know, the subject ordinance originated as a voter-approved initiative that the City later implemented through the Municipal Code in Ordinance No. 1362, which amended former Chapter 16B. To the extent any ambiguity exists within the ordinance’s reference to state law, the determining factor is legislative and where applicable, voter intent. (*People v. Domagalski* (1989) 214 Cal.App.3d 1380, 1386; *People v. Superior Court (Pearson)* (2010) 48 Cal.4th 564, 571.)

The early implementation discussions note deliberate removal of noticing requirements that had been tied to the long term lease exemption, based upon the understanding that the terms and notices for long term leases were governed by State law. In other words, City’s implementation reflected an intent to incorporate and follow the state statutory framework.

Nothing in the ordinance contains time-specific language and no basis to conclude the voters intended to prohibit future amendments. To the contrary, the implementation discussions acknowledge an intent and preference to track and to operate in harmony with the State law.

Accordingly, the City continues to conclude that Idle Wheel’s claimed long-term lease exemptions are no longer valid under the City’s ordinance and that the Park is out of compliance with the space rent ceiling requirements for the affected spaces.

Best Best & Krieger LLP | 2855 E. Guasti Road, Suite 400, Ontario, California 91761
Phone: (909) 989-8584 | Fax: (909) 944-1441 | bbklaw.com

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Jason Dilday
January 9, 2026
Page 2

Consistent with this position, City staff will be bringing a recommendation to the Manufactured Home Fair Practices Commission at its January 29, 2026, meeting to approve the 2025 Annual Permissive Adjustment application for the Park's 154 rent-controlled spaces, while denying the requested long-term lease exemptions for the 14 identified spaces: 7, 12, 15, 32, 37, 58, 68, 111, 134, 204, 267, 3, 26, 115.

Please note that the Commission's action will be taken at a public meeting, and any final determinations will be reflected in the Commission's action and related notices.

Sincerely,



Jessica K. Lomakin
of BEST BEST & KRIEGER LLP

JKL:rb

Erika Bumgardner

From: Jason Dilday <jason@harmonycom.com>
Sent: Monday, November 24, 2025 2:25 PM
To: Erika Bumgardner
Subject: FW: Idle Wheel Space Rent Exemptions

From: Jason Dilday
Sent: Thursday, October 30, 2025 5:02 PM
To: 'Rochelle.Burris@bbklaw.com' <Rochelle.Burris@bbklaw.com>; 'jessica.lomakin@bbklaw.com' <jessica.lomakin@bbklaw.com>
Cc: Matt Davies <matt@harmonycom.com>
Subject: RE: Idle Wheel Space Rent Exemptions

Dear Ms. Lomakin:

Thank you for your letter dated October 24, 2025, regarding the applicability of the Rent Control Ordinance (“MRSO”) to long-term rental agreements at Idle Wheel. We understand the City’s position to be that, because Civil Code section 798.17 has been repealed, the MRSO’s exemption for qualifying leases no longer applies. We respectfully disagree.

The MRSO establishes an independent local exemption, not a mere deferral to state law. Your letter asserts that WMC section 5.36.030(B) “is limited to agreements meeting all requirements of Section 798.17 of the California Civil Code,” and that because section 798.17 “no longer exists,” there is “no separate or independent basis for exemption.” That interpretation overlooks both the language and structure of Chapter 5.36.

Voters adopted the MRSO via ballot measure in 2001, establishing their own mandatory exemption for long-term leases meeting the section 798.17 criteria, repeating it in multiple places: WMC § 5.36.030(B): “The space-rent-ceiling provision of this chapter shall not apply to any tenancy ... covered by a rental agreement meeting all the requirements of Section 798.17 ... for the duration of such agreement.” WMC § 5.36.150(D)(1): “Rental agreements ... which meet the criteria of Civil Code § 798.17 are exempt from the rental-rate restrictions of this chapter.” WMC § 5.36.070(C): provides that when such a lease expires, “the rent in effect immediately prior to expiration shall become the space-rent ceiling.”

Because section 798.17 was already self-executing and preemptive when the MRSO was adopted, there was no need for the voters to mention it at all unless they intended to create a local, stand-alone exemption. The inclusion of multiple cross-references and implementing provisions confirms that intent.

Repeal of section 798.17 does not repeal the City’s ordinance. Under settled California law, when one enactment incorporates another by specific reference, the adoption freezes the incorporated text as it existed at the time of adoption, and later amendments or repeal of the referenced statute do not alter the adopting law absent clear contrary intent. See *Palermo v. Stockton Theatres, Inc.* (1948) 32 Cal.2d 53, 58–59; *People v. Pieters* (1991) 52 Cal.3d 894, 902 n.8; *San Bernardino County Sheriff’s Employees’ Benefit Assn. v. Board of Supervisors* (1992) 7 Cal.App.4th 602, 604–605 (applying Palermo to hold that a specific reference in Gov. Code § 3508 to a Penal Code chapter incorporated it as of 1971, unaffected by 1980 amendments).

By contrast, only a general reference—to an entire “system or body of laws”—automatically tracks future legislative changes. *In re Jovan B.* (1993) 6 Cal.4th 801, 816–817. Woodland’s ordinance uses a specific cross-reference to one statute (“Civil Code § 798.17”), not to a body of law. Consequently, the repeal of section 798.17 does not erase the City’s exemption.

AB 2782 restored local discretion—it did not void local exemptions. Assembly Bill 2782 (Stats. 2020, ch. 35) simply repealed the statewide pre-emption that once compelled local governments to honor section 798.17 leases. The Legislature did not require cities to regulate those leases, nor did it invalidate local ordinances that already contained exemptions. Woodland remains free to maintain or amend its exemption by local legislative act, but absent such an amendment, the existing text governs.

The City’s contrary interpretation renders several sections meaningless. Reading the ordinance as a mere “deferral” to state law would make sections 5.36.030(B), 5.36.070(C), 5.36.060(A), and 5.36.150(D)(1) surplusage—contrary to the rule that every clause of an ordinance must be given effect where possible. The City’s interpretation would also imply that the voters inserted long-term-lease provisions with no legal purpose during a period of complete state pre-emption—an implausible construction.

Application to Idle Wheel. If the leases for Spaces 12, 37, 68, 134, and 204 satisfy the substantive criteria of former Civil Code section 798.17 as of the MRSO’s adoption (e.g., term of 12 months or more, statutory disclosure, and right of cancellation) then they fall squarely within the MRSO’s continuing exemption for the duration of each agreement.

The Park will, of course, comply with all registration and reporting obligations under the MRSO and will remit any applicable fees. Based on Mr. Cui’s recent email, the Park owes \$150 for 2023 registration fees. Please confirm the preferred payment method so that we may remit payment immediately.

We respectfully request written confirmation that the long-term leases identified above remain exempt from the MRSO’s rent-ceiling provisions consistent with the plain text of Chapter 5.36 and the governing principles outlined herein.

Thank you.

Jason

From: Rochelle Burris <Rochelle.Burris@bbklaw.com>
Date: October 24, 2025 at 3:09:20 PM PDT
To: Matt Davies <matt@harmonycom.com>
Cc: Jessica Lomakin <jessica.lomakin@bbklaw.com>
Subject: Idle Wheel Space Rent Exemptions

Good afternoon,

Please see the attached correspondence from Ms. Lomakin.

Thank you.



Rochelle Burris
Legal Practice Assistant
rochelle.burris@bbklaw.com
T: (213) 617-7494
bbklaw.com | 



BBK
 BEST BEST & KRIEGER LLP
 ATTORNEYS AT LAW

Jessica K. Lomakin
 Partner
 (909) 483-6643
 jessica.lomakin@bbklaw.com

October 24, 2025

Matt Davies
 Harmony Communities
 6653 Embarcadero Dr. Ste. C
 Stockton, CA 95219
Matt@HarmonyCom.com

Re: Idle Wheel Space Rent Exemptions

Dear Mr. Davies:

I am in receipt of your email correspondence of October 14, 2025. Please note, the exemption identified by Woodland Municipal Code (“WMC”) § 5.36.030(B) is limited to agreements meeting all requirements of Section 798.17 of the California Civil Code. As of January 1, 2025, there are no requirements of California Civil Code Section 798.17 because Section 798.17 no longer exists and WMC contains no separate or independent basis for exemption of similar agreements. Moreover, in Idle Wheel, the spaces at issue: 12, 37, 68, 134, and 204 (the “Spaces”), are subject to rental agreements signed *after* the prior sunset date of February 13, 2020 and consequently, have actually been subject to the Space Rent Ceiling for some time. For these reasons, the City does not recognize these as exempt from the Manufactured Home Space Rent Control Ordinance in Chapter 5.36 of the WMC.

As you know, the 2025 annual registration for mobile home parks is due to the Manufactured Home Fair Practices Commission (MHFPC) on December 31, 2025. The City understands Idle Wheel is seeking to submit a fair return application (“Request for NOI Adjustment”) in the following year. According to Section WMC § 5.36.140(G)(3)(a), “An application shall be deemed complete when, among other things: (a) the park is current in all registration and registration fee requirements.”

Upon payment of current registration fees, a Request for NOI Adjustment may be considered. The City is hopeful that we can work in tandem, rather than in conflict to foster the City’s and Harmony’s goals for furthering affordable housing to its residents.

Should you have any further questions or comments regarding this matter, please feel free to contact the undersigned.

Sincerely,

Jessica Lomakin
 of BEST BEST & KRIEGER LLP

JKL

Best Best & Krieger LLP | 2855 E. Guasti Road, Suite 400, Ontario, California 91761
 Phone: (909) 989-8584 | Fax: (909) 944-1441 | bbklaw.com

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Erika Bumgardner

From: Matt Davies <matt@harmonycom.com>
Sent: Tuesday, October 14, 2025 12:02 PM
To: Franklin Cui; Jessica Lomakin
Cc: Erika Bumgardner; Katharine Apicella; Ethan Walsh; Jason Dilday; rochelle.burris@bbklaw.com
Subject: RE: Bells Trailer Village

Hello Franklin,

We have reviewed Ms. Lomakin's letter and, for the reasons previously discussed, respectfully disagree with her analysis of the Ordinance's long-term lease exemption. Please advise if there is an appeal process for the Commission's denial. If no appeal process exists, the only resolution coming to mind is a declaratory relief action in Yolo County Superior Court as a potential resolution. I do think if you take a more thorough read through your ordinance you will realize the exemption remains and it is there for a good longstanding reason. If you'd like to discuss options I am available for a call around your schedule.

Regards,

Matt Davies

Harmony Communities

6653 Embarcadero Dr. Ste. C

Stockton, CA 95219

Cell: (209) 601-4538

Main: (209) 932-8747

Matt@HarmonyCom.com



Jessica K. Lomakin
Partner
(909) 483-6643
jessica.lomakin@bbklaw.com

File No. 82093.00006

September 8, 2025

VIA E-MAIL

Matt Davies
Harmony Communities
6653 Embarcadero Dr. Ste. C
Stockton, CA 95219
Matt@HarmonyCom.com

Re: Idle Wheel Space Rent Exemptions

Dear Mr. Davies:

Please be advised that the law firm of Best Best & Krieger LLP represents the City of Woodland as City Attorney. The City has reviewed Harmony Communities' ("Harmony") correspondence dated July 28, 2025, regarding the City's denial of certain space rent exemptions under the City's Manufactured Home Space Rent Control Ordinance, codified at Woodland Municipal Code ("WMC") § 5.36 (the "Ordinance").

Regarding the long-term lease exemptions previously requested by Idle Wheel, as you know, prior to its repeal effective January 1, 2025, California Civil Code § 798.17 exempted mobilehome spaces subject to rental agreements exceeding 12 months (a "long-term rental agreement") from local rent control ordinances. In light of that statutory exemption, many jurisdictions, including Woodland, adopted corresponding provisions exempting spaces subject to such long-term agreements in order to avoid conflict with state law.

In Woodland, the Ordinance provided that rent ceiling provisions did not apply to any tenancy in a manufactured home park "covered by a rental agreement meeting all the requirements of Section 798.17 of the California Civil Code for the duration of such agreement." (WMC § 5.36.030(b).) Because the WMC exemption is expressly tied to Civil Code § 798.17, it expired with the repeal of that statute. The Ordinance includes no language creating a separate or independent exemption for long-term agreements. Accordingly, there is no longer a basis for exemption under the Ordinance. Tenancies were exempt only if they met all requirements of former Civil Code § 798.17. With the repeal of that section, there are no longer any operative statutory requirements, and thus no qualifying exempt tenancies.

Therefore, the City upholds the previous request for a response to the July 15, 2024 exemptions denial letter for Spaces 12, 37, 68, 134, 204, as well as subsequent City email requests for further clarifications regarding space rents of the aforementioned spaces in the denial letter.

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Matt Davies
September 8, 2025
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Additionally, and notwithstanding the foregoing, the City confirms that the Space rent provisions of the Ordinance do not apply to recreational vehicles parked in manufactured home parks within the City. Therefore, the City is willing to approve the exemption request from Bell's Trailer Village for Space No. 10, 13, 33, 35 in the permissive adjustment application dated May 20, 2025.

If you have any questions regarding the foregoing, or wish to discuss the Ordinance further, please do not hesitate to contact me. With respect to any further challenge or appeal of the City's application of its Ordinance, the City recommends that Harmony seek independent legal counsel for further guidance.

Sincerely,



Jessica K. Lomakin
of BEST BEST & KRIEGER LLP

JKL:rb