

TOWN OF WINDSOR AGENDA REPORT

Joint Windsor Town Council, Windsor Redevelopment Successor Agency and Windsor Water District Meeting Date: October 1, 2025

To: Mayor and Town Council
From: Jennifer Sedna, Planner I
Subject: Urgency Ordinance – Moratorium on Closure or Conversion of Mobile Home Parks

Recommendation to Council:

Adopt an urgency ordinance, making findings and establishing a town-wide moratorium on the closure or conversion of mobile home parks to become effective immediately.

Strategic Plan Element:

The recommended action supports the goal of Livability. Goal Statement: Preserve community character by maximizing the use of existing amenities and creating future opportunities that enhance quality of life for all.

Background:

Title VIII of the Town of Windsor Municipal Code includes mobile home regulations and incorporates the Mobile Home Rent Stabilization Ordinance as Chapter 1, and Conversion of Mobile Home Parks to Other Uses Ordinance as Chapter 2 (Attachment 2). Chapter 1 was first adopted by Ordinance 92-25 on October 28, 1992, and later amended in December of 1995 by Ordinance 95-70. Due to concerns about rent increases outpacing the fixed income on which many mobile home park residents rely, Chapter 1 was amended to its current version on February 1, 2023 (Ordinance 2023-373). Chapter 2, Conversion of Mobile Home Parks to Other Uses, was adopted by Ordinance 95-58 on February 15, 1995, and has not been modified in the ensuing 30 years (Attachment 2).

A mobile home is typically owned by its occupant and located on rented space in a mobile home park. Windsor has four mobile home parks with a total of approximately 569 spaces located within Town limits (Table 1 on Attachment 3). These spaces represent a significant portion of the affordable housing supply within the Town and the most affordable housing that is not deed restricted. Half of the Town's mobile home parks, and 80% of the spaces are restricted to seniors, many of whom live on fixed incomes. The tenants and homeowners in mobile home parks make up some of Windsor's most economically vulnerable residents, including seniors and families that qualify as extremely-low, very-low, or low income, immigrants, and individuals with disabilities.

All income-restricted affordable housing in the Town has existing waiting lists. The Housing Choice Voucher Program (also called Section 8), a federal program implemented by the County, currently has 575 names of applicants waiting to be housed. The last open application period for the waitlist was October 2023 which had 750 households placed on the wait list. Therefore, there is no equivalent, or nearly equivalent, immediate source of replacement housing. The vulnerable population that resides in mobile home parks are the least able to accommodate the costs, time and job relocation that rehousing demands. Given the high costs of rents and low vacancies in the County, it is probable that the closure of a mobile home park may result in some residents, including senior citizens, becoming homeless.

Over the past several months, residents of at least one of Windsor's mobile home parks have attended Town Council meetings to request support in response to proposed rent increases and threatened park closure from park ownership.

Windsor's General Plan 2040 includes a land use designation for Mobile Home Parks which recognizes the existing land that is devoted to mobile home parks and is intended to preserve its use as a mobile home park. However, Windsor's zoning code which implements the Mobile Home Park land use designation in the General Plan is Medium Density Residential which allows for residential uses other than mobile home parks.

Discussion:

With specific legislation regulating tenancies of mobile homeowners, the State of California recognizes that there is a significant difference between homeowners in mobile home parks and other dwelling units. Owners of mobile homes in mobile home parks, unlike apartment tenants or residents of other types of rental housing, are in the unique position of having made a substantial investment in a residence that is located on property that is either rented or leased and not owned. In many instances relocation requires separation of the mobile home from its appurtenances, which may create severe damage and depreciation in value. Not only is it cost-prohibitive, there is limited availability of vacant spaces, and some mobile home parks, by policy, do not accept used mobile homes.

Where land values and development pressure are high, there is a threat of conversion of mobile home parks. Mobile home parks have relatively transitory infrastructure, which is inexpensive to convert to another use, such as a residential subdivision. If the new use provides a higher return on the investment, there is a strong incentive for park owners to convert the use. Since space rent stabilization ordinances limit potential revenue growth, they add to the potential incentive for a park owner to seek conversion. The Town amended the rent stabilization ordinance in 2023, which could result in a higher likelihood of park owners seeking mobile home park conversion.

According to tenant advocates that have communicated with staff, a recent trend has seen national investment companies purchasing mobile home parks and subsequently leveraging the threat of park closures to pressure residents into making decisions that are contrary to or that waive their rights to local regulations including rent stabilization. One such company has employed this tactic in Petaluma, Cotati, Santa Rosa, and most recently in Windsor, according to testimony delivered at Council meetings.

Since the Town's municipal code section for the conversion and closure of mobile home parks was adopted over 30 years ago (Attachment 2), it predates modern standards established under State law. It may also fail to recognize the housing constraints presently in the County. Therefore, it cannot ensure that the impacts of proposed closures are fully represented and adequately mitigated in the relocation plans. Closure of a mobile home park without adequate notice and lead time for the Town to prepare threatens the public health, safety, and welfare by increasing the risk of homelessness within the community, placing greater demand on local services and resources, destabilizing neighborhoods, and contributing to economic strain and social disruption.

Mobile home parks make up a significant share of Windsor's affordable housing supply and are the Town's largest source of non-deed-restricted affordable units. The moratorium on closure or conversion of mobile home parks under consideration by the Council would allow staff time to review and update Town ordinances to both safeguard this important housing resource and recognize the rights and expectations of park owners. Adoption of the moratorium also advances Housing Element goals to maintain and improve existing housing stock and specifically implements policies supporting the

preservation of mobile home parks (Policies H-15 and H-19). Beyond the direct impacts to residents, permanent closure or conversion of these parks would substantially reduce the Town's affordable housing inventory and could affect broader policy objectives, including Windsor's Prohousing Designation status.

This urgency ordinance requires a 4/5 vote for the Town Council to adopt and would sunset after 45 days, unless extended by Council. Should the ordinance be adopted, a town-wide moratorium would apply to the closure or conversion of all mobile home parks. Approval of the moratorium would provide the Town the time required to perform the necessary analysis amendments to its municipal codes, zoning code, use permit requirements, and other land use entitlement requirements for mobile home parks. Any proposed zoning code amendments would first be considered by the Planning Commission with recommendations to the Town Council.

Fiscal Impact:

There are no financial impacts associated with this Urgency Ordinance. A town-wide moratorium on the closure or conversion of mobile home parks would not directly affect the General Fund.

Environmental Review:

The adoption of this urgency ordinance is exempt from the California Environmental Quality Act pursuant to Section 15308 because it is a regulatory action taken by the Town, in accordance with Government Code section 65858, to assure maintenance and protection of the environment pending the evaluation and adoption of contemplated local legislation, regulation and policies. Additionally, the ordinance is not a "project" within the meaning of Section 15378 of the State CEQA Guidelines, because adoption of a temporary moratorium has no potential to result in a direct or reasonably foreseeable indirect physical change in the environment. It temporarily prevents certain physical changes in the environment pending the Town's study and potential amendments to the municipal code or policies regulating the conversion or closure of mobile home parks.

Attachment(s):

- 1. Urgency Ordinance
- 2. Chapter 2. Conversion of MHP to Other Uses
- 3. Table 1
- 13.2 Correspondence Received (Distributed 2025.09.29)
- 13.2 Urgency Ordinance - Moratorium MHP PowerPoint (Distributed 2025.09.29)
- 13.2 Correspondence Received (Distributed 2025.09.30)
- 13.2 Correspondence Received (Distributed 2025.10.01)

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