

## **WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT**

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In accordance with California Government Code Section 65863.7(d), and the City of Oxnard Municipal Code, Chapter 24, Article II. Mobilehome Park Closures, Section 24-30 through 24-42 inclusive, the owner of Wagon Wheel Trailer Lodge (“Wagon Wheel” or the “Park”), Oxnard Village Investments, LLC, is: (i) submitting this Closure Impact Report to the City of Oxnard, and (ii) requesting a hearing before the City Council to determine the sufficiency of the report. The affected residents of the park will be given the appropriate notices prior to the hearing.

### **1 EXECUTIVE SUMMARY.**

Wagon Wheel Trailer Lodge (“Wagon Wheel” or the “Park”), is a 171 space mobilehome and recreational vehicle park located at 2851 Wagon Wheel Road, Oxnard, California. Wagon Wheel was originally constructed in 1953 with an expansion in 1957. Wagon Wheel has reached the end of its useful life as a mobilehome and recreational vehicle park. Like other mobilehome and recreational vehicle parks of that era, the Wagon Wheel Trailer Lodge was originally intended as an interim use with an economic life of 20 to 30 years. As such, Wagon Wheel has been in operation as a mobilehome park for some 20 to 30 years beyond its originally envisioned economic life and a complete overhaul of the Park’s existing infrastructure would need to be undertaken if Wagon Wheel were to continue operating as a mobilehome and recreational vehicle park. Such an investment is not economically justifiable at this time, especially given the changes in the surrounding area, which make it clear that a mobilehome park use is no longer the highest and best use of the property. In light of the foregoing, Wagon Wheel’s owner has made the difficult decision to cease operating the property as a mobilehome park. Ownership intends to redevelop the property as part of a larger project including the surrounding areas for use as condominiums and townhomes with some commercial development. Concurrent with the closure of the Park, the owner intends to seek approval to convert the zoning and entitlements of the site.

The residents of Wagon Wheel vary widely in age, income, and racial composition. A survey of residents was prepared and sent, with a follow up sent to those who did not respond to the first survey. There has been a considerable level of response to these surveys. Follow up phone calls were made to Residents that omitted information in their surveys. Space by space interviews will be conducted, as needed, to assist each resident in evaluating how best to achieve relocation.

This report, known as a Closure Impact Report, (“CIR”), is part of the closure process for Wagon Wheel and is required pursuant to California Government Code §65863.7(d) and the City of Oxnard Municipal Code, Chapter 24, Article II. Mobilehome

## **WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT**

---

Park Closures, Section 24-30 through 24-42 inclusive. This report applies to those persons who are the registered owners of the homes and reside in the homes pursuant to a rental agreement with the Park as their primary residence. California law affords Residents of mobilehome parks (as opposed to Renters) (footnote<sup>1</sup>) with unique protections from actual or constructive eviction from a space in an existing park, due to the high cost of relocating mobilehomes. This is true even when the underlying basis of the eviction relates to the proposed closure or conversion of an existing park to another use. As such, Government Code §65863.7(d) requires that the impacts of a proposed mobilehome park closure on affected mobilehome owners be investigated prior to the closure of the park. This report meets the requirements of Government Code §65863.7(d) by addressing “the availability of adequate replacement housing in [other] mobilehome parks and identifying relocation costs” for the residents of Wagon Wheel who currently own their own mobilehomes and lease space within the Park and (hereafter, collectively, the “Residents”) who would be displaced by its closure. This report goes beyond the requirements of Government Code §65863.7 by also identifying relocation benefits that the Park owner is willing to provide to Park Residents who would be displaced by Wagon Wheel’s closure. The Relocation Benefits being offered by the Park owner are set forth in Section “10” of this report.

Pursuant to Government Code §65863.7(e), the City of Oxnard is charged with reviewing and approving the sufficiency of the CIR and, subject to the limitations set forth in §65863.7(e), the City can address the sufficiency of the Relocation Benefits being offered by Park ownership in order to mitigate the adverse impact of the closure or cessation of use on Park Residents that will be displaced by Wagon Wheel’s closure. Pursuant to applicable law, such mitigation measures imposed upon the mobilehome park owner are directed at seeking suitable sites for relocation of the displaced Residents’ mobilehomes within another mobilehome park. If, for whatever reason, relocation sites or adequate replacement housing within a mobilehome park are not available, or the occupant chooses not to relocate their mobilehome, then park ownership can be required to compensate the displaced Residents, subject to the limitations set forth in the last sentence of Government

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<sup>1</sup> The term “Resident” has a very special meaning within the Mobilehome Residency Law (California Civil Code §798 *et seq*) (“MRL”), and is defined as “a homeowner or other person who lawfully occupies a mobilehome.” The term “homeowner” is also specifically defined in the MRL, as “a person who has a tenancy in a mobilehome park under a rental agreement.” Therefore, the scope of this Closure Impact Report (“CIR”) is limited to those persons who are homeowners as defined by the MRL. Persons who do not occupy the home as their full-time residence pursuant to an MRL tenancy are excluded from this report. The tenants who rent homes either from the park or other parties are not qualified to receive mitigation benefits as a result of this closure.

## **WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT**

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Code §65863.7(e)' which states that the Park owner cannot be required to pay Relocation Benefits which "exceed the reasonable costs of relocation" (footnote 2).

As stated above, this report has been prepared to meet or exceed the minimum requirements set forth by applicable law. The report: (i) takes into consideration the impacts of Park closure upon the displaced Residents of the park, (ii) identifies reasonable costs of relocation to other mobilehome parks, as well as other forms of housing, and (iii) identifies Relocation Benefits that will be available to displaced Residents that exceed the amounts that Wagon Wheel's owners can be required to provide under Government Code §65863.7(e). Furthermore, each affected Resident will be afforded the opportunity to be counseled on their particular relocation options since Wagon Wheel's owner realizes that each Resident's situation is unique and some Residents may seek to relocate their mobilehomes to another park while others will choose to receive a monetary payout in lieu of relocating. The above referenced relocation counseling will be made available to the residents throughout the closure process.

## **2 INTRODUCTION**

### **2.1 Subject Property: Wagon Wheel Trailer Lodge**

Wagon Wheel is permitted as a 171 space mobilehome park. It is located at 2851 Wagon Wheel Road, Oxnard, California, northwest of the intersection of the 101 Freeway and North Oxnard Boulevard. The Park was originally constructed in 1953 with an expansion in 1957. The Park is occupied by Residents with Mobilehome Residency Law tenancies who are subject to the mitigation measures provided for herein and other parties occupying mobilehomes and recreational vehicles who are not subject to the mitigation measures proposed herein. The park consists of a combination of single-wide and double-wide mobilehomes as well as recreational vehicles.

The park has facilities that are commensurate with a park of this vintage which include an office and three laundry facilities.

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2 Government Code 65863.7. (a) Prior to the conversion of a mobilehome park to another use, except pursuant to the Subdivision Map Act (Division 2 (commencing with Section 66410) of Title 7), or prior to closure of a mobilehome park or cessation of use of the land as a mobilehome park, the person or entity proposing the change in use shall file a report on the impact of the conversion, closure, or cessation of use upon the displaced residents of the mobilehome park to be converted or closed. In determining the impact of the conversion, closure, or cessation of use on displaced mobilehome park residents, the report shall address the availability of adequate replacement housing in mobilehome parks and relocation costs.

## **WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT**

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The park is bounded by commercial and industrial uses to the east and west, rail road tracks to the south, and a frontage road and freeway to the north. The park has frontage on Wagon Wheel Road.

The park occupies 1 assessor's parcel, numbered 139-0-022-125. The park consists of approximately 10.25 acres. According to the County of Ventura Assessor's Office, the owner of the property is Oxnard Village Investments, LLC.

The zoning of the property is C2PD (Commercial).

The current owner of Wagon Wheel acquired the property in December of 2004. The Park has been professionally managed since acquisition. It is anticipated that the current management company will continue to manage the park through the closure process.

### **2.2 Reasons for Park Closure**

The park has reached the end of its useful life as a mobilehome park. Most mobilehome parks built in the 1950s, 1960s and 1970s were originally constructed as an interim use with an economic life of 20 to 30 years. In the immediate case, the highest and best use of the property is no longer as a mobilehome park. It is the intent of the park owner to commence the closure process with a concurrent application for re-zoning and entitlements to redevelop the property as a residential community of condominiums and townhomes with some commercial space .

### **2.3 Purpose of Closure Impact Report.**

This Closure Impact Report is required pursuant to the Government Code §65863.7 *et seq.*, and §66427.4, and the California Civil Code §798.56 (h) It has been prepared to satisfy the requirements of the aforementioned Code sections.

This Closure Impact Report addresses the availability of replacement housing in mobilehome parks and relocation costs as required in the Government Code. It goes on to address the steps that are being taken to mitigate the adverse impact upon the mobilehome residents who are displaced by the closure of the park. While State law is specific with regard to the requirement that the steps to mitigate the impact upon the displaced residents "**shall not exceed the reasonable costs of relocation**", the park owner is prepared to offer additional assistance to the displaced residents by providing relocation counseling and information respecting the availability of other housing opportunities.

### **2.4 Preparation of the Closure Impact Report.**

The information included in this Closure Impact Report meets or exceeds the minimum requirements of the State laws governing mobilehome Park closures by reporting

## **WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT**

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on the impact of the closure upon the displaced residents of the park, and by addressing the availability of adequate replacement housing in mobilehome parks and relocation costs. This report further addresses the mitigation measures that follow the State guidelines.

This report focuses on the needs of the resident mobilehome owners in the park. Increased communication will be a part of the mitigation measures employed by the park owner. The communication will take the form of meetings with the impacted residents, information distributed through newsletters and relocation counseling. These programs will continue throughout the park closure process and will be administered by an on-site relocation counseling office. Discussions and meetings continue to be held with the residents to identify their individual needs. In addition, resident surveys have been conducted by mail, phone and in person to assist in identifying the resident's individual needs for relocation. Information will continue to be updated as received.

Extensive research has been done to identify relocation opportunities in existing mobilehome parks within a radius of 150 miles from the subject park. Mobilehome park empty space surveys were sent to all Ventura County mobilehome parks and to mobilehome parks within the 150 mile radius in Los Angeles, Riverside, San Bernardino, Orange, and portions of Santa Barbara, Kern and San Diego Counties. The survey also requested data for potential relocation spaces, mobilehome rentals and mobilehomes for sale. Advertisements will be placed to run in publications that go to mobilehome park owners to solicit more information on the availability of relocation spaces.

The closure of the Park will be a dynamic process over the ensuing months, therefore, the following information has been gathered and will continue to be updated throughout the closure process:

- 1 Inventory of mobilehomes in the park.
- 2 Identification of the types and terms of tenancy within the park.
- 3 Resident special needs assessment.
- 4 Manufacturer, age and size of mobilehomes.
- 5 Analysis of the availability of adequate replacement space in mobilehome parks in Ventura, Los Angeles, Riverside, San Bernardino, Orange and San Diego counties within a 150 mile radius from the park. This analysis includes spaces to move homes as well as mobilehomes for sale and rent in existing mobilehome parks.
- 6 Estimate of costs to relocate mobilehomes to the relocation mobilehome park spaces within 150 miles.

## **WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT**

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- 7 Identification of alternative housing opportunities (apartments, senior housing, HUD's Section 8 housing, etc.).

Based upon the evaluation of such information and in compliance with State Law, mitigation measures have been identified that are consistent with the reasonable cost of relocation.

### **3 GOVERNMENTAL REGULATIONS GOVERNING MOBILEHOME PARK CLOSURES.**

#### **3.1 State of California.**

The closure or change of use of a mobilehome park is governed by the statutes of the State of California, in particular Government Code §65863.7 *et seq.*, and California Civil Code, §798.56 (g) and (h). The Government Code provides that the impact of the closure must be assessed through a Closure Impact Report. The Government Code indicates that the report is to focus on the relocation of impacted residents and their mobilehomes to other mobilehome parks. The Government Code also speaks specifically to an absolute cap on mitigation measures not to exceed the reasonable costs of relocation.

It is also important to note that the mitigation measures required of the park owner apply only to those persons holding rental agreements with the mobilehome park that are subject to the Mobilehome Residency Law and such tenancy is for their primary residence. This report focuses on these subject tenancies only. Examples of the types of relationships that fall outside of the purview of this report and the applicable Code sections, would include but are not limited to: sub-tenancies, and investor-owned homes, Park owned rentals, vacation or second homes, bank owned units and other tenancies not subject to the MRL. These tenancy types are not subject to the mitigation measures imposed upon the park owner by state law. In the immediate case, the mobilehome park consists of 171 spaces, however, not all of those spaces are occupied by residents subject to mitigation benefits. Title search requests have been submitted to the appropriate governmental agencies (HCD and DMV) to obtain ownership information on those homes where the information has not been provided by the occupant of the home.

#### **3.2 Government Code.**

The pertinent parts of the Government Code are listed below, a copy of the complete Code is provided in Exhibit "1".

**"65863.7(a)** prior to the conversion of a mobilehome park to another use, except pursuant to the Subdivision Map Act (Division 2 (commencing with Section 66410) of Title VII), or prior to closure of a mobilehome park or cessation of use of the land as a mobilehome park, the person or entity proposing the change in use shall file a report on the impact of the conversion, closure, or

## WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT

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cessation of use upon the displaced residents of the mobilehome park to be converted or closed. In determining the impact of the conversion, the closure, or cessation of use on displaced mobilehome park residents, the report shall address the availability of adequate replacement housing in mobilehome parks and relocation costs.”

“**65863.7(e)** the legislative body, or its delegated advisory agency, shall review the report, prior to the change of use, and may require, as a condition of the change, the person or entity to take steps to mitigate any adverse impact of the conversion, closure, or cessation of use on the availability of displaced mobilehome park residents to find adequate housing and a mobilehome park. **The steps required to be taken to mitigate shall not exceed the reasonable costs of relocation.**”  
(Emphasis added)

### 3.3 Mobilehome Residency Law.

The California Civil Code §798 et seq is commonly known as the Mobilehome Residency Law. The Mobilehome Residency Law constitutes the landlord-tenancy law governing tenancies between homeowners and mobilehome parks. It covers a myriad of circumstances relating to mobilehome park living, covering areas such as rules and regulations, rental agreement terms, fees and charges, homeowner communications, termination of homeowner tenancies, transfer of mobilehome or mobilehome park and many other areas.

The Mobilehome Residency Law §798.56(g) and (h), provide direction relating to the termination of tenancies as the result of a closure or change of use of a mobilehome park. These applicable Code sections are displayed below. The complete text of the Mobilehome Residency Law is attached as Exhibit “2”.

“**798.56(g)** Change of use of the park or any portion thereof, provided:

- (1) the management gives the homeowners at least 15 days written notice that the management will be appearing before a local governmental board, commission, or body to request permits for a change of use of the mobilehome park.
- (2) after all required permits requesting a change of use have been approved by local governmental board, commission, or body, the management shall give the homeowner’s six months or more written notice of termination of tenancy.  
  
If the change of use requires no governmental permits, then the notice shall be given 12 months or more prior to the management’s determination that a change of use will occur. The management in the notice shall disclose and describe in detail the nature of the change of use.
- (3) the management gives each proposed homeowner written notice thereof prior to the inception of his or her tenancy that the management is requesting a change of use before local governmental bodies or that a change of use has been granted.
- (4) the notice requirements for termination of tenancy set forth in Sections 798.56 and 798.57 shall be followed if the proposed change actually occurs.
- (5) a notice of proposed change of use given prior to January 1, 1980, that conforms to the

## **WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT**

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requirements in effect at that time shall be valid. The requirements for notice of a proposed change of use imposed by this subdivision shall be governed by the law in effect at the time the notice was given.”

“**798.56(h)** the report required pursuant to subdivisions (b) and (l) of Section 65863.7 of the Government Code shall be given to the homeowners or residents at the time that notices required pursuant to subdivision (g) of this section.”

### **3.4 City of Oxnard.**

The city of Oxnard’s ordinance is, in some areas, more specific than the Government code requirements. The ordinance calls for specific demographic information on the affected Residents, including family size, length of residence, ages, estimated household income and whether or not the residents receive any housing subsidies. We believe that our efforts in sending surveys and follow ups fits these requirements as adequately as possible without forcing unwilling Residents to provide information

## **4 RESIDENTS ELIGIBLE FOR RELOCATION / MITIGATION BENEFITS.**

The purpose of this Closure Impact Report is to investigate the impact of the mobilehome park closure on the displaced mobilehome park residents to find adequate housing within a mobilehome park. The term “Resident” has a very special meaning within the MRL, and is defined as “a homeowner or other person who lawfully occupies a mobilehome.” The term “Homeowner” is also specifically defined in the MRL, as “a person who has a tenancy in a mobilehome park under a rental agreement.” Therefore, the scope of this Closure Impact Report is limited to those persons who are homeowners as defined by the MRL. Persons who do not occupy the home as their full-time residence pursuant to an MRL tenancy are excluded from this report. The primary purpose of evaluating the impact of the park closure and the availability of relocation sites within the mobilehome parks has been addressed by this report . Although not specifically required, this report also investigates the ancillary issues affecting the displaced residents during the period of time that their home is in the process of being dismantled, transported and reset. These ancillary issues consist of the lodging and meal allowances, and the moving company allowances. The park owner is prepared to go beyond the minimum requirements specified in the Code.

## **5 DESCRIPTION OF THE PARK.**

### **5.1 Site Plan**

The site plan for the park is attached as Exhibit “3” to this Report.

## **WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT**

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### **5.2 Aerial Photos.**

There is an aerial photo of the site attached as Exhibit "4", which provides a perspective on the affected parcel with relation to the surrounding land uses.

### **5.3 Park Operation and Tenancy.**

The park consists of 171 permitted spaces. The park operates as an "all-age" community, with no restriction on the age of tenants. The park has an office and three laundry facilities. The park was built in 1953 and later expanded in 1957. Wagon Wheel has been operated by the current owner since acquisition in December 2004.

Photographs of the homes that occupy those spaces may be found in Exhibit "5".

### **5.4 Information on the Terms of Residency.**

The limited historical data in the Park's files indicates an average tenancy of 11 years, with the longest tenancy being 46 years and the shortest tenancy being 4 months. Of the 141 currently occupied homes, 41% of the occupants have lived in the park in excess of 10 years. 27% of the occupants have lived in the park in the park between 5 and 10 years. The remaining 32% of occupants have lived in the park for less than 5 years. Exhibit "6" shows the tenancy information on a space by space basis.

According to the registration and titling information maintained by the Department of Housing and Community Development (HCD) and Department of Motor Vehicles (DMV), a number of the subject homes show that they are encumbered by a lienholder. Some of these title searches may have come back with false positives resulting from the homeowners failing to notify HCD or DMV that their loans have been paid off. For those residents who presently have loans against their mobilehomes, they should contact their lender to discuss their options.

### **5.5 Information on the Status of Residency.**

As residents respond to the surveys and door to door interviews, we will keep a database of the tenants subject to the mitigation measures outlined in this report. There are 32 vacant spaces at this time.

### **5.6 Elderly and Special Needs Residents.**

Based on the Resident information provided thus far, there are 26 elderly residents and 19 residents claiming special needs. Attempts are being made on an ongoing basis to obtain information on residents, it is expected that other elderly or special needs Residents will be identified.

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

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**6 AVAILABILITY OF ADEQUATE REPLACEMENT SPACE IN MOBILEHOME PARKS WITHIN 150 MILE RADIUS.**

**6.1 150 Mile Radius Map.**

There are no particular guidelines given in the Government Code relating to the distance to be considered for relocating the displaced residents. This report contemplates a radius of 150 miles from the subject property. An area map with a radius circle of 150 miles is provided in Exhibit "7". By using a radius of 150 miles, essentially all of the Southern California counties are included in the search. Specifically, Ventura, Los Angeles, Santa Barbara, Riverside, San Bernardino and Orange Counties and portions of San Luis Obispo, Kern and San Diego Counties fall within the 150 mile search criteria.

There are in excess of 2,060 mobilehome parks located within this radius. Surveys were circulated to all mobilehome parks in Ventura County, as well as to all mobilehome parks in the surrounding counties which fall in the 150 mile radius. A copy of the survey is attached as Exhibit "8". The survey requests information from the park operators concerning the availability of vacant spaces, the sizes of those spaces, the rent and mobilehome requirements for homes to be moved into those parks. A database has been constructed to monitor the space inventory during the closure process. Additionally, telephonic contact has been made with a number of selected parks that are known to have vacant spaces, and will accept used homes into their park.

There are very few, if any, parks in Ventura, Santa Barbara, Los Angeles, Orange, and San Diego Counties that will accept used homes onto their spaces. The housing market in these counties has produced a condition where spaces are at a premium, and older homes must be purchased with the intent of removing them from the space in order to accommodate the installation of a new home. In this circumstance, the parks will not accept used homes. The Inland Empire and the high and low desert areas, have available spaces within their parks; however, that vacant space inventory has dwindled over the past several months. There are in excess of 600 vacant spaces that have been identified in these areas, with varying requirements on the year and condition of homes that will be accepted onto those vacant spaces. Kern County has a relative abundance of available spaces, however, model year and condition of home requirements still prevail.

**6.2 For Sale and For Rent Mobilehomes in Land Lease Parks.**

Mobilehomes are typically sold by mobilehome dealers who are licensed by HCD, or real estate brokers who are licensed through the Department of Real Estate. In most market areas, the largest percentage of homes are sold by mobilehome dealers. A list of mobilehome dealers in the counties covered by the 150 mile radius is attached as Exhibit

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

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“9”.

The survey also requests information regarding the availability of rental mobilehomes within the park. Exhibit “10” provides information concerning the availability of rental mobilehomes

**6.3 For Sale Mobilehomes in Resident-Owned Mobilehome Parks.**

There are also several mobilehome parks within the 150 mile radius that are resident-owned or condominium-style ownership. These parks also represent a housing alternative for the displaced residents of the subject property. A list of resident-owned parks is provided as Exhibit “11”.

**7 AVAILABILITY OF OTHER HOUSING.**

The requirements set forth in the Government Code direct the Closure Impact Report to address relocation of the displaced residents in the context of other mobilehome spaces. Due to the severe lack of vacant spaces in the four county area consisting of Ventura, Los Angeles, Orange and San Diego Counties, relocation of the existing mobilehomes to another vacant mobilehome space within these four counties is, for all intents and purposes, impossible. As a result of this, the displaced residents may choose to look at other forms of housing to include rental apartments and condominiums, real estate for sale, senior housing or possibly HUD-assisted housing. The relocation counselor will be equipped to address these alternative housing options with each displaced resident. Exhibit “12” provides a listing of rental apartments in the area. Exhibit “13” provides information on assisted housing provided by the Area Housing Authority of the County of Ventura and Exhibit “14” provides similar information for Many Mansions, a group that promotes and provides affordable housing for residents in Ventura County. Both of the aforementioned organizations currently have substantial waiting lists. Those that qualify and are interested should act promptly.

**8 RELOCATION COST ANALYSIS .**

**8.1 Cost to relocate typical mobilehomes to replacement site.**

Unlike recreational vehicles, Mobilehomes are typically moved once in their lifetime, from the factory to the housing site. Once delivered to the site, the home is “accessorized” with various appurtenances such as carport awnings, steps, porches, patio awnings, skirting, and storage sheds. After the accessories are installed, the lot is required to be landscaped in a manner that is consistent with the park rules and regulations. As can be

## WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT

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evidenced by a review of the photos of the affected homes, Exhibit “5”, most of the homes have had numerous accessories and other modifications made to them over the years. The addition of site-built improvements, such as cabanas, ramadas, and screened porches, complicate the task of relocating the home to a new site, as these items do not generally lend themselves to being removed and reinstalled at a new location.

A number of the contractors contacted would not provide a bid for the relocation of these homes due to the age and condition of the homes. Of the three bids that were ultimately obtained, they were all limited in their scope to provide for costs relating to the dismantling and relocation of a generic double wide and generic single wide. Each of the vendors that provided a bid indicated that detailed interior and exterior inspections would need to occur prior to the finalization of a price to relocate the subject home. The contractors cited age and condition as severe limiting factors to the reuse of most of the homes. Therefore, the figures used in the preparation of this report represent the average of the numbers submitted by the contractors, with the limiting conditions specified by each of the contractors.

Copies of the bids provided by the vendors are attached as Exhibit “15”. The table below summarizes the relocation costs of the three bids received. Due to the relative ease of relocating recreational vehicles, they will be subject to separate mitigation benefits.

Vendor	Single Wide	Double Wide
Pacific MH Construction	\$11,250.00	\$14,600.00
Horizon MH Service		\$11,654.00
Inland MH Service	\$13,500.00	\$17,250.00
Average	\$12,375.00	\$14,501.33

These proposals include the installation of new vinyl skirting once the home is relocated, which represents an improvement to the mobilehome. Although the mobilehome is being improved by the installation of the new skirting, no adjustment has been made for this addition. It is generally impossible to move a storage shed without causing significant damage to that shed, so the relocation figures include a replacement shed allowance of \$400, which should be sufficient to acquire a shed of up to 8' x 10'. (See Exhibit “16”). Additionally, there has been a landscaping allowance of \$500 added to the total relocation costs, which will cover the re-landscaping of the front yard area of the relocation space.

The table below represents the total relocation costs including the allowances

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

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made for storage shed and landscaping.

Item	Single Wide	Double Wide
Average Teardown & Reset	\$12,375.00	\$14,501.33
Storage Shed	\$400.00	\$400.00
Landscape Allowance	\$500.00	\$500.00
Total	\$13,275.00	\$15,401.33

**8.2 Cost to relocate typical mobilehomes to replacement site.**

Recreational vehicles are, by design, readily transportable. These vehicles were not designed to be used a primary residence. Due to their nature, they are not subject to the relocation mitigation benefits that standard mobilehomes are. On a per case basis, some affected recreational vehicle owners may be entitled to a replacement storage shed if they currently have one of a non transportable type.

**9 ADDITIONAL COSTS OF MOVING.**

In addition to the costs associated with the relocation of the home, there are other costs to the displaced resident over and above the cost of moving the home to its new location. These costs include lodging while the resident is displaced from their home, meals during the displacement period, incidental expenses while away from home and the moving of furniture and personal items.

**9.1 Lodging.**

The Internal Revenue Service (IRS) publishes a guide book entitled Per Diem Rates, Publication 1542, which provides guidance for per diem reimbursements. The guide provides for a maximum lodging rate of \$100 per night in the Ventura County area. Several local motels were found to have rates within the \$100 per night per diem . A list of motels within a 10 mile radius is found in Exhibit "17".

**9.2 Meals**

The same IRS guide provides a maximum per diem for meals of \$51 per person. This \$51 per diem would apply to each member of the household

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

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Therefore, based upon the foregoing per diem rates, the following table represents the amount of per diem for a household given the number of persons in that household.

<b>Number in Household</b>	<b>Per Diem (lodging and meals)</b>
1	\$151.00
2	\$202.00
3	\$253.00
4	\$304.00

**9.3 Moving of Furniture and Personal Items.**

The contents of the mobilehome must be removed prior to the relocation of the mobilehome. Therefore, the services of a moving company need to be contemplated to accommodate the transport of the resident’s furniture and personal items to the new location. For purposes of this analysis, a single- wide mobilehome was deemed to have two bedrooms, and a double wide mobilehome was deemed to have three bedrooms. Estimates were obtained from three moving companies and those estimates are reflected in Exhibit “18”. The average estimate for a two-bedroom move was \$617.50 and the average estimate for a three-bedroom move was \$846.08.

**10 RELOCATION MITIGATION MEASURES.**

The park owner is aware of the significant impact that the closure of the park may have upon the homeowners who live there. These homeowners will be faced with some important decisions over the next several months. The park owner is committed to doing everything in its power to make sure that the information pipeline is open and the homeowners are receiving information that is important to them. The park will publish a newsletter no less frequently than quarterly that will keep the homeowners abreast of the closure process. Additionally, the park will conduct various seminars for the homeowners to discuss their housing options. Lastly, the park will employ the services of a relocation counselor who will be available to meet with the homeowners on an individual basis to go over their particular circumstances.

It is likely that a number of the affected homeowners will choose not to relocate their mobilehomes and choose one of the other options afforded to them. They may wish to

## **WAGON WHEEL TRAILER LODGE MOBILEHOME PARK CLOSURE IMPACT REPORT**

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purchase a mobilehome in another park, rent an apartment, or move to a senior facility. These circumstances were taken into consideration when developing the mitigation measures provided in this report. The guidelines set forth in the Government Code §65863.7(e), provide that the steps required to provide mitigation shall not exceed the reasonable costs of relocation.

The park owner has developed five Mitigation Options which will be made available to all of the affected residents of the park. These Mitigation Options will be communicated to each affected resident by written notice, with a personal follow-up to make sure that each resident is aware of their options. Owners of recreational vehicles will be limited to the benefits outlined in section 10.5

Regardless of which Mitigation Option the resident may choose, the park owner will make sure that they make available resources that will help the residents make informed choices related to their housing options. The park will attempt to find third parties who are interested in purchasing homes and moving them out of the park. The park will also attempt to act as an intermediary between the residents and the lienholders on their homes, should there be any. The park will assist in scheduling the various events that will be facing the residents as part of the relocation.

The following represents a general description of the Mitigation Options that the park owner will make available to the affected residents. The park owner is willing to enter into written Voluntary Relocation Agreements with each displaced resident that sets forth the specific terms and conditions of the agreement between the park and the resident.

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

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**10.1 Option 1: State Required Mitigation to Relocate Mobilehomes.**

Option 1 is derived from the Government Code and contemplates the payment of reasonable relocation costs to move the homeowner and their mobilehome to another mobilehome park within the 150 mile radius. The range of payments is shown in the table below. The low range for both a single-wide and double-wide, is based upon a one-person household, and the high range represents the payment to a four person household. The only variable in these computations is the per diem rate for the additional household members. The per diem allowances are those delineated in the IRS Publication 1542, May 2005 (Exhibit "19").

The costs for these moves are detailed below:

Item Description	Single Wide	Double Wide
Tear down, transportation, and reset at new location	\$12,375.00	\$14,501.33
Storage Shed Allowance	\$400.00	\$400.00
Landscape Allowance	\$500.00	\$500.00
Moving Allowance	\$651.00	\$890.00

Per Diem Allowance		
Estimated Number of Days	7	10
1 Person \$151/day	\$1,057.00	\$1,510.00
2 Persons \$202/day	\$1,414.00	\$2,020.00
3 Persons \$253/day	\$1,771.00	\$2,530.00
4 Persons - \$304/day	\$2,128.00	\$3,040.00

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

---

Mitigation Ranges	Single Wide	Double Wide
<b>Low Range Mitigation</b>	<b>\$14,983.00</b>	<b>\$17,801.33</b>
<b>High Range Mitigation</b>	<b>\$16,054.00</b>	<b>\$19,331.33</b>

This option will be available to those homeowners who find a suitable relocation space within another mobilehome park and choose to move their mobilehome to that space. This option is not available to owners of recreational vehicles or travel trailers.

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

**10.2 Option 2: Payment of reasonable costs of relocation per Option 1 and the resident sells the home in place to a third party who will move the home out of the park. The park will make payment to the homeowner when the home is removed from the park.**

Under this option, the homeowner will receive the entire amount of the relocation benefits that would be offered to them if they were to move their home to an alternate location, plus they have the opportunity to capture the salvage value of the home when it is sold to a third party who will remove it from the park. The following table shows the high and low range for the payments available to the homeowner under this Option. Please note that the figures in this table are the same as those in Option One

Item Description	Single Wide	Double Wide
Tear down, transportation, and reset at new location	\$12,375.00	\$14,501.33
Storage Shed Allowance	\$400.00	\$400.00
Landscape Allowance	\$500.00	\$500.00
Moving Allowance	\$651.00	\$890.00

Per Diem Allowance		
Estimated Number of Days	7	10
1 Person \$151/day	\$1,057.00	\$1,510.00
2 Persons \$202/day	\$1,414.00	\$2,020.00
3 Persons \$253/day	\$1,771.00	\$2,530.00
4 Persons - \$304/day	\$2,128.00	\$3,040.00

Mitigation Ranges	Single Wide	Double Wide
<b>Low Range Mitigation</b>	<b>\$14,983.00</b>	<b>\$17,801.33</b>
<b>High Range Mitigation</b>	<b>\$16,054.00</b>	<b>\$19,331.33</b>

Homeowners choosing this Option will be those who have elected not to move their mobilehomes to a suitable space in another mobilehome park. These homeowners will choose to move to an alternative type of housing such as an apartment, a condominium, a single-family home, senior living or perhaps another mobilehome.

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

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There is a possibility under this Option for the homeowner to stretch their mitigation benefits by taking the park-offered mitigation measures plus the sales proceeds of the home to a third party who will remove it from the park. For those homeowners choosing this Option, the park will act as a facilitator to match the sellers of the homes with the third-party buyers. The park will not charge any fees to the sellers for this service. This option is not available to owners of recreational vehicles or travel trailers.

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

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**10.3 Option 3: Sell the home to the park, receive free rent for six months and move out at the end of the free rent period.**

Under this option, the park will agree to purchase the home from the homeowner for 85% of the amount prescribed in Option 1. The homeowner would then be able to reside in the home rent-free for a period of six months after the purchase by the Park. The former homeowner would enter into a rental agreement with the Park for the rent-back of the home for the period of six months, and assume the role of a "Renter" in the Park. If the former homeowner, now a "Renter", moves out of the home within the six-month period, the rent will be forgiven. Should the former homeowner not move out within the six-month period, the accrued rent will be due and payable, and the former homeowner will owe rent for each month that they remain in possession after the expiration of the six months. This Option will be made available to homeowners for a period of six months from the date of the closure notice for the park. If this Option is not selected within six months, it will no longer be available. This option is not available to owners of recreational vehicles or travel trailers.

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

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**10.4 Option 4: The park will purchase the home for the NADA Book Value.**

Under this option, the Park will purchase the home for the full retail value for the home as specified by the NADA Guide (Footnote 3) for homes located within a fair quality park in California, plus a bonus amount of \$2500.00. The park will purchase these homes outright from the homeowners, at which time the homeowners will be required to surrender possession of the home and move from the Park. This option is not available to owners of recreational vehicles or travel trailers.

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3 The National Automobile Dealers Association ("NADA") guide sometimes referred to as a "Blue Book" is accepted by the manufactured housing industry and government agencies as a standard for valuing mobilehomes. Exhibit 20 Contains a summary of estimated NADA values for those mobilehomes where current information was available. These values are estimates containing average mobilehome accessory values derived from a sample of accessories associated with 20 mobilehomes in the park. In the event a homeowner selects Option 4, it will be necessary on a case by case basis to determine particular mobilehome accessory values for accessories actually associated with the homeowners mobilehome before a final purchase price is established.

**WAGON WHEEL TRAILER LODGE  
MOBILEHOME PARK CLOSURE IMPACT REPORT**

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**10.5 Option 5: Recreational vehicle mitigation.**

Under this option, recreational vehicle owners will be entitled to three days of per diem benefits and \$500 transportation fees. Any residents with non transportable storage sheds will also receive the \$400 replacement shed allowance.

Per Diem Allowance	
Estimated Number of Days	3
1 Person \$151/day	\$453.00
2 Persons \$202/day	\$606.00
3 Persons \$253/day	\$759.00
4 Persons - \$304/day	\$912.00