

El Sereno Estates

1225 S. Rice Road, Ojai CA. 93023

PH. 805-646-5719

September 2, 2025

The County of Ventura
Mobile Home Park Rent Review Board
800 S. Victoria Avenue
Ventura, CA 93009

RE: VACANCY DECONTROL AND CAPITAL IMPROVEMENT CONSIDERATIONS

Dear Chairperson and Members of the Board:

El Sereno Estates are privately owned and professionally managed mobile home communities situated in your region in Ojai, CA. The quality of life and condition of these communities rise to a degree that is superior in comparison to many of the other mobile home communities within your regulations.

As a property owner and a good steward of our communities we are concerned with the continued fairness and sustainability of the Ventura County Mobile Home Park Rent Control Ordinance, specifically regarding capital improvements and the vacancy decontrol increase cap.

HISTORY:

The County of Ventura implemented a rent control ordinance specific to mobile home parks in 1983. From December 1989 through April 1992 the rent increase upon resale of an owner-occupied home was not restricted and allowed park owners to increase the rent based on market rates and conditions. On April 21, 1992, the ordinance was revised, and vacancy control was added restricting resale rent to the lesser of 15% or \$50. In December 1999 this amount increased to 15% or \$60, whichever was less. In September 2007 the amount was adjusted to 15% or \$72 whichever was less. Please keep in mind that the resale increase has always and is currently restricted to one time every four years.

- In 2007, the cap for space rent increased upon a change of mobile home ownership was set at \$72, or 15% of the average space rent whichever is less. While you perceived that

County of Ventura
November 19, 2025
Mobile Home Park Rent Review Board Meeting
Item 8
Exhibit 2 – Public Comment, James Koehler

this was appropriate for the time, it has remained unchanged for 18 years despite significant increases in the cost of living and operational expenses for park owners.

- According to the Bureau of Labor Statistics Consumer Price Index, costs have risen by about 55% between 2007 and 2025. If the \$72 cap kept up with inflation, the equivalent today would be around \$112. Unfortunately, by not making regular adjustments, the ordinance is effectively eroding the real value of the increase available to park owners.
- Since 2007 the **overall increase in** essential sectors like **food, housing, and healthcare** jumped **60–70 %**, as measured by official inflation indices.
- The ordinance clearly intended for these vacancy decontrol increases to remain fair and economically relevant. Failure to adjust the cap ignores both legal intent and economic reality.
- Maintaining the 2007 cap for a duration of 18 years unfairly restricts rental income and undermines the ability of the Park Owner to maintain, improve and invest in their communities and stay in line with rising operational costs and regulatory agreements.
- Bringing the cap in line with 18 years of inflation by raising the \$72 to at least a minimum of \$112 would honor the original regulations intent and preserve a fair balance between protecting tenants and allowing park owners a just return.

Additionally, The County of Ventura Rent Control Ordinance has never allowed consideration for capital improvement projects. It restricts pass throughs to Completely New Capital Improvements. Since the ordinance was established in 1983, 40 plus years ago, allowances have not been given to the costs associated with addressing aging infrastructure, community buildings, and amenities. The allowed annual ministerial rent increases and restrictive vacancy controls do not afford Park Owners the ability to keep up with operating costs let alone make improvements.

HARSH REALITIES:

The restrictions and limitations placed on Park Owners under this ordinance have a significant impact on the ability to ensure a fair and predictable return on their investment. The Owners' fair rate of return has been swallowed up by rising costs. The current ordinance does not support any of these types of improvements or increases in operational costs.

Because we spend so much money annually to maintain every facility in the park (landscaping, streets, amenities, clubhouse) to the highest quality, El Sereno Estates residents are proud to call this their home.

Currently, we respectfully request the Board review and increase the vacancy decontrol cap. In addition, we encourage the adoption of an automatic adjustment mechanism such as an annual increase indexed to the CPI to prevent further neglect and policy lag. We are also requesting that you review and omit the restriction of one increase every four years. We feel it would also be

prudent if you could look at your ordinance and consider including capital replacement pass-throughs to cover some of the projects necessary to maintain our communities and aging infrastructure. Without this the Park Owners are not able to maintain their communities which in turn will result in blight and poor living conditions in your county. These items and adjustments will help restore confidence among park owners and ensure our investments are protected.

Thank you for your time and consideration.

Sincerely,

NEWPORT PACIFIC CAPITAL COMPANY, INC.
Managing Agent for El Sereno Mobile Home Park

A handwritten signature in black ink, reading "James F. Koehler". The signature is written in a cursive style with a large, sweeping initial "J" and a stylized "K".

James Koehler
Regional Supervisor