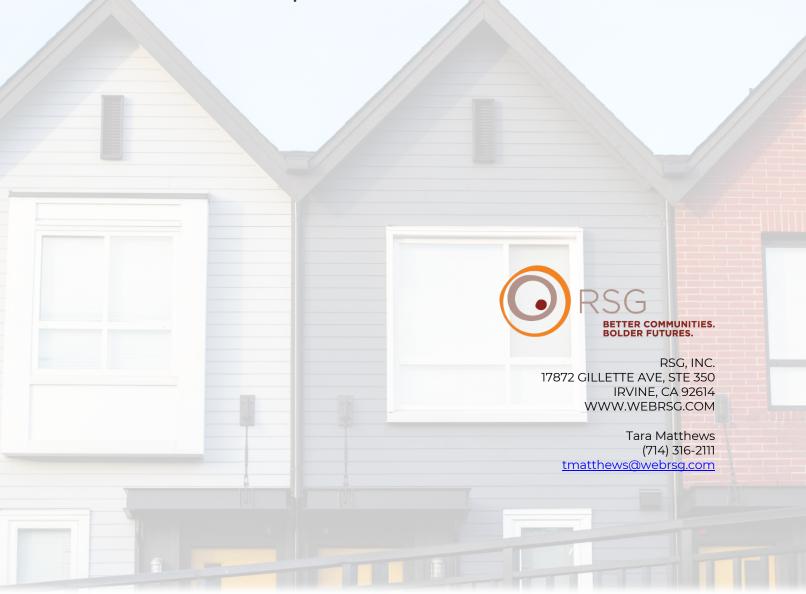


## **PROPOSAL**

Mobile Home Park Rent Stabilization Analysis and Mobile Home Rent Stabilization Implementation Plan



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October 17, 2022 <u>Via Electronic Mail</u>

Cynthia Lara, Community Assistance Manager CITY OF CORONA 400 South Vicentia Avenue Corona, CA 92882

# PROPOSAL FOR MOBILE HOME PARK RENT STABILIZATION ANALYSIS AND IMPLEMENTATION PLAN

Dear Ms. Lara:

RSG, Inc. ("RSG") is pleased to present this proposal to the City of Corona ("City") in response to its Request for Proposals ("RFP") for Rent Stabilization Mobile Home Analysis ("Analysis") and an alternate bid for a Mobile Home Rent Stabilization Implementation Plan ("Implementation Plan") for ten mobile home parks in the City of Corona. RSG understands the City is exploring local rent stabilization regulations for mobile home parks and that to enact such a regulation, the City must demonstrate that a legitimate government interest exists. The City is seeking an analysis to obtain market data and public outreach that includes meetings with the Mobile Home Park Owners Association and other critical stakeholders.

RSG recently had the privilege of working with the City on the Economic Development Strategic Plan, which was approved by the City Council on August 17, 2022. This effort provided us insight to identify the best solutions to address the City's needs, and we look forward to the opportunity to work with the City again. RSG was also selected as one of the City's approved vendors to provide financial consulting services for affordable housing.

RSG has extensive experience advising on and administering rent stabilization programs and policies, including engagements with the cities of Carson, El Monte, Escondido, Palmdale, and Santa Ana. Recently, RSG was awarded an engagement with the city of Santa Rosa to conduct an update to the community's mobile home rent control ordinance. RSG is also currently designing and facilitating a participatory strategic planning process for the city of San Jose that will create a three-year strategic plan for the Rent Stabilization Program. With over 40 years of experience in the areas of affordable housing finance and development, housing policy, and community engagement, RSG will bring a depth of knowledge and expertise to successfully meet the City's goals on this assignment.

RSG has undertaken on behalf of former cities, counties, redevelopment agencies, and housing authorities, every aspect of the development of affordable housing programs. We have substantial experience in formulating viable affordable housing implementation strategies, including technical reviews, financial deal structuring, developer negotiations, and implementation programs using multiple local, state, and federal funding sources. We work closely with City staff to formulate precise and project-specific solutions.

Should you wish to discuss any of the information presented or have questions, please feel free to contact me at (714) 316-2111 or tmatthews@webrsg.com.

Sincerely, RSG, Inc.

Tara E. Matthews, Principal

#### FIRM BACKGROUND

RSG is a creatively charged counterpart to State of California public agencies. We work with the people responsible for creating vibrant places to accomplish their goals. The inspired leaders at RSG create stronger communities capable of achieving bolder futures by bringing four decades of native knowledge to each engagement. As diverse as the agencies we work with, our services span real estate, economic development, fiscal health, and housing initiatives.

RSG is a State-based, Subchapter "S" corporation. Founded in 1979, the firm provides a wide array of community development consulting services to local government organizations and private entities. The firm is managed by principals Jim Simon and Tara Matthews. We have 26 employees and maintain three offices in California, including our main office in Irvine and two satellite offices in Berkeley and Vista. Our website is www.webrsg.com.

RSG's federal taxpayer identification number is 95-343-5849 and state taxpayer identification number is 27600915. RSG is also a State certified Small Business Enterprise (SBE - 2006876 DGS).

#### **Mission Statement:**

RSG creates solutions to enhance communities' physical, economic, and social future.

#### **Core Values:**

Our core values define who we are as people and the standards by which we provide services to our clients.



### FIRM QUALIFICATIONS

At RSG, we believe housing is a basic human right and the foundation of a stable and successful community. We are passionate about creating opportunities for residents to live in housing they can afford, helping to provide the necessary platform to nurture and protect quality of life for all residents. RSG understands the critical role that housing and in particular, affordable housing, for all income levels plays. Affordable housing is the key to providing residents with the income to support other needs and stimulate economic development in their communities, allowing children a safe place to return to after school and a greater chance of attaining educational success, and allowing individuals a place to call home and recharge after work. Without an adequate supply of affordable housing, communities are deprived of the opportunity to thrive and issues like homelessness, overcrowding, and economic decline can take hold.

We see our role as technicians, advisors, and extensions of staff to local governments and developers, sharing a common vision of producing and maintaining healthy and affordable housing in communities. As practitioners, we know firsthand that there is no one-size-fits-all solution to the State's housing crisis and are ready to dig in and help our clients find solutions that work best for them. RSG's housing clients have included cities, counties, housing successor agencies, housing authorities, and developers. We have experience working in coastal communities, major cities, urban areas, Central Valley agricultural communities, islands, and rural areas from Southern to Northern California. We are adept at brainstorming and developing strategies and programs, implementing and overseeing affordable housing programs and developments, performing complex affordable housing underwriting, identifying gap financing resources, and ensuring compliance with State and Federal guidelines.

We are not only consultants in the field, but leaders in the industry as well. As active policy committee members of the San Diego Housing Federation and the Non-Profit Housing Association of Northern California, we give a voice to the challenges our clients and communities face in the State by influencing legislative initiatives. We collaborate with industry leaders, other consulting firms, and community stakeholders throughout the State to share local success stories, build capacity and broader successes in the State, and remove impediments to communities' ability to reach housing goals. Like you, we hope to solve the housing crisis in the State and live in communities where all populations are adequately served and housed. We know there is a ton of work to do and here at RSG we are ready to roll-up our sleeves up and get to it!

#### **Creating and Achieving Strategic Planning Goals**

Affordable housing can uplift and transform a community not only through elevating residents' quality of life, but also, increasing diversity, improving neighboring property values, and attracting more businesses and jobs. Understanding community needs and the role strategic planning plays is a key step in advancing the development of affordable housing. RSG evaluates community needs by understanding State and Federal housing goals and requirements, evaluating local housing element goals and RHNA requirements, evaluating local market opportunities and constraints, assessing local community demand and demographics, and understanding local politics and staffing resources.

RSG fully understands the nuances involved in developing both short- and long-term affordable housing strategies and market studies. We help our clients identify appropriate development programming alternatives, explore policy implementation, and identify available

financial and real property resources to help reach goals. We work closely with our clients to formulate precise, accurate, and project-specific solutions and analyses.

#### Affordable Housing Underwriting and Gap Financing Resources

Developing affordable housing is more of an art than a science and each project comes with its own unique issues to ensure that gap financing is secured. We work behind the scenes to help our clients navigate through the complex task of developing affordable housing. RSG advises on crafting appropriate development programs, including funding assistance strategies that balance the developer and community's interests. Development programming evaluations are performed to identify financially feasible opportunities and examine alternatives that will result in projects having long-term economic viability while fulfilling the community's development goals and objectives. Based on our long-standing relationships with the State's community development field, we can identify and facilitate meetings with the affordable housing community to assist in project financing.

RSG has experience with single-family ownership, multifamily rental apartments, and mixed-use development projects that leverage multiple funding sources, including housing asset funds (LMIHAF), State and federal low-income housing tax credits (LIHTC), and other local funding sources, such as HOME, CDBG, PHC, NSP, HOPE VI, MHP, AHP, and inclusionary housing in-lieu fees, as well as other resources. We guide our clients through the financing process to best leverage local public financial assistance.

#### **Real Estate Development Programming and Transaction Structuring**

Nothing substitutes for knowledge, creativity, and experience when negotiating agreements for affordable housing transactions. In-depth knowledge of applicable laws and regulations, including requirements under the Government Code and other State and federal real estate regulations, coupled with broad experience in preparing development agreements are essential to bringing a project to life. RSG has assisted clients in programming analyses, assembling sites, relocating residents, soliciting developer proposals, and negotiating and drafting disposition agreements. Our staff is well versed in navigating the landscape of real estate in the sphere of affordable housing and we possess the insight and expertise required to help our clients make informed decisions and execute transactions with certainty.

#### Rent Stabilization and Tenant Protection Program Design and Implementation

As housing affordability continues to slip further away from many Californians, local jurisdictions are looking at ways to help protect their most vulnerable populations and ensure that renters remain housed without steep rental increases and unfair evictions. RSG helps our clients implement, evaluate, and revise ordinances for effective outcomes. We accomplish this through engaging the community, preparing informational materials, processing petitions and rent increase calculations, preparing reports for decision makers, conducting hearings, and evaluating the efficacy of existing ordinances.

We have hands-on experience in the administration of rent stabilization and tenant protection programs for all applicable rental units and mobile home parks. Each jurisdiction has specific nuances within their ordinances and RSG is skilled at navigating these to ensure smooth implementation. A key to successful implementation is ensuring neutrality in the process, building off of our in-depth experience in advising both residents and landlords.

#### **Program Administration**

Affordable housing helps to support the physical, mental, and social well-being of residents and therefore, residents often look to their communities for local support to secure, maintain,

and provide affordable housing. RSG is well versed in developing and facilitating affordable housing programs, having assisted many communities with establishing rehabilitation loan programs and first-time homebuyer programs. We work with our clients to tailor programs to the specific needs of the community and identify financial resources to fund such programs.

We monitor and track available funding sources that could be resources to local communities to ensure that we always keep a pulse on the industry. Our team is proficient in working with lenders to ensure homebuyer eligibility and working collaboratively to execute loan documents. Our services span from program design to program implementation. We work closely with our clients to help formulate programs and processes that best fit the overall housing needs of their communities.

#### **State and Federal Regulatory Compliance**

We understand that regulatory compliance and reporting is a critical aspect of a local government's housing responsibilities. Our redevelopment agency roots have positioned our team well to address regulatory compliance and reporting needs. Understanding this work can be burdensome, time-consuming, and complex for some communities, RSG works closely with our clients to ensure that all annual reporting for Housing Successor Agencies, Housing Authorities, and Cities is completed each year. As the State legislature continues to tighten up on local government housing production and compliance with annual reporting and regulatory compliance, it is imperative that reports accurately reflect community progress towards meeting housing goals.

We have hands-on experience in the administration of public agencies' affordable housing activities for multi-family rental projects and homebuyer assistance programs. RSG ensures that program and project operations are consistent with an applicable bond or other applicable financing provisions, including oversight of a project's financial status, tenant income recertifications, and affordability requirements, together with annual compliance monitoring and regulatory reporting. We understand the importance of these reporting tools and assist our clients with getting into and maintaining compliance. We strive to have all of our clients audit-ready and off any State "naughty list!"

#### **Additional Housing Consulting Services**

RSG is highly experienced in providing additional direct and indirect staffing and housing consulting services for the following:

- Down Payment Assistance Programs
- Relocation Assistance and Monitoring
- Major and Minor Housing Rehabilitation Programs
- Preparing Local, County, State, and Federal Reports
- Rental Calculations, Income Limit Verification

RSG has been in the affordable housing arena for over 40 years and intimately understands what it takes to see a project come to fruition and maintain affordability. Aside from our indepth experience in multiple facets of affordable housing, we see providing housing services as an opportunity to embrace, inspire, and create the changes so desperately needed and deserved in communities all across the State. To put it simply, we are passionate about affordable housing!

#### SCHEDULE OF FEES

#### **BUDGET AND HOURLY RATES**

Our services for this engagement would be charged on a time-and-materials basis, with a not to exceed amount of **\$98,016**. A breakdown of the costs are provided in the Bid Schedule – Base Bid on the following page. We have also provided an estimate for the Alternate Bid for Mobile Home Rent Stabilization Implementation Plan in the Bid Schedule – Alternate Bid. We anticipate the costs for the Alternate Bid may change after completion of the Base Bid, as the City explores what type of program they may want to administer.

RSG proposes the below rate schedule for these services.

#### **Hourly Billing Rates**

Principal / Director	\$ 275
Senior Associate	\$ 200
Associate	\$ 185
Senior Analyst	\$ 150
Analyst	\$ 135
Research Assistant	\$ 125
Technician	\$ 80
Clerical	\$ 60
Reimbursable Expenses	Cost plus 10%

RSG does not charge clients for travel or mileage (except direct costs related to field work/surveys), parking, standard telephone/fax expenses, general postage or incidental copies. However, we do charge for messenger services, overnight shipping/express mail costs, and teleconferencing services. We also charge for copies of reports, documents, notices, and support material in excess of five (5) copies. These costs are charged back at the actual expense plus a 10% surcharge.

RSG issues monthly invoices payable upon receipt, unless otherwise agreed upon in advance. Invoices identify tasks completed to date, hours expended and the hourly rate.

#### **BID SCHEDULE**

## **BASE BID (Rent Stabilization Mobile Home Analysis)**

	Description of Work	<b>Unit Price</b>
1.	Analyze mobile home resident demographics (i.e., household size, household income, ages of household, etc.) – this information may be obtained through a combination of methods such as direct contact and through reliable government databases.	\$ 24,066
2.	Review local Housing Element to determine if mobile homes constitute an important source of affordable housing.	\$ 5,735
3.	Assess low-income households to determine if a rent burden exists as defined by the US Department of Housing and Urban Development.	\$ 4,775
4.	Examine past and current space rent rates and pass-through fees included in space rent (i.e., utilities, property tax, capital works fair-share, etc.).	\$ 9,575
5.	Assess rent increases and the escalator used to determine if increases are reasonable or inconsistent with standard practices.	\$ 5,600
6.	Assess the number of spaces that may potentially be exempted under the Mobile Home Residency Law.	\$ 4,800
7.	Evaluate the feasibility of relocating mobile homes.	\$ 5,800
8.	Outreach efforts with park owner and resident associations and individuals.	\$ 12,530
9.	Host a minimum of four (4) meetings.	\$ 25,135
	TOTAL COST	\$ 98,016

## **Spell out the total cost:**

Ninety-eight thousand and sixteen dollars

,	Corona October 2022			Task Hou	rs & Billing Rate	)		Total
		Principal \$ 275	Director	Sr. Assor 5 \$ 20	Analyst 0 \$ 135	Res. Asst. \$ 125	Total Hrs	lot to xceed
ask 1	Analyze Mobile Home Resident Demographics	4	1 .	7 3	7 39	45	142	\$ 24,0
	Task 1.1 Kickoff meeting and project management: review scope, data needs, schedule		)	5 1	5 5	5	32	6.2
	Task 1.2 Receive and review data from staff		-		6 2		12	2,2
	Task 1.3 Prepare and launch online resident survey (Resident Survey)			6 1	2 12	18	49	8,
	Task 1.4 Produce summary notes from survey outreach efforts	•		4	4 20	20	49	7,3
ask 2	Review Local Housing Element and State Resources	:	2	2	6 6	i 21	37	\$ 5,
	Task 2.1 Review Housing Element			1	3 3	6	14	2,
	Task 2.2 Analyze data and statewide trends			1	3 3	15	23	3
ask 3	Assess Low-Income Households to Determine if Rent Burden Exists			2	5 20	2	30	\$ 4
	Task 3.1 Analyze City programs and data sources to determine if rent burden exists			2	5 20	2	30	4
ask 4	Examine Past and Current Space Rent Rates and Pass-Through Fees			4 1	5 20	20	60	\$ 9
	Collect and analyze data on rent increases, evictions, buyouts, turnover, vacancies,							
	Task 4.1 Collect and analyze data of Tent increases, evictoris, buyouts, turnover, vacancies, fair return petitions, property sales, and condition of housing stock			4 1	5 20	20	60	9
ask 5	Assess Rent Increases and the Escalator			3	3 15	15	37	\$ 5
	Task 5.1 Assess rent increases and escalataors and consistency with AB 1482			3	3 15	15	37	5
ask 6	Assess Spaces Affected by Mobile Home Residency Law	,		3	5 20	-	29	\$ 4
	Task 6.1 Assess spaces affected by or exempt from Mobile Home Residency Law			3	5 20	-	29	4
ask 7	Evaluate the Feasibility of Relocating Mobile Homes		ı	3 1	0 20		34	\$ 5
	Task 7.1 Evaluate feasibility of relocating mobile homes		l	3 1	0 20	-	34	5
ask 8	Outreach Efforts with Park Owners, Associations, and Individuals	- 1	2	0 1	6 28	18	74	\$ 12
	Task 8.1 Prepare and launch park owners and associations surveys (Park Owner Survey)			6 1	2 12	! 18	49	8
	Task 8.2 Produce summary notes from survey outreach efforts				4 16		25	4
ask 9	Hosting Four Public Outreach Meetings	ę	) ;	6 4	0 26	10	121	\$ 25
	Task 9.1 Prepare presentation of information - 4 outreach meetings	8	3	8 1	0 10	10	46	9
	Task 9.2 Four stakeholder meetings		. :	.5 2	5 -	-	50	11
	Task 9.3 Produce summary notes from public outreach and survey			3	5 16	-	25	4
RAND	TOTAL BUDGET	22	2 8	0 13	7 194	131	564	\$ 98
	Optional Summary Memorandum				5 8		59	12

## **ALTERNATE BID (Mobile Home Rent Stabilization Implementation Plan)**

	Description of Work	
1.	Assess the infrastructure necessary to implement a mobile home rent stabilization program, including staffing needs, start-up costs, and projected annual costs.	\$ 13,535
2.	Provide recommendations for the City's initial implementation and long-term implementation of the program based on known best practices.	\$ 11,315
3.	Provide advisory services throughout the creation of the ordinance and program guidelines. Assist staff with fee studies, and all financial impacts of the program. Assist staff with content creation – i.e., forms, applications, letters, fliers/handouts.	\$ 39,000
4.	Provide staffing support with all startup tasks and program launch. Including but not limited to CPI rent calculations, notices, Fair Return petition review, Capital Improvement Pass-Through applications, Inquires and Staff Training.	\$ 89,565
5.	Provide As-Needed Services.	\$ 61,500
	TOTAL COST	\$269,265*

## **Spell out the total cost:**

Two hundred and sixty-nine thousand, two hundred and sixty-five dollars\*

<sup>\*</sup>Assuming 3 Fair Return Petitions

	2022)				Task	Hours & Billin	a Rate			Total
			Principal \$275	Director \$275	Sr. Assoc \$200	Associate \$185	Analyst \$135	Res. Asst. \$125	Total Hrs.	Not to Exceed
ask 1	Assess the	Costs and Infrastructure to Implement a Rent Stabilization Program	3	6	12	6	30	28	85	\$ 13,53
	Task 1.1	Research - Comparison of Jurisdictions	1	1	-	-	12	12	26	3,67
	Task 1.2	Interviews - Comparable Jurisdictions	1	4	12	-	12	8	37	6,3
	Task 1.3	Summary Matrix	1	1	-	6	6	8	22	3,4
ask 2		commendations and Best Practices	1	15	1	29	10		56	\$ 11,3
	Task 2.1	Develop Best Practices	1	-	1	4	-	-	6	1,2
	Task 2.2	Summary memo		15	-	25	10	-	50	10,
ask 3		visory Services	12	55	55	-	20	55	197	\$ 39,0
	Task 3.1	Creation of Ordinance and Guidelines	5	30	20	-	20	15	90	18,2
	Task 3.2	Content Creation - Forms, Applications, Letters, Handouts, Etc.	5	5	25	-	-	40	75	12,7
	Task 3.3	City Council Meetings and Preparation	2	20	10	-	-	-	32	8,0
ask 4		ff Support with Program Launch	37	90	126	94	80	10	437	\$ 89,
	Task 4.1	Written Notices to Tenants and Landlords / Owners	2	5	15	-	15	-	37	6,9
	Task 4.2	Preparing Fair Return Petition Analysis	-	8	10	-	25	-	43	7,5
	Task 4.3	CPI Rent Increase Calculations	-	2	1	4	-	-	7	1,4
	Task 4.4	Fair Return Petition Review (per application)	-	25	35	50	30	-	140	27,
	Task 4.5	Capital Improvements Analysis	10	-	25	25	10	10	80	14,9
	Task 4.6	Staff Training	10	25	25	-	-	-	60	14,6
	Task 4.7	Fair Return Petition Hearings	15	25	15	15	-	-	70	16,7
ask 5	Provide As	Needed Services		20	150		100	100	370	\$ 61,5
	Task 5.1	Staffing Counter and Hotline		20	150		100	100	370	61.5

#### **KEY PERSONNEL**

RSG dedicates a Principal to each project assignment and creates a core group of project managers and staff who work on the individual assignments on a consistent basis throughout all stages of the contract engagement. Our staff is focused, committed, and passionate about the work we do. We conduct our engagements around our Core Values and are proud of it. We pride ourselves on our ability to appropriately allocate our time and resources to ensure that a project is completed on time and within budget.

This engagement will be led by Tara Matthews, Principal-in-Charge. Ms. Matthews would be assisted by RSG staff members Lynn Kelly-Lehner, Director and Project Manager, and Cindy Blot, Senior Associate. Resumes of the key consulting staff assigned to this engagement are included on the pages that follow. Additional RSG staff will be assigned as needed.

#### PROJECT AND TEAM MANAGEMENT PRACTICES

RSG manages staff allocation weekly to ensure that clients experience consistent, timely, and high-quality services. When responding to a proposal, RSG considers the expertise needed as well as the availability of personnel and makes assignments at that stage—even before getting a contract. This early commitment of resources minimizes the personnel turnover on engagements, so clients have a consistent team of consultants working on their project.

Each month, employees submit a forecast of their three-month (3) workload (after collaborating with project managers and principals) to RSG's resource management team for a review of overall hourly commitments to ensure adequate time allocation for the highest quality work products.

Project management is a critical part to RSG's operations, and we use several tools that all consulting staff employ as part of their daily activities. RSG employs WorkFlowMax, a project and time management application, daily to manage and track hours and milestones on assignments. On a weekly basis, all RSG team members provide updates on each project assignment in Microsoft Teams, and the Principals conduct weekly one-on-one meetings with each of our staff to review all assignments, actual hours, projected hours, and deliverables to ensure jobs are completed on time, within budget, and at our quality standards.



# TARA MATTHEWS

## **Principal & Vice President**

714.316.2111 tmatthews@webrsg.com

#### **PROFILE**

"I enjoy problem solving and working with people who make things happen to improve their community. Seeing a project that I worked on come to fruition is very exciting. I can say, "I helped make that happen!"

#### **OUT & ABOUT**

San Diego Housing Federation/Policy Committee and Conference Speaker

The Kennedy Commission

California Property Tax Managers Association, Annual Conference Speaker

California State Municipal Finance Officers, Speaker

California Association for Local Economic Development (CALED)

**Housing California** 

Non-Profit Housing Association of Northern California (NPH)

Southern California Association of Non-Profit Housing (SCANPH)

California Association of Local Housing Finance Agencies (Cal-ALHFA)

San Diego Housing Federation (SDHF)

California Association of Local Agency Formation Commissions (CALAFCO)



#### **ABOUT TARA**

Driven by the passion to improve the lives of all sectors of a community, Tara expertly navigates projects with a comprehensive knowledge of community development, affordable housing, and economic development. The complexity of her projects includes property acquisition and relocation services, development impact fee analyses, and the creation and monitoring of affordable housing projects. Tara is skilled at client collaboration, strategic planning, research and analysis, financial projections, report writing, and outreach.

#### **EDUCATION**

Tara joined RSG in 2004. She received a BS in Earth Sciences at the University of California, Santa Cruz, and a Certificate in Urban Planning and Development from the University of California, San Diego. Tara is an active member of the San Diego Housing Federation and serves on its Policy Committee. She shares her knowledge and proficiency in municipal finance, economic development policy analysis, and real estate to advance client and community objectives.

#### RECENT ENGAGEMENTS

Advised on and administered rent stabilization programs and policies, including engagements with the cities of Escondido, Palmdale, and Santa Ana.

Provided interim staffing services for the City of Carson, acting as the Interim Housing Program Manager for the City's mobilehome rent control program.

Assisted City of El Monte staff and legal counsel in administering the City's mobilehome rent control program by conducting the detailed analysis required to process fair return rent increase applications submitted by a mobilehome park owner.

Assisted the County of San Diego in developing a rental assistance program during the COVID-19 pandemic for residential landlords.

Assisted with drafting a memorandum for the County of Orange on the technical requirements for the creation of an emergency rental assistance program funded by the CARES Act CDBG-CV3 and Federal Treasury.

Assisted the County of San Diego with establishing an accessory dwelling unit (ADU) subsidy program. Analysis included researching ADU subsidy programs in comparable jurisdictions and assessing demand in the County for ADU development.



# LYNN KELLY-LEHNER

#### Director

714.316.2198 llehner@webrsg.com

#### **PROFILE**

"I am a strategic thinker and proactive and creative problem solver. I excel in a fast-paced environment, I am passionate about local government, and I am committed to make our communities thrive."

#### **OUT & ABOUT**

Southern California Association of Non-Profit Housing (SCANPH)

Urban Land Institute (ULI)

ULI OC/IE Multi-Housing Product Council

San Diego Housing Federation (SDHF)

California Association for Local Economic Development (CALED)

Non-Profit Housing Association of Northern California (NPH)

Housing California (Housing CA)

California Association of Local Housing Finance Agencies (Cal-ALHFA)

California Association of Local Agency Formation Commissions (CALAFCO)

Engaging Local Government Leaders (ELGL)

# RSG BETTER COMMUNITIES. BOLDER FUTURES.

#### **ABOUT LYNN**

Lynn's passions for serving the public, local government, and leadership appear in all aspects of her work. Lynn has held leadership positions in professional organizations, nonprofits, and cities, and has over 15 years of municipal economic development and special project management experience from the cities of Temecula, Dana Point, San Dimas, and Los Angeles.

Lynn has had success with public outreach efforts and bringing together diverse stakeholders and elected officials around public issues, and has a strong command of municipal budget implementation, preparation, and management, as well as advanced financial analysis, such as fiscal impact analyses.

#### **EDUCATION**

Lynn returned to RSG in 2020, having started her professional career with the firm before spending 15 years in the public sector, with a focus on community development and economic development. She earned a BA in Economics and Political Science from the University of Delaware and a Master of Public Policy (MPP) from the University of Southern California.

Lynn has also completed extensive professional training, organized multiple professional conferences, appointed as a board member for several non-profit organizations, and authored over a dozen articles for professional organizations.

#### RECENT ENGAGEMENTS

Conducted a low and moderate housing income analysis analyzing the potential closure of a mobile home park in Carson and its effects on the supply of housing.

Created policies and procedures manuals for multi-department programs including economic development incentives, grant programs, and administrative and operational procedures for the City of Temecula.

Developed Economic Development Strategic Plans in Corona and Carlsbad. Managed public outreach to understand challenges faced in the business community including the development of a resident surveys, phone calls with brokers and critical businesses, stakeholder workshops, engagement with key economic development partners, and presenting findings and recommendations to the City Council.



# CINDY BLOT

#### **Senior Associate**

714.316.2118 cblot@webrsg.com

#### **PROFILE**

"I am a creative problem solver who enjoys getting deeply connected with my projects."

#### **OUT & ABOUT**

**Housing California** 

Non-Profit Housing Association of Northern California (NPH)

Southern California Association of Non-Profit Housing (SCANPH)

California Association of Local Housing Finance Agencies (Cal-ALHFA)

San Diego Housing Federation (SDHF)

California Association of Local Agency Formation Commissions (CALAFCO)

(The list below is related to North Carolina.)

Chamber of Commerce

Rotary Club, Director

Habitat for Humanity

The Entrepreneur Center-Grant Writer/Organizer

SCORE, Counselor

Downtown Business Development Council

#### **ABOUT CINDY**

Cindy's background includes community and economic development, asset management, and finance for affordable housing, mixed-income multifamily, and commercial real estate developments. Having worked in commercial banking, Cindy developed strong skills financing complex residential and commercial projects utilizing a variety of funding sources and tax credits. Her community development experience resulted in municipalities being awarded millions of dollars in federal grant funds.

#### **EDUCATION**

Cindy joined RSG in October 2021 as a Senior Associate. She received a BS in Business Management and a master's degree in Public Administration, with an emphasis on Economic Development, from Eastern Carolina University. Cindy has worked with multiple municipalities throughout the country, focusing on affordable housing and economic development. Her affordable housing experience includes both 9% and 4% LIHTC transactions, HUD HOME and CDBG projects, and mixed income/mixed use public/private partnership developments. Her economic development experience includes new market and historic tax credit projects and public/private partnership development.

#### RECENT ENGAGEMENTS

Coordinated grant writing efforts for an EPA Brownfield Assessment Grant for the City of South Gate.

Worked with the City of El Monte in delivering CDBG, HOME, and ESG funds to support affordable housing and economic development.

Evaluated responses to County of San Diego Notices of Funding Availability (NOFAs) and provided recommendations regarding whether to provide the funding requested by the applicants.

Assisted the City of Merced and City of Tulare with project review and selection for ARPA compliance and reporting.

Assisted with the development and delivery of two renter protection ordinances for the City of Santa Ana; Rental Stabilization and Just Cause Eviction.



#### SCOPE OF SERVICES

#### UNDERSTANDING AND APPROACH

RSG understands that the City is looking for a consultant to complete a Rent Stabilization Mobile Home Analysis ("Analysis") and an alternate bid for a Mobile Home Rent Stabilization Implementation Plan ("Implementation Plan") for ten (10) mobile home parks and 1,835 mobile home units in the City of Corona. The City is exploring local rent stabilization regulations for mobile home parks and that to enact such a regulation, the City must demonstrate that a legitimate government interest exists. The City is seeking an analysis to obtain market data and public outreach that includes meetings with the Mobile Home Park Owners Association and other critical stakeholders.

RSG will draw on experience administering and evaluating apartment rental and mobile home rent stabilization programs for cities across the State. Our Analysis will also consider the tenant protection provisions in the California Code and related case law.

#### SCOPE OF SERVICES - BASE BID - RENT STABILIZATION MOBILE HOME ANALYSIS

The following details RSG's proposed scope of services for the Rent Stabilization Mobile Home Analysis.

#### Task 1: Analyze Mobile Home Resident Demographics

RSG will analyze mobile home resident demographics including, but not limited to, household size, income, ages of household, race and ethnicity, and more. RSG will obtain this information through a combination of methods such as direct contact with the mobile home parks and through reliable databases such as the Census, American Community Survey, DataQuick or ESRI Business Analyst. As part of this task, RSG will complete a review of the preliminary research regarding mobile home parks that staff has completed.

In coordination with the City's Communications Department, RSG will create an anonymous digital survey to send to mobile home park owners and residents to collect demographic data. This survey will be available in both Spanish and English, and in a hard copy format, if requested.

This task also includes <u>one (1) kick-off meeting</u> with City staff (in-person or virtually) to review the final scope and schedule, identify data needs and documentation, gather any additional ideas and input, and surface any concerns or issues to be aware of or to be addressed.

Deliverables for this task include the development of a digital survey (English and Spanish) and a summary of the survey results.

#### Task 2: Review Local Housing Element and State Resources

RGS will review the City's 2021-2029 Housing Element to determine if mobile homes constitute an important source of affordable housing. As California communities look for ways to address the housing crisis, manufactured homes may play an increased role in the provision of affordable housing. RSG will also review literature from HCD and academic institutions on the role of mobile homes in addressing the housing crisis.

#### Task 3: Assess Low-Income Households to Determine if Rent Burden Exists

RSG will assess the low-income households in Corona to determine if a rent burden exists, as defined by the US Department of Housing and Urban Development ("HUD"). HUD defines cost-burdened families as those "who pay more than 30 percent of their income for housing" and

"may have difficulty affording necessities such as food, clothing, transportation, and medical care." Severe rent burden is defined as paying more than 50 percent of one's income on rent. Housing affordability is an important determinant of health and well-being.

RSG will analyze data collected through ESRI Business Analyst, the City's CDBG Analysis of Impediments, Mobile Home Assistance Program, and the Mobile home Park Rehabilitation and Restoration Ownership Program, as well as the survey results from Task 1 to determine if rent burden exists.

#### Task 4: Examine Past and Current Space Rent Rates and Pass-Through Fees

RSG will examine past and current space rent rates and pass-through fees included in space rent, such as utilities, property tax, capital works fair- share, and more. RSG will obtain the information utilizing the survey discussed in Task 8 and will request recent space rent rolls (if available).

#### Task 5: Assess Rent Increases and the Escalator

In conjunction with Task 4, RSG will assess rent increases and the escalator used to determine if increases are reasonable or inconsistent with standard practices. This will include an analysis of the allowable annual rent increases established by other jurisdictions that administer mobile home park rent stabilization programs. The assessment will consider statewide trends and rates in rental increases in affordable housing units. The analysis will also consider the maximum caps in rental increases, as established by AB 1482.

#### Task 6: Assess Spaces Affected by Mobile Home Residency Law

RSG will assess the number of mobile home spaces that may potentially be exempted under the Mobile Home Residency Law, sometimes referred to as the landlord-tenant law. Factors may include existence of long-term leases and resident-owned parks.

#### Task 7: Evaluate the Feasibility of Relocating Mobile Homes

Utilizing our experience of mobile home relocation in other Southern California communities, RSG will evaluate the feasibility of relocating mobile homes. Determining factors would include, but are not limited to, age of the mobile home coach, availability of vacant mobile home spaces, value of the coaches, costs to breakdown and move coaches, and special considerations of the tenants, such as senior restricted parks.

#### Task 8: Outreach Efforts with Park Owners, Associations, and Individuals

In conjunction with Task 9, RSG will conduct outreach efforts with critical stakeholders, including park owners and mobile home association board members. Outreach in this phase could include park owner surveys to identify critical issues and concerns facing the stakeholders. We will work with staff to develop the scope of the outreach and ensure that intended goals are met.

#### Task 9: Hosting Four (4) Public Outreach Meetings (Minimum)

In conjunction with Task 8, RSG will conduct a total of <u>four (4) in-person meetings</u> including <u>two (2)</u> with residents, two (2) with mobile home park owners.

Mobile Home Park Owners: The first meeting will introduce RSG to mobile home park owners, provide background on the scope of this project and overall goals, and collect feedback about the benefits and drawbacks of rent stabilization. The second meeting will present up to four potential policy alternatives for consideration, with the goal of understanding the financial viability of operating the mobile home parks. Residents: The first meeting with residents will introduce RSG to attendees, provide background on the scope of this project and overall goals, and collect feedback about the benefits and drawbacks of rent stabilization The second meeting will present up to four potential policy alternatives, with the goal of understanding the potential impact to affordability and tenancy for residents.

RSG will collaborate with City staff to determine a schedule for the meetings and conduct outreach to reach participation levels that will provide adequate feedback from the affected communities. RSG will gather RSVPs for the meetings and keep a record of attendees.

RSG will lead discussion, gather feedback, and produce summary notes for each meeting. RSG will have a Spanish-speaking staff person present to translate and communicate with Spanish-speaking attendees as necessary. RSG will confer with the City on whether other languages need to be accommodated and how best to make arrangements for translation.

RSG's proposed fee assumes community meetings will be in-person. If desired, RSG can provide a fee estimate to conduct additional community meetings in-person or via teleconference or prepare an online survey tool to gather feedback from stakeholders who are unable or unwilling to participate in the in-person meetings.

#### RECOMMENDED ADDITIONAL SERVICES

RSG recommends the inclusion of a summary report as part of its services. The budget for this task includes a report summarizing RSG's findings, public outreach, and recommendations from all of the tasks above.

#### SCHEDULE/TIMELINE

RSG expects to complete the scope of work within one year of an initial kickoff meeting with staff.

# SCOPE OF SERVICES – ALTERNATE BID – MOBILE HOME RENT STABILIZATION IMPLEMENTATION PLAN

RSG understands that, pending the results of the Analysis described above, the City may wish to implement a Mobile Home Rent Stabilization Implementation Plan. RSG will undertake the following tasks to help the City understand program requirements, administrative structure and resources, program revenue and expenses, program compliance, and identify best practices that the City should consider in its long-term implementation should they move forward with a Mobile Home Rent Stabilization Program. However, RSG anticipates that the scope below may be modified as the City progresses through the process and has a clearer understanding of how they would like to administer a mobile home rent stabilization program.

#### Task 1: Assess the Costs and Infrastructure to Implement a Rent Stabilization Program

RSG will assess the infrastructure necessary to implement a mobile home rent stabilization program, including staffing needs, start-up costs, and projected annual costs.

RSG will coordinate with City staff to select up to five (5) comparable jurisdictions to prepare a comparison assessment of rent stabilization and tenant protection controls and procedures. RSG will review the selected jurisdictions' policies to identify differences and commonalities. We will conduct interviews of staff who implement their programs to gain insight into the scope and depth of their programs and collect advice based on their experience.

A summary matrix will compare tenant protection policies and rent stabilization requirements, maximum rent increases, frequency of rent increases, administrative fees, and other relevant points that will inform Corona's decisionmakers.

#### Task 2: Provide Recommendations and Best Practices

In conjunction with Task 1, RSG will provide recommendations for the City's initial implementation and long-term implementation of the program based on known best practices. RSG will prepare a draft memo that synthesizes RSG's analysis, findings, and recommendations for City staff review and comment. After incorporating City feedback, RSG will prepare a final memo.

#### Task 3: Provide Advisory Services - Creation of Ordinance and Guidelines

RSG will provide advisory services throughout the creation of the ordinance and program guidelines, including assist staff with fee studies and all financial impacts of the program. RSG will also assist staff with content creation such as notices, forms, applications, letters, fliers, handouts, and social media verbiage. RSG can also help prepare guidelines to help administer the ordinance.

RSG will work with the City Attorney on providing technical support for the draft ordinance to be considered by the City Council but would defer to the City Attorney for drafting the ordinance itself and the associated staff report.

This task and budget include attendance at two (2) in person City Council meetings (first and second reading of the ordinance).

#### Task 4: Provide Staff Support with Program Launch

RSG will provide staffing support with all startup tasks and the program launch of a mobile home rent stabilization program. This would include, but is not limited to, CPI rent calculations, notices, Fair Return petition review, and Capital Improvement Pass-Through applications. RSG

would also assist staff in fielding inquiries from the public and providing adequate training. Tasks include:

- Written Notices to Tenants and Landlords/Owners: RSG can prepare required notices
  as required by the Municipal Code, in coordination with the City Attorney. It is
  anticipated that City staff will be responsible for mailing any documents.
- <u>Preparing Fair Return Petition Analysis:</u> RSG can review a Fair Return Petition Application and evaluate an applicant's request to increase rents above the amount automatically allowed under a rent stabilization ordinance, in order to receive a fair and reasonable return. A Fair Return Petition Application analysis will be provided to the City Manager for final review and approval.
- <u>CPI Rent Increase Calculations</u>: RSG can prepare and distribute allowable rent increase
  amounts to affected property owners pursuant to the procedures detailed in an
  adopted ordinance. CPI calculations determine the allowable percentage a property
  owner/landlord is allowed to increase a tenant's rent by.
- Fair Return Petition Review: If a property owner/landlord believes an annual rent increase does not allow for a sufficient fair return on investment, they may file a petition for a fair return increase that may allow for an adjustment above the CPI calculation. This process requires reviewing income and expense information and performing a maintenance of net operating income analysis. RSG can use a Maintenance of Net Operating Income ("MNOI") methodology for determining fair and reasonable rent. The MNOI method is a recognized and accepted practice used in other jurisdictions for evaluating fair return increases under rent stabilization. RSG will calculate a base year NOI for a property prior to adoption of the RSO, using actual historical revenue and expenses for that property, collected through the Petition process. RSG will provide the analysis to the City for review so the City Manager or designee can decide on the allowable rent increase amount. RSG will also evaluate all the other factors that may be considered by the City Manager as part of the rent increase as detailed in the RSO.
- <u>Capital Improvements Analysis</u>: RSG will use a Capital Improvement methodology for determining a fair return and amortized capital improvement rent increase. RSG will prepare a written evaluation of the materials submitted by the applicant and residents. The written evaluation will include a description of the various rent increase factors and the proposed allowable rents under each method.
- <u>Staff Training</u>: RSG understands that all or a portion of the services will be on an interim basis until such time as City staff, or another designated party, is ready to assume responsibility for implementation. RSG is available to prepare training materials and support as needed for use by City staff for program implementation. Materials can include, but are not limited to webinars, in person meetings, and policies and procedures.
- <u>Fair Return Petition Hearings</u>: RSG will be available to attend the Hearing to answer any questions that the public or Hearing Officers may have on the analysis. This includes time for hearing preparation and any required briefings by legal counsel prior to the Hearing(s). RSG understands that there is the possibility of more than one Hearing. The budget for this task assumes one (1) Hearing.

#### Task 5: Provide as Needed Services

In addition to the tasks above, RSG can attend and participate in City Council and Staff meetings, as requested. RSG is available to conduct surveys or other forms of community outreach as needed, as well as the tasks outlined below.

• Staffing Counter and Hotline: RSG can provide temporary staffing to answer questions of property owners and residents, both in person for walk-ins and appointments at City Hall or the Housing Authority (or another location best suited for the clientele), and via a dedicated phone line or email address. Depending on the availability of City staff and the volume of inquiries, the number of days and hours of in-person staffing will be adjusted accordingly. RSG can provide information to tenants regarding the provisions of the RSO but will not be expected to assist the tenant any further regarding complaints or enforcement. Rather, tenants will be directed to contact an attorney that can file a civil suit if warranted.

RSG will be available to provide analysis, expert testimony, or other support to the City regarding any challenges to a mobile home rent stabilization ordinance.

#### SCHEDULE/TIMELINE

RSG expects to complete the scope of work within one year of an initial kickoff meeting with staff.

#### RELEVANT SAMPLE PROJECTS

The projects below demonstrate RSG's experience providing services of a similar nature as those requested in the RFP, including names and telephone numbers of contact persons. We encourage you to contact our references or follow up with additional questions.

Tara Matthews, RSG Principal, oversaw each engagement described below and can leverage her experience leading these initiatives towards the City's requested analysis. All these projects contribute to RSG's overall experience in rent control ordinances and rent stabilization programs.

# CITY OF CARSON - MOBILEHOME PARK RENT CONTROL PROGRAM AUDIT AND ADMINISTRATION

In 2011, RSG conducted an audit of the City of Carson's mobile home rent control ordinance. The audit reviewed the City's ordinance and procedures and analyzed historical data to recommend revised rent increase application process and procedures. The process resulted in the City adopting an automatic consumer price index annual rent adjustment.

Since 2017, RSG Principal Tara Matthews has served as the City's Interim Housing Program Manager. In this role, she administers the City's mobile home park rent control program. The scope of services includes the following:

- Rent Increase Application Review and Processing RSG reviews all applications submitted by park owners seeking either a capital improvement or a fair return rent increase. RSG ensures that each application is complete and adheres to the Program guidelines. This review includes closely evaluating each of the expenses submitted by the park owner to ensure that each reported expense is reasonable, accurate, and sufficiently documented. RSG's work includes frequent communication with park owners and residents, as well as collaboration with the City's legal counsel.
- Resident Noticing Once an application is deemed complete, RSG prepares required noticing for the park residents and is available to answer any questions that the park residents may have. RSG is available for on-site visits as needed to allow park residents an opportunity to review the application and ask in-person questions.
- Park Inspections The processing of each application requires an inspection of the mobile home park which entails visually inspecting the condition of the park (for fair return rent increase applications) or verifying the completion and quality of improvements to the park (for capital improvement rent increase applications). The findings of the inspection are included in the staff report present to the Mobile Home Rental Review Board ("Board"). One of the City's contract inspectors accompanies RSG at these inspections to provide expertise on the park conditions and improvements.
- Public Hearing RSG prepares the public hearing notices mailed to park residents. RSG also prepares the staff reports presented to the Board for consideration at the public hearings. Each staff report includes all material facts related to the application and outlines various rent increase options for the Board to consider. RSG attends all public hearings to present information to the Board and answer any questions posed by the Board.
- Point of Contact RSG responds to general inquiries from park owners, park residents, and the general public regarding the City's mobile home park rent control program.

Contact: Saied Naaseh, Director of Community Development

# CITY OF EL MONTE – MOBILEHOME PARK FAIR RETURN RENT ADJUSTMENT PETITION ADMINISTRATIVE SERVICES

RSG assists the City of El Monte with administration of the City's Mobile Home Park Rent Stabilization Program by providing services as it pertains to the El Rovia Trailer Village, LLC rent increase petition review and Maintenance of Net Operating Income ("MNOI") analysis. The scope of services includes the following:

- Petition Review RSG reviews the petition to ensure that it is complete and adheres with the Program guidelines and that all claimed expenses are eligible operating expenses. Additionally, RSG verifies park revenues. Petition review also includes preparing correspondence to the park owner informing them if their petition has been accepted or rejected. Should a petition be rejected, RSG will detail the reason for the rejection to inform the park owner of any deficiencies.
- MNOI Analysis RSG calculates the MNOI and the proposed MNOI Entitlement pursuant to Section 8.70.080 of the Municipal Code.
- Settlement Agreement Analysis RSG evaluates the rent differences between the terms proposed in the settlement agreement versus the MNOI Analysis as needed.

Contact: Betty Donavanik, Director of Community and Economic Development (626) 580-2056 / bdonavanik@elmonteca.gov

# CITY OF SANTA ANA – RENT STABILIZATION AND JUST CAUSE EVICTION ORDINANCE ADMINISTRATION

In 2021, Santa Ana became the first city in Orange County with rent control. RSG helped announce and launch the City's Rent Stabilization and Just Cause Eviction Ordinance by creating a press release, website content, letter to property owners, informational flyers, and public workshops. RSG collaborated with the City Attorney to create a form of written notice and fair return petition application that complies with local policies and State law. RSG currently provides interim staffing of the public counter and hotline five days a week to answer questions from the public. RSG also helps train new city staff hired to implement the program. RSG most recently prepared a long-term implementation plan to help city staff administer the program that ultimately led to the City Council adopting an amended Ordinance. RSG will provide ongoing support to prepare and distribute allowable rent increase amounts (the lesser of 3% per annum of 80% of the change in CPI), review fair return rent increase petitions, and respond to tenant complaints.

Contact: Judson Brown, Housing Division Manager (714) 667-2241 / jbrown@santa-ana.org

#### CITY OF ESCONDIDO - REVIEW OF MOBILEHOME RENT REVIEW APPLICATION

RSG was hired by the City of Escondido in 2022 to assist with the review of a Mobile Home Rent Review Application submitted by the Eastwood Meadows Mobile Home Park. The scope includes reviewing written submissions provided by the park owner and park residents and preparing a report for the rental review board to inform their decision to grant a rent increase. Escondido considers three different types of rent increases that RSG can evaluate: Maintenance of Net Operating Income (MNOI), Gross Profits Maintenance Analysis (GPM), and changes in Consumer Price Index (CPI).

Contact: Holly Nelson, Housing & Neighborhood Services Manager

#### CITY OF PALMDALE - MOBILEHOME PARK RENT CONTROL REVIEW

In 2022, RSG was hired by the City of Palmdale to review 2021 mobile home registration documentation submitted by park owners, review rent rolls and related documents, prepare a letter detailing any instances in which the park owner charged excessive rent (if applicable), and prepare a letter approving the implementation of a 2022 Permissive Rent Increase under the City's ordinance. RSG also reviewed the City's mobile home ordinance, policies, and program documents to create a checklist of the annual registration documentation required.

Contact: Sophia Reyes, Housing Manager

(661) 267-5100 / SReyes@cityofpalmdale.org