

Assembly Committee on March 6, 1981

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MEMBERS PRESENT: Mr. Chaney, Mr. Prengaman, Mr. Kovacs

MEMBERS ABSENT: None

GUESTS PRESENT: See Attached Guest List

Chairman Kovacs called the meeting to order at 10:11 a.m. in Room 131 of the Legislative Building. As the first item of business, Mr. Kovacs asked that the booklet prepared by the Mobile Home Owner's League of the Silver State be entered into the record and marked as EXHIBIT A.

The Chairman set the ground rules for the meeting and asked that the following items be entered into the record:

- Information from the Las Vegas Mobile Home Park Mediation Board . . . . . EXHIBIT B
Bylaws of the City of Las Vegas Mobile Home Park Mediation Board showing the Ordinance that created the Board, No. 2036 . . . . . EXHIBIT C
Testimony by the Nevada Association of Realtors . . . . . EXHIBIT D
A letter from the District Attorney's office of Clark County . . . . . EXHIBIT E
A memorandum from the office of the Clark County Manager . . . . . EXHIBIT F
A copy of Chapter 27.04, Clark County provisions for mobile homes and mobile home parks . . . . . EXHIBIT G

The first bill open to discussion was A.B. 31.

A.B. 31: Provides for regulation of mobile home parks.

Chairman Kovacs called Ernest Miller to speak as a proponent. Mr. Miller, representing the Reno Chapter of the Mobile Home Owners League and the Mobile Home Advisory Board for Washoe County, stated that the general position of the Advisory Board was to seek a Do Pass for A.B. 31. He added that the Washoe County District Attorney's office was also seeking to have the bill passed. Mr. Miller indicated that there were some serious health problems existing in some Washoe County mobile home parks and that the health department did not inspect as frequently as it should because of a lack in manpower.

The Chairman next called Wayne Tetrault, Administrator of the Manufactured Housing Division. Mr. Tetrault indicated that he was in support of A.B. 31 and noted that the bill "is actually two bills in one." He said that sections 2 through 27 related to the construction, maintenance and use standards and that sections 28 through 45 dealt with the enforcement of the landlord/

tenant law.

Mr. Tetrault remarked that he was "strongly in support of the provisions that relate to standards for the construction and use of the parks." He stated that any regulations or standards governing mobile home parks would be developed in conjunction with local ordinances and codes. He added that A.B. 31 would have a tremendous effect on parks in rural areas--particularly if the MX comes to Nevada.

Mr. Tetrault commented that if the standards are not set, "By 1990 we will have a lot of mobile home ghettos in Nevada." As an example of such a situation, he related a story about an area in Rock Springs, Wyoming where oil shale was discovered and there was a large influx of mobile homes into the area that were not regulated, which ultimately resulted in a serious problem.

"A.B. 31 is a far-reaching piece of legislation," remarked Mr. Tetrault. He added that there was little or no enforcement of NRS 118 at this point and that A.B. 31 "provides a vehicle for the enforcement of landlord/tenant laws." He also said that the mediation boards that have been established are generally ineffective in resolving landlord/tenant laws.

Mr. Tetrault noted that the Manufactured Housing Division would enforce A.B. 31 or the city and counties could choose to enforce it. He added that there would, of course, be a fiscal impact and that he had revised his original budget figures to reflect an estimated cost of approximately \$135,000 for the first year and \$155,000 the second year. He noted that the provisions of A.B. 31 would make it a "self-supporting" program.

Mr. Tetrault indicated that he had a number of amendments to the bill. He read and explained the amendments which are attached and marked EXHIBIT H. Budget figures are also included in this exhibit.

Following Mr. Tetrault, Chairman Kovacs called Shannon Zivic to testify. Ms. Zivic, speaking as president of the Mobile Home Owners League of the Silver State, commented that the people she represented would be willing to pay the cost of enforcement of A.B. 31. She indicated that there were many "bad health conditions" in Clark County and the mobile home inspection department of the county does not adequately take care of the problems. She remarked that she realized the enforcement of A.B. 31 would be assigned to the local governments with the state to turn to in the event that the enforcement was not properly carried out.

Mr. Kovacs questioned Ms. Zivic concerning her statement regarding the willingness of the tenants to absorb the cost of enforcing A.B. 31. Ms. Zivic reemphasized that the tenants were willing to pay the costs in return for alleviation of some of their problems with health hazards and landlord/tenant relationships.

Ms. Zivic questioned whether or not the state had the authority to enforce a local ordinance. Mr. Wayne Tetrault responded to the question by remarking that the question could best be answered by Mr. Daykin, Legislative Counsel. He added that unless it was so written into law, the state could no more enforce local ordinances than the local officials could enforce the state laws.

Chairman Kovacs then called Russ Jones to testify. Mr. Kovacs indicated that he lived in a mobile home park in Reno and that the tenants had a very good relationship with the park owner. He indicated that he was in opposition to the section of A.B. 31 which specified that someone could inspect the records of the owner "without notice."

Next to speak was James Edmundson, Bureau Chief of the Consumer Health Protection Services. Mr. Edmundson indicated that, basically his office was in agreement with A.B. 31; however, he proposed two amendments. These amendments are attached and marked EXHIBIT I.

Mr. Prengaman remarked, "During the interim study committee, we heard a lot of testimony that health inspections were not being made on a regular basis; and as I understand what you're asking is that if you wipe out this section--and maybe Mr. Tetrault can enlighten us--you're wiping out the authority for the administrator of this division to inspect health violations." Mr. Edmundson responded that the administrator of the division had the authority to make an inspection, that his amendment would remove the redundancy of having his division also inspect.

Mr. Kovacs asked Mr. Edmundson if his division was having a difficult time with making inspections of mobile home parks. Mr. Edmundson responded that regulations for the inspection of mobile home parks were adopted in 1970 and that his division has been inspecting "once per year." He added that prior to the construction of a new park, the plans for the park were supposed to be submitted to the Division of Health for approval. Mr. Edmundson submitted a copy of the "Regulations Governing Mobile Homes and Mobile Home Parks (Trailer Courts)" to the Committee. The copy is attached and marked EXHIBIT J.

Mr. Kovacs asked Mr. Edmundson how health problems could be corrected if his division only inspected once per year. He also asked if it had been found that there were health problems existing in mobile home parks. Mr. Edmundson responded that the main health problems involved the sewage and water connections in older parks.

The Chairman then called Thelma Clark to testify. Ms. Clark asked if certificates were issued when health inspections were made. Mr. Edmundson replied that certificates were not required by law, but that a copy of the inspection form was left with the park operator. He added that if the discrepancies were not satisfactorily corrected, the matter was pursued through the district attorney. He noted that it was very difficult to get the district attorney to take action in such cases.

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Ms. Clark asked if there was any way that the tenants could find out the results of a health inspection of their particular parks. Mr. Edmundson responded that a "posting" was not required, but that the division's records were public records, and anyone could come and look into them. He added that in Clark County, the County Health Department was responsible for the enforcement of the health regulations.

Ms. Clark commented that as mobile home tenants, "We are in great need of an enforcement agency for existing state laws." She indicated that she would like to see the responsibility for enforcement at the local level. She stressed that there was no one to turn to when tenants have problems with a mobile home park owner. She added that the mediation boards were not helpful because they had no authority. At this point, Ms. Clark read a letter addressed to Ms. Lila Dunkel from Governor Robert List. The letter is attached and marked EXHIBIT K. Ms. Clark closed her comments by stating that Riviera Vegas Mobile Home Park had sent 1,541 letters to members of the legislature and the Governor asking for passage of the bill.

Mr. Kovacs asked Mr. Wayne Tetrault of the Manufactured Housing Division to return to the podium to answer a question from Mr. Prengaman. Mr. Prengaman asked if "wiping out" section 51 would delete the powers of the Manufactured Housing Division to inspect mobile home parks. Mr. Tetrault responded that the law was written in such a way as to allow the Division to adopt regulations pertaining to health inspections. In addition, if a "nuisance situation" existed, the Health Department would still be able to come into the picture.

Mr. Chaney then asked Mr. Tetrault if there would be any effect on the proposed budget if section 51 were deleted from the bill. Mr. Tetrault indicated that deletion of the section would have no effect at all on the budget.

Chairman Kovacs called Elma Lawler to testify. Ms. Lawler indicated that she was speaking for herself as a tenant in a mobile home park. She stated that she was asking the Committee to vote yes on A.B. 31 and that the tenants could not ask for enforcement of local ordinances unless there was "legislation from the legislators." She indicated that there must be standards set in anticipation of the large influx of mobile home owners and tenants that are expected in the state. Ms. Lawler stated that she thought it would be a good idea for the health inspectors to post inspection certificates in mobile home parks.

Ms. Lawler read two letters to the Committee requesting yes votes on A.B. 30 and A.B. 31. The letters were from a Mr. Taylor and a Mr. Shaw.

In answer to a question from Ms. Lawler concerning the small number of legislators present for the hearings, Mr. Kovacs responded that it was a subcommittee hearing and that the sub-

committee would report back to the full committee.

Mr. Chaney asked Ms. Lawler if she had any suggestions on how the inspection reports should be written after the health department inspects a mobile home park. Ms. Lawler indicated that, first of all, the inspections should be more frequent, and that the posted reports should not grade the parks in the same fashion that restaurants are graded. Instead, she recommended that the report itemize infractions.

Chairman Kovacs called John Clark. Mr. Clark indicated that he represented the Public Service Commission and that he wished to make a comment concerning Section 53 of A.B. 31. Mr. Clark stated that the Commission did not have an opinion on any other parts of the bill.

Mr. Clark said that the Commission does not have the personnel to do the examinations and testing required in Section 53 of the bill and would, therefore, have to delegate that responsibility to local authorities, which would impact local funding.

Mr. Prengaman asked if the man now on the Commission's staff who is responsible for testing gas lines could not assume the testing requirements in Section 53. Mr. Clark responded that he would not be able to do it because of his other obligations and responsibilities, mainly larger pipelines and gas lines.

The Chair called Lew Dodgion to testify. Mr. Dodgion, Administrator of the Division of Environmental Protection, stated that his division was in favor of A.B. 31; however, he wished to propose an amendment to the bill. A copy of the proposed amendment is attached and marked EXHIBIT L.

Vickie Demas, representing the Mobile Home Owners League of the Silver State, came forward to testify as a proponent of A.B. 31. Ms. Demas remarked that she was under the impression that the bill had been drafted because it had been ascertained through interim subcommittee hearings that the proper inspections had not been carried out and that tenants had no recourse when problems existed within the mobile home parks where they lived. Mr. Prengaman responded to her by saying, "That's correct."

Ms. Demas cited some of the problems that tenants were having with park owners and went on to say that the tenants were receiving no cooperation from the local authorities who are charged with the enforcement of health and safety regulations in mobile home parks. She added that a state agency was necessary to see that the local authorities did their jobs properly.

Mr. Russ Jones returned to the podium to reply to some of the remarks that Ms. Demas had made. He indicated that he had lived in a number of mobile home parks over a period of years, and that he felt it was not always the owner who was at fault for safety

and health violations. He added that sometimes the tenants were the cause of the violations.

Mr. Kovacs called Robert Stubbs, President of the Nevada Parks Association, to testify. Mr. Stubbs stated that he felt A.B. 31 dealt with the total control of mobile home parks and that implementation would be expensive and "absolutely devastating to mobile home park development." He indicated that the provisions of the bill were redundant since the responsibilities assigned to the Manufactured Housing Division were already being carried out by various local agencies. He added that he wondered about the constitutionality of some of the provisions of the bill.

Mr. Stubbs remarked that an alternative to A.B. 31 might be to give the power to the building and health departments to enforce compliance with local regulations through the district attorney's office. He commented that he was particularly opposed to Section 18 of the bill and summarized his remarks by saying that the bill would establish "a super agency to enforce rules and regulations that already exist and should be enforced by the building or health departments."

Mr. Stubbs also indicated that his personal experience has shown that the health department will inspect properly if called upon. He said that he felt that mobile homes on private land should be subject to the same regulations as those in rental parks and that health or safety violations are usually caused by individual tenants. Mr. Stubbs suggested that more study should be done before the bill is either adopted or defeated.

Mr. Chaney asked Mr. Stubbs why he felt that the state should not pay for the implementation of A.B. 31. Mr. Stubbs remarked that all segments of the population should not be held responsible for implementation of a law that applies to only a small segment of that population.

Mr. Prengaman remarked that the funds for the bill would not be coming from the state's general fund; rather, they would be from mobile home park owners and tenants who would be charged fees.

Speaking next in opposition to A.B. 31 was Mr. Al Fischer, owner of Cottonwood Mobile Home Park in Carson City. Mr. Fischer said that the tenants in his park would be opposed to paying for the implementation of A.B. 31. He added that he did not feel that it was fair to penalize Carson City because the Clark County officials were not doing their jobs. He stated that he had specific problems with A.B. 31. He listed those concerns to be with page 2, line 4; page 9, lines 33 and 34; and page 10, lines 25 through 31.

Mr. Fischer remarked that it was costing him more to get his meters tested than the law allowed him to collect from the tenant. He also indicated that page 11, lines 14 through 16 frightened him with respect to the fines that would be charged under this section.

Mr. Chaney remarked that Mr. Fischer had indicated that his tenants would not be willing to pay the \$10 annual fee to be charged to park tenants for enforcement of the provisions of A.B. 31. He also asked Mr. Fischer what his park rents were. Mr. Fischer indicated that his rents were presently \$125 and gave some background information concerning his park and rent increases over the past 20 years.

Mary Fischer joined Al Fischer at the podium to give an extensive rationalization for past space rent increases. Mr. Fischer interrupted Ms. Fischer and summarized her remarks by saying that his tenants did not have a problem, so why should they have to pay for enforcement of a bill that they do not need.

May Thorp, owner of Hillside Mobile Home Park in Carson City, came forward to testify in opposition to A.B. 31. Ms. Thorp indicated that she was opposed to having "such dire state regulations." She indicated that she felt enforcement should be on a local level. Ms. Thorp also mentioned that there were no problems within her park and explained that she posted the health department's inspection report and required tenants to sign an extensive set of park rules and regulations. She implored the committee to take into consideration the fact that there are good parks and not to condemn everyone because "of what a few people are doing."

Mr. Chaney asked Ms. Thorp what effect this bill would have on her park if she had no problems with her tenants. Ms. Thorp responded that her tenants would be hurt because she would have to increase her rents because costs to her would be increased for additional inspections. As an alternative to A.B. 31, Ms. Thorp recommended that the laws that are now on the books should be enforced.

Shannon Zivic stepped up to the podium and stated that she would like to clarify a matter. She said that the local authorities already have the authority and power to make the necessary inspections outlined in A.B. 31; however, they are not performing their duties satisfactorily and that the purpose of this bill is to provide the authority to make the local governments and agencies "do what they're supposed to do."

Ms. Zivic explained to the Committee how a one-time charge is levied on a master metering system and how the park owners were, in turn, charging back that fee to each tenant each month. When Mr. Kovacs asked Ms. Zivic if that situation was occurring in every case in Clark County, Ms. Zivic responded, "Certainly."

Mr. Robert Stubbs returned to the podium to reply to Ms. Zivic's statements. He indicated that the monthly charge that was assessed to the tenants in connection with master metering systems was for the maintenance of the system and the replacement of worn parts

as well as for the reading of the meters, computing the bills, collecting the bills and paying the bills.

Mr. Stubbs also mentioned that there was a \$5 charge to have a meter re-read. If it was ascertained that the meter was faulty, it would be replaced without charge. If the meter was operating properly, the utility company would keep the \$5 as a service charge.

In response to a question from Mr. Kovacs, Mr. Stubbs indicated that he would like to see master metering systems done away with entirely because of all of the problems associated with these systems. Mr. Stubbs went on to narrate some of the problems and expenses that he had encountered in his park with the master metering system.

Mary Fischer also returned to the podium to respond to Ms. Zivic's statements concerning charges for "testing" meters relating to Section 44 of A.B. 31. Ms. Fischer brought out the fact that the \$5 charge imposed by the utility company was simply a charge to re-read the meter, not to test the meter. She indicated that in order to test meters, they must be removed and sent to a facility outside of Nevada equipped to do such testing, and the charge for this type of testing exceeded \$100 for each meter. Ms. Fischer remarked that the tenant should be required to put up a deposit or a bond to help allay the cost to the park owner in the event that meter is found to be working properly.

Mr. Prengaman commented that he felt Ms. Fischer was talking about a different type of testing than required in A.B. 31. She argued that the law specifically said "test" and not "re-read."

There ensued further discussions concerning charges made by the utility companies and how those charges were reported on monthly statements or bills. It was also brought out that there were no new mobile home parks being built using master metering systems and that some of the parks that originally had such systems were converting. Costs for such conversions were said to run from \$400,000 to \$500,000, and that those costs were being split between the tenants and the park owners over a period of time.

The Chairman then closed the hearing on A.B. 31 and recessed the meeting for lunch. Immediately following the lunch break, the hearing for A.B. 30 was opened.

A.B. 30: Revises landlord and tenant relationships in mobile home parks.

The first person to speak with regard to A.B. 30 was Mr. Bill Hanmer, representing the Attorney General's Office. Mr. Hanmer indicated that was appearing to support Section 6, page 3, lines 9 and 10 of the bill, which is a provision to forbid the tying of a mobile home lot rental to the purchase of a mobile home



from the park owner or any other person as a condition of renting a mobile home lot. Mr. Hanmer went to give a detailed explanation of what was meant by a "tying arrangement."

Mr. Hanmer presented the Committee with a copy of a letter from Attorney General, Richard Bryan, which explained his support for Section 6 of A.B. 30 and suggested the addition of another section to the bill. The letter is attached and marked EXHIBIT M.

Mr. Kovacs asked Mr. Hanmer for his personal opinion with respect to the letter (Exhibit E) from the Clark County District Attorney.

Mr. Hanmer responded, "I have some problems personally, as an attorney, with the concept that rent control can be triggered by emergencies to begin with." He also said, "I think that there is a conceivable problem if you can declare an emergency in mobile home lots without declaring a similar emergency in other types of residential housing." He stressed that this was an "off-the-cuff" opinion and that he had done no research at all on the matter. He went on to say that he questioned the effect of rent control laws on a unified city/county such as Carson City as distinguished from Washoe County and Reno or Las Vegas and Clark County.

The Chair called Belie Williams to testify. Mr. Williams, a Washoe County Commissioner specified that he was appearing before the Committee as an individual and that he had been involved in building almost all of his life. Mr. Williams said that he felt A.B. 30 in its present form, especially Section 2, "Would create irrevocable damage to the economy, particularly Washoe County and the state of Nevada because of the connotations of rent justification; "rent controls," as I would call it."

Mr. Williams remarked that controls restrict the money invested in housing. He also said that some of the abuses that had existed several years ago had been cleared up by the establishment of arbitration boards. He indicated that he felt if controls were allowed on mobile home parks, those controls would advance to other areas of housing such as apartments and eventually even to ownership of houses.

Mr. Prengaman asked if Mr. Williams had ever built a mobile home park or had ever attempted to obtain financing for a mobile home park. Mr. Williams responded that he was a part owner in a park and had built a park in the past. He also said that he had been denied financing for a park previously based on the fact that there was the possibility of rent control. He remarked, "The Bank of America gave me that as a specific reason," in reference to the denial of financing.

In response to questioning from Mr. Prengaman, Mr. Williams stated that the supply of mobile home parks was increasing and that zoning restrictions were being eased. As solutions to the problems that mobile home tenants face, he suggested strengthening of the arbi-

tration boards and the purchasing of BLM land for the development of low-cost mobile home rental parks. He also suggested that low interest loans from the Housing Authority could be used for the development of more parks.

Mr. Prengaman asked Mr. Williams if he had any suggestions to help the people that were "trapped" in mobile home rental parks, who could not move because of the tremendous cost involved in moving a mobile home. Mr. Williams responded that in such cases, the arbitration boards could be of assistance by placing pressure on park owners. He emphasized that if controls were imposed, no more supply would be generated but, "With the evils of inflation, you're going to have continuing, rising costs of rent."

The Chairman next called Mr. Ernest Miller to testify. Mr. Miller stated that he represented the Mobile Home Owners League and the Reno and Washoe County Advisory Board. Mr. Miller expressed his dissatisfaction with the fact that opponents to A.B. 30 were centering their remarks around "rent control." He read the definitions for both "justification" and "control." and added that the wording in A.B. 30 be changed from "regulate" to "justification." Mr. Miller said that there was a large difference between the implications of the two words.

Mr. Miller stated that the existing boards should be given the power to hear and mediate problems concerning rent increases in mobile home parks. He added that in order to make this type of legislation work, the people involved would have to have a positive attitude. Mr. Miller gave some background on the establishment of the Washoe County Advisory Board and the types of problems that board had handled since its inception in 1979. Mr. Miller concluded his remarks by requesting that the Committee pass A.B. 30.

Mr. Prengaman asked Mr. Miller if the Washoe County Board was experiencing the same types of frustrations that had been expressed by the members of the Clark County Board. Mr. Miller responded that his board's "avenues of recommendation" were quite large and that the board had been able to resolve most of its problems successfully through these avenues. In the situations involving rent control issues, the complainants had been advised to take legal civil action, remarked Mr. Miller.

Mr. Kovacs requested Mr. Miller to submit copies of the minutes of the Washoe County Advisory Board to the Committee, which Mr. Miller indicated that he would do.

Chairman Kovacs called Joe McDonald to testify. Mr. McDonald indicated that he was representing the Builders Association of Northern Nevada and the Northern Nevada Tahoe Chapter of the Institute of Real Estate Management. Mr. McDonald spoke as an opponent of A.B. 30. His remarks are submitted and attached in their entirety and marked EXHIBIT N.

Mr. Prengaman asked if either of the associations that Mr. McDonald represented had done anything in the near past to encourage more mobile homes to be constructed. Mr. McDonald responded that individual members of the organizations had participated in such efforts. He indicated that, among other endeavors, he had developed a 93 unit mobile home subdivision. Mr. McDonald said that the organizations had encouraged their members to pursue such endeavors.

Mr. Prengaman expressed concern over the fact that people in other facets of housing were so opposed to legislation that would be effecting only mobile homes. Mr. McDonald explained that although builders are involved in other types of shelter, they are concerned with the plight of mobile home renters and that many of the members of his organizations had attempted to build mobile home parks only to be thwarted by zoning ordinances and other problems.

Mr. McDonald indicated that the economic conditions and high interest rates were posing problems for all types of housing. He suggested that some possible solutions to rent increase problems in mobile home parks might be subdivisions where the mobile home owner also owned his own lot and low-interest loans being made available by the housing department. Mr. McDonald added that FHA had recently changed its policies concerning mobile homes and the financing of mobile homes and mobile home lots.

Next to speak was Ed Horner, representing the City of Las Vegas Mediation Board. Mr. Horner gave the background of the Las Vegas Mediation Board and indicated that after the third meeting, the mobile home tenants no longer were using the Board. He gave some examples of how the Board had solved some of the problems of the tenants and in some cases, park owners.

Mr. Horner agreed that there was a problem with rent increases, but indicated that rent control would not be a solution. He added that implementation of A.B. 31 would also increase an owner's costs and cause mobile home space rents to be increased.

Mr. Prengaman questioned Mr. Horner with reference to expanding the authority of the mediation boards. Mr. Horner indicated that the only recommendation he had in that area was to suggest that tenant groups take their problems to the mediation boards instead of the media. He said that he felt the boards already had all of the power that was needed to solve most of the tenant/landlord problems.

Mr. Kovacs asked if Mr. Horner would provide the Committee with copies of the minutes of the Las Vegas Mediation Board's meetings. Mr. Horner answered that he would submit a complete package to the Committee by "next week."

Mr. Kovacs then called Bill Jowett to testify. Mr. Jowett spoke in opposition to A.B. 30. He indicated that he represented the Nevada Association of Realtors within the Nevada Housing Coalition.

The complete transcript of Mr. Jowett's speech is attached and marked EXHIBIT O.

The Committee had no questions for Mr. Jowett, so the Chairman called the next speaker, Peter Smith.

Mr. Smith, representing the Carson City Mobile Home Park Advisory Board, indicated that the Advisory Board was in unanimous opposition to A.B. 30. He commented that the current landlord/tenant problems fall into two categories: economic problems, and personality problems.

Mr. Smith stated that because of the current economic conditions, a new park could not be built that would be able to charge rents as low as now exist in the Carson City area. Mr. Smith also said that A.B. 30 should be amended to allow park managers as well as park owners to sit on the mediation boards. He also recommended that lines 1 and 2 on page 2 of the bill be deleted; that line 45 of page 2 not be changed from 60 to 120 days; and that the term, "guest" found at the top of page 3 be clarified.

Mr. Prengaman noted that the only alternative to the fine mentioned page 2, lines 1 and 2 was a jail sentence.

Mr. Chaney asked Mr. Smith what the make-up of the Carson City Advisory Board was. Mr. Smith responded that there were 3 landlords, 3 tenants, and 3 members of the general public.

Chairman Kovacs called Al Cartlidge to testify. Mr. Cartlidge indicated that he was speaking in opposition to A.B. 30. The entire text of Mr. Cartlidge's speech is attached and marked EXHIBIT P. Mr. Cartlidge referred to a program developed in California that offered some viable solutions in low-cost housing. He indicated that he would make a copy of that report available to the Committee.

Mr. Prengaman asked what the Housing Authority had done in terms of mobile home parks or spaces. Mr. Cartlidge indicated that the Housing Authority was developing 18 mobile home park spaces in addition to almost 1,000 other types of housing units.

Following Mr. Cartlidge, Chairman Kovacs called Shannon Zivic to testify. Ms. Zivic stated that she personally could not understand why anyone would want to build a new mobile home rental park today. She said that there were six new rental parks in Clark County having difficulties filling up with tenants. Ms. Zivic indicated that at least part of the reason that tenants were not leaving other parks to move into the new was the fact that it is very difficult and costly to move a mobile home. She mentioned that some parks were converting from rental parks to estate type parks and that mobile home space renters were "In a situation where we just can't afford the rents anymore."

Ms. Zivic referred to statistics on page five of Exhibit A to show the costs of providing rental spaces for low income tenants. She remarked that if such a project were undertaken in Clark County, it would be a minimum of five years before any facilities would be completed. She commented that people who were moving into new parks now "know what they're getting into," but that the "elderly people" did not know what they were getting into when they first moved into rental lots with low space rents, and these elderly people were "the victims."

Ms. Zivic asked the legislators to pass A.B. 30 now to give it a chance to work, then if they were unhappy with the results, they could always take it out of the laws during the next session. She stressed that she was not advocating "rent control." She also emphasized that mobile home owners were to be distinguished from apartment renters because they were "home owners."

Ms. Zivic stated that if the legislators did not pass A.B. 30 during this session, and if the tenants had to wait another two years to try again, "50 percent of the elderly will not be around to come back next time," and the clientele will change considerably in the mobile home parks.

With reference to the mediation boards, Ms. Zivic said, "These boards are workable, but they're not workable unless they can provide something. They are not providing anything, and don't let anyone fool you that they are." She indicated that more authority might make the boards workable and related her experiences with the Clark County Board and gave her view of how "rent justification" could be applied in certain situations.

Chairman called Mr. Robert Stubbs to testify. Mr. Stubbs indicated that he would recommend some alternatives to A.B. 30. He explained about the formation and activities of the Nevada Parks Association and his role as a member of the board of directors of the Las Vegas JC's Senior Citizens Low Income Mobile Home Park.

Mr. Stubbs gave details on how the JC's plans for the park were progressing and how the various aspects of the park were being financed as well as the anticipated final results when the park is completed. Mr. Stubbs indicated that these types of parks are one alternative to A.B. 30.

Next to speak was Dick Wells, who was speaking as a proponent of A.B. 30. Mr. Wells opened his remarks by saying, "I have no desire to have rent control. I don't want controls on anything, but I would like to have justification." Mr. Wells related some statistics on the income and expenses of the owner of the park in which he resides. In addition, he narrated some of the problems he had with the park owner and his experience with the Carson City Mediation Board when he attempted to go to the Board for assistance.

In his discourse, Mr. Wells mentioned that his complaints to the Mediation Board had been rejected because they were not submitted

in proper form and that it took months to prepare the complaint in such a way as to be acceptable to the Board. He also gave the specific nature of the complaints against the park. One particular item that he found offensive was the fact that the park owners charged additional amounts of rent for each additional member of the household and for pets. Mr. Wells also told how his rent had gone from \$49 to \$190 in a period of five years.

Following Mr. Wells, Chairman Kovacs called Al Fischer to speak. Mr. Fischer commented that a solution to the problems of the elderly would be to give them a direct subsidy to help with their rents. He remarked that this method would be much cheaper than to build a new, government subsidized mobile home rental park. He also gave some statistics on his return on investment, which he hoped would help explain why rents keep increasing.

The Chairman called Jim Thorp to testify. Mr. Thorp is the owner of Hillside Mobile Home Park in Carson City. Mr. Thorp gave an explanation of some of his park's expenses, especially a recent 500% tax increase. Mr. Thorp indicated that he really didn't have a solution to the rent increase problem, but that he was not in favor of rent control and that he was doing everything he possibly could to keep the rents in his park down even to the point of absorbing more of the costs himself. He said that some of his tenants live only on social security and they were really having problems with costs but, "I'm not going to throw them out, if I have to give it to them for nothing." ("nothing" referred to the space rent.)

Chairman Kovacs called Elma Lawler to testify. Ms. Lawler expressed her gratitude to the members of the Committee for holding the hearings. Ms. Lawler stated that some of the tremendous increases in space rents were not justified. She said that the high rents prevented mobile home owners from selling their homes because buyers could not afford to make the payments on the mobile homes plus the monthly space rent payments. She also stated she was opposed to "rent control" but that she was in favor of "justification."

Ms. Lawler indicated that she knew of a number of individuals who simply "walked away" from their mobile homes because they could no longer afford to live in them. She stressed that the senior citizens needed legislation like A.B. 30, "to help us stay in our own homes."

Speaking next as a proponent of A.B. 30 was Thelma Clark. Ms. Clark began her remarks by relating the story of the recent rent increase in Riviera Vegas, the mobile home park in which she resides. She told of an individual who lived in the park who had only a \$220 monthly income and of the difficulties that that senior citizen was having, particularly with the rent increase.

When questioned by Mr. Kovacs as to why this individual was not

applying for the direct assistance programs that she was entitled to, Ms. Clark responded, "She doesn't want any help from outside." Mr. Kovacs stressed that such assistance programs were not welfare. He also asked Ms. Clark what she felt the landlord should do in such a situation. Ms. Clark responded that the lady's daughter was helping her but did not directly answer Mr. Kovacs' question.

Ms. Clark went on to explain how much income the recent rent increase would be providing for the park owner. She added that she had researched what the owner's expenses were, and that she felt the rent increase was totally unjustified.

Ms. Clark referred to two questionnaires that she had received prior to the last elections. Those questionnaires are attached as EXHIBIT Q and EXHIBIT R. She remarked that A.B. 30 would not solve all the problems of the senior citizens, but that it would be a beginning.

The last person to testify as a proponent of A.B. 30 was Vickie Demas, a member of the Mobile Home Owners League. Ms. Demas presented the Committee with a petition signed by some residents of the Boulder Cascade Mobile Home Park in Las Vegas. The petition is attached as EXHIBIT S.


Ms. Demas read a prepared speech which is attached and marked EXHIBIT T.

Mr. Kovacs remarked that throughout the hearing the figure of "72,000" had repeatedly been used to indicate the number of senior citizens who are living in in mobile homes in Nevada and he questioned Vickie Demas as to where that number had been derived from. Ms. Demas responded that the number had been obtained from surveys and from the department of aging. She added that of that number, about 13 percent could be considered indigent, and that the percentage was increasing by about 6 percent per year. Ms. Demas referred Mr. Kovacs to the booklet prepared by the Mobile Home Owners League, Exhibit A, for more information on those statistics.

Following Ms. Demas remarks, Chairman Kovacs closed the subcommittee hearings.

In addition to the other exhibits previously described, Ms. Shannon Zivic, president of the Mobile Home Owners League of the Silver State, submitted a copy of her remarks for the record. Those comments and remarks are marked as EXHIBIT U.

Respectfully submitted,

  
Evelyn Edwards  
Committee Secretary

ASSEMBLY

AGENDA FOR COMMITTEE ON..... COMMERCE SUBCOMMITTEE

Date March 6, 1981 Time 10:00 Room 131  
FRIDAY

Bills or Resolutions  
to be considered

Subject

Counsel  
requested\*

THIS AGENDA CANCELS AND SUPERSEDES THE PREVIOUS AGENDA FOR THIS DATE

10:00 a.m. until 12:00 noon

A.B. 31 Provides for regulation of mobile home parks.

12:00 noon until 1:00 p.m.

Lunch Break

1:00 p.m. until Adjournment

A.B. 30 Revises landlord and tenant relationships in mobile home parks.

NOTE:

ALL PROPONENTS AND OPPONENTS SHOULD SIGN THE GUEST LIST AND INDICATE WHAT ASSOCIATION, IF ANY, THEY REPRESENT AND WHETHER THEY WISH TO SPEAK IN FAVOR OF OR IN OPPOSITION TO THE SPECIFIED BILL.

TESTIMONY WILL BE LIMITED TO 5 MINUTES FOR EACH SPEAKER AND TO NEW MATERIAL NOT PREVIOUSLY HEARD BY THE SUBCOMMITTEE.

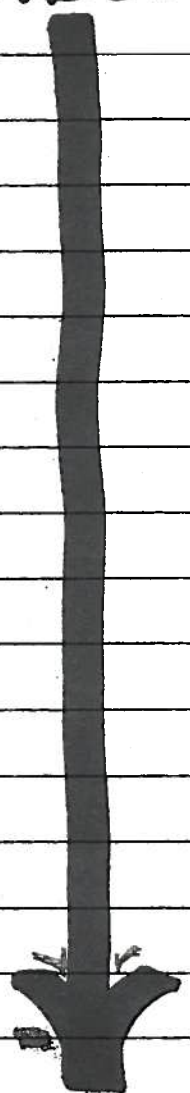


SPEAKERS  
ONLY

GUEST LIST

DATE: **3/6/81**

PLEASE PRINT YOUR NAME	PLEASE PRINT WHO YOU REPRESENT	I WISH TO SPEAK		
		FOR	AGAINST	BILL NO.
ROBERT STUBBS Pres. <i>Board</i>	NEVADA PARKS ASSOC. ✓		X	<b>AB31</b>
<del>ERNEST MILLER</del>	WASHING CITY ADVISORY Bd. ✓	X		
<del>DICK WELLS</del>	M. H. Com. of School State	X		
<del>Al Fish</del> <i>Mediation</i>	COTTON WOOD M.H.A.		X	
<del>James Chubberson</del>	NEV DIV of Health		amendment	
<del>Kus</del>	TRAVELLER, RENO AND MYSELF	X	X	
<del>THELMA CLARK</del>	SELF	X		
<del>Alma Lawlor</del>	UMTA MEMBER	X		
<del>* Vicki Winters</del>	M.H.O.L.S.S.	X		
<del>* Shannon Zinn</del>	Pres. M.H.O.L.S.S.			
<del>Jim Aragon</del>	NEV Div of Environment/Prot.		Propose amendment	
<del>JOHN L. CLARK</del>	PSC		comment only on Sec. 53	
<del>WALTER HERNANDEZ</del>	PSC		" "	
<del>J. M. VARGAS</del>	LEARNING > maybe?	X		
<del>Wayne Fretwell</del>	Manufactured Housing Div	X		
<del>May Sharp</del> 38				



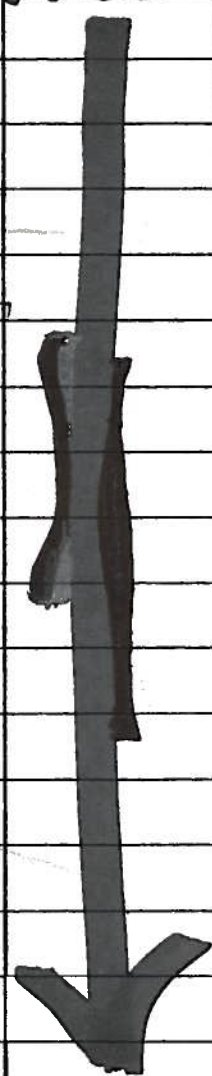
*w/s  
Buck*



SPEAKER  
ONLY

GUEST LIST

DATE: 3/6/81

PLEASE PRINT YOUR NAME	PLEASE PRINT WHO YOU REPRESENT	I WISH TO SPEAK		
		FOR	AGAINST	BILL NO.
E.W. HANMER	ATTORNEY GENERAL	X <sup>26</sup>		<b>AB30</b> 
<del>F. MILLER</del>	<del>WASHOE CTY ADVISORY BD &amp; MHOLSS</del>	<del>X</del>		
VOE McDONALD *	BUILDERS ASSN		X	
BILL JOWETT	Reno Bd of Realtors		X	
<del>BETIE WILLIAMS</del>	<del>WASHOE COUNTY COMMISSION</del>		X	
<del>AL CARTERIDGE</del>	<del>NEV. HOUSING COALITION</del>		X	
<del>AL FISCHER</del>	<del>COTTAGEWOOD</del>		X	
<del>MARY FUCHER</del>	<del>"</del>		X	
2 ROBERT STUBBS	NEVADA PARKS ASSN.		XX	
<del>JAMES R THORPE</del>	<del>MILLSIDE MOBILE HOME PARK</del>		X	
<del>1 Sherman</del>				
<del>3 Vickie</del>				
<del>Dick Wells</del>				
Peter Smith	Carson City MH Park Advisory Bd		X	
Ed HORNER.	CITY of LAS VEGAS Mediation Board			
4 Dick Wells				
<del>Lawlor</del>	<del>Mobile Home Tenant</del>			

Renee Bas 27



mobilehome owner's league  
of the silver state, inc.

P.O. BOX 2891

LAS VEGAS, NEV. 89104

CHAPTER

Be it known by all present, the mobilehome owner's league of the Silver State, Inc. has granted a charter to the Mobile Home Park, said chapter to be located at Nevada. With all rights and privileges as outlined in the constitution and by-laws of said Inc.

This chapter shall remain in force until revoked, for just cause, by the Board of Directors.

Said chapter shall be known as Chapter Number ..... located in District Number .....

Given under our hand and seal this ..... Day, of ..... 1981 A.D.

.....  
PRESIDENT  
.....  
SECRETARY

# Mobile Home Renters Rebel At Increases

By MARY ANN MELE  
SUN Staff Writer

Venting frustration over rent increases they believe are unjustified, residents of the Boulder Cascade Mobile Home Park on South Sandhill Road have voted unanimously to refuse to pay the extra charges. They are beginning a "rent strike" at 10 a.m. Wednesday.

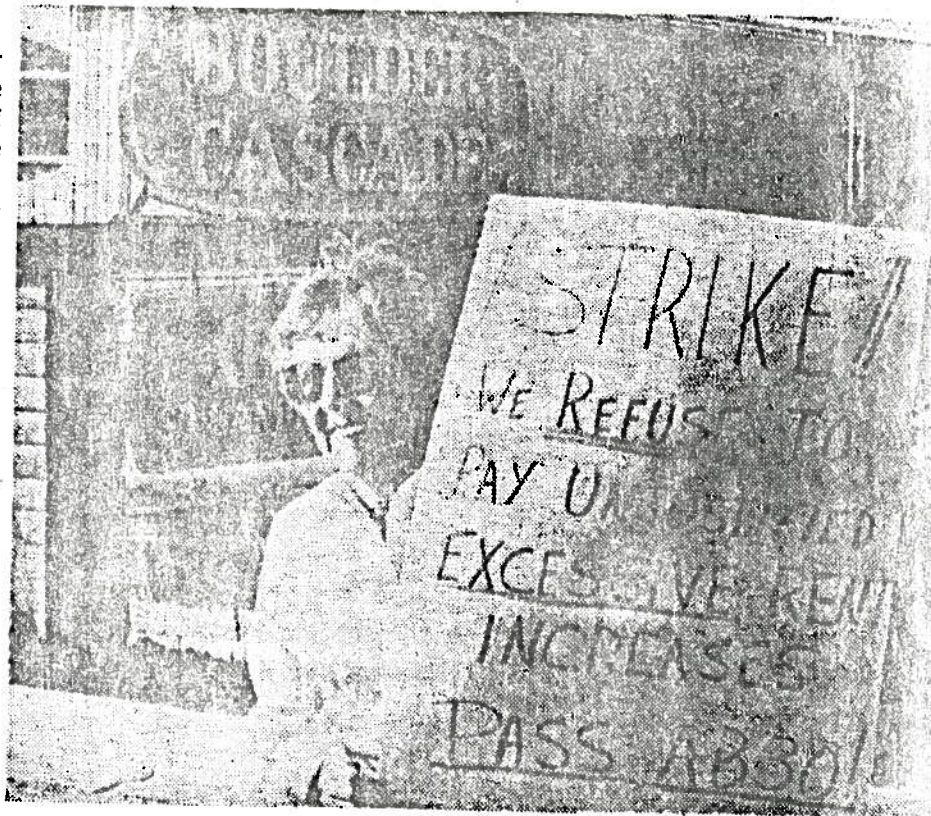
In a letter to residents, the California owners of the park said rent increases ranging from \$30 to \$40 would become effective May 1. There are 300 spaces in the park.

Feeling the explanation for the increases isn't sufficient, the residents voted Monday not to pay the increase. "We're not refusing to pay our rent, we just won't pay the increase," strike organizer Joy Bevik said.

Park residents agreed to picket outside the brick gateway to Boulder Cascade with signs proclaiming support for Assembly Bill 30. The bill, pending in the Nevada Legislature, would give local government the power to review proposed mobile home rent increases.

"We just want to know why" rent is being increased, park resident Ruth Cruice said. "They can't justify this increase with the reasons given in the letter."

Since the park manager has no control over cost increase decisions, Boulder Cascade residents requested a meeting with one or more of the park owners — all of whom reside near Santa Barbara, Calif. The owners



Joy Brevik and Ruth Cruice support rent strike

SUNfoto By DON PLOKE

agreed to meet with the residents on March 14 to discuss the controversial rate hike.

"The managers are nice people. They only tell us what the owners tell them," Cruice said.

According to the written notice from the park owners, "Inflation has affected operation costs of Boulder Cascade substantially, especially in the area of utilities."

Shannon Zivic, president of the Mobile Home Owners League of the Silver State, said most excessive park ren-

tal increases come directly from new owners who are seeking to cover the costs of a recently acquired mortgage. And the turnover in park owners, she said, is tremendous.

"Anytime a park is sold, an increase follows. Instead of refinancing the purchase,

they just add on another mortgage," Zivic said. "The mortgages are killing the people."

Boulder Cascade, which is managed by American Capitol Management, has its fifth group of owners in four years. But park manager Robert Stubbs said these

owners have done more to improve the park than previous owners.

And it is not the mortgage or the desire to make a profit that prompted the recent rent hike, said co-owner Jim Taylor. The real reason, he said, is the cost of improving and maintaining the park.

"We've spent \$85,000 to \$70,000 last year in capital improvements out there," Taylor said. "We spent far more money on the park than we intended to, and operated at a loss last year."

Taylor said in addition to monies spent for road maintenance and pool upkeep, his electrical costs are "astronomical."

Mobile home parks that serve their residents through a master meter supplied by Nevada Power Co. must submit to the renters. Meaning that the park manager is responsible for reading the meters, billing the residents and collecting the money.

Nevada Power Co. tacks a surcharge onto the master meter customers for the power they siphon from the reactors during peak demand hours.

"That charge amounts to many, many, many thousands of dollars," Stubbs said, adding that the park owners must absorb any costs resulting from bad checks or "skip outs."



MOBILEHOME OWNERS LEAGUE OF THE SILVER STATE, INC.  
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March 6, 1981

MOBILE HOME SUMMARY - AB 30 - ENABLING AUTHORITY

This summary of mobile home living statistics is submitted by the Mobile Home Owners League of the Silver State, Inc., who represent mobile home owners throughout the State of Nevada.

Because we believe that the elderly of Nevada residing in rental mobile home parks are in sever financial conditions, and we believe that our country has an obligation to those who can no longer work to meet the high costs of inflation. We have compiled this summary, to qualify our beliefs, and prove to the Nevada Legislatures that these mobile home residents need protection from unreasonable rent increases in Nevada mobile home rental parks.

The data compiled in this summary was obtained through research from governmental agencies and as a result of a person to person survey sent to 10,000 mobile home rental residents. We received a 33% response.

An attempt has been made to give the Legislatures an insight of the mobile home economics and a full scope of how mobile home living relates to the present and future in the State of Nevada.

We have included comments from the survey, which have not been altered in anyway.

We hope the legislatures will take the time to read this summary, and find as we do, that the passing of AB 30 is essential to the peace and welfare of the elderly mobile home residents in our state.

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MOBILE HOME SUMMSRY

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NAMES OF MOBILE HOME PARKS BY CLASSIFICATION.	Page 8 thru 11.
Record of rent rates, size of park, percent of increases, park total earnings of increases, and taxes paid during 1979-1980. For a two year period.	
PERSONAL COMMENTS FROM THE MOBILE HOME OWNERS RESIDING IN MOBILE HOME RENTAL PARKS.	Not numbered





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1980 MOBILE HOME SURVEY - CLARK COUNTY

1. MOBILE HOME SPACES

Estate Mobile Home Spaces	4,956
Rental Mobile Home Spaces	18,600
Clark County Mobile Spaces -	<u>23,556</u>

2. CLARK COUNTY & CITIES - PARKS AND SPACES.

	ESTATE PARKS		RENTAL PARKS	
	Spaces	Parks	Spaces	Parks
Clark County	3639	12	13,167	120
City of Las Vegas	363	1	2,891	30
Henderson	372	1	998	13
Boulder City	325	4	586	6
North Las Vegas	253	1	958	15
	<u>4956</u>	<u>19</u>	<u>18,600</u>	<u>184</u>

3. NUMBER OF PARKS BY CLASSIFICATION

Class "A" parks developed after 1970	-	29
Medium standard parks developed before 1970		23
Below standard parks		132
		<u>184</u>

4. TOTAL NEVADA MOBILE HOME PARKS & POPULATION

No. of mobile homes in Nevada	51,000
No. of mobile home population	112,200
Assessed Value	121,158,822
Assessed value Clark County	52,910,960
Washoe	29,385,123

- Clark County has 45% of Nevada's mobile home population  
Washoe County has 21% of Nevada's mobile home population
- Clark County has 73% rental mobile home park spaces and 27% Estate owned mobile home park spaces.

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MOBILEHOME OWNERS LEAGUE OF THE SILVER STATE, INC.  
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1980 MOBILE HOME SURVEY - CLARK COUNTY

6. Rent Rates.

a.) Class A parks	\$165 to \$242 115 to 160	- No. parks -	17 12	Average \$178.
b.) Medium Standard Parks	\$135 to \$190 105 to 130		9 14	Average \$147.
c.) Sub-standard pks.	\$120 to \$135 60 to 120		46 85	Average \$ 97.

7. Average Incomes.

Couples average income \$9,013 - 67% of mobile home residents.  
 Singles average income \$6,084 - 33% of mobile home residents.  
 Paying over 25% of income for housing - 57%.  
 Paying over 40% of income for housing - 18%  
 Paying over 50% and up of income. - 13%

8. Seniors - Families.

- a.) Mobile Home owners 62 years or older - 65% - 72,930 people.
- b.) Mobile home owners 50 years or older - 82% - 92,009 people.
- c.) Number of mobile homes in Nevada - 51,000.
- d.) Number of mobile home residents in Nevada 112,200.
- e.) Number of families with children in Nevada (persons) 20,191.
- f.) Only 17.9 % accommodate families in rental parks.
- g.) One Third of MH residents are single and two thirds couples.

9. Percent of rent increases during 1979 - 1980.

a.) Class "A" parks developed after 1970 - rent increases.	45%
b.) Medium standard parks developed before 1979	70%
c.) Sub Standard parks	40%

Total Average 51.6%



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CLARK COUNTY - NEW PARK DEVELOPMENT - APPROVED ZONING - 1979 - 1980

As of January, 1979 there were 3500 approved spaces undeveloped.

In 1979 three parks were developed with 592 spaces.

In 1980 four parks were developed with 809 spaces.

Total of 1401 spaces

As of August, 1980 4,133 spaces were zoned approved and not developed.

During the latter part of 1980 to February, 1981, 14 zoned approved parks for rental mobile home spaces have changed to other classification of zoning.

One new park was developed in Henderson, under HUD funds. This park has only 14 spaces remaining unoccupied.

Of the six parks developed in the close proximity to Las Vegas, there still remains a 77% vacancy rate with some of these parks having been open to the public for twenty months.

The reasons given for these vacancies is:

1. The rent is unaffordable, when combined with the mobile home mortgage payment.
2. The interest rates are too high, and the prospective buyers cannot meet the income requirements.

No new developments have begun since June of 1980. We are told that developers cannot get financing, due to the problems of the new parks not filling up.

Two new Estate parks were developed during 1979-1980. Both have had similar problems as the new rental parks and the lots are selling very slowly. Costs of Lots have gone from \$14,500 to \$18,000 to \$25,000 since January, 1979.

NEW RENTAL PARKS DEVELOPED 1979 & 1980

<u>DATE OF DEVELOP.</u>	<u>PARK</u>	<u>SPC.S</u>	<u>VACANCIES</u>	<u>RENT RATES</u>	<u>ADULT/FAM.</u>
July, 1980	Casa Del Sol	175	125	\$150 - \$210	Adult
Sept., 1980	Cabana MH Pk.	265	230	165 - 195	Adult
June, 1980	San Remo. MH PK.	60	59	165	Adult
Aug., 1980	Villa Borega	300	295	170 - 205	Adult
June, 1979	Heritage Village	114	74	165 - 178	Adult
Nov., 1979	* La Jolla, Chap.	162	52	145 - 178	Both
June, 1979	* Villa Hermosa	316	14	110 - 125	Both
* Hud Financed		<u>1401</u>	<u>849</u>		



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LOW INCOME MOBILE HOME TENANTS PARK

CLARK COUNTY

Recommendations have been made by the legislatures and opposition to AB 30, an Enabling Authority bill that would allow local governments to address the problems of mobile home park rents, that the developing of mobile home parks for low income mobile home tenants would resolve the unaffordable rent problems.

A survey, made in 1980, revealed that approximately 5000 tenants, residing in 2417 mobile homes are in the critical income levels, If low income parks were to solve the unaffordable rental problems, the following number of spaces would have to be provided which would require the approximate cost of development, based on estimates taken from quotes received by the J.C. Senior mobile Home, proposed senior low income mobile home park. Land is to be purchased from BLM, at \$2.50 per acre.

a.)	\$8,000 per space.	2,417 spaces	=	\$19,336,000 Cost
c.)	Clark County	1711 Spaces	-	\$13,693,680
	City of Las Vegas	375 Spaces	-	3,006,640
	Henderson	130 Spaces	-	1,037,920
	Boulder City	76 Spaces	-	668,800
	North Las Vegas	125 Spaces	-	996,320

It is estimated that the J.C. Park will rent spaces for \$100 for single wides and \$120 for double wides. Even at these rates, the 2417, would still qualify for Section 8 rental subsistence, at the cost of \$199,395 per month, or \$2,392,740 per year.

The number of tenants who will join this critical income level, will increase by 6% each year, as the rents continue to climb.



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APARTMENT RENTS IN CLARK COUNTY

	<u>2 BEDROOMS</u>	<u>RENTS</u>	<u>25% FOR LAND</u>
GRAND PLAZA APT.	2	\$ 275	\$68.75
GREEN TREE APT.	2	395	96.25
DELTA GARDENS	2	285	71.25
DEAIVILLE	2	345	86.25
DESERT AIRE	2	300	75.00
DESERT INN APT.	2	390	97.50
DESERT PLAZA	2	225	56.25
DESERT SPRINGS	2	395	98.75
MOUNTAIN SHADOWS	2	300	75.00
PARADISE SQUARE	2	340	85.00
RIVER GALE VILLAGE	2	350	87.50
VILLA DE PARADISE	2	370	92.50
FOXWOOD VILLAGE	2	340	85.00
SANDPIPER VILLAGE	2	350	87.50
SAHARA PALMS	2	350	97.50
THE PARK	2	350	87.50
TOWNHOUSE GARDENS	2	325	81.25
MICHELAS	2	240	60.00
CASA ROYAL	2	339	84.75
ST CHARLESTON	2	335	83.75
CEDAR SPRINGS	2	339	84.75
TORREY PINES	2	385	96.25
TURTLE ROCK HORIZAN	2	180	45.00
SARATOGA GARDENS	2	240	50.00
SWENSON	2	365	91.25
SAN PEBBLE VILLATE	2	330	82.50

Average rent rate for two bedroom apartment - \$325.00 Per month  
 Average rent for land, based on 25% of rent of apartment - 81.25 " "

Based on the formula of 25% for land of apartment, and due to the use of more land, basing mobile homes on 33% for land, including the land rent of a mobile home space, the cost for the same housing costs the mobile home tenant: Rent \$203.00 \$609.00 per month

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NATIONAL RENT REGULATION STATISTICS

1. Nine states have rent regulatory measures:

California	30	Maryland	1	New Jersey	51
Conneticut	1	Massachusetts	2	New York	9
Florida	5	New Hampshire	1	District of Columbia	1

2. Twenty eight states have been, or are now, involved in some form of rent regulatory actions.

Alabama	- Apartment Rent Control	California	- Apartment & Mobile Homes
Alaska	<u>only</u>	Florida	
Arizona		New Jersey	
Colorado		Michigan	
Connecticut			
Georgia			
Hawawii			
Illinois		Nevada	- Mobile Homes Only
Louisana		New Hampshire	
Maine		Idaho	
Minnesota			
Missouri			
New York			
Ohio			
Oregon			
Vermont			
Washington D.C.			
Oklahoma			
Maryland			
Massachusetts			
Washington			

Rent Regualations	- Apartment	- 21
	- MH & Apts.	- 4
	Mobile home	= 3
	Total	<u>28</u>

3. There are 101 Rent regulatory measures in 9 states.

4. Rent control, with maximum ceilings, roll backs and strict requirements, is only used when involving apartments.

5. Mobile home rent regulations are more conservative, and where included in with apartment rent control is the only time rent control can be found in mobile home rental parks.

6. California has approximately 26 conservative rent regulatory ordinances. The greater portion are Rent Review Boards and a few Rent Stablization Boards. The State of New Jersey has a few mobile home parks with a Rent Leveling Board.

7. With the exception of New Jersey, all Eastern states are apartment rent control measures.

MOBILE HOME RENTAL PARKS - CLARK COUNTY

PARK	SPACES	1980 RENT	1979-1980 RENT INCREASE	PARK INC. 1979-1980	TAXES PER PARK	
					1979	1980
<u>DEVELOPED - 1980</u>						
CASA DEL SOL 4800 Vegas Valley	75	\$160 - 210	New	-		
CABANA MOBILE HOME PARK 5303 East Twain Avenue	265	160 + 195	New	-		
SAN REMO 3821 East Lake Mead	69	135	New	-		
VILLA BOREGA 1111 North Lamb	300	170 - 205	New	-		
<u>DEVELOPED - 1979</u>						
HERITAGE VILLAGE 1515 Mojave South	114	165 - 178	New	-		
LAJOLLA -CHAPPERAL 4400 Owens Avenue	162	145 - 178	New	-		
VILLA HERMOSA 2250 Magic Way, Hend.	316	110 - 125	New	-		
CASA LINDA 5250 E. Lake Mead Blvd.	107	160 - 170	13% (1yer)	\$ 25,680		
<u>DEVELOPED 1970 THRU 1978</u>	-	CLARK COUNTY				
BOULDER CASCADE 1601 Sandhill Road'	300	161 - 196	56%	234,000	\$ 15,704	\$15,680
CAREFREE COUNTRY 3225 North Nellis Blvd.	228	175 - 190	67%	199,728	9,413	9,444
DESERT INN ADULT MHP 4505 East Desert Inn Rd.	85	155 - 165	11%	15,300	New	5,573
ELDORADO MHP 4525 West Twain Avenue	299	164 - 180	46%	190,164	15,360	15,634
GOLDEN VALLEY ACRES 3401 North Walnut Road	248	155	67%	184,512	8,806	8,791
PLEASANT VALLEY CASCADE 3800 So. Decatur Blvd	300	205 - 242	58%	291,600	18,414	26,857
PUEBLO DEL SOL FAM MHP 3751 So. Nellis Blvd	452	185 - 190	52%	347,136	9,024 9,024	9,186 9,853
ROYAL MOBILE PARK 4470 East Vegas Valley	176	130 - 135	47%	95,040	8,271	8,255
SAND CREEK MOBILE HOME 2627 So. Lamb Boulevard	324	155	30%	132,192	14,978	14,943

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<u>MOBILE HOME RENTAL PARKS - CLARK COUNTY</u>		<u>1979-1980</u>		<u>PARK INC.</u> <u>1979-1980</u>	<u>PARK</u> <u>PROPERTY TAX (REAL)</u>	
<u>DEVELOPED 1970 THRU 1978 -</u>	<u>Cont'd.</u>	<u>1980 RENT</u>	<u>RENT INCREASE</u>		<u>1979</u>	<u>1980</u>
SHADOW MOUNTAIN VILLAGE 2800 So. Lamb Blvd.	277	\$158 - 167	56%	\$ 186,144	\$ 11,459	\$11,425
STOREYVILLE MHP 3755 Nellis Blvd.	186	120	41%	178,120	16,858	6,846
TROPICAN EAST VILLAGE 5900 West Tropicana	424	155	31%	188,700	18,666	19,393
WEST VALLEY ADULT MHP 6300 West Tropicana	425	170	39%	246,528	20,700	20,020
<u>DEVELOPED 1970 THRU 1978 - LAS VEGAS CITY</u>						
ARROW PALMS MH COMM. 543 N Lamb Blvd	86	115 - 126				
MEADOWS MOBILE HOM COMM. 2900 S. Valley View	338	143 - 230	32%	186,576	22,835	30,799
PECOS PARK COACH CLUB 200 M. Pecos Road	135	138	104%	113,400	6,786	7,018
SUNRISE OAKS LTD. 1200 N. Lamb Blvd.	130	155	11%	23,400	New 495	10,204
THREE CROWNS MOBILE PARK 867 N. Lamb Boulevard	262	175 - 195	49%	126,633	13,158	14,125
BONANZA VILLAGE 3700 E. Stewart Ave.	364	119 - 127	37%	148,512	8,270	8,553
RANCHO VEGAS 825 N. Lamb Blvd	371	130 - 145	57%	222,600	13,796	15,320
<u>DEVELOPED 170 THRU 1978 - BOULDER CITY</u>						
GINGER WOOD MOBILE HOME PK. 1302 Hazelwood	270	108 - 115	31%	87,480	11,024	11,405

AVERAGE                                      29 Parks                                      \$162.50                                      45%

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MOBILE HOME RENTAL PARKS - CLARK COUNTY

DEVELOPED PRIOR TO 1970 - GOOD TO FAIR CONDITION

		Rent - 1979	Rent 1980	Increase %
Desert Mobile Home Park 16 Bon Rea Circle	80	\$ 75 - 85	\$100	25%
El Capitan Mobile Park 4900 E. Bonanza Road	72	74 - 79	100 - 105	34%
Blue Skies MHP <del>8922</del> Las Vegas Blvd So.	107	140	158	12%
Bramblewood Trailer Park 1690 North Gateway Road	80	79 - 85	105	28%
Capri Mobile Park 3150 So. Arville	100	75	108 - 118	30%
Desert Winds Mobile Park 3815 North Nellis Blvd	107	75	105	40%
Golden Manor Mobile Park 252 East Tropicana	109	75	150	100%
Kings Row Trailer Park 3660 Boulder Highway	360	70	109	56%
Las Vegas Mobile Home Park 324 East Tropicana Avenue	187	95 - 80	110 - 145	40%
LaVilla Vegas Mobile Home Park 1190 So. Mojave Road	65	88 - 93	115	28
MayCliff Mobile Park 3601 East Wyoming Avenue	300	90 - 100	125 - 135	37
Miracle Mile Mobile Home Park 3642 Boulder Highway	465	74 - 94	104 - 127	36%
Palm Grove 1624 Palm Street	348	100 - 117	140 - 165	39%
Riviera Vegas Mobile Home Park 2039 So. Palm Street	451	110 - 122	150 - 175	40%
Sierra Mobile Park 3139 East Sahara Avenue	206	85	115	35%
Treasury Mobile Home Park 372 East Tropicana Ave.	136	95	143	55%
Tropicana Mobile Home Park 300 East Tropicana Avenue	158	75 - 105	150 - 215	103%
Vegas Vally Mobile Park 4155 East Vegas Valley Dr.	114	75 - 85	105 - 197	33%
Walnut Mobile Ranch 1750 Walnut Road	75	70 - 80	105 - 110	43%
Whispering Sands MHP 1481 South Palm Street	78	86 - 90	109 - 113	26%

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MOBILE HOME RENTAL PARKS - CLARK COUNTY

DEVELOPED PRIOR TO 1970 - GOOD TO FAIR CONDITION

	SPU	Rent 1979	Rent 1980	Increase Percent
World Wide Mobile City 2104 West Spring Mountain Road	217	\$ 78.00	\$ 105	35%
Echo Mobile Park 1322 So. Mojave	73		117	
Vista MHP - Henderson	176		115	

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When we moved into this park, the rent of \$78.00 per month included gas, lights, and water; now we have to pay for everything. Gas is \$50.62, electricity is \$14.60 per month. Winter, summer, total rent can and has gone as high as \$252.00 per month. Improvements in six years to total park: swabbed tar on streets and driveways, which was approximately one month ago, cracks and bumps in drives already back! When asked present managers "why another raise in rent, last July", the reply was, "because it is the 1st of July"! A hill in this park has been partially cleaned in six years time, a hazard of fire in the summer, but tenants have had written notices stating "if you do not keep your yard clean, the park will clean it and you will be charged \$50.00!"  
Boulder Cascade

✓ Former owner was told to ask the new buyer \$10.00 more per month due to a raise coming up in July. We were unaware of the fact when we bought, therefore paying \$10.00 each month until July 1st. We moved in April and had to pay \$30.00 extra for 3 months. When asked the Manager of Boulder Cascade Park, it was explained to us about the raise due soon and since they didn't know exactly how much we were asked to pay \$10.00 more. About question #2 about where we would live, if we couldn't afford to pay the maintenance is SELL THAT IS, IF YOU COULD GET SOMEONE TO AFFORD IT. It seems people who live in a mobile are trapped in a spider's web. We have been active in this program, but to no avail.  
Boulder Cascade

I am 50 years old. I cannot live with any of my children. At my age I feel I need a little time to myself and a place of my own. I thought a mobile home would be my answer. Maybe by the time I can retire I will have my home paid for. Now, I'm not sure I can make it until retirement. I cannot ask my children for help, they have families of their own so what does a person do. I am making it but barely. If an emergency comes up I am in trouble.  
Boulder Cascade

It's a darn shame the way park rents are increasing! How about the poor people who have a small fixed income? There had better be a ceiling somewhere.  
Boulder Cascade

✓ We took early retirement figuring we could live decently on our income. What we couldn't foresee was the gasoline situation, inflation rate and the raises here in the park. We certainly would not have bought a mobile home in this park had we known rent would increase by \$31.00. We could not live above water now if we were not continually dipping into our savings. How long can one continue to do this?  
Boulder Cascade

✓ Just would like to say after working so hard all our lives and now that we are retired and must depend upon our Social Security for the most part, we feel it quite unfair to have our rent increased everytime we get a raise in social Security due to the cost of living. It just doesn't make sense. My husband at 79 must still work to make ends meet.  
Boulder Cascade

✓ My mobile home rent will have gone up from \$130.00 to \$186.00 (\$53.00) in less than 3 years (rent effective May 1, 1980). Will be here 3 years Oct 1, 1980. Soon we will be forced to sell (too costly to move mobile home). Have to lower our standard of living, which we have already done, or else lose our pride and slowly starve. Our dream and years of work are soon becoming a nightmare.  
Boulder Cascade

✓ I feel the past rent increases have been way too high. I know prices of upkeep are high but when you increase 300 homes \$21.00 a month it more than makes up for their increases. Also, we pay our own gas and electric so we absorb the increases in the utility bills also. We are close to having to sell our home and go back to an apartment as we have trouble making ends meet and could not save enough for a down payment on a home. So we bought a mobile home so we could have a home of our own. There must be a stop somewhere.  
Boulder Cascade

I feel that if local governments would allow more freedom in the building of mobile home parks that the free enterprise system would insure reasonable rents.  
Boulder Cascade

✓ I am not going to be chased out of my home by anymore rent increases. I will fight the next increase whatever way is necessary. If we let them keep increasing it without any kind of reaction or rejection they'll just keep on doing it. Someone or some organization as yours must put a stop to it. There is no way the piece of ground I'm renting is worth anymore than what I'm paying. It's not worth more than \$100.00 per month.  
Boulder Cascade

It seems to me there has to be a stopping place some place,; we both work and it is keeping us going to try and meet our bills, these people on fixed incomes I do not see how they can possibly pay anymore. We have a nice park, but they do not make that many improvements to keep going up on space rent, and then when new people want to move in, they are allowing no more pets or children, which makes it bad if you do want to sell. Children need places to live and people love pets and if are taken care of, think they should be allowed.  
Boulder Cascade

If I could not afford to pay the increase I would practically be forced to go back east and live with my children, and I don't like the idea at all. When we moved here the rent was \$89.00, effective May 1st the rent will be \$178.00. It seems every time we people are due for an increase, the park takes double.  
Boulder Cascade

The park being sold to different firms, a gas leakage (1978) re-surfacing the roads. (1979-1980), I expect an increase in rent 7-1-80 to pay for road re-surfacing.  
Boulder Cascade

We still have to pay gas, electric, and telephone besides the rent. We are both on permanent disability and have to drive to Dr. and get medicine.  
Boulder Cascade

This is a very well kept up park. One problem, no social activities or entertainment for persons unable to drive a car. No pets and older folks need a pet if they feel they want one, especially if they live alone. Extra charges of \$15.00 month to park a boat, trailer or camper. Should have free facilities for what the rent charge costs and raises in view.  
Boulder Cascade

Why pay high rent and still be pushed into landscaping and grooming the rented lot or be charged \$50.00 to \$100.00 a month if park does the work. Yet if you move, still have to leave the lot in near perfect order. We pay high rent, why not some help on landscaping? Or a cut in rent.  
Boulder Cascade

In 1973 we payed \$101.00 for everything now for space, electric and gas it runs close to \$200.00 or more a month. Everytime we get a raise in Social Security our rent raises exceeds our raise. Luckily, we own our coach otherwise with rent increases every year, inflation, insurance premiums raises it isn't much security in being a senior citizen. Also, the electric and gas companies are surely getting their pockets lined. Then there is the matter of the SVC charges that we feel is really a rip off. Our charges run anywhere from \$5.00 to \$7.00 per month. This alone is most distasteful to us; times this by 12 months it's quite a sizeable amount.

Boulder Cascade

I think some of these park managers need to be checked out and see where some of the rent money is really going for. It looks like someone can stop these high prices some way for sure. The park reads the meters (gas and electric) and they have been read too high a couple of times for me. I cut down on both and up goes the price. Others have had the same happen also. Thanks for letting we renters know you are interested in our problems.

Boulder Cascade

✓ This place is a rip off. Here I am living by myself and paying \$37.00 for gas to live here. My friend has a three bedroom home and pays \$8.00 or \$9.00 for gas. This park is no good. You own your home and they tell you what to do. They just jack the rent up when they want to. It's just got to stop. Something got to be done right now. People just can take so much.

Meadows

✓ I intend to attempt to try to sell my coach in the near future as inflation makes it impossible for me to survive with the 2-1-80 rent raise and various other costs of living. I have no idea what to do or where to go. But I do intend to find something cheaper if possible. Unless these rent raises aren't controlled in some way I truly feel it is the end for elderly, middle class people to own their own place, and after that where is there to go? I am truly frightened about the future. I am paying the raise (I have no alternative) I fear my next step will have to be the "poor house".

Meadows

✓ We shut our thermostat down to 64 degrees at night and have it set at 70 degrees daytime. I do not have a washer or dryer and we go out 3 nights a week for a hamburger. Then I only cook dinner 4 nights. My gas bill for Dec. 1979 was \$56.54. For Jan. 1980 it was \$71.14. My next door neighbor who has an Islander same size as mine and uses a washer every other day had a bill for January for \$50.00 and we lower the thermostat at the same time everyday and turn it up at the same time and the same temperature. I've complained several times but the manager just ignores my complaints and the Southwest Gas Co. told me they have no jurisdiction over the Meadows. I know I'm being ripped off. It's impossible for us to continue to pay \$195.00 since my husband has cancer and I have diabetes and a lot of our income goes for doctor and medicine bills. Tried to sell our coach but had no luck because of the high rent for the space we occupy. Other lots in the park, the same size as ours and have a nice view, pay less rent than we do and we look at a 15 foot wall. I never believed in rent control but if it will help senior citizens I'm all for it.

Meadows

If the rent keeps raising we may have to sell and live in our R.V. It will be cramped but guess we could get by if we had to. The continued rent increases all the time make it very difficult for seniors living on social security alone. Many have had to sell their coaches and move out of the park. Meadows

✓ The main reasons for our decision to purchase a mobile home was because we thought it was an economical way to live and also the rent was within our means. We too enjoy the facilities and beauty of the park. Now we beautify the property therefore benefiting the park owner. We live under strict park rules, get privileges denied us (like rental of reception room) without added improvements and still a rent increase. Most of the tenants live on a fixed income or are reduced and we are being priced right out of our park. Meadows

If the rents keep increasing we just can't afford to live here. I do work and have an income but I work on commission and these rent increases are really putting pressure on the budget. With these rent increases there just is no way I can afford to retire. Meadows

My concern is in the future. If we continue to get our rent raised every year, by the time we retire we won't be able to afford the rent. In 1979 our highest gas bill was approximately \$49.00. This year so \$75.00 Meadows

Owners claim that we have a beautiful park to live in but the tenants are the ones who keep the park looking as it is. We all take care and maintain our mobile home and grounds, the management doesn't bother to clean our streets, they are filthy, all they take care of is the clubhouse and grounds. The rest is all up to the tenants therefore, can't see any reason for these rent raises as they have no expense whatsoever to maintain this park. The managers are never here on Saturday or Sundays and if something goes wrong you can't get in touch with them. They have an answering service and nothing is done until they return on Monday. If we were getting service and they had some help to work and keep the park in a clean and neat and as beautiful as they say then I could see some of these rent raises. And I say that these raises are just to stuff the stock holders pockets. Someone should tell them about the Blue Sky Mobile park and see how much their rents are and how many they have had in 10 years. Meadows

✓ I believe in free enterprise. However, the owners of this park have taken advantage of the renters. They know we cannot afford to move our coaches and that there is not any low rent parks available to move to if we could afford to move. We have had 4 increases in the past 3 years. Not one increase has been for more than a year duration; they have been spaced at 10 or 11 month intervals. I feel we should have some legislation permitting us to have a 2 or 3 year lease at a nominal rent and when renewal is due to have an arbitration commission determine a fair increase for the owners. Meadows

When we first came to live in this park the rent was \$89.00 monthly. Five years later it is \$166.00 without utilities. There should be some control, we expect rents to go up but it's too fast. Meadows

✓ I would like to have a space large enough to breathe. My mobile is so close I can hear my neighbor flush the toilet and if we ever have a fire, God help us, neither of us could survive. And one more thing I'd like to say here, in this court we have people going through our garbage cans all year around, no lids on them, the smell is something terrible especially in the heat of summer. I think the Health Dept. should look into it. It isn't a bed of roses to live in a mobile court where they don't enforce the rules and regulations. I hope in some way I can help this situation in some way. It is all we can do to survive as it is. We haven't gotten our increase for 1980 but it will come about July sometime. Just about the time we get our little increase in Social Security. They take it from us before we get it. Isn't that awful? I wonder if these people think they will ever get old.  
Miracle Mile Court

This one mobile house has been here since 1972 and there's been at least 5 raises in rent. I own this one and want to sell it. It hasn't been lived in for 5 months and I pay rent on it and the one I'm living in which is \$189.60 a month. The Gas Co. put in new gas lines and in digging up the ground the construction Co. cut the electric wires and they weren't fixed until about 2 weeks ago and I couldn't sell my mobile home or live in it and I had to move into the one I'm now living in since (ct. 18, 1979).  
Miracle Mile

With heating cost plus electric cost it is pretty hard. Older people should have phones in case of emergency. Clothing is costly also. Our Congressman should have laws protecting the elders. Parks do not put forth services. I realize that one must make a return for investments but they could cut their expenses down if managers instead of hiring extra help would do something in line of work for park and not hire extra help.  
Palm Grove

✓ I do hope you can help some of us. During summer it takes my whole income for rent and utilities. My niece helps me but she can't continue, she may marry and move away--then what will I do?  
Palm Grove

We are a captive group. If we want or need to move, MUST move mobile home if it is past a certain age. No place to move. Can't afford. Treated like we are nothings. Don't think anything can be done.  
Palm Grove

Definitely I'd like all other senior citizens like to see the rent increases stop. We may get an increase each year in our pensions but only one month pay for an increase. If you get \$35.00 increase in pension check it pays just one months increase the way it has been the last few years.  
Palm Grove

The reason for us coming here in 1972 was my health. I had developed emphysema from spray painting and was near death. This dry climate has done wonders for me. If I had to move, the only place I could go would be to my sons home at Everett, Washington. I don't know what that climate would do for me.  
Palm Grove

✓ I have had to use what little savings I had, by the month of July it will be all gone. I have had some help with the rent and taxes from the tax assessor's office. I will surely have to try and sell my home soon and I have no idea where I am to go. I have called the Senior Citizens apartments and understand they have at least a 3 year waiting period. I am alone in the world with no family to help out. If anyone in the Legislature only would try and help someway for the elderly people to live in a decent place at some kind of rents we could afford. We desperately need some kind of control for the old people. Meadows

Our rents have been increased over 50% and nothing has improved from raises; less care, streets are cracked, holes, drainage water from apartment complex next door, smelly, and leak gas all over, which they tried to correct. I wish Gas Co. would service us instead of park and these continued high bills would be corrected. Our electric has been much better since Nevada Power is reading our meters. Our last raise was only 10 months before last one given us. Hawaii Properties, outside owners, have sold three times now since I moved in. Something has to be done soon it's too hard as a senior citizen to survive these raises. Meadows

Any increase should have to be justified by showing an equal increase in the cost of maintainence. Our park has gone down. Not one single improvement has been made. Only the repairing of shoddy workmanship has been done through the insistence of the Clark County code. If our representatives can't do something now, I'll not vote for them again. I'm caught in the "widows gap" and had hoped to be able to live out my life here in my mobile home. Meadows

GovernorRobertList: Sure hope you will help with the mobile home rents increasing so rapidly as I sold my home to have a little savings for when I might need it but at the rate of rent increases I may have to sell the mobile home and live in a room as I keep drawing from these savings each month. Mr. Governor, I helped in a small way to get you elected and I'm sure you won't ignore our problem now. Meadows

✓ I am a widow; thinking this was the best way for me to go, selling my home and buying a mobile home, now with all the rent raises and no more coming in, I don't know what or where to go. I don't want to have to depend on my children but if something isn't done, I can't work much longer, I am afraid this will be the ending. Each time the rent is raised it is not just a few dollars but a big raise, nothing more done for us at this park, in fact less. The streets or the grounds aren't kept up and we can't use the club house anymore. These last owners just bought the park and the first thing a rent raise. How can this be? We used to have policing of the grounds every hour and street lights, now they don't and have taken out a lot of the lights. Meadows

I think the park is far in excess of Gas Company charges to the park. Something should be done to correct this. A storm drain should be installed. When it rains people with no car cannot get out to go to the store.. Meadows

✓ If illegal aliens and Vietnamese are encouraged to come here and be subsidized for rent--then why can't American citizens be helped? Meadows



We senior citizens on fixed incomes should have some allowance made for our circumstances. When we try to supplement our income by looking for work, our age is against us. Employers seem to want 18 year old Playboy bunnies instead of efficient, qualified personnel in their businesses; therefore, we senior citizens must get along as best we can on our small fixed incomes. As the cost of living increases in every area of living (food, clothing, utilities, etc.), we have a harder time getting along. Perhaps some mobile home parks especially for senior citizens on fixed incomes would be the answer. Palm Grove

I have a paper from the park management stating that the rent for a single wide is based on space fottage of 3,200. My space is only 2,500 but I am paying the same as those that have the right size. I am so squeezed in that my neighbor has to use my driveway for their walk to get to the back of their coach. I think rent should be paid according to size of space. I have said that to the management but to no avail. Rancho Vegas

I am working at Caesars Palace. I have no sick leave included in salary. I am making \$47.60 per day. If I am off a week sick I have trouble making my payments. I am 61 and at my age illness is a factor. My Southwest Gas Co. bill since Jan. 1, 1980 is \$10.00 a month more than in 1979. Riviera Vegas

It would make it very difficult for us. We have so many doctor bills and medicine to buy plus high cost of food, gasoline, electric and gas to pay for. It is very hard to keep up with the rise in all prices. I'm sure none of us know when it will end. Riviera Vegas

I know there is a better way other than rent control to stop the rent gouging. I wish I was smart enough to figure out how. I'm not hurting yet but am looking for a retired male to share my home. Riviera Vegas

My husband has heart trouble and also cancer. By the time we pay the Dr. and his medication, we have nothing left. Riviera Vegas

I can't hardly make it now. If I can't pay my bills I may have to move again to someplace I can afford. Riviera Vegas

Realize mobile parks need to be kept up and each tenant keep his lot according to rules and regulations. However, as tenant supplies his own home, pays his/hers rent, why can't they be entitled to something out of life too. Many are alone and would welcome responsibility of a pet--share the "T.L.C. Those who don't like pets or neighbors could move out. Some folks wouldn't be happy in heaven. Riviera Vegas

✓ Maybe rent control isn't the answer but we surely need some kind of law to help us who are old and unable to supplement our income. People on fixed incomes are just surviving as it takes all to pay our rent, utilities and food. The Government helps everyone else all over the world so why not help us at home for a change? Riviera Vegas

A mobile park was a pleasant place to reside. Now one isn't allowed to live humanely; can't even have luxury of a small pet, etc. Just pay your rent and obey rules and regulations. Though owners and manager don't carry out their responsibilities. Riviera Vegas

I am a 100% totally handicapped widow and my Social Security is \$301.90 per month which leaves me \$168.00 left per month to live on after rent of \$133.00 per month. On top of that, I have my utilities to pay, heavy medical bills each month around \$400.00 which is not refunded by medicare. Out of the recent \$38.10 raise in Social Security I was left with \$8.60 increase. After this new owner raised our rent again by \$29.50, that goes along with the \$25.00 increase last March, which makes a large rent hike of \$55.50 this year alone. As you can see all of my other expenses must come out of the small savings I have in the bank. And I just can't see how I can absorb anymore rent increases without being forced to sell my mobile which I bought here with the proceeds from our home in southern California after my husband passed away 3 years ago. This I feel is an exorbitant price just to park our home and it forces a hardship on other widows like myself plus retired couples living here. If one owner can make money out of \$60.00--\$70.00--\$80.00 then I can't see how this man is crying poverty. And we have part time managers and no cleaning of the streets even in snow. I myself have fallen on the ice and many others have too, including broken bones. I was lucky, I only had a badly swollen and bruised right hand and arm but I did protect my head and that cost me \$45.00 in x-rays plus all the pain for several weeks. I am not strong enough to clean snow off the street in front of my home but I have to try and do it as it only piles up and ices over and is dangerous to all walking on the street. I have a double wide for a single width lot. Other doubles are charged \$10.00 per month more as they supposedly have a wider lot than a few of us who have a single wide lot. Royal Mobile Park

Since the majority of the parks have gone to adult parks this places a burden on me as a single parent. To move is out of the question since I cannot afford the cost involved in moving. Also the park has me at their mercy since moving is out of the question. Also, the parks which do allow families are located on the outside of the city. This would require more money for gas to get to and from work. Frankly, I personally don't see what's wrong with children, after all I was once one. If people would assume their normal roles as being parents and teach their children the difference between right and wrong then the parks would not have the trouble they claim exists when renting to people with children. Another factor not included in your survey is the fact that not only does rent increase but also the cost of food, clothing, and utilities. Therefore, just comparing the increase of rent as opposed to the increase of our salaries is not going to show the entire picture. It is a shame that people today care only for monetary gain and not the preservation of the human race. Sand Creek

As you can see by the time I pay for rent and mortgage payments, power, gasoline, upkeep on car, car insurance, life insurance, medical insurance, food, clothing and medicine, plus the income tax that is taken out of my check, it would be a burden to pay more rent. Sand Creek

I feel the park we live in is just about the finest park in Las Vegas. The rent we pay is \$160.00 including the gas, water, sewage, and trash pick-up twice weekly. We also have a tennis court available for our use and a swimming pool and club house with pool tables, card tables, color T.V. and use of club house for parties, meetings, etc. Our park has one of the best managers I have seen in Hank Procaccino. The park is well maintained and even has a street sweeper come in twice a month. We have canine security patrol and park security patrol. The owner's of Sand Creek are a dedicated couple in that they are concerned about the welfare of their tenants and the up-keep of this park. Compare what we have at Sand Creek with any of the other parks in this town and you will find that you would not consider trading spaces with any of them. Higher rents, pay all your utilities yourself and trashy parks, cars parked all over the streets, and pets allowed to run. Stop and consider what you have here and maybe you might consider yourself pretty lucky.

Sand Creek

I realize most parks are having rent increases. If they remodel or take better care of the parks then O.K. but not \$30.00. I believe \$5.00 is plenty. These new owners are all from out of town and only here to make a big buck. Not all retired people have pensions so just trying to survive on social security is a struggle. Too bad the rent controls aren't in. We do realize the big fight ahead. The people with bank accounts and pensions, etc. don't care it's us little folks trying to live the best we can. I hope all parks back the rent control.

Sand Creek

I have a second mortgage that I receive \$65.00 payment for 5 years. I tithe from my Social Security check \$40.00 monthly. My church is my social life. I try to attend meetings here at the park. I was so proud I could pay \$130.00 rent and have my church within walking. I don't drive. I pray that the rent won't go up. We need help.

Sand Creek

Rent control is nice but stop and think. These land owners have the same equality as the utility companies. When the utilities fabricate some scheme to raise their rates they cry to the PSC and the bleeding hearts in the PSC grant them their increases. The same applies to these land owners or mobile park owners. The moment they get together and fabricate their own scheme on raising rents they contact their favorite politician in Carson City (who probably is on their payroll) and cry the blues about expenses they are incurring operating their park and in a shake of a lamb's tail rent increases are given to them. I know what I'm talking about because I've seen it happen too many times.

Sand Creek

Between the following payments, what's left?

\$147.00	Food	Life Insurance
\$122.22	Rent & Gas	House Insurance
	House Payments	Auto Insurance & License & Gas
	Electric	Co.Ass's. Tax
	Telephone	Dr. & RX (diabetic)
	Hospitalization Ins.	Misc.

Sand Creek

✓ It is becoming more difficult to exist today. Being on a fixed income is the worst thing that could happen to retired people. With the ever increasing costs of medical attention, gasoline, oil, food, and taxes, it's almost impossible to live. Since last Oct. my wife and I have run up medical bills to the extent of \$1200.00; medicare allows a very small percentage. Our only pleasure is taking short drives in our automobile. Now with additional costs of the Emission tests and the price of gasoline we have to deprive ourselves of the only pleasure. If we were working and members of a union we could strike for more money but we're old and our great elected fathers care less. Their pockets are padded and their bellies full. The hell with the older folks. But wait, someday they'll grow old too.  
Sand Creek

With rent at \$150.00 a month, the park should include a recreation hall, swimming pool and wash room. Also, we don't have any supervision here at all.  
Swanky Trailer Park

If I have to move, there is no place to move to. I have a 32 foot travel trailer and they are only accepted in adult court. Since I am raising a 10 year old grandson, in adult court they won't accept him. To get a space in a mobile park, my trailer isn't long enough to move into one of them. So there is no place to move to. Swanky Trailer Park

We're all for what MHOLSS is working for. I believe in legalized rent justification to protect us in the future and so we will be prepared for future planning. At this point in rent assessment we couldn't find an apartment for what we are paying in a mobile park for a desirable atmosphere so we're living with it, but we recognize the need for a legalized rent justification board. Foremost, I appreciate what you are doing and I think you are great.  
Three Crowns

We will be paying \$170.00 as of April 1, 1980. Talking to the man in the park, he claims the owner needs this raise to make 10% on his money. The space I'm referring to is 50 ft. x 65 ft. On Stewart Street, two blocks west of Lamb, there is a mobile park where the rent is \$85.00 per month. If this man needs the raise, why then does the park make money at \$85.00 per month. Stewart Street is paved, islands, and lights. Surely this property should cost more for taxes than Three Crowns. Is it possible to make the owners of Three Crowns and other parks that are raising their rates to be forced to bring in their records?  
Three Crowns

✓ The cost of renting a small space to put a mobile home on that you own is raising so rapidly that people on pensions are hard put to keep up with the times. It seems that business and government are both not caring about the plight of senior citizens and God help us if we have a serious illness. There should be some way things can be worked out so that everything we have worked all our lives for isn't in vain. This next rent raise would bring our payment to \$259.00 and this amount is in the wrong end of town for such an amount. Gave up Social Security and pension fund to go back to work because of high rising costs.  
Three Crowns

W  
To keep utilities down we are always cold. We cannot use dryer for laundry. We cannot use dryer cycle for dishes. We are not permitted to dry clothing outside of coach--not even on a folding rack on porch. Of course, when coach was purchased we had to put in a water softener and an RO system (because of my elevated blood pressure and kidney stones). Thus one should add that monthly payment of \$35.85 to the living costs. When we purchased coach we wanted to live in Boulder City. Salesman telephoned designated park and was told we could not live there unless we purchased coach from a specific and local mobile coach dealer. It was then salesman telephoned this park. No one had ever lived on this space prior to us. Park was over 7 years old as best as I can figure. I asked repeatedly if there were any hidden charges when told the rent was \$132.00. I was emphatically assured no hidden charges. I wish you could see my receipts. Our budget is now stretched at Jan.'s bill of \$200.00. What will happen as A/C use goes into effect plus the rent increase (plus the petrol for operating to go to store, etc.). There is no bus service and no sidewalks to nearest grocery and drug stores for walking. We both have arthritis and walking approximately 8 miles (there and back to coach) is out of the question. I am so concerned all of the time that I have seriously considered suicide but I have no guts so am still facing every month. My books show a monthly deficit!

Three Crowns

Obviously, I am not in the lowest income category; however, my mother is. There's no way she would be able to cope with costs of medical care, medicine, housing, food and other less "life or death" vital, without assistance. I know many people who are in the same position as my mother. Rent increases in general appear to be generally greater than the cost of living. Not one of us who is on a fixed retirement income is getting cost of living allowance increases at the rate that rents go up for all mobile home park residents. I am in favor of rent control even though I own a house which is leased out. Because of this fact I can truly see both sides of the owner--tenant problems.

Three Crowns

Looks like it will be easier to go on welfare and let the state pick up the tab for your medical needs plus your rent. Will at least get food stamps to help out. The Congressmen, if they are ready to pass laws to increase our pension by 133% to keep up with just rent increases.

Three Crowns

W  
About the utilities: the park reads the meters and we pay our utilities to the park along with our rent. I resent this because we don't know if we are being over charged. I live alone and never cook at home. Only gas I use is for heating with my thermostat at 70 and my gas bill this winter has been out of sight. I work grave yard and for 9½ hrs. thermostat is set at 55 & 60. In the summer my electric is around \$95.00 month. Every time they increase is because labor and materials have gone up. Or they want the nicest park. Every tenant is responsible for his own. Who are these people trying to kid. Right now I need an electrician, my mobile home leveled and new carpeting on my porch. Who can afford it after paying car payments, insurance on mobile home, taxes, medical insurance on self, gas to get to work, meals, rent and utilities, and many other necessary things.

Three Crowns

There are over 200 mobile homes in this park, surely the last raise of \$20.00 would bring an income of over \$4000.00 monthly, is that in line with cost of living? Who are these money hungry people trying to fool? We have to pay \$4.00 per month for meter reading--gas and electricity. April 1980 there will be an \$18.00 increase. That will be an income of over \$3600.00 per month for these thieves. This park has mostly elderly widows and retired tenants. Three Crowns

For those of us on minimum income it's really a hardship when ones rent is increased \$38.00 since April 1979 to April 1980. Yes, we get Social Security raises but each time it's taken by a rent raise. We are not stupid and know the park owners are making plenty. Figure out each coach raised \$38.00 in a year and 250 coaches in the park. \$9500.00 a month without the regular rent. \$114,000.00 per year minus total rent. I'm sure overhead hasn't gone up that much. It's a good business to be in, I'd say. Where is it going to end? Three Crowns

Management is prone to issue hard nosed directives and eviction notices, i.e. (two awnings, landscape, parking). I believe more efforts should be used to preserve the present status instead of expensive up-grade efforts. Human beings resent being herded like sheep or cattle. Tropicana East

On fixed income we'll have to give up mobile park living because of rent increases. People that have been here a few years started at \$69.00 a month. Due to increases are up to \$135.00 a month now. That is just for space rent. Would have to go and live in a one room cheap apartment if worse comes to worse. Now with gasoline and all utilities going up and everything else. Insurance premium have to be paid. There is not very much left for clothing and food. It's a good thing we have a good son, he saw we couldn't make it as we're paying \$157.59 on our coach. So he was good enough to pay our balance off on the coach out of the goodness of his heart and pity for us. But everyone is not that fortunate. We have big medicine bills for my husband and Drs., the balance of medicare for later is they pay only 80%, plus yearly taxes. Tropicana East

My wife and I purchased this mobile home to help fight the inflation and rent increases that we suffered in a rental apartment tract. This park was an ideal park and the lot rent was \$95.00 month. The day after paying our first months rent of \$95.00 on Nov. 1, 1979, we received a notice to the effect that due to the cost of operating a property, etc. beginning with the rent payment due on Jan. 1, 1980, our rent will be \$135.00 a month. This was a shocking announcement and needless to say, very disconcerting. What can we do to achieve peace of mind and insure a place to live? I also plan on retiring in two years at age 65. This will put me on a fixed income from Social Security without any additional income. Someone has to be concerned about my welfare and my wife's welfare. Tropicana East

I do not waste postage or time writing to the officials because I do not think that they are, or intend to be, any help from what I've read. I have written Congressmen before about certain matters and got sort of a form letter which means nothing. They aren't really interested. I imagine there will be another increase not later than Jan. 1, 1981. Tropicana East

We, too, think the rent increases are way out of line and think something should be done about this. If something isn't done and soon, they will certainly find many more senior citizens on their welfare rolls! In 5 years our space rent has almost tripled.

Pleasant Valley Cascade

We love Vegas! I have to have a dry climate. Back in Baltimore I was a semi-invalid due to arthritis. I doubt if I can remain here! We might have to give up our coach and lose everything we paid on it. We had to buy new furniture in coming here. We can hardly make ends meet. I cannot understand why this park needs a total of \$108,000.00 increase for a year. We are about 300 homes, plus \$30.00 month increase=equals the above sum.

Pleasant Valley Cascade

We would not normally advocate a rent control. Everyone in business is entitled to a fair profit. However, the increases are coming too frequently to be justified. We should do more than ask for relief; we should demand it!

Pleasant Valley Cascade

Rent raises should not exceed raises in the cost of living. Raises should be % raises, not a blanket amount. The person paying the smallest rent pays a larger % raise than the person paying highest rental.

Pleasant Valley Cascade

This will be my third rental raise. Our streets are not kept clean. Hardly ever able to get hold of anyone in the office. Former manager at least was able to do something when things went wrong but not these new managers. As for "night" guard, sometimes he's on duty--more often not; because of this we have had many robberies. Two occurred last week. Out of my \$836.00 monthly, I have to pay rent, Dr. bills, medication (taken every-day), run my 1966 car, food, electric, gas, was in emergency twice, in hospital for 3 days: a raise is hard on me. I cut my gas completely off every night to keep expenses down. Also, whenever I go out--same with electric and very low at night. I think both my meters are off and I think both should be tested (too high) but though I asked them to check them, nothing was done.

Pleasant Valley Cascade

✓ When I pay my utilities along with the rent this last year, they averaged for twelve months \$264.00. Now with this new increase it will be \$294.00 plus the new utilities increase to come. Beside all this, they are talking about increasing our property taxes. I used the cash I had to buy this mobile home; the interest I would be getting on my money comes to \$3,900 per year plus \$3,528.00 expenses (rent and utilities) comes to \$7,428.00, which comes out to \$619.00 per month. Please help to slow down these increases.

Pleasant Valley Cascade

We carry insurance on our mobile home and car, which has gone up. The upkeep on the automobile, taxes, food--which all have increased. We feel like the rent here is far too much for what we get. Lot size 52 x 70.

We don't necessarily believe in rent control but that a justification should be shown that an increase is needed. This latest \$30.00 per month increase is a 17% increase for us. Our park shows no evidence of any improvement after these raises. Surely, any increased cost to the park owner for water or sewage or utilities isn't going to cost him anywhere near the \$9,000 extra per month that he will collect from this latest increase. If we were on welfare or state aid, some interest would be shown in us by the legislature. Since we are in the class that's trying to make it on our own, we are constantly gouged for more and more. We've practically reached our limits.

Pleasant Valley Cascade

Trees are not pruned; Streets not cleaned; Laundry appliances not repaired; Laundry room not cleaned proper; Security comes on duty too late in the evening.

Pleasant Valley Cascade

The \$85.00 per month space rent in 1974 included gas. Gas was metered in early 1975. Prices and costs have increased but these increases are too much--too often.

Pleasant Valley Cascade

Park needs better services and maintainence.

Pleasant Valley Cascade

Rip-off artists and gougers!! May move to California.

Pleasant Valley Cascade

✓ How does the 25% of a person's income should go for housing apply when you have over a \$30,000.00 investment? Also, 25% of a person on a limited income will not pay for an apartment today.

Pleasant Valley Cascade

My husband had open heart surgery in 1977 and the same again in 1980. Is unable to work and I am too old to work.

Pleasant Valley Cascade

We feel the place is not being kept in the best condition as when we moved in. At these impossible rents it's not possible to move and sell.

Pleasant Valley Cascade

✓ After my husband's first heart attack, we sold our home and moved into a mobile home at Pleasant Valley Cascade, January 14, 1972. At that time the payments on our home were \$150.00 per month, the space rent was \$75.00; that was 9 years ago. Since then my husband has been hospitalized 10 times. He had a second heart attack, open heart surgery, kidney stones, surgery for lung cancer and is a full diabetic. Our medical expenses have been unbelievable. Each new rent increase hits us hard! This has been our home for 9 years and if forced to move because of continued rent increases, we have no idea where we would go.

Pleasant Valley Cascade

It is very rough on senior citizens on your own. I feel gas is very high here. Work all your life and just exist and worry how to get along. Can't afford to get sick. Everything is so costly.

Pleasant Valley Cascade



We have less maintenance help; there were 3 maintenance men. We now have one very good, steady man, a poor helper occasionally. The manager does nothing. Park rules are not being adhered to. Park has deteriorated badly; grounds not cared for, tenants not forced to comply with parking, keeping yards up, etc. Laundry facilities are miserable. Dirty machines and out of order. We had to personally spray laundry rooms to get rid of bugs. Streets not swept, park trees not pruned, weeds around swimming pool. Corners have constant filthy, stagnant water.

Pleasant Valley Cascade

They should have a guide line. Raise the rent under the cost of living no more than once a year.

Pleasant Valley Cascade

✓✓ From here on out I plan to spend every dime I have left for clothing and canned foods and other non-perishables OUT of the state of Nevada. Legislators of Nevada forgets many retired people left California and other states and have brought their retirement checks with them. We are being abused by the greed and lack of empathy of big business and it's big business who control many of our so-called leaders. These politicians haven't seen the true anger and hostility of conscientious and fed up elder population; but they will. We're trapped here and have very little chance to sell our tin houses with so many for sale signs up at this time. But many of us will not resort to a loss to get out--we'll stay--I will stay--if I have to eat cat or dog food, but I promise this, I will gather others together for our own meetings and expose those responsible on television. Fortunately we do know a few in the media and Las Vegas will have its own Watergate. Someone is taking a payoff and we'll find out who they are.

Pleasant Valley Cascade

From Feb. 1978 to March 1981 space rent went from \$140.00 per month to \$220.65 per month in three years.

Pleasant Valley Cascade

Beautiful park when we moved in, extremely unkempt now. Park property terribly maintained. I don't think the Park lawns and shrubs have been cleaned, pruned, and watered as needed. Many of the tenants lots no longer kept with pride. New manager for 6 months whom I have never seen but do know what bar or bars he hangs out in. One pool closed, double parking one of the worst irritations, unkempt shrubs in entrance, dog run, etc. Good security when there but not there at approximately 10.00 p.m., 11:00 p.m., 2:30 a.m.; where is he? Aren't we entitled to know their schedule even if he is walking around (which I saw once last summer). People afraid to complain. I think we're paying enough rent for first class security, day and night, and maintenance. Apparently no cooperation with management. I am not home during the day but do hear a lot of complaints about the manager doing nothing; not available for an evening problem. We are paying a lot of rent for 50% of the beauty and rule enforcement we had before the rent increases. I think this is serious.

Pleasant Valley Cascade

This park absolutely does not warrant an increase in rent to the tune of \$9,000.00 per month or \$108,000.00 per year! The costs have not gone up that much for expenses and I feel they are ripping us off since it's difficult to move our mobile homes. I'm really outraged at the frequency of the raises and of the amount.  
Pleasant Valley Cascade

They should change the name of this park to Pleasant Valley Prison!  
Pleasant Valley Cascade

It's a shame, your mobile home is paid for and have to pay someone else rent like this. We were promised security 24 hours and then have someone in at 8:00p.m. and leave at 5:00 a.m. in the morning. It's like living in a prison. Most everyone here has their mobile home up for sale. It's hard to sell and get out because people won't pay the high rent. This park first started at \$100.00 per month and it's not the greatest for one person to pay \$231.00 per month. There's not only senior citizens in this park that can't afford it. Where are we supposed to go? It's a rotten shame, mobile home living is supposed to be cheap, not anymore. Utilities are higher than when I owned my home; always doubled.  
Pleasant Valley Cascade

This is the third time our rent has gone up and when we moved in we were told it wouldn't go up for 5 years. This is where our money is going from all our savings. Pleasant Valley Cascade

I don't think it's fair for amount of increase in rent for the little service you get and for the length of time I lived here. Also power cost is outrageous for one person, for the amount of power I use.  
Pleasant Valley Cascade

✓ We have had four (4) rent increases in amount of \$110.00 from 1-1-77 to 3-1-81. Pleasant Valley Cascade is the highest rental park in Las Vegas - city and county. We are paying more rent and less benefits than any other park.  
Pleasant Valley Cascade

Living on a fixed income. Last raise is unjustifiable. When will it end?  
Pleasant Valley Cascade

What good will anything do with the kind of manager they have at this park! He is only obeying orders -- Do Nothing!  
Pleasant Valley Cascade

I do not think it's fair for a single wide to have to pay the same size rent increase as a double wide. I am single and use very few facilities; can't see why I have to pay the same as a double wide with two people using twice as much as I do.  
Pleasant Valley Cascade

I called you last week and told you about the rent increase that takes effect March the first. The increase will be fifteen dollars a month more. Last year they raised it to nineteen dollars a month which it makes thirty four dollars in two years so I will be paying a hundred and thirty four dollars a month. I also told some of the other tenants to write a letter to you but I don't know if they will. I hope they do, people will squawk but I wonder if it will do any good.

Ballerina Trailer Park

✓ The Personal Property Tax on Mobile Homes should be abolished Clark County, Nevada. They are stealing from the people. Who can afford to pay it. \$522.34 retirement--U.S. Civil Service. \$266.42 actual cost per month. \$255.92 Month left from monthly charges living here. Over 50%, in spite of the 25% the U.S. Government states we should live on, this is actual costs totally. Then comes food, clothes, medical expenses, etc., insurance, income taxes.  
Bonanza Village

Sixty three years old and can't afford to retire. Rent, utility bills, food, gas all going up but not my wages. God help me if I get sick and can't work.  
Bonanza Village

At the age 67 not able to work much longer. If get on Social Security would get \$213.20 month. What does us older people have to live on after rent and utilities. I think instead of all this land being fenced in with brush and bushes the state could make trailer parks for senior citizens with a rent they could pay and have a little left to live on.  
Bonanza Village

My monthly income from my job and Social Security would ordinarily get me by, but because of emphysema, I am off work a lot and hospitalized at least once a year, and to date owe Valley Hospital \$2600.00 which I am trying to pay off, but it is getting harder and harder due to inflationary food etc. costs.  
Bonanza Village

✓ I believe if utility companies read and billed us directly, the gas and electric would be less. I feel I'm being ripped off in being charged more than I utilize. I can't afford to pay all the increases that have transpired since living here. They have us locked since it's too costly to move. My income is pretty well fixed since an annual raise is too meager to even keep up with the cost of living. Boulder Cascade

After next raise in rent will be unable to afford living here and don't know where I will go.  
Boulder Cascade

✓ We have more or less been told we can expect a rent increase this July 1st. We have had 3 increases since I have moved into this park. Little or no improvements have been made, but promises. Everytime senior citizens receive an increase in Social Security we have had a rent increase. As to rent control, I believe it would be best to have rent justification.  
Boulder Cascade

Rent controls would remove all incentive. There are not enough parks now. How many more will be built if no incentive to make a profit. This doesn't mean we like rent increases.  
Boulder Cascade

The park is filthy from the time I bought my coach (a trailer). Also, the management is not concerned. The garbage lays for weeks before it is cleaned up; that is, picked up from the cement. The garbage men pick up, I mean around the garbage area. Our people, I believe, are tidy; it's the management again. The showers have not been properly cleaned in over a year. The Health Department has been called in many times. The wooden standing boards are not removed or cleaned until there is mold and they stink. For this we should pay another \$30.00? Security -- They do not come on until 7:00 p.m., two hours after dark, and at 10:00 p.m. every night security leaves the front post for approximately 1/2 hour to lock up the recreation hall. No one to take their place so anyone can come in and do anything. And as far as phoning the manager, forget it. They say, phone 876-5999 and listen to the phone ring forever; other than from 9:00 a.m. to 4:00 p.m. From 4:00 p.m. to 7:00 p.m., the park is up for grabs. Thank God for neighbors.

Pleasant Valley Cascade

## INTER-OFFICE MEMORANDUM

January 16, 1981

TO: Mayor Bill Briare  
Commissioner Ron Lurie  
Commissioner Paul Christensen  
Commissioner Al Levy  
Commissioner Roy Woofter

FROM:

*Russ Dorn*  
Russell W. Dorn  
City Manager

SUBJECT:

Mobile Home Park Mediation Board

COPIES TO:

The Las Vegas Mobile Home Park Mediation Board, created by City Ordinance 2036, held its first meeting in May of 1980 and adopted by-laws at that meeting. These by-laws call for a semi-annual report to the Board of City Commissioners, advising the Commission of matters which were brought before the Mediation Board and setting forth any recommendations they may have.

Attached is a copy of the first such semi-annual report as submitted by the Mediation Board.

MH:jae  
enc.

A REPORT TO THE LAS VEGAS CITY COMMISSION

FROM: The Las Vegas Mobile Home Park Mediation Board

In accordance with the bylaws of the City of Las Vegas Mobile Home Park Mediation Board, we herewith submit the semi-annual report on your Mediation Board's activities.

The Las Vegas Mobile Home Park Mediation Board has met on three (3) occasions since its inception on May 19, 1980.

This organizational meeting on May 19th resulted in the election of officers and the delineation of the ground rules under which the Board could function.

The first regular meeting of the Board took place on July 23, 1980, at which time a hearing was held, which included testimony of nineteen (19) complainants who had been asked to move or be evicted from the Rancho-Vegas Mobile Home Park. The Park owners proposed a conversion from a family park to an adult park, which would result in the eviction of families with children under 18 years of age.

After much testimony, the Board unanimously recommended that the Park owners bear all costs of relocating these tenants to a "comparable park within a ten (10) mile radius of subject park," if they wanted them evicted. To date the status quo continues at the Park, tenants being advised that no action, if any, will be taken before June 1981.

The hearing held on September 24, 1980 involved the manager of Sunrise Oaks Mobile Home Park filing a complaint against a tenant for refusing to abide by manager's request to not allow a certain guest, whose park residency had been terminated, on the Park premises.

The unanimous recommendation of the Board was that the aforementioned guest, a juvenile male, be permitted on the Park premises only under the direct supervision of an accompanying adult, namely, his mother or her male friend. Both parties agreed to try this solution and no further correspondence was received.

The Mediation Board has functioned well with its very limited powers. However, the fact that the Board has no real authority creates several inherent problems. The Board can only request the appearance of the parties involved in a particular complaint; consequently, we have held hearings in which only one side of a dispute was represented. Without the authority to make binding decisions the only purpose served by the Board is sometimes simply an opportunity to air grievances. Perhaps it is because of these problems that the Board has had to cancel its last two regularly scheduled meetings due to lack of items requiring consideration by the Board.

It is to the City's and the Board's credit that the Mobile Home Owners League of the Silver State expressed their appreciation of the efforts

of the Las Vegas Board at the same time that they publicly criticized the County Board. Your Mediation Board is pleased to do whatever it can to diminish conflict in mobile home parks, but it could be more effective in resolving landlord-tenant disputes if given the necessary tools, namely some authority to make binding decisions.

Respectfully submitted,

Julian W. Wallace,  
Vice-Chairman, Mobile Home Park Mediation Board

for

Marvin Myers, Chairman  
Robert E. Horner  
Ed Stricker  
Karen Davenport  
Mary Hibbs  
Raymond Haldeman



Clark  
County

Building Permit Application Center

CARL W. WHITTINGTON  
COORDINATOR

Department of Building & Zoning

ROBERT D. WEBER  
DIRECTOR

CLARK COUNTY COURTHOUSE ANNEX  
400 LAS VEGAS BLVD SOUTH  
LAS VEGAS, NEVADA 89101  
(702) 388-4308

March 5, 1981

TO: R. D. Weber, Director  
FROM: Carl W. Whittington, Coordinator *lu*  
SUBJECT: Mobile Home Park Rent Increases

The following information is in reference to mobile home park rent increases. Assembled is a survey prepared by Bob Stubbs of the Mobile Home Owners Association, and a summary of appeals made to the Mobile Home Mediation Board along with reference material.

In addition, I was advised yesterday that Paul Swartz of Clark County Community College has, as commissioned by sponsors of ACR-3, conducted a comprehensive survey of mobile home park owners and tenants. Areas covered were, among other things, reported rent increases, employment status, income, age groups, and the like. A telephone call to Mr. Swartz verified that the survey results have been documented, is with a printer today, and will be flown to Carson City tonight in time for the meeting tomorrow.

CWW:bd

Attachments

**B-3**

COMMISSIONERS

Sam Bowler, Chairman • David B. Canter, Vice-Chairman  
Robert N. Broadbent, Manuel J. Cortez, Thalia Dondero, Jack R. Petitti, R.J. "Dick" Ronzone  
Bruce W. Spaulding, County Manager • Joseph C. Denny, Assistant County Manager



"MOBILE HOME PARK RENT INCREASES"

6-

PARK NAME	3-78	10-80	3-81
BONANZA VILLAGE	70.50		138.50
BOULDER CASCADE	131.50	152.50	178.50
ELDORADO	120.00	142.00	172.00
HERITAGE VILLAGE			170.00
MAYCLIFF	85.00	120.00	130.00
MEADOWS	133.00		186.50
PALM GROVE		128.50	148.50
PLEASANT VALLEY CASCADE	166.00	196.00	226.00
RIVIERA VEGAS	97.50		145.00
SAND CREEK	113.50	127.50	137.50
SHADOW MOUNTAIN	99.00	141.00	163.00
THREE CROWNS	122.00		187.50

THE ABOVE FIGURES WERE OBTAINED BY TELEPHONE SURVEYS AND REPRESENT AVERAGE RENTAL AMOUNTS.

NOTE: Mobile home park rent information is provided by Mr. Robert Stubbs, President of both the State and Clark County Mobile Home Park Owners Association through cooperation of those parks listed. Entries represent median rents charged. Rent variables consider space location and size of mobile home.

*lw 3/1/01*

MARCH 4, 1981

CLARK COUNTY  
"MOBILE HOME MEDIATION BOARD"  
RENT INCREASE APPEALS HEARD

<u>NUMBER</u>	<u>MOBILE HOME PARK</u>	<u>FILED BY</u>	<u>REASON FOR COMPLAINT</u>	<u>BOARD RECOMMENDATION</u>
80-1	Golden Valley Acres 3401 N. Walnut Road	Mr. Robert Erickson Space 83	\$20.00 per month yard cleanup service.	Complainant proceed with legal action by placing complaint with the Attorney General's Office.
80-2	Tropicana 300 E. Tropicana Ave.	Mr. William Waschow Space 80	Unreasonable rent increases of over 90% in a two year period.	Rent increase is unfair and there should be no increase. Motion lacked a second. No further action.
80-3	Riviera Vegas 2038 Palm Street	Ms. Thelma Clark Space 253	Rent increases of 36.67% in 13 months.	Management's letter itemizing costs and justifying rent increases). Board made no recommendation.

B-5



MOBILEHOME OWNERS LEAGUE OF THE SILVER STATE, INC.  
P. O. BOX 1557  
LAS VEGAS, NEVADA 89101

May, 27, 1980

Mr. Robert Weber, Director  
Building and Inspection Department  
400 S. Las Vegas Blvd.  
Las Vegas, Nevada

Dear Mr. Weber:

It is requested that the following complaint be heard by the Clark County Mediation Board.

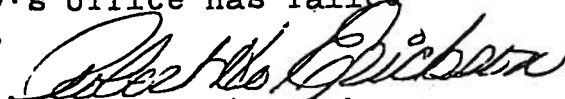
NRS 118,270 2., (a) thate that a rent increase or service fee may be given to the tenants. However, if it is a service fee, it shall apply to a given circumstance.

On May 1, 1979, our park gave a notice (see Exhibit A) that the rent would be increased \$20.00 per space per month to become effective July 1, 1979. They stated "When the rent increase becomes effective, Golden Valley Acres will maintain every yard in the park, which includes daily cleaning of the yards of trash and rubbish, in an all out effort to improve the entire park."

There are 250 coaches in this park. That amounts to \$5000 per month and the tenants have paid \$55,000 for services that have not been rendered.

We took our complaint to the District Attorney's Office, Mr. Vince Laubach, because this was violation of the NRS 118, and we were advised that they could do nothing to help us.

We would ask that the mediation consider our pomplaint on the grouds that we are paying for a service that is not being rendered and that the District Attorney's office has failed to give enforcement of the NRS Statute.

  
Mr. Robert Erickson  
3401 N. WALNUT RD. SP. 83  
LAS VEGAS, NV 89030  
673-9774

before 9 am  
after 7:30 pm

*Ades*

MINUTES

The meeting of the Clark County Mobile Home Mediation Board was called to order at 7:15 P.M. Tuesday, August 12, 1980 by Larry Swecker, with the following board members in attendance.

<u>Present</u>	<u>Absent</u>
Richard Gillespie	Luther Kutcher
Lawrence A. Jewell	Judy Brailsford
Art Rader	
Larry Swecker	
Richard Worthen	

The minutes of the previous meeting were submitted for approval. A motion was made for approval and unanimously approved.

No new grievances were received. Cases 80-1, 80-2, 80-3 are carryovers from the previous meeting for recommendation by the board.

Agenda was submitted for approval. A motion was made for approval and unanimously approved.

Case 80-2 - Unreasonable rent increase

Michael Davidson representing the owner of the Tropicana Mobile Home Park, 300 East Tropicana presented a documentation of the operating expenses for the park. There are a total of 160 spaces, 100% occupancy. Prior to the rent increase the monthly deficit amount was \$8,691.00. An anticipated rent increase will become effective September 1, 1980, and will decrease monthly deficit to approximately \$4,000.00. The park is comprised of single, expandos, and double trailers renting as follows:

	<u>SINGLE</u>	<u>EXPANDOS</u>	<u>DOUBLES</u>
<u>1979</u>	\$135.00	\$145.00	\$155.00
<u>Effective September 1, 1980</u>	160.00	175.00	195.00

There was a long discussion on what may be on the master plan regarding the future of this park. This is a park on prime property with access to the Strip.

RECOMMENDATION: The availability of more spaces within the County to balance supply and demand so rents will not sky rocket. The adoption of an ordinance to lower restrictive zoning in older mobile home parks.

A motion made by Richard Gillespie that this rent increase is unfair, and there should be no increase. Motion denied due to a lack of a second.

Case 80-1 - Unreasonable rent increase

Mr. Ross Brock's letter dated August 8, 1980 in reply to Al Lorence's letter dated July 9, 1980 was read to the board. Mr. Brock, owner of the Golden Valley Acres Mobile Home Park, stated in his letter the reason for the rent increase was due to maintenance. The tenants of the park are not complaining about the rent increase, but are complaining about the \$20.00 increase for maintenance which has not been fulfilled.

Minutes of the Clark County Mobile Home Mediation Board  
Tuesday, August 12, 1980

Case 80-1 - Unreasonable rent increase - Continued

RECOMMENDATION: The board suggests that the complainant, Mr. Robert Erickson, proceed with legal action by placing a complaint with the Attorney General's office. Motion made by Richard Worthen and unanimously approved.

Mr. Erickson requested a copy of the minutes.

Case 80-3 - Unreasonable rent increase.

Letter from President, John M. Sachs, Inc. to Al Lorence, Senior Construction Inspector of the Building and Zoning Department, itemizing a financial report justifying the rent increase was presented to the board.

Mr. Robert Forrer, Manager of the Riviera Vegas Mobile Home Park, advised that Felix Havis of the Clark County Health Department inspected the park facilities, and found that two (2) shower stalls needed repair, and some broken tile which will be taken care of. There was no evidence of an unsanitary condition.

An inspection by Al Lorence of the Building and Zoning Department on July 28, 1980 revealed no violations in the park, and everything appeared clean and orderly.

Ms. Thelma Clark Did not concur entirely with these findings, but felt that the board should pursue other avenues to get legislation to help alleviate problems occurring in these parks.

Mr. Forrer mentioned the possibility of building "no frills" parks in the future to cut down expenses resulting in rent increases.

RECOMMENDATION: By the board - none.

Vicky Demas of the Silver State Mobile Home Association advised that there are bills pending before the Legislature. One is for the establishment of a County and City Housing Review Board. There are other various bills pending that will assist in giving City and County Mediation Boards some authorization to make recommendations and render decisions. The State Housing Division is now allowed to "float bonds" in order to have funds available to lending institutions for investors to borrow money to build mobile home parks at a lower interest rate.

Mr. Stubbs, President of the Park Owners and Managers Association, expressed the feeling that individuals have the right to invest their money as they wish. This is free enterprise. Inflation is hitting the wage earner as well as the senior citizen on a fixed income.

It was the unanimous approval of the board that the next agenda be devoted to thinking very seriously about proposed changes to be presented to the next legislation on behalf of people living in mobile home parks. Developers could be contacted, and invited to attend the next Clark County Mobile Home Mediation Board scheduled September 9, 1980 to discuss problems occurring in the construction of new mobile home parks.

Motion made for adjournment by Larry Swecker at 10:00 P.M.

Approximately twenty-five (25) people were in attendance.



MOBILEHOME OWNERS LEAGUE OF THE SILVER STATE, INC.  
POST OFFICE BOX 42326  
LAS VEGAS, NEVADA 89104  
TELEPHONE (702) 873-9896

May 30, 1980

Mr. Robert Weber, Director  
Building and Safety  
400 So. Las Vegas Blvd  
Las Vegas, Nevada 89103

Dear Mr. Weber:

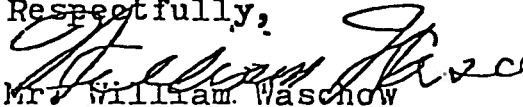
As the President of Chapter 26, of the Mobile Home Owners League of the Silver State, we wish to have a hearing before the Clark County Mediation Board.

It is our intent to place a complaint against the Tropicana Mobile Home Park, located at 300 East Tropicana, Las Vegas. The Owner is Renaissance Development, DBA, Tropicana Enterprises Mr. Robert Van Ostrand, President.

The subject of our complaint is unreasonable rent increases amounting to over 90% in a two year period.

Thank You.

Respectfully,

  
Mr. William Waschow  
Pres. Chapter 26, MHOLSS  
300 E. Tropicana Space 80  
Las Vegas, Nevada 89109  
Tel, 736-0644

B-9

ra

MINUTES

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80-3  
June 23, 1980

Mobilehome Park Mediation Board  
Mr. Luther Kutchner, Chairman  
400 Las Vegas Blvd So.  
% Building & Safety Department  
Mr. Bob Weber, Dir.

Dear Mr. Weber:

I would like a hearing with the Mobilehome Park Mediation Board at your July meeting. The manager of Riviera Vegas Mobilehome Park is Bob Forrer.

Please let me know the time and place. If you wish you can reach me by telephone after 5 P.M. at 457-4597.

I hope you will give my request favorable consideration. I will furnish you with additional information at the meeting.

The assembled data should be of interest to the Mediation Board.

Thank you.

THELMA CLARK,  
Riviera Vegas MH Park  
2038 Palm, Sp 253  
Las Vegas, Nev. 89104

RECEIVED  
JUN 17 1980  
CLARK, THELMA  
BUILDING DEPT.

112W -  
(B-11)



Riviera Vegas MH Park

RENT:

Our rent was raised \$20.00 May 1, 1979 (451 spaces x 12 months = \$18,260.00 the first 13 months); - \$15.00 on June 1, 1980 (451 spaces x 12 months = \$80,680.00 (second year). This is 36.67% in 13 months.

A large majority of our residents are Senior Citizens on fixed incomes. They can not afford to move and there are no available places if they could.

UPKEEP of the Park:

Since the new owners bought the park, we have had practically nothing done to repair patios, carports, streets, and better street lighting (especially in the older section of the park), or promised additional recreational facilities. (One of the recreation rooms was closed by the Fire Department, due to so-called fire hazards, and has not been reopened.)

UTILITIES:

The Public Service Commission should not allow increases that are being asked by Nevada Power and Southwest Gas. Our senior citizens can not survive these increases. Due to these increases in rent, they are already doing without nourishing food and unable to participate in church services and donations their pension may have afforded them previously.

Too many of the seniors are widows or widowers and those who want them are deprived of the pleasure of a small pet for companionship. This was the reason pet owners preferred this park over a no-pet regulated park. True, they own their own homes and thus are not yet burdens on the state, as far as rest or convalescent homes are concerned. They are too proud!

Thank you.

THELMA CLARK  
Riviera Vegas Mobilehome Park  
2038 Palm, Sp. 253  
Las Vegas, Nv. 89104

Encl: cy ltr 5/13/80

cys: - See Distribution List

Minutes of the Clark County Mobile Home Mediation Board  
Tuesday, August 12, 1980

Case 80-1 - Unreasonable rent increase - Continued

RECOMMENDATION: The board suggests that the complainant, Mr. Robert Erickson, proceed with legal action by placing a complaint with the Attorney General's office. Motion made by Richard Worthen and unanimously approved.

Mr. Erickson requested a copy of the minutes.

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Motion made for adjournment by Larry Swecker at 10:00 P.M.

Approximately twenty-five (25) people were in attendance.

EXHIBIT C

BYLAWS OF THE CITY OF LAS VEGAS MOBILE HOME PARK MEDIATION BOARD

Preamble

The City of Las Vegas Mobile Home Park Mediation Board hereinafter referred to as "BOARD", was created by Ordinance No. 2036 of the Las Vegas Board of Commissioners pursuant to Chapter 692, Statutes of Nevada, 1979.

Article I - Duties

1. The Board is created to advise the Las Vegas Board of Commissioners, by way of the semi-annual report referred to in Section 4 of this Article, on matters relating to mobile home parks. This shall include:
  - a. recommendations to affect change in local ordinances relating to mobile homes and mobile home parks;
  - b. recommendations to promote equity between tenants and landlords;
  - c. recommendations to promote mobile home park development responsive to the needs of the citizens of the City of Las Vegas.
2. The Board is also charged with the duty of attempting to mediate disputes that might arise concerning landlords and tenants of mobile home parks. The Board will examine all materials/facts relevant to any dispute concerning a mobile home park, a tenant or the City's policies toward an existing or planned mobile home park.
3. The Board shall not have jurisdiction over any dispute which has resulted in the commencement of court proceedings under NRS 40.215-40.420, as amended by Chapter 692, Statutes of Nevada, 1979, providing for summary proceedings for obtaining possession of real property or mobile homes, or under any other remedy provided by law.
4. The decisions of the Board shall serve as recommendations only. Relative to the duties contained in Section 1 of this Article, the Board shall file a semi-annual report with the Board of City Commissioners and may make recommendations to the City Manager at any time on matters requiring administrative or legislative consideration.

Article II - Meetings

1. The Board shall meet in the month of May, 1980, and bi-monthly thereafter on the 4th Wednesday of the month at 7:30 p.m., at the Las Vegas City Hall.

2. Special meetings may be held on the call of the Chairman and must be called when so requested by three (3) or more members of the Board or by the Board of City Commissioners.
3. All determinations by the Board shall be made on the basis of a majority vote of the members present and voting. Each Board member including the Chairman shall have one (1) vote on all matters. Any member shall have the right to make a motion except the Chairman. No Board member who is a party to or has personal interest in any matter brought before the Board pursuant to Section 2 of Article I, shall sit with the Board in the hearing or deliberation on the matter. A Board member who is a party to or has an interest in any matter brought before the Board may not testify on that matter like any other witness but may be represented by a spokesman.
4. A simple majority of the Board shall constitute a quorum for the transaction of business.
5. All meetings of the Board shall be held in accordance with the provisions of the Open Meeting Law as contained in Chapter 241 of the Nevada Revised Statutes.
6. The Secretary, as provided in Section 4 of Article IV, shall prepare the agenda for each Board meeting. The agenda shall include complaints within the purview of the Board as provided in Article III and such other matters as may properly be brought before the Board.
7. Meetings shall be conducted and governed by Robert's Rules of Order, except as otherwise provided by these bylaws.

Article III - Procedures for Contested Cases

1. Any person or entity desiring Board consideration of a complaint concerning a specific mobile home park shall file a written complaint with the Board at the City Attorney's Office. The complaint must be filed at least 20 days before a regularly scheduled meeting in order to be heard at that meeting.
2. Within five working days of receipt of a complaint, the Secretary of the Board shall review the complaint. If the complaint is determined to be within the purview of the Board, the Secretary shall cause each person or entity named in the complaint, hereinafter referred to as "RESPONDENTS," to be delivered a copy of the complaint and any supporting documents together with a notice stating:

C-1

- a. Date of receipt of the complaint
- b. Date scheduled for hearing of the complaint
- c. A statement advising the Respondent of the advisory nature of the Board
- d. An invitation to respond to the allegations made in the complaint either in writing and/or by appearing at the hearing
- e. The possibility that the Board will hear and make its recommendation on the matter solely on the testimony of the complainant if no response is made
- f. The respondent(s) may appear at the hearing and present testimony and evidence

If the complaint is determined to be outside the purview of the Board, the Secretary shall so advise the complainant, together with the reasons for such determination.

3. Any party is entitled to be represented at the hearing by a person of its choice, and such person need not be an attorney.
4. At the hearing opportunity shall be afforded all parties to respond and present evidence and argument on all issues involved. The hearing shall not be conducted according to the formal procedures and rules of evidence that apply to judicial proceedings. The Board may consider all relevant evidence. Each party or his representative shall have the opportunity to cross-examine any persons who testify against him at the hearing.

#### Article IV - Membership

1. The Board shall consist of seven (7) members appointed by the Board of City Commissioners as follows:
  - a. Two (2) representatives who shall be owners of mobile home parks
  - b. Two (2) members who shall be tenants of mobile home parks
  - c. Three (3) members of the general public
2. The duly elected or appointed officers of the Board shall be as follows: Chairman, Vice-Chairman and Secretary. The Chairman and Vice-Chairman shall be elected annually, at the first regular meeting in 1980 and at the first regular meeting in January thereafter, by a majority vote.

C-2

3. It shall be the duty of the Chairman to act as presiding officer at all regular and special meetings. The Vice-Chairman shall act in the absence of the Chairman.
4. The City Attorney or his designee shall serve ex-officio as Secretary of the Board, and as such shall be responsible for the administration of the affairs of the Board. The Secretary shall be the custodian of all official records of the Board, and such records shall be open to public inspection. In the event that both the Chairman and the Vice-Chairman shall be absent from any regular or special meeting, the Secretary shall appoint another member to act as Chairman for that particular meeting.
5. The terms of office of the members of the initial Board shall be as follows:

- two shall be appointed for 2-year terms
- two shall be appointed for 3-year terms
- two shall be appointed for 4-year terms
- one citizen member shall be appointed for a 5-year term

After the expiration of the terms of office of the initial members, subsequent appointment shall be made for 5-year terms.

Vacancies shall be filled by the Board of City Commissioners for the unexpired term of any member whose office becomes vacant.

6. The fact that any member fails to attend 4 regularly scheduled meetings within a 12-month period without being excused by the Chairman shall be reported to the Board of City Commissioners and such member may be removed from the Board.

#### Article V - Adoptions and Amendments

These rules shall be adopted by a majority vote of the entire Board. These rules may be amended at any time by majority vote of the entire Board. provided that such amendments are not inconsistent or in conflict with the City Charter or any ordinance of the City of Las Vegas, and provided, further that any proposal to amend the rules shall be presented to the Board at on meeting for discussion and be held for the next subsequent meeting for action.

AN ORDINANCE TO AMEND TITLE II OF THE MUNICIPAL CODE OF THE CITY OF LAS VEGAS, NEVADA, 1960 EDITION, BY ADDING THERETO A NEW CHAPTER ENTITLED "MOBILE HOME PARK MEDIATION BOARD" CREATING A MOBILE HOME PARK MEDIATION BOARD AND ESTABLISHING THE MEMBERSHIP, QUALIFICATIONS AND DUTIES THEREOF; TO PROVIDE FOR OTHER MATTERS PROPERLY RELATING THERETO; AND TO REPEAL ALL ORDINANCES AND PARTS OF ORDINANCES IN CONFLICT HEREWITH.

Sponsored by:  
COMMISSIONER RON LURIE  
COMMISSIONER ROY WOOFER

Intent of Bill: To amend Title II of the Municipal Code of the City of Las Vegas, Nevada, 1960 Edition by adding a new chapter creating a Mobile Home Park Mediation Board and establishing the membership, qualifications and duties thereof

THE BOARD OF CITY COMMISSIONERS OF THE CITY OF LAS VEGAS, NEVADA, DOES HEREBY ORDAIN AS FOLLOWS:

SECTION 1: Title II of the Municipal Code of the City of Las Vegas, Nevada, 1960 Edition is hereby amended by adding thereto a new chapter, designated as Chapter 14, to read as follows:

CHAPTER 14

MOBILE HOME PARK MEDIATION BOARD

2-14-1: CREATION: There is hereby created a Mobile Home Park Mediation Board which shall consist of seven (7) members appointed by the Mayor and Board of City Commissioners as follows:

- (A) Two (2) representatives who shall be owners of mobile home parks.
- (B) Two (2) members who shall be tenants of mobile home parks.
- 1 Member added*  
(C) Three (3) members of the general public.

2-14-2: DUTIES: It shall be the duty of the Mobile Home Park Mediation Board to:

- (A) Attempt to adjust grievances between the landlords and tenants by means of mediation or negotiation.

- (B) Recommend changes in local ordinances relating to mobile homes and mobile home parks.
- (C) Recommend measures to promote equity between tenants and landlords.
- (D) Encourage the development of mobile home parks to meet the needs of the community.

2-14-3: Term of Board Members; Vacancies; Meetings; Subpoenas:

- (A) The terms of office of the members of the initial Board shall be as follows:

- 1 for 2 years* 1. Two shall be appointed for 2-year terms.
- 2. Two shall be appointed for 3-year terms.
- 3. Two shall be appointed for 4-year terms.
- 4. One citizen member shall be appointed for a 5-year term.

- (B) After the expiration of the terms of office of the initial members, subsequent appointments shall be made for 5-year terms.

- (C) Vacancies shall be filled for the unexpired term of any member whose office becomes vacant.

- (D) Meetings of the Board shall be held at the call of the Chairman, who shall be elected annually by the members, and at such other times as the Mediation Board or City Commission may determine. The Board shall keep the minutes of its meetings and official proceedings, showing the vote of each member upon each question, including all abstentions, and the attendance of each member at the meeting. All records shall be filed with the City Clerk's Office and be open to public inspection.



(E) The Chairman of the Board, or in his or her absence the Acting Chairman, may administer oaths and order the attendance of witnesses and the production of all papers relating to any business before the Board.

SECTION 2: If any section, subsection, subdivision, paragraph, sentence, clause or phrase in this Chapter or any part thereof, is for any reason held to be unconstitutional, or invalid or ineffective by any court of competent jurisdiction, such decision shall not affect the validity or effectiveness of the remaining portions of this Chapter or any part thereof. The Board of Commissioners of the City of Las Vegas hereby declares that it would have passed each section, subsection, subdivision, paragraph, sentence, clause or phrase thereof irrespective of the fact that any one or more sections, subsections, subdivisions, paragraphs, sentences, clauses or phrases be declared unconstitutional, invalid or ineffective.

SECTION 3: All ordinances or parts of ordinances, sections, subsections, phrases, sentences, clauses or paragraphs contained in the Municipal Code of the City of Las Vegas, Nevada, 1960 Edition, in conflict herewith are hereby repealed.

PASSED, ADOPTED and APPROVED this 17th day of October, 1979.

APPROVED:

By /s/ Ron Lurie  
RON LURIE, Mayor Pro Tem

ATTEST:

/s/ Edwina M. Cole  
Edwina M. Cole, City Clerk

The above and foregoing ordinance was first proposed and read by title to the Board of Commissioners on the 3rd day of October, 1979, and referred to the following committee composed of Commissioners Lurie and Woofter for recommendation; thereafter the said committee reported favorably on said ordinance on the 17th day of October, 1979, which was a regular meeting of said Board; that at said regular meeting, the proposed ordinance was read by title to the Board of Commissioners as first introduced and adopted by the following vote:

VOTING "AYE" Commissioners: Christensen, Levy, Lurie and Woofter

VOTING "NAY" Commissioners: None

ABSENT: Mayor Briare  
(excused)

APPROVED:

By /s/ Ron Lurie  
RON LURIE, Mayor Pro Tem

ATTEST:

/s/ Edwina M. Cole  
Edwina M. Cole, City Clerk

## TESTIMONY IN OPPOSITION TO A.B. 30

Presented To  
ASSEMBLY COMMERCE SUBCOMMITTEE  
March 6, 1981  
BY  
Nevada Association of REALTORS®

Because we share the same concerns as both the proponents and opponents of A.B. 30, and because we are concerned about the ability of those on fixed incomes to withstand the ravages of inflation, the Nevada Association of REALTORS® opposes this bill.

APB 150  
The Interim Study Committee on the Problems of Owners and Renters of Mobile Homes has itself stated that the Committee was not in favor of rent control. It correctly diagnosed the cause of increased space rents as inadequate supply. During this session, many bills have been introduced which are designed to increase the supply of mobile home park spaces. For example: ACR 3 directing the Nevada Housing Authority to procure lands for mobile home parks, A.B. 20 which provides a procedure for reporting the success of that effort and S.B. 4 which authorizes local governing entities to purchase public land for housing and industrial development. AJR 9 and ACR 4 urge Congress and the local governments to pursue aid for low-income mobile home park tenants and are directed specifically to the problems of people on fixed incomes who are not able to keep up with inflation.

A.B. 30 may destroy all of these creditable steps in the right direction. It could effectively close off all those fruitful avenues pursued by the Committee to solve a very real problem.

The U.S. Congress, in the 1980 session, narrowly missed passing legislation which would prevent federal funding in any areas which have enacted rent control. President Reagan's Urban Affairs Task Force condemned rent control as a major contributor to the nation's housing slump, and a HUD study recommended that rent control laws be eliminated in order to remedy the current housing shortage. HUD Secretary, Pierce, has observed that it may be economically infeasible for HUD to invest in communities with rent control, and four out of six rent control initiatives were defeated by the voters on the west coast last year. Is there any doubt that when Congress considers this legislation in the 1981 session, as it certainly will, that the legislation will pass. The reasoning is clear: Why should the entire country contribute to an area which persists in its own destruction? And when that happens, the 1981 Nevada Legislature, if A.B. 30 becomes law, will have slammed the door not only on any new programs to help the low-income tenant, but on the existing programs as well.

Enactment of rent control ordinances as emergency measures will ensure a permanent emergency situation. New York City's "emergency" rent control laws have been in effect for 42 years. Yes, New York is not Nevada, but economic facts do not discriminate between New York, Boston, Washington, Reno or Las Vegas.

- FACT: Rent Control dries up the investment dollar. Lending institutions invariably refuse to lend in rent controlled areas.
- FACT: Maintenance is the first and perhaps the only expense that can be cut. The few remaining parks will not offer the same quality of life as offered in the past.
- FACT: Just the threat of rent control can substantially decrease the number of new units available. ENABLING LEGISLATION IS THAT TREAT.
- FACT: If just one local government fails to make the "herculean effort" predicted by the Committee to increase the number of mobile home spaces RENT CONTROL IS NO LONGER A THREAT, IT IS A FACT.

The Nevada Association of REALTORS® urges the Committee to pursue the two-fold approach that was recommended by the Interim Study Committee, the first being a long-range cure designed to increase the available funding and available land for new parks, two of the major causes of inadequate supply; and the second designed to provide additional assistance to those who need it.

This two-fold approach to the problem, action to alleviate the symptoms and action to eradicate the cause, will work. Let us not, in over-zealousness, deal the killing blow of rent control.

Respectfully submitted,

*Sharon Cleary*

Sharon Cleary,  
Director of Governmental Affairs  
Nevada Association of REALTORS®



*Office of the District Attorney*

CLARK COUNTY COURTHOUSE  
LAS VEGAS, NEVADA 89101  
(702) 386-4011

ROBERT J. MILLER  
DISTRICT ATTORNEY

REX BELL  
ASSISTANT DISTRICT ATTORNEY

BILL CURRAN  
COUNTY COUNSEL

CHIEF DEPUTIES

JAMES M. BARTLEY

STEVE GREGORY

MELVYN T. HARMON

RAYMOND D. JEFFERS

EDWARD R. J. KANE

WILLIAM T. KOOT

CHUCK PAINE

ERNEST D. ROARK, III

DAVID P. SCHWARTZ

DAN M. SEATON

DONALD K. WADSWORTH

BEECHER AVANTS  
CHIEF INVESTIGATOR

KELLY W. ISOM  
ADMINISTRATIVE OFFICER

February 2, 1981

TO: PATRICIA MULROY, Management Analyst  
County Manager's Office

FROM: JAMES M. BARTLEY,  
Chief Civil Deputy

Re: Comments as to A.B. 30

The provision of this bill as it relates to rent controls gives me some concern. First, is the mere finding that 5% or less vacancy factor sufficient constitutionally? It is my view that other findings of fact may be necessary. Further, does a finding of 5% or less in a city allow the finding that an emergency exists in the county, even if it has an 8% factor? The proposed statutory language says in the city or county is 5% or less. This should be cleared up.

Subsection 2 of section 2 of the proposed legislation provides:

"If the governing bodies of a city and county both provide for the regulation of those rents, the ordinance adopted by the county does not apply to that city."

My question is, what if no city adopts such regulations, can the county adopt such an ordinance to apply in the city or what if one city does and another city doesn't.

JMB:nw

Handwritten signature of James M. Bartley in cursive script.  
JAMES M. BARTLEY  
Chief Civil Deputy

OFFICE OF THE COUNTY MANAGER

TO: PAT PINE  
FROM: MARGARET BURDUE  
SUBJECT: AB 31  
DATE: MARCH 4, 1981

The County at this time has not taken a stand on mobile home park regulation. AB 31 pertains to regulation of mobile home parks.

This bill allows the Manufactured Housing Division or the County or City to adopt regulations governing alterations, maintenance, use and occupancy of mobile home parks and lots. These regs will also govern health/safety of park residents. However, if a city or county enforces regulations, the Mobile Home Division can judge whether these regulations are being enforced properly.

Section 24 eliminates Master Meter Parks by July 1, 1985. Currently there are 12 master meter gas parks and 35 master meter electric parks. Conversion costs could run as much as \$1000 to \$3000 a space.

Section 38-2 provides for an administrator to inspect the records and documents which are relevant to matters concerning the relationship of landlord/tenant.

This bill does not provide funds to do inspections or provide for standards for coach inspections. It also gives district court jurisdiction over provisions.

Section 51 states Health Department must inspect each mobile home park at least once a year and also must do inspections on request by tenant or city or county. Besides requiring more health inspectors, these inspectors would have a ripple effect creating more work and requiring more personnel for building and zoning to enforce regulations.

Section 53 requires local government to test electric and gas distribution lines and equipment at least once a year.

Just to handle current workload, the County Building and Zoning are requesting a Mobile Home Division at a cost of \$36,926. Personnel necessary to enforce these regulations would be:

1. An administrator to arbitrate landlord/tenant problems;
2. An analyst to review books;
3. A deputy D.A. to review grievances;
4. Two building inspectors to review parks;
5. Two health inspectors to conduct health inspections;
6. Clerical support to handle increased workload.

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13,000

Pat Pine  
Page 2  
March 4, 1981

Mobile home parks need regulating. However, without funding this task is not feasible.

Perhaps a state-funded Mobile Home Authority could be created which would have sufficient funding and authority to regulate mobile home parks and adjudicate grievances.

MP:bjw

(F1)

MEMORANDUM  
OFFICE OF THE COUNTY MANAGER

BRUCE W. SPACEDING  
County Manager  
JOSEPH C. DENNY  
Assistant County Manager

TO: PAT PINE  
FROM: MARGARET PURDUE  
SUBJECT: AB 30  
DATE: March 4, 1981

At this time the County has not adopted a policy on Mobile Home Regulations. AB 30 addresses the issue of regulating rents charged for mobile home lots. The issues which confront the County in regard to this bill are:

1. Requirement that a 5% or less vacancy factor constitutes an emergency which allows a city or county to regulate rents by ordinance. Conversely, a 5% or more vacancy factor over a six month period from time of ordinance calls for repeal of the ordinance. (Currently, there are approximately 13,000 mobile home park spaces and the vacancies are running at about 5%. However, 650 new spaces for six months could cause a repeal.) The District Attorney's Office feels that there should be more criterion for raising rents than the 5% factor. The bill is also unclear as to what is city or county jurisdiction.

Section 7 of this bill would require that the Mediation Board include members of organizations including owners, tenants and general public which is a large unwieldy group. This group has not excelled at mediating grievances. What would say that they could arbitrate rent arguments. This group has no teeth.

No money has been allocated to pay for rent control and yet it is estimated that if rent controls were instituted, staff needed conservatively would be:

- a. An analyst to evaluate vacancies and rent rates;
- b. A budget analyst to review rent increases and analyze mobile home park records;
- c. A deputy district attorney to review grievances and process complaints;
- d. Inspector(s) to review complaints or inspect new requirements;
- e. Full time clerical help to process workload of rent control board.

Other issues which this bill deals with are:

2. Actions to enforce any right granted by law, the prevailing party may recover damages up to \$500 for each wilful violation of the provisions of those laws.
3. The landlord may not adopt arbitrary regulations or rules



Pat Pine  
Page 2  
March 4, 1981

concerning guests or children in mobile home parks. The court is aware that senior citizens and low income residents are faced with severe problems when dealing with rent increases in mobile home parks. However, this bill could cause park owners to exclude these people as renters if this bill were instituted, not to mention the increased costs to local government in trying to implement AB 30.

MP:bjw

# EXHIBIT G

## GENERAL PROVISIONS 27.02.010

### Chapter 27.02 GENERAL PROVISIONS

#### Sections:

27.02.010 Purpose and scope.

27.02.010 Purpose and scope. This title is designed and created for the purpose of promoting the public health, safety, morals and general welfare of the present and future inhabitants of Clark County by providing certain minimum standards, provisions, requirements, and arrangements for sanitation, safety, and maintenance for all mobile home parks, mobile home subdivisions, and mobile homes on private property as a permanent or temporary residence. (Ord. 510 § 1 (part), 1976).

### Chapter 27.04 DEFINITIONS

#### Sections:

27.04.010 Definitions established—Inclusive terms.  
27.04.020 Acre.  
27.04.030 Accessory building.  
27.04.040 Accessory use.  
27.04.050 Building.  
27.04.060 Business.  
27.04.070 Cabana.  
27.04.080 Camp or court, trailer.  
27.04.090 Carport.  
27.04.100 Commerce.  
27.04.110 Driveway.  
27.04.120 Dwelling.  
27.04.130 Family.  
27.04.140 Frontage.  
27.04.150 Future width line.  
27.04.160 Garage, private.  
27.04.180 Household pets.  
27.04.190 Kennel.  
27.04.200 Kitchen.  
27.04.210 Lot.  
27.04.220 Mobile home.  
27.04.230 Mobile home park.  
27.04.240 Mobile home site or space.  
27.04.250 Motor home.  
27.04.260 Nonconforming building or structure.  
27.04.270 Nonconforming use.  
27.04.280 Operator.

27.04.010-27.04.050 MOBILE HOMES, MOBILE HOME PARKS

- 27.04.290 Owner.
- 27.04.300 Park subdivision.
- 27.04.310 Parking space.
- 27.04.320 Person.
- 27.04.330 Ramada.
- 27.04.340 Recreational vehicle.
- 27.04.350 Sign.
- 27.04.360 Story.
- 27.04.370 Street.
- 27.04.380 Structure.
- 27.04.385 Tenant.
- 27.04.390 Trailer, house.
- 27.04.400 Trailer park.
- 27.04.410 Trailer site or lot.
- 27.04.420 Yard.

27.04.010 Definitions established – Inclusive terms. For the purposes of this title certain words and terms are defined as follows in this chapter. Words used in the present tense include the future; words in the singular number include the plural and the plural the singular; the word “shall” is mandatory, not directory; words not included in this chapter but defined in the building code or in Title 29 of this code shall be construed as defined therein. (Ord. 510 § 1 (part), 1976).

27.04.020 Acre. “Acre” means a commercial acre of forty thousand square feet. Such area shall be exclusive of public streets or alleys or other public rights-of-way, lands or any portion thereof abutting on, running through, or within a building site. (Ord. 510 § 1 (part), 1976).

27.04.030 Accessory building. “Accessory building” means a detached subordinate building clearly incidental to and located upon the same lot with a main building. Any accessory building shall be considered to be part of the main building when joined to the main building by a common wall not less than four feet long, or when any accessory building and the main building are connected by a breezeway which is less than ten feet in width. (Ord. 510 § 1 (part), 1976).

27.04.040 Accessory use. “Accessory use” means a use customarily incidental and accessory to the principal use of the land, building or structure located on the same lot or parcel of land as the accessory use. (Ord. 510 § 1 (part), 1976).

27.04.050 Building. “Building” means any structure on a permanent foundation having a roof supported by columns or walls for the housing or enclosure of persons, animals, or chattel, or property of any kind. (Ord. 510 § 1 (part), 1976).

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DEFINITIONS 27.04.060-27.04.140

27.04.060 Business. "Business" means any activity or enterprise for gain, benefit, advantage, or livelihood. (Ord. 510 § 1 (part), 1976).

27.04.070 Cabana. "Cabana" means any cabin, small house, room, enclosure or other building erected, constructed or placed on any trailer site for residential use in conjunction with a trailer coach on the same site or lot. (Ord. 510 § 1 (part), 1976).

27.04.080 Camp or court, trailer. "Trailer camp or court" means any area or premises where space for two or more house trailers is rented, held out for rent, or on which free occupancy or parking of such trailers is permitted to house trailer owners or users for the purpose of securing their trade, including groups designated as trailer parks, courts, lots, or parks but not including automobile or trailer sales lots on which unoccupied house trailers are parked for inspection or sales. (Ord. 510 § 1 (part), 1976).

27.04.090 Carport. "Carport" means a structure accessory to a residential use consisting of a roofed space, but not enclosed by a wall or door on more than two sides, and established for the convenient loading or unloading of passengers and for the accommodation of a passenger car. For the purposes of this title, a carport shall be subject to all the regulations prescribed for a garage. (Ord. 510 § 1 (part), 1976).

27.04.100 Commerce. "Commerce" means "business," defined in Section 27.04.060. (Ord. 510 § 1 (part), 1976).

27.04.110 Driveway. "Driveway" means a thoroughfare provided and maintained in a trailer park as the principal means of access to abutting trailer sites. (Ord. 510 § 1 (part), 1976).

27.04.120 Dwelling. "Dwelling" means a building or portion thereof designed or used for residential occupancy, including mobile homes. (Ord. 510 § 1 (part), 1976).

27.04.130 Family. "Family" means an individual living alone, or two or more persons related by blood or marriage or an unrelated group of not more than five persons, other than domestic employees, living together as a single housekeeping unit in a dwelling. (Ord. 510 § 1 (part), 1976).

27.04.140 Frontage. "Frontage" means all the property fronting on one side of a street between intercepting or intersecting streets or between a street and any other public right-of-way, waterway, end of a street or city boundary. An intercepting street shall determine only the boundary of the frontage on the side of the street which it intercepts. (Ord. 510 § 1 (part), 1976).

27.04.150-27.04.230 MOBILE HOMES, MOBILE HOME PARKS

27.04.150 Future width lines. "Future width lines" means lines established adjacent to highways or streets for the purpose of defining limits within which no structure nor any part thereof shall be erected or maintained in order to insure the future acquisition of these limits as public rights-of-way. (Ord. 510 § 1 (part), 1976).

27.04.160 Garage, private. "Private garage" means a detached accessory building, or a portion of a main building, enclosed on more than two sides designed or used for the parking or storage of automobiles owned and used by the occupants of the premises. (Ord. 510 § 1 (part), 1976).

27.04.180 Household pets. "Household pets" means animals or fowl ordinarily permitted in the dwelling and kept for company or pleasure, such as dogs, cats, canaries, and parakeets, but not including a sufficient number of dogs to constitute a kennel, as defined in this title, unless the dogs are licensed under the provisions of Section 10.08.020 of this code relating to "dog fanciers," or a sufficient number of fowl to constitute an aviary as defined in Section 29.02.150 of this code. (Ord. 510 § 1 (part), 1976).

27.04.190 Kennel. "Kennel" means any lot, building, structure, or premises on which four or more dogs more than four months old are kept but shall not include dogs licensed under the provisions of Section 10.08.020 of this code relating to "dog fanciers." (Ord. 510 § 1 (part), 1976).

27.04.200 Kitchen. "Kitchen" means any room used, or intended or designed to be used for cooking or the preparation of food. (Ord. 510 § 1 (part), 1976).

27.04.210 Lot. "Lot" means a parcel of land occupied or to be occupied by a building or group of buildings, together with such yards, open spaces, lot width, and lot area as required by this title, having frontage upon a street or upon a right-of-way approved by the planning commission. A lot may be land recorded on a plat of record, or considered as a unit of property and described by metes and bounds, and may include parts of or a combination of such lots, when adjacent to one another, providing such grounds are used for one improvement. All lots shall front on or have ingress and egress by means of an officially approved public right-of-way. (Ord. 510 § 1 (part), 1976).

27.04.220 Mobile home. "Mobile home" means "house trailer," as defined in Section 27.04.390. (Ord. 510 § 1 (part), 1976).

27.04.230 Mobile home park. "Mobile home park" means "trailer camp or court," as defined in Section 27.04.080. (Ord. 510 § 1 (part), 1976).

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DEFINITIONS 27.04.240-27.04.330

27.04.240 Mobile home site or space. "Mobile home site or space" means "trailer site or lot," as defined in Section 27.04.410. (Ord. 510 § 1 (part), 1976).

27.04.250 Motor home. "Motor home" means a portable home designed and constructed as an integral part of a self-propelled vehicle. (Ord. 510 § 1 (part), 1976).

27.04.260 Nonconforming building or structure. "Nonconforming building or structure" means the lawful use of a building or structure or portion thereof, existing at the time this title or amendments thereto take effect, and which does not conform to all the height, area, and yard regulations prescribed in the zone in which it is located. (Ord. 510 § 1 (part), 1976).

27.04.270 Nonconforming use. "Nonconforming use" means areas lawfully occupied by a building or land use at the time this title or amendments thereto take effect, and which does not conform with the use regulations of the zone in which it is located. (Ord. 510 § 1 (part), 1976).

27.04.280 Operator. "Operator" means a person performing the functions of manager, agent, and/or employee and who is in continuous responsible charge of a mobile home park. (Ord. 510 § 1 (part), 1976).

27.04.290 Owner. "Owner" means agent, occupant-owner, or employee when exercising the functions of ownership, such as supervision of a mobile home park or facility. (Ord. 510 § 1 (part), 1976).

27.04.300 Park subdivision. "Park subdivision" means an area of land legally subdivided into individual parcels in compliance with Titles 28 and 29 of this code, each parcel of which is used or intended to be used for one trailer residence for one family. (Ord. 510 § 1 (part), 1976).

27.04.310 Parking space. "Parking space" means space within a building, lot or parking lot for the parking or storage of one automobile. The space shall not be less than a nine-foot by twenty-foot area, exclusive of drives, streets, alleys, or aisles giving ingress and egress thereto. (Ord. 510 § 1 (part), 1976).

27.04.320 Person. "Person" means any natural person, firm, association, or corporation. (Ord. 510 § 1 (part), 1976).

27.04.330 Ramada. "Ramada" means any roof or shade structure installed, erected or used above a trailer coach and site or any portion thereof. (Ord. 510 § 1 (part), 1976).

27.04.340-27.04.410 MOBILE HOMES, MOBILE HOME PARKS

27.04.340 Recreational vehicle. "Recreational vehicle" means any structure designed and/or used for living or sleeping purposes in temporary locations and equipped with wheels to facilitate movement from place to place, and automobiles when used for living or sleeping purposes and including pickup coaches (campers), motor homes, travel trailers, and camping trailers. No trailer coach shall be deemed to be a recreational vehicle if it exceeds eight feet in width or forty feet in length or is not designed to be moved by a passenger automobile or pickup type truck. (Ord. 510 § 1 (part), 1976).

27.04.350 Sign. "Sign" means any device and all parts thereof used to advertise products, goods, or services, or otherwise promote the sale of objects or identify objects or services for sale or rent. (Ord. 510 § 1 (part), 1976).

27.04.360 Story. "Story" means a space within a building between the surface of any floor and the surface of the ceiling next above. (Ord. 510 § 1 (part), 1976).

27.04.370 Street. "Street" means a thoroughfare which has been dedicated or abandoned to the public and accepted by proper public authority or a thoroughfare which has been made public by right of use and which affords the principal means of access to abutting property. (Ord. 510 § 1 (part), 1976).

27.04.380 Structure. "Structure" means any building, fence, sign, tower, edifice, or any piece of work artificially built up or composed of parts joined together in some definite manner, located on the ground or attached to anything having location on the ground. (Ord. 510 § 1 (part), 1976).

27.04.385 Tenant. "Tenant" means the person or persons who holds or possesses a trailer site or lot in a mobile home park pursuant to a rental agreement or otherwise. (Ord. 535 § 1, 1977).

27.04.390 Trailer, house. "House trailer" means a vehicle without motive power but capable of being pulled by a motor vehicle and which is used or intended to be used for human habitation in a semipermanent location. "Trailer coach" is synonymous with "house trailer" for the purposes of this title. Any vehicle defined as a house trailer by NFPA 501A shall also be deemed to be a house trailer for the purposes of this title. (Ord. 510 § 1 (part), 1976).

27.04.400 Trailer park. "Trailer park" means "trailer camp or court" as defined in Section 27.04.080. (Ord. 510 § 1 (part), 1976).

27.04.410 Trailer site or lot. "Trailer site or lot" means a plot of land in

TRAILER PARKS 27.04.420-27.06.010

a trailer camp or court used or intended to be used for the accommodation of not more than one house trailer and any approved accessory structures. (Ord. 510 § 1 (part), 1976).

27.04.420 Yard. "Yard" means an open space on a lot unoccupied and unobstructed from the ground upward. (Ord. 510 § 1 (part), 1976).

Chapter 27.06  
TRAILER PARKS

Sections:

- 27.06.010 Applicability.
- 27.06.020 Animals and fowl.
- 27.06.030 Area of trailer park.
- 27.06.040 Area of trailer site.
- 27.06.050 Caretaker.
- 27.06.055 Discrimination because of age.
- 27.06.060 Driveways.(interior private streets).
- 27.06.070 Existing trailer parks.
- 27.06.080 Fences.
- 27.06.090 Fire protection.
- 27.06.100 Garbage and trash.
- 27.06.110 Laundries and laundry yards.
- 27.06.120 Off-site and on-site improvements.
- 27.06.130 Operation and supervision.
- 27.06.140 Park subdivisions.
- 27.06.150 Parking spaces required.
- 27.06.155 Rental agreements.
- 27.06.156 Rules and regulations.
- 27.06.160 Resolution of intent procedures required.
- 27.06.170 Setbacks and separation.
- 27.06.180 Sewers.
- 27.06.190 Signs.
- 27.06.193 Termination of tenancy.
- 27.06.200 Toilet facilities.
- 27.06.205 Use of recreational or community facilities.
- 27.06.210 Violation notice.
- 27.06.230 Water.
- 27.06.240 Certificate of use and occupancy.
- 27.06.250 Zoning compliance required.

27.06.010 Applicability. The provisions of this chapter shall apply to all trailer parks and all trailer coaches located in trailer parks. The provisions of this chapter shall not be held to authorize noncompliance with applicable provisions of Chapter 27.08, which applies to all trailer coaches wherever located. (Ord. 510 § 1 (part), 1976).



27.06.020-27.06.060 MOBILE HOMES, MOBILE HOME PARKS

27.06.020 Animals and fowl. No animals shall be permitted to run at large in any trailer park. No animals other than household pets shall be permitted in any trailer park and no single owner shall keep or maintain more than three dogs or cats, unless licensed under Section 10.08.020 of this code. (Ord. 510 § 1 (part), 1976).

27.06.030 Area of trailer park. The minimum area of any trailer park shall be ten acres. (Ord. 510 § 1 (part), 1976).

27.06.040 Area of trailer site. No trailer site in any trailer park shall contain less than fifteen hundred square feet of ground area, nor shall any such site be less than thirty feet in minimum width measured parallel to the front site line, nor shall any such site be less than fifty feet in depth. (Ord. 510 § 1 (part), 1976).

27.06.050 Caretaker. It is unlawful for any person to operate or maintain or permit the operation or maintenance of any trailer park of over one hundred spaces unless there is a caretaker, owner or manager in the park at all times. Such person shall post a schedule showing his name, address and phone number and those responsible for his duties in his absence. The caretaker, owner or manager shall enforce within the park the provisions of this title governing the operation and supervision of trailer parks, as set forth in Section 27.06.130. (Ord. 535 § 2, 1977; Ord. 510 § 1 (part), 1976).

27.06.055 Discrimination because of age. (a) No person may, because of age:

- (1) Refuse to sell or rent or refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a site to any person;
- (2) Discriminate against any person in the terms, conditions or privileges of sale or rental of a dwelling, including the amount of breakage fees, deposits or other undue penalties or in the provision of services or facilities in connection therewith;
- (3) Make, print or publish, or cause to be made, printed or published, any notice, statement or advertisement with respect to the sale or rental of a site that indicates any preference, limitation or discrimination, or an intention to make any such preference, limitation or discrimination;
- (4) Represent to any person because of age that any site is not available for inspection, sale or rental when such dwelling is in fact so available.

(b) Nothing in this section shall prohibit the maintenance and operation of an all-adult mobile home park or of all-adult areas within a mobile home park. (Ord. 535 § 2, 1977).

27.06.060 Driveways (interior private streets). Every trailer site shall have access to and abut upon a driveway (interior private street). The driveway shall have a clear and unobstructed access to a public thoroughfare.

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TRAILER PARKS 27.06.070-27.06.120

No driveway shall be less than thirty-two feet in width. Collector streets and entrances shall not be less than thirty-eight feet in width. Parking shall be prohibited on all driveways within a trailer park. (Ord. 510 § 1 (part), 1976).

**27.06.070 Existing trailer parks.** Existing trailer parks shall comply with all the provisions of this title pertaining to operation and supervision as set forth in Section 27.06.130. (Ord. 510 § 1 (part), 1976).

**27.06.080 Fences.** A six-foot block wall fence shall be constructed along all property lines adjacent to a different zoning district and between adjoining mobile home parks. A six-foot decorative block wall fence shall set back from any right-of-way or future street width line a sufficient distance to allow for landscaping as required by the planning commission or board of county commissioners. (Ord. 510 § 1 (part), 1976).

**27.06.090 Fire protection.** In every trailer park there shall be installed and maintained approved fire hydrants and fire extinguishers of the number, type, size, and locations as approved by the department having jurisdiction; provided, however, that all trailer parks regardless of size shall meet the minimum requirements of the county fire department. (Ord. 510 § 1 (part), 1976).

**27.06.100 Garbage and trash.** In every trailer park not having individual garbage and trash collection services for each trailer site, an adequate number of garbage and trash containers shall be located within a general area or areas and enclosed with a block wall at least five feet in height. Every trailer site shall be within two hundred feet of such garbage or trash disposal areas. (Ord. 510 § 1 (part), 1976).

**27.06.110 Laundries and laundry yards.** In every trailer park there shall be a central laundry facility or facilities which provide automatic washers and dryers. Additionally, a laundry drying yard enclosed by a screen fence and of a size approved by the county commission shall be provided. (Ord. 510 § 1 (part), 1976).

**27.06.120 Off-site and on-site improvements.** Off-site and on-site improvements shall be provided at the time of construction of any trailer park. All improvements shall be in accordance with the specifications of Clark County department of public works, and shall normally include curbs and gutters, concrete sidewalks, street lights, paving of streets and driveways (see Section 27.06.060 relating to driveways), fire hydrants of a number and at locations in conformance with fire department specifications and served by a minimum six-inch water main, underground utilities and street lights with at least one hundred-watt luminaries on not less than twelve and one-half-foot posts spaced not more than one hundred feet apart. Underground utilities shall include the provisions of a community television

27.06.130 MOBILE HOMES, MOBILE HOME PARKS

antenna system with underground distribution. Plans and construction of all improvements and utility installations shall be inspected and approved by the department of public works. A performance bond shall be required to guarantee the installation and proper construction of all improvements and utilities. (Ord. 510 § 1 (part), 1976).

**27.06.130 Operation and supervision.** (a) Plot Plan, Construction Plan, and Business License to be Displayed. The owner or operator of every trailer park shall maintain in a conspicuous location the county business license, a copy of the approved plot plan, and the construction plan for which a permit has been issued, and each site shall be designated by number for identification.

(b) Operation and Maintenance. The owner, operator, or lessee of the trailer park or his designated agent shall be responsible for securing the maintenance of all devices, installations and safeguards required by this title or any other ordinance of Clark County in an approved safe and sanitary condition and in approved repair and operating order, and shall also be responsible for securing the maintenance and repairs of all structures and their sites.

(c) Supervision. The owner, operator, or person in charge of any trailer park shall:

(1) Keep a register of all persons staying in the park, which register shall be at all times open to inspection by county, state, or federal officers. The register shall record the names and home addresses of all persons staying in the trailer park; the date of their arrival and departure; make, model, year and overall length of every trailer; and the state of registration and license number of all automobiles and trailers in the park;

(2) Maintain the park in a clean, orderly, and sanitary condition at all times;

(3) Require that all trailer coaches and automobiles be located on their respective sites as required by this title;

(4) Require that all toilets in every trailer coach be sealed so that they cannot be used during the entire time the trailer remains in the park unless every plumbing fixture in the trailer coach is connected to the park sewer system during its entire stay in the park;


(5) See that all electric lights required by Section 27.06.120 are kept lighted from dusk until dawn;

(6) See that all garbage and trash is properly wrapped and deposited in approved garbage and trash containers located as required by this title and that all such containers are collected, cleaned and redistributed as required by any ordinance of Clark County;

(7) Not permit any domestic animal in the park unless the animal is kept on a leash at all times;

(8) Report promptly to the proper authorities any violation of the law;

(9) Post a copy of this title in a conspicuous location in the trailer park;

  
TRAILER PARKS 27.06.140-27.06.156

(10) Insure that every trailer site lot line is adequately and clearly marked by the placing of permanent markers at each lot corner or by the installation of fencing along each lot line. (Ord. 510 § 1 (part), 1976).

27.06.140 Park subdivisions. Every trailer park subdivision shall comply in every respect whatsoever with the provisions of Chapter 29.16 of this code. (Ord. 510 § 1 (part), 1976).

27.06.150 Parking spaces required. Every trailer park shall provide at least two off-driveway parking spaces for each trailer site and one guest parking spot for each five trailer sites and adequate storage for boats and recreational vehicles if recommended by the fire department and specified by the county commission. All off-street parking, guest parking, and required storage areas shall have A.C. paving. (Ord. 533 § 1, 1977; Ord. 510 § 1 (part), 1976).

27.06.155 Rental agreement. (a) Upon receipt of consideration for the use and occupancy of a mobile home site for one month or longer, regardless of whether rent is to be paid weekly, monthly or otherwise, an agreement in writing shall be signed by the owner and the tenant containing, but not limited to, the following:

- (1) Duration of the agreement;
- (2) Amount of rent and the manner and time of its payment;
- (3) Restrictions on occupancy by children or pets;
- (4) Services and utilities included with the site rental and the responsibility of maintaining or paying for the services and utilities;
- (5) Fees which may be required and the purposes for which they are required;
- (6) Deposits which may be required and the conditions for their refund;
- (7) Maintenance which the tenant is required to perform.

(b) If a tenant remains in possession of the mobile home lot with the owner's consent after expiration of the term of the rental agreement, the tenancy is from week-to-week in the case of a tenant who pays weekly rent, and in all other cases the tenancy is from month-to-month. The tenant's continued occupancy shall be on the same terms and conditions as were contained in the rental agreement unless specifically agreed otherwise in writing. (Ord. 535 § 4, 1977).

27.06.156 Rules and regulations. (a) The owner shall adopt rules or regulations concerning the use and occupancy of the mobile home sites which are:

- (1) Reasonably related to the health or safety of the tenants or to the upkeep of the park;
- (2) Sufficiently explicit in their prohibition, direction or limitation to inform the tenant of what he must do or not do for compliance;

(3) Adopted in good faith and not for the purposes of evading any obligation of the landlord arising under the law; and

(4) Uniformly enforced against all persons to whom they apply.

(b) Such a rule or regulation is enforceable against the tenant only if a rule or regulation existing when the tenant entered into his rental agreement was:

(1) Contained in the rental agreement, if that agreement was written; or

(2) Delivered to tenant at time of execution of agreement; and

(3) The rule or regulation is posted in a conspicuous place in the park's community or recreation facility or other common area.

(c) A rule or regulation adopted or amended after the tenant enters into the rental agreement is not enforceable unless the tenant consents to the amendment or is given sixty days' written notice of the same. (Ord. 535 § 5, 1977).

**27.06.160 Resolution of intent procedures required.** A zone change to allow the construction of any trailer park, or for any addition to an existing trailer park or park subdivision shall be made only under resolution of intent procedures as provided in Section 29.68.080 and subject to the condition that construction is commenced within six months and completed within one year from the date of approval by the board of county commissioners. Extensions of time may be granted with or without the addition of conditions not included in the initial approval. (Ord. 510 § 1 (part), 1976).

**27.06.170 Setbacks and separation.** (a) No mobile home, accessory building, or other structure shall be located closer than five feet from any lot line or property line, nor closer than ten feet from any other mobile home. Awnings or eaves, however, may intrude into a required setback or separation no more than two feet.

(b) No mobile home, accessory building, or structure shall be closer than twenty-five feet from any right-of-way line or future street width.

(c) No provision of this section shall be held to prohibit the construction of an otherwise legal fence or windbreak along any lot line.

(d) No mobile home, accessory building, or other structure located on an established mobile home rental space, shall be located closer than five feet from the front, side and rear of said rental space. (Ord. 550 § 1, 1977; Ord. 510 § 1 (part), 1976).

**27.06.180 Sewers.** (a) **Connection to Sewer System Required.** Every trailer park and park subdivision shall be served with an approved public sewer system with connections thereto on every trailer site. Septic tanks shall not be permitted. The sewer system shall comply with the provisions of all laws and ordinances of Clark County and shall be specifically approved by the district health department, Clark County building department, and the Clark County sanitation district.

TRAILER PARKS      27.06.140-27.06.156

(10) Insure that every trailer site lot line is adequately and clearly marked by the placing of permanent markers at each lot corner or by the installation of fencing along each lot line. (Ord. 510 § 1 (part), 1976).

**27.06.140 Park subdivisions.** Every trailer park subdivision shall comply in every respect whatsoever with the provisions of Chapter 29.16 of this code. (Ord. 510 § 1 (part), 1976).

**27.06.150 Parking spaces required.** Every trailer park shall provide at least two off-driveway parking spaces for each trailer site and one guest parking spot for each five trailer sites and adequate storage for boats and recreational vehicles if recommended by the fire department and specified by the county commission. All off-street parking, guest parking, and required storage areas shall have A.C. paving. (Ord. 533 § 1, 1977; Ord. 510 § 1 (part), 1976).

**27.06.155 Rental agreement.** (a) Upon receipt of consideration for the use and occupancy of a mobile home site for one month or longer, regardless of whether rent is to be paid weekly, monthly or otherwise, an agreement in writing shall be signed by the owner and the tenant containing, but not limited to, the following:

- (1) Duration of the agreement;
- (2) Amount of rent and the manner and time of its payment;
- (3) Restrictions on occupancy by children or pets;
- (4) Services and utilities included with the site rental and the responsibility of maintaining or paying for the services and utilities;
- (5) Fees which may be required and the purposes for which they are required;
- (6) Deposits which may be required and the conditions for their refund;
- (7) Maintenance which the tenant is required to perform.

(b) If a tenant remains in possession of the mobile home lot with the owner's consent after expiration of the term of the rental agreement, the tenancy is from week-to-week in the case of a tenant who pays weekly rent, and in all other cases the tenancy is from month-to-month. The tenant's continued occupancy shall be on the same terms and conditions as were contained in the rental agreement unless specifically agreed otherwise in writing. (Ord. 535 § 4, 1977).

**27.06.156 Rules and regulations.** (a) The owner shall adopt rules or regulations concerning the use and occupancy of the mobile home sites which are:

- (1) Reasonably related to the health or safety of the tenants or to the upkeep of the park;
- (2) Sufficiently explicit in their prohibition, direction or limitation to inform the tenant of what he must do or not do for compliance;

TRAILER PARKS      27.06.190-27.06.200

(b) Connection of Each Trailer. Immediately after being placed on a trailer site, every trailer coach shall have its sink and water closet connected to the park sewer system in accordance with the Uniform Plumbing Code. (Ord. 510 § 1 (part), 1976).

27.06.190 Signs. Only one on-premises sign of not more than one hundred square feet shall be permitted for each trailer park and any such sign shall be set back at least ten feet from any property line. (Ord. 510 § 1 (part), 1976).

27.06.193 Termination of tenancy. The owner shall not terminate a tenancy, refuse to renew a tenancy, increase rent or decrease services he normally supplies, or bring or threaten to bring an action for possession of a mobile home lot as retaliation upon the tenant because:

(a) He has complained in good faith about a violation of a building, safety or health code or regulation pertaining to a mobile home park to the governmental agency responsible for enforcing the code or regulation;

(b) He has complained to the owner concerning the maintenance, condition or operation of the park or a violation of any provision of this title;

(c) He has organized or become a member of a tenants' league or similar organization;

(d) A citation has been issued to the owner as the result of a complaint of the tenant;

(e) In a judicial proceeding, an issue has been determined adversely to the owner;

(f) He has failed or refused to give written consent to a rule or regulation which is adopted or amended by the owner after the tenant entered into a rental agreement. (Ord. 535 § 6, 1977).

27.06.200 Toilet facilities. Every trailer park shall provide properly installed toilet facilities, properly maintained in good working order and accessible at all times for the use of the occupants of the trailer site in the trailer park, containing not less than the following fixtures:

(a) For trailer parks which provide trailer sites used for and accepting only independent (modern) trailers with self-contained sanitary facilities, there shall be not less than one water closet, one stall shower, and one lavatory for each sex for each one hundred trailer sites.

(b) For trailer parks used and operated to provide facilities for dependent trailers or a combination of both dependent and self-contained trailers or a combination of travel trailers and house trailers, the following facilities shall be provided for each sex:

No. of Trailer Sites	Toilets	Showers	Lavatories
Less than 50	2	2	2
51 through 100	4	4	4

594-1

(Clark County, Nev. 9-15-77)

27.06.205-27.06.250 MOBILE HOMES, MOBILE HOME PARKS

and one additional toilet, one additional shower, and one additional lavatory for each sex for each fifty additional trailer sites or fraction thereof in excess of one hundred. Complete sanitary facilities shall be located no more than three hundred feet from each trailer site. (Ord. 533 § 2, 1977 Ord. 510 § 1 (part), 1976).

27.06.205 Use of recreational or community facilities. Any tenant of a mobile home park shall have the right to use the recreational or community facility of the park for the purpose of holding therein any lawful meeting open to all tenants in the park, if such a meeting is held at a reasonable hour and when the facility is not otherwise in use. (Ord. 535 § 7, 1977).

27.06.210 Violation notice. Any person responsible for the maintenance and/or operation of any trailer park or site shall, upon failure to comply within ten days after written notification of violation of the provisions of this title, be subject to penalty and enforcement procedures set forth in Chapter 27.12. (Ord. 510 § 1 (part), 1976).

27.06.230 Water. Every trailer park shall be served with a public water system, with connections thereto on every trailer site for the use of the occupants thereof. The supply system shall be installed so as to comply with the Uniform Plumbing Code and with all other regulations or ordinances of Clark County. All water outlets shall be adapted to hose connections. (Ord. 510 § 1 (part), 1976).

27.06.240 Certificate of use and occupancy. In no case shall a trailer coach be placed on any trailer site nor shall any trailer park be used or occupied prior to the issuance of a certificate of use and occupancy for the trailer site or trailer park by the Clark County building department. (Ord. 510 § 1 (part), 1976).

27.06.250 Zoning compliance required. Subject to the provisions of this title, trailer parks or park subdivisions may be established and maintained only in those certain zones as are specifically mentioned for trailer park or park subdivision use in the text and maps of the zoning ordinance of Clark County or its amendments, or in any zone approved for change to such zone under the procedures set down in Chapter 29.68 of this code. (Ord. 510 § 1 (part), 1976).

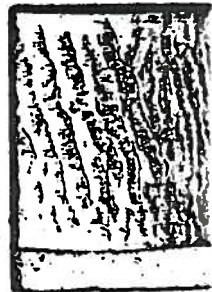
Chapter 27.08

TRAILER COACHES AND ACCESSORY STRUCTURES

Sections:

- 27.08.010 Applicability.
- 27.08.020 Cabanas.

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TRAILER COACHES 27.08.010-27.08.030

- 27.08.030 Drainage.
- 27.08.035 Foundations.
- 27.08.040 Garbage and trash.
- 27.08.050 Gas lines.
- 27.08.060 Gas water heaters.
- 27.08.070 Habitable enclosures.
- 27.08.080 Parking on right-of-way prohibited.
- 27.08.100 Ramadas.
- 27.08.110 Trailer coaches on private property.
- 27.08.120 Recreational vehicle and trailer coach storage by owner.
- 27.08.130 Unlawful occupancy.
- 27.08.140 Unlawful use.
- 27.08.150 Unlawful rent.
- 27.08.160 Unlawful sale of lots.

27.08.010 **Applicability.** The provisions of this chapter shall apply to all trailer coaches and accessory structures, wherever located, including all such structures located in trailer parks, park subdivisions, and on private property outside of trailer parks and park subdivisions. (Ord. 510 § 1 (part), 1976).

27.08.020 **Cabanas.** (a) **Location.** Every cabana shall be designed and erected as a freestanding structure and shall not be permanently attached to or become a permanent part of any trailer coach. Trailer coaches shall not be a physical part of any cabana. Cabanas may be attached to a trailer with appropriate breakway flashing or sealing materials to provide a weather seal only. No cabana shall be constructed, placed or maintained on more than one side of a trailer coach. As used in this section "side" includes end.

(b) **Protection Against Elements.** Every cabana shall be constructed in accordance with the requirements for an "I" occupancy as detailed in the Clark County Building, Electrical, Plumbing, and Mechanical Codes.

(c) **Height.** The height of a cabana shall not exceed one story nor fourteen feet at the highest point above the actual adjoining ground level. Eaves or awnings may extend into any required yard area or setback distance not more than two feet.

(d) **Cooking Prohibited.** Cooking within cabanas is prohibited. Cooking appliances, including hot plates, shall not be installed in cabanas. No portion of such a cabana shall contain kitchen sinks, refrigerators, or similar devices.

(e) **Cabana Rental Prohibited.** No structure, including cabanas by whatever name referred to, may be occupied unless the site is occupied by a trailer; and no structure nor cabana may be occupied by any person other than the person or persons legally occupying the trailer on the site. (Ord. 510 § 1 (part), 1976).

27.08.030 **Drainage.** Every trailer coach shall be located and maintained on a well-drained area, and such premises shall be properly graded so as to provide for the drainage of storm and casual water and to prevent its

accumulation. To this end the planning commission may require the submission of a topography map and grading plan of any trailer park or trailer coach location. (Ord. 510 § 1 (part), 1976).

**27.08.035 Foundations.** (a) A mobile home may be located on a foundation, or otherwise permanently attached to the ground; provided, that plans for such location are approved by the department of building and zoning and the department of public works. The following items shall be submitted in conjunction with any such plans:

(1) A deed to the property and document or deed showing easements and rights-of-way;

(2) Two copies of a plot plan showing location and dimensions of all property lines, structures, mobile homes, fences, walls, and hedges;

(3) Two copies of a topographic plan prepared by a Nevada registered land surveyor, showing proposed drainage on the parcel of land;

(4) Two copies of a foundation (footing) plan in conformance with the requirements of the division of building and safety.

Plans shall be submitted to the zoning division for verification of compliance with Titles 27 and 29, forwarded to the department of public works for verification of compliance with right-of-way and flood control requirements, and forwarded to the division of building and safety for verification of conformance to applicable building and mobile home codes. A building permit may be issued only after all the listed reviews have been completed.

(b) Restricted Use. The foregoing use shall be permitted only in RU and RT districts. (Ord. 679 § 1 (part), 1980).

**27.08.040 Garbage and trash.** No person who uses, occupies, or maintains any trailer coach shall deposit or dispose of any garbage, rubbish or refuse otherwise than by approved methods in approved locations as required by the district health department and in accordance with health regulations or ordinances of Clark County and the provisions of this title. (Ord. 510 § 1 (part), 1976).

**27.08.050 Gas lines.** Where gas lines are to be installed the distribution system and gas lines shall comply with the Uniform Plumbing Code. (Ord. 510 § 1 (part), 1976).

**27.08.060 Gas water heaters.** Every gas water heater or appliance shall be of an approved vented type and shall comply with all the applicable provisions of health department regulations and the Uniform Plumbing Code. (Ord. 510 § 1 (part), 1976).

**27.08.070 Habitable enclosures.** No tents or other habitable enclosures shall be allowed in conjunction with a trailer coach use unless elsewhere specifically authorized in this title as cabanas. (Ord. 510 § 1 (part), 1976).



27.08.080-27.08.110 MOBILE HOMES, MOBILE HOME PARKS

27.08.080 Parking on public right-of-way prohibited. It is unlawful to park a trailer coach upon any public right-of-way. This shall not be held to apply to a trailer coach temporarily stopped for emergency repairs. (Ord. 510 § 1 (part), 1976).

27.08.100 Ramadas. (a) Structural Requirements. A ramada or roof over a trailer or any portion thereof shall be designed and erected as a freestanding self-supporting structure and shall comply with the Uniform Building Code.

(b) Location and Construction. A ramada or any portion thereof shall have a clearance of not less than twelve inches in a vertical direction and not less than six inches in a horizontal direction from any trailer coach. Cross braces or structural ties shall not obstruct movement of any trailer coach.

(c) Prohibitions. No portion of a ramada shall be attached to any trailer coach. No side or end of a ramada shall be enclosed or form a partial enclosure except that the roof of a ramada may be used as a part of a cabana awning or carport; provided, that any such enclosed area conforms to all other applicable requirements of this title.

(d) Cooking and Water Closet Prohibited in Ramada. Cooking within a ramada shall not be permitted nor shall any cooking or heating appliance be installed therein. No water closet or bathroom facilities of any sort shall be installed or used within a ramada. Facilities within a trailer coach covered by a ramada are exempt from the provisions of this section.

(e) Vents and Ducts. All vents and ducts projecting from a trailer coach through the roof of a ramada shall be of an approved fire resistive slip-joint or approved quick-disconnect type. (Ord. 510 § 1 (part), 1976).

27.08.110 Trailer coaches on private property. Nothing in this title shall be construed to prohibit any owner of a lot or tract of land from parking his own trailer or recreational vehicle thereon and living therein if proper sanitary facilities are provided as required by the district health department and provided that:

(a) The owner has first obtained a trailer permit as provided in this section and is constructing a permanent residence on the tract of land for his own use. This exception shall not exceed the period of one year from the date of first occupancy. Before receiving a permit to park a trailer on a tract of land, the owner shall execute a surety bond to Clark County in the sum of one thousand dollars. The bond shall be conditioned that the owner has a valid building permit in force during the entire time that the trailer coach is located on the tract of land. A refundable cash deposit in the sum of five hundred dollars may be substituted for the required bond. The director of zoning and comprehensive planning for Clark County may grant a six-month extension to the above one-year period provided that a valid building permit remains in force at the time the extension is requested; or

(b) The lot or tract of land is two acres or more in area and is situated

TRAILER COACHES 27.08.120-27.08.150

within an R-U district as specified by the zoning ordinance and zoning map of Clark County; or

(c) If the owner of a permitted business in a C-1, C-2, H-2, M-1, or M-2 zone required a caretaker or night watchman, he may maintain a trailer for that purpose if approved under use permit procedures as set forth in Chapter 29.66 of this code. (Ord. 510 § 1 (part), 1976).

27.08.120 Recreational vehicle storage by owner. Nothing in this title shall be deemed to prohibit the storage of a recreational vehicle on the home premises of its owner, when not used for living or sleeping purposes; provided, that the recreational vehicle is not connected with or served by any sewage, electric, gas, or water facility and is not used for any other purpose whatsoever. (Ord. 510 § 1 (part), 1976).

27.08.130 Unlawful occupancy. It is unlawful for any person to use or cause or permit to be used for occupancy:

(a) Any trailer coach which is permanently attached with underpinning or foundation to the ground except as allowed by Section 27.08.035. This prohibition shall not be held to apply to tiedowns required by any other Nevada or Clark County regulation;

(b) Any cabana, ramada, or other structure which is potentially detrimental to health through lack of maintenance, general repair, unsanitary conditions, or unsafe or improper construction;

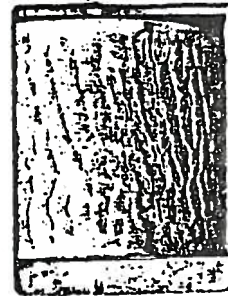
(c) Any trailer coach which is rigidly attached to a water, gas, power or sewer line; provided, however, that alternative materials may be used for connections if in accordance with the Clark County building code, electrical and plumbing codes, where approved by the building and safety division;

(d) Any trailer coach which contains more than a single living unit or which is occupied or intended to be occupied by more than one family. (Ord. 679 § 2, 1980; Ord. 510 § 1 (part), 1976).

27.08.140 Unlawful use. It is unlawful for any person to use, occupy, or maintain any trailer coach upon any area or tract of land for any time without the written permission of the owner or person legally in charge of the land, and no owner, occupant or other person having charge or control of any lot or tract of land shall allow, suffer or permit any person to place, keep or maintain any trailer coach for living or sleeping quarters or other purpose contrary to this title on any land except in a duly licensed trailer park or as permitted by Section 27.08.110 or in the case of travel trailers or recreational vehicles, within a duly licensed recreational vehicle park established and operated in accordance with Chapter 29.36 of this code. (Ord. 510 § 1 (part), 1976).

27.08.150 Unlawful rent. (a) It is unlawful for any person to rent or lease, or cause to be rented or leased, any trailer coach to any person to be used as living or sleeping quarters except within a licensed trailer park, park

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27.08.160-27.10.020 VARIANCES AND NONCONFORMITIES

subdivision, or, in the case of a travel trailer or recreational vehicle, within a licensed recreational vehicle park established and operated in accordance with Chapter 29.36 of this code.

(b) It is unlawful for any person to rent, lease, or use or cause to be rented, leased, or used, any trailer coach for business purposes unless the use is approved in each individual case by the planning commission and the board of county commissioners under use permit procedures. (Ord. 510 § 1 (part), 1976).

27.08.160 Unlawful sale of lots. It is unlawful for any person to sell or offer for sale any lot or parcel of land or mobile home site for the purposes of being tenanted or occupied by a trailer coach for rental or fee ownership in a planned development or otherwise, except in a duly approved and recorded trailer park subdivision as provided by Chapter 29.16 of this code or in an R-U district as specified in Section 27.08.110(B). (Ord. 535 § 8, 1977; Ord. 510 § 1 (part), 1976).

Chapter 27.10

VARIANCES AND NONCONFORMITIES

Sections:

- 27.10.010 Variances.
- 27.10.020 Nonconformities.
- 27.10.030 Abatement of nonconformities.

27.10.010 Variances. Variances to any requirement of this title may be granted by the board of county commissioners in accordance with the procedures set forth in Chapter 29.66 of this code. (Ord. 510 § 1 (part), 1976).

27.10.020 Nonconformities. Licensed trailer parks existing on the date of adoption of this title but not conforming to one or more provisions of this title are declared to be nonconforming uses and may continue to operate or exist; provided, that any such trailer park is in full compliance with the requirements as to the operation and supervision set forth in Section 27.06.130 and also complies with all health and safety regulations; and further provided, that any such nonconforming trailer park is abated as required in Section 27.10.030 below; provided however, that:

(a) Those parks which are in compliance with Section 27.06.030, 27.06.040 and 27.06.060 on the date of the adoption of this title shall not be subject to abatement with respect to such noncompliances under Section 27.10.030; and

(b) Those parks which are in noncompliance with Section 27.06.080 on the date of the adoption of this title may be abated under Section 27.10.030 only to the extent that screened fencing may be installed in lieu

VARIANCES AND NONCONFORMITIES 27.10.030

of block wall fencing; and

(c) Those parks which are in noncompliance with Section 27.06.170(a) on the date of the adoption of this title shall not be subject to abatement under Section 27.10.030 if the sole necessity for such abatement is that a mobile home, accessory building, or other structure in such park is located closer than five feet from any lot line or property line. (Ord. 533 § 3, 1977; Ord. 510 § 1 (part), 1976).

27.10.030 Abatement of nonconformities. Any trailer park which constitutes a nonconforming use as specified in Section 27.10.020 shall be abated, corrected, or removed so as to be in full compliance with the provisions of this title within ten years of the date of the adoption of this title. Subsequent amendments to this title shall not be deemed to extend the abatement period except insofar as any such amendment may impose



entirely new requirements not represented in the present title. (Ord. 510 § 1 (part), 1976).

Chapter 27.12

PENALTIES AND ENFORCEMENT

Sections:

- 27.12.010 Responsibilities for enforcement.
- 27.12.020 Penalties for violation.

27.12.010 Responsibilities for enforcement. (a) Building Department's Duty. It shall be the duty of the Clark County building department to enforce the provisions of this title pertaining to the erection, construction, reconstruction, moving, conversion, alteration, or addition to any building or structure, and to enforce any other provision of this title which may properly fall under the purview of that office.

(b) License Enforcement. It shall be the duty of the county clerk and all officials charged with the issuance of licenses to enforce the provisions of this title pertaining to the use of land or buildings for which any such license is required by any ordinance of Clark County.

(c) Health Department's Duty. It shall be the duty of the health department of Clark County to enforce the provisions of this title pertaining to the maintenance and use of property, structures, and buildings so far as matters of health are concerned.

(d) Sheriff's Duty. It shall be the duty of the sheriff of Clark County and all officers of the county otherwise charged with the enforcement of the law to enforce this title and all the provisions of the same.

(e) District Attorney's Duty. It shall be the duty of the district attorney to prosecute any criminal or civil action necessary to enforce the provisions of this title under such statutes and ordinances as are applicable. (Ord. 510 § 1 (part), 1976).

27.12.020 Penalties for violation. Any person, firm, or corporation, whether as principal, agent, employee, or otherwise, violating any provisions of this title shall be guilty of a misdemeanor and upon conviction therefor shall be punishable by a fine of not more than five hundred dollars or by imprisonment in the Clark County jail for a term not exceeding six months or by both such fine and imprisonment. Such person, firm, or corporation shall be deemed guilty of a separate offense for each and every day during any portion of which any violation of this title is committed, continued, or permitted by such person, firm, or corporation, and shall be punishable as provided in this section. (Ord. 510 § 1 (part), 1976).

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27.14.010-27.16.020 MOBILE HOME PARK MEDIATION BOARD

Chapter 27.14  
SALE OF COPIES

Sections:

27.14.010 Cost.

27.14.010 Cost. Copies of Title 27 of the Clark County Code may be sold by the Clark County zoning division at the uniform charge of three dollars per copy. (Ord. 704 § 3, 1980: Ord. 510 § 1 (part), 1976).

Chapter 27.16  
MOBILE HOME PARK MEDIATION BOARD

Sections:

27.16.010 Created—Membership.  
27.16.020 Duties.

27.16.010 Created — Membership. There is created a mobile home park mediation board which shall consist of seven members appointed by the board of county commissioners as follows:

- (1) Two members who shall be owners of mobile home parks;
- (2) Two members who shall be tenants of mobile home parks;
- (3) Three members of the general public;
- (4) Each member of any of the three aforementioned categories may be appointed from an incorporated city who shall join the board by joint resolution of Clark County and the city or from the unincorporated areas. (Ord. 696 § 1, 1980: Ord. 643 § 1, 1979).

27.16.020 Duties. It shall be the duty of the mobile home park mediation board to:

- (1) Attempt to adjust grievances between the landlords and tenants by means of mediation or negotiation;
- (2) Recommend changes in local ordinances relating to mobile homes and mobile home parks;
- (3) Recommend measures to promote equity between tenants and landlords;
- (4) Encourage the development of mobile home parks to meet the needs of the community. (Ord. 696 § 2, 1980: Ord. 643 § 2, 1979).



EXHIBIT H

NEVADA DEPARTMENT OF COMMERCE

MANUFACTURED HOUSING DIVISION

CAPITOL COMPLEX

CARSON CITY, NEVADA 89710

(702) 885-4299



ROBERT LIST  
GOVERNOR

JAMES WADHAMS  
DIRECTOR

A. WAYNE TETRAULT  
ADMINISTRATOR

February 26, 1981

TO: Chairman, Assembly Commerce Committee  
FROM: A. Wayne Tetrault, Administrator  
SUBJECT: Suggested Amendment to AB 31

Amend Section 6, page 1 by deleting lines 14 through 22 and adding in place thereof, the following:

"Mobile home" means a vehicular structure without independent motive power, built on a chassis or frame, which is:

1. Designed to be used with or without a permanent foundation;
2. Capable of being drawn by a motor vehicle; and
3. Used as and suitable for year-round occupancy as a residence, when connected to utilities, by one person who maintains a household or by two or more persons who maintain a common household.

Amend Section 9, page 2, line 8 to correct typographical error, as follows:

"Owner" includes the lessor [of] or operator of a mobile home . . . .

Amend Section 13, page 2, lines 19 through 39 by adding a new subsection 4 as follows:

4. The administrator may prefer a complaint for a violation of this chapter before any court of competent jurisdiction, and may take the necessary legal steps through the proper legal officers of this state to enforce the provisions thereof.

continued page two

Amend Section 25, subsection 1, page 5, lines 37 through 46 by adding a new subsection 1(c) as follows:

- c. Order any work stopped by written notice served on any person engaged in the doing or causing such work to be done, and any such person shall immediately stop such work until authorized by the agency to proceed with the work.

Amend Section 25, subsection 3(a), page 6, line 10 to read as follows:

- a. Deny, suspend or revoke any permit issued under this chapter.

Amend Section 38, page 8, lines 1 through 4 by adding a new subsection 3 to read as follows:

3. The administrator may prefer a complaint for a violation of NRS 118.235 to 118.340, inclusive, sections 29 to 45, inclusive, of this act before any court of competent jurisdiction, and may take the necessary legal steps through the proper legal officers of this state to enforce the provisions thereof.

Amend Section 40, subsection 5, lines 41 through 43 to read as follows:

. . . enforcement within [30]90 days after receipt of notice and the city or county shall forthwith transfer to the division all pertinent records which the division may require and the unused portion of permit fees collected by the city or county.

Amend Section 45, page 10, lines 32 through 36 to read as follows:

Section 45

1. The agency for enforcement may, after notice and hearing, suspend or revoke any permit to operate a mobile home park issued under sections 2 to 27, inclusive, of this act or reissue the permit subject to reasonable conditions, for any violation of NRS 118.235 to 118.340, inclusive, sections 29 to 45, inclusive, of this act or regulations adopted under those sections.

continued page three

2. Whenever the administrator finds any violation he may issue a notice of violation to the appropriate person, citing the violation and specifying the corrective action to be taken and the time within which that action must be taken.
3. If a person fails to comply with a notice of violation or any other order of the administrator, after notice and hearing, the administrator may:
  - a. Assess a fine against that person.
  - b. Apply for injunctive and such other relief as a court of competent jurisdiction may grant to compel compliance.
  - c. Report for criminal prosecution any violation to the district attorney of the county in which the mobile home park is located.
4. The owner of a mobile home park is liable for the cost of any action incurred by the division in the enforcement of this section.

Fiscal Note:

No additional funds or personnel would be needed to govern the construction, alteration, maintenance, use and occupancy of mobile home parks as set forth in Sections 2 through 27 of AB 31.

Funds in the amount of \$135,000 for FY 1981-82 and \$155,251 for FY 1982-83 would be needed to regulate landlord-tenant affairs as set forth in Sections 29 to 45 of AB 31. This would be a new program and would require staffing a new section within the division to handle this activity. Attached is the proposed 1981-83 budget for the landlord-tenant program.

This budget amends the fiscal note I submitted on December 22, 1980 to the Legislative Counsel Bureau. Based on discussions with tenant groups, I believe an acceptable level of program enforcement can be achieved within the proposed budget attached hereto.

This will be a self-funding program through mobile home park permit fees. However, start-up costs may be necessary, which could be paid back to the general fund.

Revenue: FY 1981-82

Estimate 550 parks @ \$85.00/yr = \$ 46,750

Estimate 28,000 spaces @ \$3.00/yr = 84,000

\$130,750

Revenue: FY 1982-83

Estimate 550 parks @ \$100.00/yr = \$ 55,000

Estimate 28,000 spaces @ \$3.50/yr = 98,000

\$153,000

Category	GL #	Line Item Description	FY 1982	FY 1983
01		Auditor trainee (1) Grade 28	14,500	16,675
		Investigator (2) Grade 31	35,000	40,250
		Adminv Aid II (2) Grade 21	20,000	23,000
		Employee benefit (30%)	16,500	18,975
			86,000	98,900
03	6200	In-State travel	1,080	1,242
	6210	Motor Pool	6,000	6,900
			7,080	8,142
04	7010	Office Supplies	2,700	3,105
	7020	Operating Supplies	1,600	1,840
	7030	Communications	14,400	16,560
	7040	Print/Duplicating	8,970	10,316
	7060	Contractual	300	345
	7080	Legal/Court	3,140	3,611
	7090	Equipment Repair	140	161
	7100	Rent - Las Vegas - Carson	3,240 1,320	3,726 1,518
		35,810	41,182	
05		Equipment	6,110	7,027
			6,110	7,027
			6,110	7,027
<b>TOTAL EXPENDITURE</b>			135,000	155,251

(H-3)

EXHIBIT I



STATE OF NEVADA  
DEPARTMENT OF HUMAN RESOURCES  
DIVISION OF HEALTH  
BUREAU OF CONSUMER HEALTH PROTECTION SERVICES

505 EAST KING STREET  
CARSON CITY, NEVADA 89710  
TELEPHONE: (702) 885-4750

620 BELROSE STREET  
LAS VEGAS, NEVADA 89158  
TELEPHONE: (702) 385-0241

MEMORANDUM

DATE: March 6, 1981  
TO: Dr. Robert E. Robinson, Chairman  
Committee on Commerce  
FROM: James A. Edmundson, *JA* Bureau Chief  
Consumer Health Protection Services  
SUBJECT: Proposed Amendment to AB 31

---

Add to Section 14:

The manufactured housing division or local agency may not approve plans for a mobile home park or extension of a mobile home park unless it has received written verification from the division of health of the state department of human resources that the plans meet the requirements of NRS 445.361 through 445.339 and 439.200.

Delete Section 51.

JAE/lg

EXHIBIT J

STATE OF NEVADA

REGULATIONS GOVERNING MOBILE  
HOMES AND MOBILE HOME PARKS  
(TRAILER COURTS)

ADOPTED SEPTEMBER 21, 1970

by the

NEVADA STATE BOARD OF HEALTH



DIVISION OF HEALTH  
BUREAU OF CONSUMER HEALTH  
PROTECTION SERVICES

CARSON CITY, NEVADA 89710

**NEVADA STATE DIVISION OF HEALTH REGU-  
LATIONS GOVERNING MOBILE HOMES AND  
MOBILE HOME PARKS (TRAILER COURTS)**

WHEREAS, 439.130, 439.150, and 439.200, Nevada Revised Statutes, provide:

**439.130 General powers, duties of state health officer.** The state health officer shall:

1. Enforce all laws and regulations pertaining to the public health.
2. Investigate causes of disease, epidemics, source of mortality, nuisances affecting the public health, and all other matters related to the health and life of the people, and to this end he may enter upon and inspect any public or private property in the state.
3. Direct the work of subordinates and may authorize them to act in his place and stead.

**439.150 State board of health supreme in all health matters; state department of health is agency for federal cooperation.**

1. The state board of health is hereby declared to be supreme in all nonadministrative health matters and it shall have general supervision over all matters, except for administrative matters, relating to the preservation of the health and lives of citizens of the state and over the work of the state health officer and all local (District, County and City) health departments, boards of health and health officers.

2. The department of health and welfare is hereby designated as the agency of this state to cooperate with the duly constituted federal authorities in the administration of those parts of the Social Security Act which relate to the general promotion of public health, and is authorized to receive and expend all funds made available to the health division by the Federal Government, the state or its political subdivisions, or from any other source, for the purposes provided in this chapter.

**439.200 Rules and regulations of state board of health; local ordinances superseded; filing and distribution of regulations.**

1. The state board of health shall have the power by affirmative vote of a majority of its members to adopt, promulgate, amend and enforce reasonable rules and regulations consistent with law:

- (a) To define and control dangerous communicable diseases.
- (b) To prevent and control nuisances.
- (c) To regulate sanitation and sanitary practices in the interests of the public health.
- (d) To provide for the sanitary protection of water and food supplies and the control of sewage disposal.
- (e) To govern and define the powers and duties of local boards of health and health officers.
- (f) To protect and promote the public health generally.
- (g) To carry out all other purposes of this chapter.

2. Such rules and regulations shall have the force and effect of law and shall supersede all local ordinances and regulations heretofore or hereafter enacted inconsistent therewith.

3. A copy of every regulation adopted by the state board of health, giving the date that it takes effect, shall be filed with the secretary of state, and copies of the regulations shall be published immediately after adoption and issued in pamphlet form for distribution to local health officers and the citizens of the state; and

WHEREAS, 445.010, 445.030, and 445.455, Nevada Revised Statutes, provide:

**445.010 Unlawful pollution of waters; penalty.** Any person or persons, firm, company, corporation, association, city or town which shall deposit, or which shall permit or allow any person or persons in their employ or under their control, management or direction to deposit in any of the waters of the lakes, rivers, streams and ditches in or running into or through the State of Nevada, or cause to be washed or infiltrated into any of such waters, or place or deposit where the same may be washed or infiltrated into any of such waters, any sawdust, pulp, oils, rubbish, filth or poisonous or deleterious substance or substances which affects the health of persons, fish or livestock, or renders such waters unpalatable or distasteful, shall be guilty of a gross misdemeanor.

**445.030 Furnishing impure water for public use unlawful; fluoride concentration.** Every owner, agent, manager, operator or other person having charge of any waterworks furnishing water for public use who shall:

1. Knowingly permit any act or omit any duty or precaution by reason whereof the purity or healthfulness of the water supplied shall become impaired is guilty of a gross misdemeanor.

2. Fail to adjust the naturally occurring fluoride concentration of the water to levels recommended by public health authorities when there has been approval by a majority of the votes cast pursuant to NRS 445.037, or who shall adjust such concentration if such approval has not been obtained, is guilty of a misdemeanor. The provisions of this subsection do not apply to purveyors of bottled water who label their containers to inform the purchaser that the naturally occurring fluoride concentration of the water has been adjusted to recommended levels.

**445.455 State air pollution control regulations.** The department of health, welfare and rehabilitation, through the state board of health, may:

1. Promulgate, amend and enforce reasonable rules and regulations; and

2. Delegate authority to enforce state rules and regulations relating to air pollution control to districts, counties, cities or towns.

WHEREAS, 439.550 to 439.580, Nevada Revised Statutes, inclusive, provide:

**439.550 Strict, thorough enforcement by local health officers.** Each local health officer is charged with the strict and thorough enforcement of the provisions of this chapter in his jurisdiction, under the supervision and direction of the health division. He shall make reports to the health division of any violation of this chapter coming to his notice by observation or upon complaint of any person or otherwise.



**439.560 Enforcement of chapter, regulations by public officers.** All health officers, local boards of health, sheriffs, constables, policemen, marshals, all persons in charge of public buildings and institutions, and all other public officers and employees shall respect and enforce this chapter and all lawful rules, orders and regulations adopted in pursuance thereof in every particular affecting their respective localities and duties.

**439.570 Health division may report violations to district attorney, attorney general: Initiation and prosecution of actions.**

1. When the health authority deems it necessary, he shall report cases of violation of any of the provisions of this chapter to the district attorney of the county, with a statement of the facts and circumstances. When any such case is reported to him by the health authority, the district attorney shall forthwith initiate and promptly follow up the necessary court proceedings against the person or corporation responsible for the alleged violation of law.

2. Upon request of the health division, the attorney general shall assist in the enforcement of the provisions of this chapter.

**439.580 Penalties.**

1. Any local health officer or his deputy who shall neglect or fail to enforce the provisions of this chapter in his jurisdiction, or shall neglect or refuse to perform any of the duties imposed upon him by this chapter or by the instructions and directions of the health division shall be punished by a fine of not more than \$100.

2. Each person violating any of the provisions of this chapter or refusing or neglecting to obey any lawful order, rule or regulation of the state board of health shall be guilty of a misdemeanor.

WHEREAS, the quoted statutes both authorize and require these regulations governing mobile homes and mobile home parks:

NOW, THEREFORE, the Nevada State Board of Health does hereby adopt the following regulations:

#### REGULATION 1. DEFINITIONS

The following definitions shall apply in the interpretation and the enforcement of these rules and regulations:

1. "Mobile home park." "Mobile home park" means a plot of ground divided into lots, under the ownership or management of one person, firm or corporation for the purpose of locating two or more mobile homes for dwelling or sleeping purposes.

2. "Mobile home lot." "Mobile home lot" means a parcel of land within a mobile home park for the placement of a single mobile home and the exclusive use of its occupants.

3. "Mobile home." "Mobile home" means a transportable, single-family dwelling unit suitable for year-round occupancy and containing similar plumbing, waste disposal and electrical conveniences as immobile housing.

4. "Independent mobile home." "Independent mobile home" means a mobile home having toilet and bathing facilities.

5. "Dependent mobile home." "Dependent mobile home" means a mobile home without toilet and/or bathing facilities.

6. "Permit." "Permit" shall mean a written permit issued by the Health Authority allowing a person to operate and maintain a mobile home park subject to the provisions of these rules and regulations.

7. "Health Authority." "Health Authority" means officers and agents of the Health Division or officers and agents of the local boards of health.

8. "Person." The word "person" means a person, firm, corporation, partnership, association, or agency of state, county, or municipal government, or agency of the federal government which is subject to the jurisdiction of the State.

9. "Service building." "Service building" means a structure housing toilet, lavatory, shower and such other facilities as may be required by these rules and regulations.

10. "Sewer connection." "Sewer connection" means the connection consisting of all pipes, fittings and appurtenances from the drain outlet of the mobile home to the inlet of the corresponding sewer riser pipe of the sewerage system serving the mobile home park.

11. "Sewer riser pipe." "Sewer riser pipe" means that portion of the sewer lateral which extends vertically and terminates above ground elevation to permit hook-up with the mobile home sewer connection.

12. "Water connection." "Water connection" means the connection consisting of all pipes, fittings and appurtenances from the water riser pipe to the water inlet pipe of the distribution system within the mobile home.

13. "Water riser pipe." "Water riser pipe" means that portion of the water supply system serving the mobile home park which extends vertically above ground elevation and terminates at a designated point at each mobile home lot.

## **REGULATION 2. PERMIT FOR CONSTRUCTION REQUIRED**

Approval for construction of a mobile home park must be obtained from all appropriate state and local agencies before commencing construction.

Requests for approval must be accompanied by plans of the proposed trailer court showing size of court, number of spaces, swimming pool, service buildings, electrical, sewerage and water supply systems and any other information requested by the Health Authority. Plans and specifications must be prepared by a professional engineer, architect, or any other persons authorized under state law to prepare such plans and specifications, and submitted for the approval of the Health Authority. All plans must meet all county and city laws, rules, regulations, ordinances and zoning requirements.

The application for approval shall include the name and address of the applicant and mobile home park, a legal description and complete plan of the proposed park, which shall contain the following information:

1. The area and dimensions of the tract of land;
2. The number, location, size of all mobile home lots—dependent and independent;
3. The number, location, and size of all automobile parking lots;

4. The location and width of roadways and walkways;
5. Method and plan of water supply, including chemical analyses of the proposed water supply;
6. Method and plan of sewage disposal, including percolation test and distance to the water table;
7. Method of garbage and refuse disposal;
8. Plan of electrical service;
9. Plans and specifications of all buildings and other improvements constructed or to be constructed within the mobile home park;
10. Size and location of the play area, if provided;
11. Size and location of swimming pool and bathing place and bathhouses;
12. Plans and location of grocery store, food and drink establishments, and recreation building within the mobile home park;
13. Method and plan for fire protection;
14. Evidence of compliance with local building and/or zoning requirements;
15. Topographic map.

No major change or alterations shall be made to any part of the mobile home park, as outlined in the park plan, without approval of the Health Authority.

### **REGULATION 3. PERMITS FOR OPERATION OF MOBILE HOME PARKS**

No person shall operate a mobile home park in the State of Nevada who does not possess an unrevoked permit as issued by the designated Health Authority in the name of such person, for the specific mobile home park.

Inspection of the mobile home park shall be made one time per year, or more if deemed necessary by the Health Authority.

### **REGULATION 4. CONSTRUCTION, LOCATION, SPACE AND GENERAL LAYOUT**

1. All mobile home parks in the State of Nevada which are hereafter constructed, re-constructed, or extensively altered shall conform in their construction to the requirements of these rules and regulations.

2. The mobile home park shall be located on a well-drained site, and shall be so situated and maintained as not to create a public health hazard or nuisance and shall meet all applicable local laws, rules, regulations and/or zoning requirements.

3. The area of the mobile home park shall be adequate to accommodate:

- (a) A maximum of eight (8) trailers per acre where community sewerage is not available.
- (b) The designated number of mobile home lots, independent and dependent.
- (c) Necessary streets and roadways, parking and lighting.
- (d) Service areas.
- (e) Playgrounds, if provided.

(f) Swimming pools, if provided.

(g) Water, sewage, and refuse systems.

4. Each mobile home lot shall be numbered or designated by street number or other suitable means and the lot lines defined by corner markers or other suitable means. Each lot shall abut on a driveway or other clear area with unobstructed access to a public street. Mobile homes shall be parked on such lots so that a spacing of at least fifteen (15) feet is maintained between adjacent mobile homes together with their additions and other structures excepting non-combustible awnings and excepting that mobile homes placed end-to-end need a clearance of only ten (10) feet when opposing rear walls are staggered.

5. No mobile home shall be parked so that any part of such mobile home will obstruct any roadway or walkway.

6. A mobile home shall not be occupied unless it is properly placed on a mobile home lot and connected to water, sewerage, and electrical or gas utilities.

7. Carports, ramadas and porches may be erected, constructed or maintained on a mobile lot only as an accessory structure to a mobile home located on the same lot and shall meet all state and local building laws, rules and regulations pertaining to structures.

8. Access roads shall be provided to each mobile home lot, meeting all state and local requirements. Access roads shall be surfaced with crushed rocks, blacktop, concrete or other suitable material approved by the Health Authority. Each access road shall connect with a street or highway; have a minimum width of twenty-four (24) feet; and shall be well marked in the daytime and adequately lighted at night.

9. Surfaced and lighted walkways shall be provided to all service buildings.

10. Service buildings:

(a) Are optional for mobile home parks serving only independent mobile homes.

(b) Adequately equipped with flush-type toilet fixtures, lavatories and showers with hot and cold water shall be provided for the use of dependent mobile homes.

(c) Shall be conveniently located not more than 200 feet from any dependent mobile home lot and not less than 20 feet from any mobile home.

11. Construction and maintenance of service buildings:

(a) Service buildings shall be of permanent construction with an interior finish of light colored moisture-resistant material which will stand frequent washing and cleaning.

(b) All exterior openings, except doors, from toilet rooms shall be covered with 16-mesh screen. Toilet rooms shall be provided with self-closing doors arranged to prevent direct view of the interior when the exterior door is opened.

(c) Toilet and shower rooms shall be well-lighted at all times. The average illumination level for general seeing tasks in these rooms is to be 5 foot-candles. For more exacting visual tasks a higher level of illumination is needed. In laundry room work areas and at toilet room mirrors there shall be a minimum of 40 foot-candles. There shall be at least one openable window, or a mechanical device which will adequately ventilate such rooms.

(d) During periods of use, service buildings shall be maintained at a

temperature of 70° F., minimum. Exposed flame heaters are prohibited and electrical heaters must have protective grids and safety switch. All heating and ventilating systems must be approved by the Health Authority.

(e) An adequate quantity of hot and cold water shall be provided for lavatory and bathing fixtures.

12. Toilet, lavatory, shower and laundry facilities. Service buildings shall have toilet, shower and lavatory facilities separate for each sex, with a minimum of one toilet for females, one toilet for males, one lavatory and one shower for each sex, and shall be equipped either with an openable window or electrical mechanical exhaust fan and shall be heated and shall meet state and local laws.

13. For those mobile home parks that have a capacity of more than ten (10) dependent mobile homes, additional fixtures shall be provided. One additional toilet for each sex shall be provided for every ten (10) additional dependent mobile homes, or portion thereof. Urinals may be substituted for one-third of the toilets for males. One additional lavatory for each sex shall be provided for every ten (10) additional dependent mobile homes, or portion thereof, and one additional shower for each sex for every twenty (20) additional dependent mobile homes, or portion thereof.

14. Toilets shall be located in separate compartments with self-closing doors.

15. Toilet rooms shall be provided with toilet paper.

16. Lavatory facilities shall be provided with liquid soap and single service towels.

17. If laundry facilities are provided, the room containing them shall be separate from the toilet rooms and shall have an exterior entrance; be heated, and have electrical mechanical exhaust fan; shall have hot and cold water.

18. Where community recreation structures are provided, an adequate and sufficient number of toilet and lavatory facilities, separate for each sex, and in accordance with the appropriate plumbing code shall be installed. Such facilities shall be housed in a building, or buildings, of comparable construction to that meeting state and local requirements.

19. All food establishments, swimming pools, and vending or dispensing machines shall meet all state and local laws, rules and regulations.

#### REGULATION 5. WATER SUPPLY

1. An accessible, adequate, safe, and potable supply of water shall be provided in each mobile home park. For all new construction where a public supply of water of satisfactory quantity, quality, and pressure is available, connection shall be made thereto and its supply used exclusively. When a satisfactory public water supply is not available, a private water supply system shall be developed and used as approved by the Health Authority. Samples from private water supplies shall be submitted to the State Health Laboratory at least once each month for bacteriological analysis.

2. The water supply shall be capable of supplying a minimum of 300 gallons per day per mobile home. This quantity must be available in an 8-hour period.

3. Individual water connections having a minimum of one-half inch

diameter and consisting of a water riser pipe terminating at least four inches above the ground surface shall be provided at each mobile home lot.

4. Each water connection shall be equipped with a shut off valve not subject to flooding, protected from freezing, from damage from mobile home wheels and the ground surface around the riser pipe shall be graded to divert surface drainage away from the connection. Underground stop and waste valves shall not be installed on any water service.

5. Once a year a water sample must be submitted to the State Health Laboratory for chemical analysis.

6. Plumbing shall conform with the current edition of the Uniform Plumbing Code of the International Association of Plumbing and Mechanical Officials, and local code requirements shall prevail, when these requirements are in excess of or more stringent than the Uniform Plumbing Code.

#### **REGULATION 6. SEWAGE DISPOSAL**

1. All sewage and waste water from mobile homes and service buildings, and all other buildings, shall be drained to a sewage collection system and discharged to a public sewage treatment plant; provided, however, that where no public sewage treatment plant is available, a private sewage disposal system approved by the Health Authority shall be provided. The disposal system shall be located and maintained where it will not create a nuisance or a health hazard to the park occupants or to the owner or occupants of any adjacent property.

2. All sewer lines shall be located in trenches of sufficient depth to be free of breakage from traffic or other vehicular movements and shall be separated from the park water supply system at a safe distance according to Nevada's water supply regulations and as approved by the Health Authority. Sewers shall be at a grade which will insure a velocity of two feet per second when flowing full. All sewer lines shall be constructed of materials approved by the Health Authority, shall be adequately vented, and shall have watertight joints.

3. Each mobile home lot shall be provided with at least four inch diameter sewer riser pipe. The sewer riser pipe shall be so located on each mobile home lot that the sewer connection to the mobile home drain outlet will approximate a vertical position.

4. The sewer connection shall have a minimum diameter of at least three inches, and the slope of any portion thereof shall be at least one-fourth inch per foot. The sewer connection shall consist of one pipe line only without any branch fittings. All joints shall be leak and insect proof.

5. The sewer riser pipe shall be capped when a mobile home does not occupy the lot. Surface drainage shall be diverted away from the riser. The rim of the riser pipe shall extend above ground elevation and be equipped with a standard threaded fitting.

6. When community sewerage system is not available, the following shall be used in design of private sewerage systems:

(a) Three (3) people per trailer;

(b) 100 gallons sewage per person per day;

(c) Septic tank capacity of 300 gallons per trailer per day, plus 600 gallons (for sludge storage) for each ten (10) trailers or fraction thereof;

(d) Septic tanks and leach system shall be constructed in accordance with the latest recommendations or regulations of the state or local board of health.

#### **REGULATION 7. REFUSE DISPOSAL**

1. The storage, collection and disposal of refuse in the mobile home park shall be so conducted as to create no health hazards, rodent harborage, insect breeding areas, accident or fire hazard or air pollution.

2. Where individual refuse collection is not available, refuse shall be stored in flytight, waterproof, rodentproof containers, which shall be located not more than 150 feet from any mobile home lot. Containers shall be maintained on collection stands designed to prevent tipping and shall be provided in sufficient number and capacity to properly store all refuse.

3. Where suitable collection service is not available from municipal or private agencies, the mobile home park operation shall provide this service.

4. All refuse shall be collected and transported in covered vehicles or covered containers to an approved disposal site or disposed of by other methods approved by the Health Authority and/or air pollution control authorities.

#### **REGULATION 8. ELECTRICITY AND FIRE PROTECTION**

1. Mobile home parks shall adhere to local and state electrical and fire prevention regulations and fire extinguishers shall be provided.

2. Natural gas or liquefied petroleum gas piping systems shall be installed and maintained in accordance with American Standards Association 2-2130 or local applicable laws.

#### **REGULATION 9. PARK MANAGEMENT**

1. The person to whom a license for a mobile home park is issued shall operate the park in compliance with the rules and regulations issued hereunder and shall provide adequate supervision to maintain the park, its facilities and equipment in good repair and in a clean and sanitary condition.

2. A mobile home shall not be occupied for dwelling purposes unless it is properly connected to water, sewerage, and other utilities.

3. The park management shall not allow the owner or person in charge of a dog, cat or other pet animal to permit it to run at large or to commit any nuisance within the limits of any mobile home park.

#### **REGULATION 10. VIOLATIONS AND PENALTIES CONTENTS, REASONABLE TIME FOR COMPLIANCE**

1. Whenever the Health Authority finds unsanitary or other conditions or violations of these rules and regulations in the operation and maintenance of mobile home parks, he shall:

(a) In the case where he determines that a substantial and immediate hazard to public health or safety exists, take any of the following actions:

- (1) Revoke the permit.
- (2) Remove or abate such hazard.
- (3) Take necessary steps to protect persons from such hazard.
- (4) Notify the permitholder or operator and all persons who might be affected by such hazardous conditions, require specific corrective action and specify the time period within which such action shall be taken.

(b) In all other cases issue a "Notice of Violation" to the permitholder or operator citing such conditions, specifying the corrective action to be taken, and specifying the time period within which such action shall be taken.

2. If the permitholder or operator fails to comply with a "Notice of Violation," the permit shall be revoked.

3. When a permit is revoked without notice because of a substantial and immediate hazard to public health and safety, the permitholder may request a hearing within ten (10) days after the Health Authority's action of revocation.

4. In all other cases, the permitholder may request a hearing at any time prior to the expiration of time stated in the "Notice of Violation," provided that at least ten (10) days shall be allowed any permitholder regardless of time periods stated in the "Notice of Violation."

5. Request for hearing shall be directed to the health officer of the agency issuing the permit. The health officer or his designee shall provide the permitholder with opportunity to present all facts relevant to the issue of revocation. The decision of the health officer shall be final.

6. Nothing in this rule shall prevent the Health Authority from extending the time allowed for corrective action when the permitholder provides a written response within ten (10) days of receiving a "Notice of Violation" setting forth the nature and time needed for corrective action. The Health Authority shall require such periodic reports as may be necessary to demonstrate reasonable progress toward final compliance.

#### **REGULATION 11. LOCAL STANDARDS**

The foregoing rules are minimum standards; nothing herein shall preclude local health agencies or governmental units from formulating and adopting additional standards or standards in excess of those set forth.

#### **REGULATION 12. EXISTING FACILITIES**

Those facilities in operation at the time of enactment of these regulations shall obtain a permit. All sanitary requirements shall be followed, but the Health Authority may waive deficiencies in existing structures. No subsequent construction or major alteration shall occur without full compliance with these rules regarding such construction or alteration.

#### **REGULATION 13. UNCONSTITUTIONALITY CLAUSE**

Should any section, paragraph, sentence, clause or phrase of these regulations be declared unconstitutional or invalid for any reason, the remainder of said regulations shall not be affected thereby.



[ 13 ]

ADOPTION: Now, THEREFORE, by affirmative vote of the Nevada State Board of Health, these Regulations Governing Mobile Homes and Mobile Home Parks (Trailer Courts) are hereby adopted and compliance therewith ordered.

To become effective November 21, 1970.

DONALD F. GUISTO, M.D., *Chairman*  
JOHN H. CARR, M.D., *Secretary*  
MRS. RICHARD FULSTONE  
WILLIAM B. BENTLEY, M.D.  
JOSEPH B. LIBKE, D.D.S.  
GERMAIN R. HOULE, D.V.M.  
THORNE J. BUTLER, M.D.

50

J-5



The State of Nevada  
Executive Chamber  
February 16, 1981

Robert List  
Governor

Capital Complex  
Carson City, Nevada 89710

Ms. Lila Dunkel  
2308 Palm #200  
Las Vegas, Nevada 89104

Dear Ms. Dunkel:

Thank you for your letter expressing your interest in Assembly Bill 30 and Assembly Bill 31.

I agree that everything possible needs to be done to reduce the burden on homeowners who rent space in mobile home parks. This is particularly true for senior citizens living on a fixed income. My tax reform plan would reduce this financial burden and, I believe, offer much needed relief to mobile homeowners.

I strongly support the need to establish minimum standards for the construction and maintenance of mobile home parks. Residents of mobile homes who choose to reside in parks must be assured of a safe and well-maintained environment to protect their lifestyle. These standards are also needed to prevent substandard parks from being constructed in the rural areas of our state where the mining industry and other construction projects have and will continue to create a tremendous demand for mobile housing.

I recognize the problems that exist between park landlords and tenants and that some authority is needed to enforce the landlord-tenant law. I support the concept found in Assembly Bill 31 but the Legislature must authorize the funds and people to enforce this law at an acceptable level.

Please convey my appreciation to the mobile homeowners in your park who took the time to inform me of their thoughts on this matter.

Sincerely,


  
ROBERT LIST  
Governor

EXHIBIT L



STATE OF NEVADA  
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES  
DIVISION OF ENVIRONMENTAL PROTECTION

CAPITOL COMPLEX  
CARSON CITY, NEVADA 89710

TELEPHONE (702) 885-4670

March 5, 1981

M E M O R A N D U M

TO: Assembly Committee on Commerce

FROM: *LHD* L.H. Dodgion, P.E.  
Administrator

SUBJECT: AB 31

The Division of Environmental Protection proposes the following amendment to the subject bill:

Page 2 Section 14.3. C. line 50

(c) The disposal of refuse and sewage [;] provided said regulations are not inconsistent with those adopted by the State Environmental Commission pursuant to Chapter 444 and 445 of NRS.

LHD:kh

cc: Pete Morros

EXHIBIT M

February 25, 1981

The Honorable Robert E. Robinson  
Chairman, Assembly Commerce Committee  
The Nevada State Legislature  
Capitol Complex  
Carson City, Nevada 89710

Dear Mr. Robinson:

We have conducted a review of the provisions of AB 30 and wish to indicate our support for the provision contained in Section 6 (1) appearing on page 3 at lines 9 and 10. Under this legislation, tying arrangements between mobile home parks and mobile home dealers would be prohibited. This practice has been held by the courts in other states to be a violation of antitrust laws, and has caused significant problems in Nevada.

Tying arrangements such as these also constitute a violation of NRS 598A.060 (4) which reads as follows:

"NRS 598A.060 Prohibited acts. Every activity enumerated below in this section constitutes a contract, combination or conspiracy in restraint of trade, and it is unlawful to conduct any part of any such activity in this state

. . . . .

4. Tying arrangements, consisting of contracts in which the seller or lessor conditions the sale or lease of commodities or services on the purchase or leasing of another commodity or service of the seller or lessor."

We suggest that in order to maintain consistency between the existing statute quoted above and Section 6 of AB 30, that an additional section be added to this bill as follows:

Section 9:

NRS 598A.060 is hereby amended to read as follows:

598A.060 Prohibited acts. Every activity enumerated below in this section constitutes a contract, combination or conspiracy in restraint of trade, and it is unlawful to conduct any part of any such activity in this state:

1. Price fixing, which consists of raising, depressing, fixing, pegging or stabilizing the price of any commodity or service, and which includes, but is not limited to:
  - (a) Agreements among competitors to depress prices at which they will buy essential raw material for the end product.
  - (b) Agreements to establish prices for commodities or services.
  - (c) Agreements to establish uniform discounts, or to eliminate discounts.
  - (d) Agreements between manufacturers to price a premium commodity a specific amount above interior commodities.
  - (e) Agreements not to sell below cost.
  - (f) Agreements to establish uniform trade-in allowances.
  - (g) Establishment of uniform cost surveys.
  - (h) Establishment of minimum markup percentages.
  - (i) Establishment of single or multiple basing point systems for determining the delivered price of commodities.
  - (j) Agreements not to advertise prices.
  - (k) Agreements among competitors to fix uniform list prices as a place to start bargaining.
  - (l) Bid rigging, including the misuse of bid depositories, foreclosures of competitive activity for a period of time, rotation of jobs among competitors, submission of identical bids, and submission of complementary bids not intended to secure acceptance by the customer.
  - (m) Agreements to discontinue a products, or agreements with anyone engaged in the manufacture of competitive lines to limit size, styles or quantities of items comprising such lines.
  - (n) Agreements to restrict volume of production.
2. Division of markets, consisting of agreements between competitors to divide territories and to refrain from soliciting or selling in certain areas.
3. Allocation of customers, consisting of agreements not to sell to specified customers of a competitor.
4. Tying arrangements, consisting of contracts in which the seller or lessor conditions the sale or lease of commodities or services on the purchase or leasing of another commodity or service [of the seller or lessor]

Page Three

February 25, 1981

We will of course offer testimony in support of this bill before the full committee. Thank you for your consideration.

Sincerely,

RICHARD H. BRYAN  
ATTORNEY GENERAL

RHB/EWH/ab

EXHIBIT N  
TESTIMONY OF JOSEPH F. MCDONALD  
BEFORE ASSEMBLY COMMERCE COMMITTEE: SUB-COMMITTEE  
HEARING ON AB 30

MEMBERS OF THE COMMITTEE:

My name is Joe McDonald from Reno, Nevada. I am here today representing the Builders Association of Northern Nevada and the Northern Nevada Tahoe Chapter of the Institute of Real Estate Management. Both of these groups are members of the housing coalition. I am a builder and developer and am well acquainted with the problems of the low and moderate income persons and the elderly. I am presently the managing agent for approximately 1200 units of low income subsidized apartments with a portion of that number being for the exclusive use of the elderly and handicapped. We deal with their problems on a daily basis. I am here today to talk against the passage of AB 30. This measure which provides for rent justification is a measure to which any far seeing resident of the state of Nevada should be totally opposed.

Rent justification is no more than another name for rent control and rent control is one of the most insidious forms of legislation that has ever been developed. The short term effects may look like the answer but the long term effects are devastating. Rent control hurts most those whom it is designed to help- the low income and the elderly. Rental properties deteriorate because of lack of funds to accomplish needed maintenance. New properties do not get built because of lack of financing.

Let me explain. As builders and developers, we feel we have a deep rooted responsibility to supply adequate safe and affordable housing to fill the needs of the people of Nevada. One of the most difficult phases of developing and building is to obtain an adequate financial package. Nevada has always been a cash short area as far as obtaining large amounts of money for financing building projects. The money used to develop these projects, as a general rule, come from financial pools operated from large financial centers such as san Francisco, Chicago, New York, Houston and the like. There is great demand from all over the world on these money pools and the money goes where the climate is most favorable in the eyes of the managers of those pools.

One of the fastest ways to dry up a source of financing is to associate an area with rent controls.

Lenders do not want to invest monies for housing or any other purpose where the government restricts the movement of the market

place by controls of any kind. Once any form of rent controls are established, you can forget about getting adequate financing.

Hiding behind the fancy name of rent justification is not going to fool anybody. It is a form of rent control, pure and simple and cannot be looked at in any other way.

The big problem in the mobile home park industry today is the lack of adequate spaces. It's the old law of supply and demand at work. Because of the shortage of spaces, there have been abuses - not by the majority of park owners but by a greedy minority. More available spaces will take care of their action. You cannot ease the problem of demand by controlling rents. It may help a few people for the short run but will hurt many, many more over the long run.

I think we all agree that there is a heavy demand for more mobile home spaces. To install a form of rent control will eliminate any possibility of an investor building a new park. Rent controls would also eliminate or sorely limit the building of other forms of shelter such as low income apartments, affordable housing or other types of shelter which depend on financing. This is only one of the results of rent control.

Another result is the shifting of the tax base. Let me explain. If rent controls are in effect, they restrict the income to a mobile home park. This limits the value of the mobile home property which in turn limits the property taxes that can be charged against the park. The tax income provides needed services in the community. Once the value of the mobile home park is fixed due to the controls, the tax burden shifts to other residential or commercial property. In other words, the remainder of the real property in the community begins subsidizing the needed services such as police, fire, public safety for the mobile home park and its residents. In our opinion, this is a grossly unfair situation and there is a good possibility that some public services would have to be curtailed for the entire community.

I know that you have heard many times that rent control has failed in New York and other areas of the United States. I cannot help but think that the results here would be the same. The



proponents of this bill have asked that controls be triggered by a shortage of spaces. The effect of the controls will do more than control the rents. It would almost guarantee that no new parks with the needed spaces would be built. I can't see any businessman in his right mind developing a park with the threat of rent controls limiting his chances of breaking even much less making a profit. Let me ask you- Why should a mobile home park operator subsidize persons who cannot afford to or say they can't afford to pay rents. If this is a requirement of owning and operating a mobile home park, it will eliminate the chance of any more being built and will guarantee that the maintenance on existing parks will deteriorate greatly.

I think we all feel that adequate supply of spaces or other forms of housing is the best way to solve the problem.

I think it incumbent upon the legislature and the cities and counties of this state to review the zoning laws and other restrictive measures so as to make it easier to develop mobile home parks. It is important to the well being of all concerned and to the mobile home residents in particular that a more competitive situation be created.

While our members are not primarily engaged in the mobile home business, we are engaged in the overall shelter business. To allow one form of rent control or justification or what ever fancy name you want to put on it to exist is only opening the door to rent controls for apartments and other rental properties. That is our main concern.

We want to play a part in the development of mobile home parks, multi-family apartments, townhouses, condominiums and other forms of affordable housing. As single family homes get more and more expensive and the market becomes more and more limited, we are going to be forced to depend more and more on mobile homes, apartments and like type shelter. We cannot provide this needed housing for our citizens unless we have adequate financing and adequate financing will not be available if any form of rent control exist.

You don't solve a problem by compounding it. You solve it by eliminating the basic cause. Don't stifle the free enterprise system our country depends upon. Let it grow. Let it operate.

EXHIBIT O

NEVADA HOUSING COALITION

COMMENTS BEFORE THE ASSEMBLY COMMERCE SUBCOMMITTEE ON AB 30.

MARCH 6, 1981

MR. CHAIRMAN AND MEMBERS OF THE COMMITTEE, MY NAME IS BILL JOWETT. I REPRESENT THE NEVADA ASSOCIATION OF REALTORS WITHIN THE NEVADA HOUSING COALITION. DURING THE 1979 LEGISLATIVE SESSION I WAS EXECUTIVE DIRECTOR OF THE COALITION FOR FAIR HOUSING.

IT IS MY OPINION THAT DURING THE LAST SESSION AND SO FAR DURING THIS ONE THAT THE MAJORITY OF TENANT COMPLAINTS HAVE BEEN TENANT/MANAGER PROBLEMS. THERE HAVE BEEN SOME COMPLAINTS ABOUT RENTS, BUT THERE HAVE BEEN COMPLAINTS FROM ALL QUARTERS ABOUT RISING PRICES, FROM FOOD TO GAS TO AUTOMOBILES AND ON AND ON. WE DO NOT BELIEVE IT IS FAIR TO SHELTER ONE SEGMENT OF SOCIETY FROM INFLATION AT THE EXPENSE OF ANOTHER SEGMENT OF SOCIETY.

WHEN RENTS ARE UNFAIRLY RAISED THERE IS A REASON FOR IT. THAT REASON IS AN IMBALANCE IN THE SUPPLY AND DEMAND FORMULA. IF YOU BELIEVE IN A FREE ENTERPRISE SOCIETY, THEN YOU MUST SUPPORT THE IDEA OF THE SUPPLY AND DEMAND FORMULA. IF IN FACT RENTS ARE BEING RAISED UNFAIRLY IT FOLLOWS THAT THERE IS MORE DEMAND THAN SUPPLY. GIVEN UNFETTERED FREE ENTERPRISE THE SUPPLY WOULD BE CREATED TO SATISFY THE DEMAND. WHAT WE FIND, HOWEVER, IS A LACK OF EFFORT ON THE PART OF GOVERNING BODIES TO ASSIST IN THE ACQUISITION AND DEVELOPMENT OF NEW MOBILE HOME PARKS. THE ATTITUDE OF GOVERNMENT TOO OFTEN REQUIRES THE DEVELOPER TO NOT ONLY PUT HIS PLAN INTO ACTION, BUT TO DO IT IN SPITE OF LOCAL GOVERNMENTAL RED TAPE, RESTRICTIVE REGULATIONS AND UNCOOPERATIVE ATTITUDES.

THE TENANTS AND THE OWNERS ARE OFTEN ASKED BY ELECTED OFFICIALS TO WORK TOGETHER TO SATISFY THEIR PROBLEMS. I SUGGEST IT IS TIME FOR ANOTHER TEAM TO BE FORMED. I RECOMMENDED A CLOSE TEAM EFFORT BETWEEN DEVELOPERS AND LOCAL GOVERNMENT IN ORDER TO REDUCE RED TAPE AND GOVERNMENTAL RESTRICTIONS TO PROVIDE ADDITIONAL PARKS. THE STATE LEGISLATURE SHOULD ENCOURAGE SUCH COOPERATION.

THE STUDY PERFORMED AS A RESULT OF ACR-3 IN THE 1979 LEGISLATURE DEVELOPED A VARIETY OF SOLUTIONS TO THE VARIED PROBLEMS EXPRESSED BY MOBILE HOME PARK TENANTS. MANY OF THESE APPEAR TO HAVE MERIT AND SHOULD BE CONSIDERED BY YOU FOR ADOPTION, EXCEPTING OF COURSE AB-30.

RENT CONTROL IS NOT THE ANSWER. SUPPORTING SUCH LEGISLATION IS NOT ONLY A REFUSAL TO ADDRESS THE PROBLEM DIRECTLY BUT IN FACT SERVES TO INCREASE THE PROBLEM.

UNFORTUNATELY, ESTABLISHING OR ALLOWING LOCAL GOVERNMENTS TO ESTABLISH SUCH LEGISLATION WILL NOT ONLY WORSEN THE TENANTS AND OWNERS SITUATION IT WILL ADVERSELY EFFECT THE ENTIRE ECONOMY.

SOME OF THE ADVERSE EFFECTS WOULD BE:

- CREATION OF AN ADDITIONAL BUREAUCRACY.
- INVESTORS WILL NOT INVEST.
- LENDERS WILL NOT LEND.
- BUILDERS CANNOT BUILD.
- HOUSING DETERIORATES.
- PROPERTY VALUES DECREASE.
- THE TAX BURDEN SHIFTS.

- BECAUSE OF INADEQUATE HOUSING, OTHER BUSINESSES WILL BE UNABLE TO ATTRACT QUALIFIED PERSONNEL.
- SOCIETY STAGNATES.
- BUSINESSES CLOSE.

WE URGE YOU NOT TO SUPPORT AB 30.

THANK YOU. I WILL BE GLAD TO ANSWER YOUR QUESTIONS.

0-2

NEVADA HOUSING COALITION  
COMMENTS BEFORE THE ASSEMBLY COMMERCE SUBCOMMITTEE ON A.B.30  
MARCH 20, 1981

MR. CHAIRMAN AND MEMBERS OF THE COMMITTEE, MY NAME IS ALBERT CARTLIDGE. I AM SENIOR PARTNER OF CARTLIDGE, SHOOLROY & COMPANY, CERTIFIED PUBLIC ACCOUNTANTS, LTD., AN INVESTOR, PROPERTY OWNER, ENTREPRENEUR, AND A NEVADAN VITALLY INTERESTED IN THE ECONOMIC HEALTH AND QUALITY OF LIFE IN NEVADA. I AM ALSO A RENO HOUSING AUTHORITY COMMISSIONER INVOLVED IN NEARLY 1,000 AFFORDABLE, LOW COST HOUSING UNITS.

I AM SPEAKING TO YOU TODAY AS CO-CHAIRMAN OF THE NEVADA HOUSING COALITION. THE COALITION, FORMED EARLIER THIS YEAR, CONSISTS OF VARIOUS ORGANIZATIONS MAKING UP OUR HOUSING INDUSTRY IN THE STATE OF NEVADA INCLUDING BUILDERS ASSOCIATIONS IN NORTHERN AND SOUTHERN NEVADA REPRESENTING GENERAL CONTRACTORS, SUB-CONTRACTORS AND MATERIALS AND TRADES ORGANIZATIONS TOTALING OVER 1,000 ENTITIES: NEVADA MANUFACTURED HOUSING; NEVADA PARKS ASSOCIATION; NORTHERN AND SOUTHERN NEVADA APARTMENT ASSOCIATIONS REPRESENTING OVER 800 MANAGERS AND OWNERS AND INCLUDING 45,000 HOUSING UNITS IN THIS STATE; RENO AND LAS VEGAS BOARD OF REALTORS AND THE NEVADA ASSOCIATION OF REALTORS REPRESENTING OVER 4,000 REAL ESTATE BROKERS AND SALESMEN IN NEVADA; THE INSTITUTE OF REAL ESTATE MANAGEMENT; NEVADA SAVINGS AND LOAN LEAGUE REPRESENTING ALL OF THE SAVINGS AND LOAN ASSOCIATIONS IN NEVADA AND NEVADA LAND TITLE ASSOCIATIONS REPRESENTING TITLE AND ESCROW COMPANYS IN THE STATE.

WE REPRESENT THE HOUSING INDUSTRY - AND WE ARE EXTREMELY CONCERNED. THE HOUSING INDUSTRY HAS AN OBLIGATION TO PROVIDE HOUSING - - WE ARE FRUSTRATED IN OUR ATTEMPTS TO PROVIDE AFFORDABLE HOUSING. HIGH LAND COSTS, HIGH INTEREST RATES, EVER INCREASING LABOR AND MATERIAL COSTS, BUREAUCRATIC RED TAPE AND NOW, THREAT OF STILL FURTHER GOVERNMENT INTERVENTION INTO THE INDUSTRY, HAS ALREADY CREATED A NEGATIVE CLIMATE FOR GROWTH IN THE HOUSING INDUSTRY IN OUR STATE.

THE NEVADA HOUSING COALITION HAS BEEN FORMED TO -

1. FOSTER A POSITIVE CLIMATE FOR CONTINUED STRONG ECONOMIC HEALTH AND GROWTH IN THE STATE AND
2. TO MAINTAIN A HIGH QUALITY OF LIFE FOR ALL CITIZENS OF OUR STATE AND
3. TO PROVIDE AN ADEQUATE SUPPLY OF AFFORDABLE HOUSING.

WE WANT TO WORK WITH YOU, OTHER MEMBERS OF THE STATE LEGISLATURE AND ANY OTHER CITIZENS OR GROUPS TO ACHIEVE THESE GOALS. WE CANNOT URGE THIS COOPERATIVE EFFORT STRONGLY ENOUGH, FOR BY WORKING TOGETHER WE CAN DEVELOP PUBLIC POLICY TO INSURE A PROSPEROUS FUTURE FOR ALL NEVADANS. A.B. 30 WOULD ALLOW RENT CONTROLS AND I REPEAT RENT CONTROLS, WHETHER YOU CALL IT ENABLING LEGISLATION, REGULATION OF PRICE INCREASES, JUSTIFICATION OF PRICE INCREASES OR BY WHATEVER

LABEL. RENT CONTROL IS NOT THE SOLUTION. RENT CONTROL SIMPLY COMPOUNDS THE PROBLEM. I WILL NOT TAKE TIME TO REITERATE ALL THAT YOU HAVE AND WILL HEAR ABOUT THE CATASTROPHIC RESULTS OF ATTEMPTS AT RENT CONTROL IN MAJOR METROPOLITAN AREAS THROUGHOUT THE COUNTRY.

THE REAL PROBLEM IS LACK OF AN AFFORDABLE AND CONTINUING SUPPLY OF AVAILABLE HOUSING. NEVADA IS GROWING AND WITH THE ADVENT OF THE MX MISSILE SYSTEM, THE PACE WILL QUICKEN RAPIDLY. THE HOUSING INDUSTRY RECENTLY HAS NOT BEEN ABLE TO KEEP UP WITH THE DEMAND FOR HOUSING, MUCH LESS THE DEMAND FOR AFFORDABLE HOUSING - DUE TO LACK OF FINANCING AND RAPIDLY INCREASED COSTS OF MATERIALS AND LABOR RESULTING FROM RAPID INFLATION THE COUNTRY HAS ENCOUNTERED RECENTLY.

AFFORDABLE HOUSING MUST BE PROVIDED THROUGH A CONCERTED EFFORT OF ALL CONCERNED, INCLUDING THE HOUSING INDUSTRY, CITIZENS, TENANT GROUPS, FEDERAL STATE AND LOCAL GOVERNMENTS. WE HAVE ATTEMPTED THIS APPROACH WITH REPRESENTATIVES OF THE MOBILE HOME OWNERS LEAGUE OF THE SILVER STATE. I WORKED WITH THESE REPRESENTATIVES TWO YEARS AGO ON SIMILAR MATTERS AND THEIR RECENT REPLY TO MY REQUEST FOR MEETINGS TO TRY TO SOLVE THE REAL PROBLEM WAS THAT TWO YEARS AGO, WE SIDE TRACKED THEM AND THEY LOST THEIR RENT CONTROL BILL. THEY DID LOSE THEIR BILL. RENT CONTROL IS NOT THE ANSWER; IT WAS NOT THE ANSWER TWO YEARS AGO; IT IS NOT THE ANSWER NOW AND IT WILL NEVER BE THE ANSWER.

TWO YEARS AGO WE PASSED A.B. 784, REVISING PROVISIONS RELATING TO TENANT-LANDLORD RELATIONSHIPS. WE PROVIDED FOR MEDIATION BOARDS TO HEAR TENANT-LANDLORD GRIEVANCES, STRENGTHENED PROVISIONS REGARDING RENTAL CONTRACTS OR LEASES, INCLUDING PROVISIONS IN THE AGREEMENTS. ADOPTION OR CHANGES IN RULES AND REGULATIONS CONCERNING TENANTS USE AND OCCUPANCY OF MOBILE HOME PARKS WAS FORTIFIED AND NEW RESTRICTIONS WERE PLACED ON CHANGING THOSE REGULATIONS. DEPOSIT REFUND REQUIREMENTS WERE STRENGTHENED AND LANDLORDS MUST NOT INTERRUPT ESSENTIAL SERVICES EXCEPT IN CONFORMANCE WITH STRICT GUIDELINES. MOBILE HOME DEALERS, INSTALLERS OR SALESMEN WERE PROHIBITED FROM RENTING OR LEASING VACANT MOBILE HOME LOTS UNLESS THEY WERE OCCUPIED WITHIN 60 DAYS BY A MOBILE HOME OCCUPIED BY THAT DEALER, INSTALLER OR SALESMAN.

AND FOUR YEARS AGO MANY OF THESE SAME PEOPLE PASSED A.B. 173, COMMONLY REFERRED TO AS THE FAIR RENTAL HOUSING ACT. THIS BILL REWROTE AND STRENGTHENED MANY PROVISIONS OF CHAPTER 118 IN CONNECTION WITH LANDLORD-TENANT RELATIONSHIPS INCLUDING REFUNDS OF DEPOSITS, RENTAL AGREEMENTS AND PROVISIONS TO BE INCLUDED THEREIN, MAINTENANCE OF DWELLING UNITS, PROVIDING OF ESSENTIAL SERVICES AND EVICTION PROCEEDINGS. MY POINT HERE IS THAT WE HAVE WORKED TOGETHER IN THE PAST. WE HAVE ACCOMPLISHED A GREAT DEAL AND WE MUST AGAIN. TIME SPENT ON A.B.

(P-1)

30 ALONE HAS BEEN AND IS AND MAY WELL CONTINUE TO BE A TREMENDOUS WASTE OF TIME AND ENERGY. LET'S GET ON TO SOLVING THE REAL PROBLEM. LET'S PROVIDE AFFORDABLE HOUSING FOR THOSE PEOPLE THAT NEED IT.

WE SHOULD BE TALKING ABOUT BILLS ALREADY BEING CONSIDERED BY THE LEGISLATURE TO SOLVE AT LEAST A PART OF THE PROBLEM OF AFFORDABLE HOUSING SUCH AS -

- A.B. 97
- AND 125 - ALLOWANCE OR DEFERALL TO LOW INCOME ELDERLY FOR A PORTION OF PROPERTY TAXES
- A.B. 131 - ASSISTANCE TO LOW INCOME ELDERLY IN OBTAINING INSULATION UP TO 25% OF COST
- A.B. 132 - ASSISTANCE TO LOW INCOME ELDERLY IN PAYING FOR ELECTRICITY AND FUEL
- A.B. 150 - ADDING MOBILE PARKS AND HOMES TO TYPES OF RESIDENTIAL HOUSING FINANCED UNDER NEVADA HOUSING LAWS
- A.C.R. 3 - URGING HOUSING DIVISION OF THE DEPARTMENT OF COMMERCE TO ACQUIRE LAND FROM GOVERNMENT AGENCIES AND SELL IT AT COST FOR THE PURPOSE OF DEVELOPING MOBILE HOME PARKS AT LOW AND MODERATE RENTAL LEVELS
- A.C.R. 4 - URGING LOCAL HOUSING AUTHORITIES TO PURSUE ADDITIONAL RENTAL ASSISTANCE UNDER THE U.S. HOUSING ACT
- A.J.R. 9 - URGING CONGRESS TO INCREASE THE AMOUNT OF RENTAL ASSISTANCE AVAILABLE, INCREASE THE RENT LIMIT ON MOBILE HOME SPACES, AND ALLOCATE MONEY SPECIFICALLY FOR MOBILE HOME SPACE RENTALS
- A.J.R. 19 - URGING CONGRESS TO MAKE MOBILE HOMES ELIGIBLE FOR LOANS UNDER THE U.S. HOUSING ACT OF 1937
- S.B. 197 - ALLOWANCE AGAINST PROPERTY TAX FOR SOLAR SYSTEMS

WE CHALLENGE REPRESENTATIVES OF THE MOBILE HOME PARK OWNERS LEAGUE TO JOIN WITH US TO PROMOTE THESE BILLS BY TALKING TO LEGISLATORS ABOUT PASSING THIS TYPE OF LEGISLATION - - AND FURTHER TO DIRECT OUR JOINT EFFORTS TOWARD INVESTIGATING FHA SECTION 203(b) WHICH WOULD ALLOW FEDERALLY ASSISTED FINANCING OF MOBILE HOMES AND MOBILE HOME LOTS; TO TALK TO OFFICIALS OF THE RENO HOUSING AUTHORITY AND CLARK COUNTY HOUSING AUTHORITY IN CONNECTION WITH SECTION 8 FINANCING AND GOVERNMENT SUBSIDIES AVAILABLE OR THAT MIGHT BE AVAILABLE TO PROVIDE AFFORDABLE HOUSING; TO HELP THE LAS VEGAS JAYCEES ON THEIR LOW COST MOBILE HOME PARK SINCE THE JAYCEES ARE ABOUT TO SECURE LAND FROM BLM, HOWEVER, HAVE BEEN FRUSTRATED AT THE LOCAL GOVERNMENT LEVEL. THEY NEED HELP! - - TO LOOK AT AND HELP WASHOE COUNTY'S ENTRY LEVEL HOUSING PROGRAM DESIGNED TO PROVIDE INCENTIVES TO LOCAL DEVELOPERS, BUILDERS AND FINANCIERS TO PROVIDE AFFORDABLE HOUSING IN WASHOE COUNTY AND TO FOLLOW CALIFORNIA'S LEAD IN A PROGRAM SIMILAR

EXHIBIT Q

GEORGE BODDIE

CITIZEN QUESTIONNAIRE RESULTS

The following represents the results of the questionnaire mailed to citizens of Assembly District 14 and will assist George Boddie in representing your views in the legislature.

	STRONGLY FAVOR	FAVOR	UNDECIDED	OPPOSE	STRONGLY OPPOSE
1. Question 6	1. 21%	10%	24%	21%	24%
2. MX missile system in Nevada	2. 16%	23%	15%	15%	31%
3. Mass transit system supported with taxes	3. 31%	26%	19%	13%	11%
4. Increased mobile home owner rights	4. 65%	21%	10%	3%	1%
5. Sex education in the schools	5. 25%	31%	18%	12%	14%
6. Keep other states' nuclear waste out of Nevada	6. 64%	11%	8%	8%	9%
7. Mandatory sentences for repeat felony offenders	7. 78%	14%	3%	1%	4%
8. Financial relief for seniors	8. 53%	35%	7%	2%	3%
9. State funding to assist our Metro Police	9. 32%	32%	16%	10%	10%
10. Additional funding for education programs	10. 21%	29%	24%	15%	11%
11. Additional funding for road and highway maintenance and construction	11. 24%	47%	20%	5%	4%
12. Eliminate impractical state auto emission controls	12. 64%	19%	7%	3%	7%



# POLL RESULTS

## EXHIBIT R

Government must always be the servant of the people and never their master. For that reason I appreciate your response to a recent survey I took in Assembly District 14. Your answers will be an important guide for me in Carson City and I thought You would like to know the results.

My campaign has enabled me to meet many, many good people. I am sorry that I didn't get to personally talk to all of you but you are always welcome to call or write me a note. Remember to vote, and thanks for your consideration.

Sincerely,

*Jan Stewart*

	Yes %	No %	Undecided %
1. Do you favor the legislative tax-cutting measure over question 6 which cuts taxes by constitutional amendment?	39	30	31
2. Do you believe taxes paid by our state's gaming industry should be raised?	50	32	18
3. Would you support returning a portion of the casino entertainment tax to the cities and counties in which it is generated?	90	5	5
4. Should taxes be used to improve the bus service in the Las Vegas Valley?	56	33	11
5. Would you support an increase in the state gasoline tax to pay for road construction and maintenance?	23	71	6
6. Do you consider air pollution to be a serious problem in Southern Nevada?	57	37	6
7. Did you favor the law requiring automobile emission inspections in Clark County?	34	60	6
8. Would you support a better auto inspection procedure?	67	24	9
9. Do you believe the MX missile system is vital to our nation's defense?	47	36	17
10. Do you support the location of the MX missile system in Nevada?	47	40	13
11. Do you favor allowing other states to continue their disposal of nuclear waste in Nevada?	17	75	8
12. Should federal lands in Nevada be placed under state control?	57	28	15
13. Do you favor splitting the Las Vegas Metropolitan Police Department into a city police department and a county sheriff's office?	18	73	9
14. Do you favor decriminalizing of the possession of small amounts of marijuana as some people have suggested?	32	62	6
15. Should speeding violations between 55 and 65 mph be recorded for insurance purposes?	19	75	6
16. Should state law require "no smoking" sections in restaurants and other public places?	56	38	6
17. Do you favor government-imposed limits upon rent in mobile home parks?	53	35	12
18. Should the minimum age for liquor and gaming be reduced to 18?	19	76	5
19. Do you think government welfare and social programs are effective?	10	78	12
20. Do you believe our courts are effective in bringing to justice those who commit crimes?	12	83	5
21. Do you think that too many people who are accused of crimes avoid being convicted because of technicalities?	85	12	3
22. Do you believe our police do a good job in solving crimes and arresting those who commit them?	64	25	11
23. Do you think our police are unduly hampered in their work by decisions of the United States Supreme Court?	69	20	11
24. Do you favor the elimination of all plea bargaining (reducing charges in a criminal case in exchange for a guilty plea)?	56	35	9
25. Do you believe prosecutors engage in too much plea bargaining?	82	8	10

JAN STEWART  
ASSEMBLYMAN  
2098 WINTERWOOD  
LAS VEGAS, NEVADA 89122

**DISTRICT 14 POLL RESULTS**

ECH 003  
THELMA M. CLARK  
2038 PALM STREET SPACE 253  
LAS VEGAS, NV 89104

Bulk Rate  
U.S. POSTAGE  
**PAID**  
Las Vegas, Nevada  
Permit No. 650

Manager Robert Stebbins Pres. of Boulder Park Assoc.

WE, THE UNDERSIGNED, TENANTS OF BOULDER CASCADE MOBILE HOME PARK, LOCATED AT 1601 SANDHILL ROAD, LAS VEGAS, NEVADA, DO HEREBY STATE THAT THE FOLLOWING STATEMENT IS TRUE.

AS TENANTS OF BOULDER CASCADES MOBILE HOME PARK, WE ADAMENTLY PROTEST THE AMOUNT OF THE RENT INCREASE GIVEN TO US TO BECOME EFFECTIVE MAY 1, 1981. WE DO NOT BELIEVE THAT THIS RENT INCREASE IS JUSTIFIED, NOR DOES IT PROVIDE ANY ADDITIONAL SERVICES OR AMENITIES TO QUALIFY FOR SUCH A RENT INCREASE.

Total 66 Residences.

MARCH 1, 1981

NAME	SPACE	AMOUNT OF RENT INC.	NEW RENT RATE
Jan Palani	258	33 <sup>00</sup>	229 <sup>00</sup>
Christina R. Crawford	284	33.00	229. <sup>00</sup>
Eleanor J. Dieborg	"		
Bette L. Patrick	259	33 <sup>00</sup>	229 <sup>00</sup>
Mary Keelel	253	33 <sup>00</sup>	229 <sup>00</sup>
Bud + Dolly Smith	23	30.00	208.00
Viviel + Jay Brevick	22	30.00	208.00
J. D. + Ruth Cruise	42	30.00	208.00
W + C Wright	39	30 <sup>00</sup>	208.00
Olida H. Moore	38	30 <sup>00</sup>	208.00
Esther Weinstein	102	18.00	189.00
Doris Robichaud	273	30.00	208.00
John Robichaud	273	30.00	208.00
Tom + Lois	18	30 <sup>00</sup>	208 <sup>00</sup>
R. Steadman	242	30 <sup>00</sup>	208 <sup>00</sup>
E. Baller	295	33.00	229.00
J. Chr.	5	33.00	229.00
Patricia Kelly	3	33.00	229. <sup>00</sup>
Caryl Shulenberg	175	40	236
<del>Pat + A.</del>			
Dow Skinner	210	30.00	208.00
Delores Skinner	210	30.00	208.00
Ellis + Kathryn Nowlan	209	30.00	208.00
Edward Rodusky	208	30.00	208.00
Lita Rodusky	208	30.00	208.00
Artha Valencic	180	30.00	208.00
Dora Valencic	180	30.00	208.00
Maria Mazzola	68	30.00	208.00
Maria Mazzola	68	30.00	208.00
Lillian Placet	43	30.00	208.00
Clarence D. Jankoski	269	30 <sup>00</sup>	208 <sup>00</sup>
Jennie Lou Roche	269	30 <sup>00</sup>	208

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MARCH 1, 1981

NAME	SPACE	AMOUNT OF RENT INC.	NEW RENT RATE
Clement La Roche	269	30	208
Chunna La Roche	269	30	208
Linda G. Smith	296	33	229
V. W. Bryant	52	18	189
Terrence C. Bryant	52	18	189
Lupe & Wagon	187	14	175
W. C. Schel	149	14	175
Mrs. Nauman	144	40	236
Mr & Mrs B. Nelson	141	40	236
Mr & Mrs B. F. Summers	245	30.	208.
Mr & Mrs W. Baker	297	33.00	229.
Mr & Mrs Allan S. Lindgren	6	33.00	229
Chas + Elizabeth Kline	171	40	236
Robert B. Porter	147	40	236
E. B. Bordenick	146	40	236.00
Mr & Mrs W. H. Smyth	142	40	236.00
Carl & Marie Kelnoski	45	33	229.00
Russell Smith	153	14	175.00
David Fealowitz	257	35	229.00
Kenneth Falkins	164	40	236.00
Carlton Parsons	176	40.	236.00
Louise Whelan	62	33	229.
Paul & Bob Porter	147	40	236
J. Feldman	292	18	189
Mr & Mrs R. C. Bird	229	30	208
Margie Vance	263	30	208
Evelyn Hou SKA	47	18	189
Maria Merrill	57	14	175.00
Irene M. Armstrong	86	14	175.00
Mr & Mrs Chas. Sheets	121	18	189.00
Mr & Mrs G. C. Casore	184	30.00	208.00



AB30

2/6/81

EXHIBIT T

I speak for the Mobile Home Owners League of the Silver State, who represent our members throughout the State of Nevada.

As members of this committee, I believe you are fully aware that there exist a serious economical condition in the mobile home parks, particularly because of the heavily populated number of elderly who make up the greater portion of the mobile home residents. We have provided a summary booklet that will give you an indepth view of mobile home statistics and related economics. I do not believe it is necessary that I take up your time and the short time allowed our organization to speak on AB 30, to elaborate any further in convincing this committee that we need help. I feel you already know this. We believe this has already been done.

We feel there is only one central issue to be decided upon by this committee, and that is - what will the impact be on the state and local communities if you release the state authority to legislate any form of rent regulation to the counties and cities?

The concern appears to be - will it stop future development of mobile home housing? Will it discourage future lending for the development of mobile home parks? And the greatest opposition seem to be coming from the apartment building faction and the related lending institutions. It is their fear, if you approve AB 30, and such help is allowed the mobile home owners in rental parks, it will eventually break over into the apartment sector.

First, in answer to future building of mobile home parks in Nevada. The builders and lenders cannot possibly be concerned about future development of mobile home parks. Because, as expertize in their field, they know that the future building rental mobile home parks is not probable. They know that the new parks build in the past twenty months in the Las Vegas area, have a 77% vacancy rate. They know that the rents are unaffordable for the average wage earner let alone the fixed income people. They

know that the reason these spaces are standing empty is due to high interest rates, and the difficulties of clearing credit for the new prospective buyer. Why, then in heavens name would these skilled professionals, argue for the right to continue to build unaffordable parks that are in trouble now.

Are these same lenders going to finance the buying of exiting parks that are full of for sale signs on the coaches, because the residents cannot pay the rent any longer? Won't these lenders question why there are vacancies that are in parks that had a zero vacancy ratio six months ago? No. I do not think these lenders are really arguing for the mobile home future development, because due to the unaffordability of mobile home rents, there is no future. What they are arguing about is that AB 30, would endanger a much bigger business that of apartment building.

Actually, will it threaten apartment housing. We say no, it will not, unless there is a need for such measures. It is understandable that this fear exists. because of the 28 states involved in rent<sup>m</sup> regulatory movements, twenty one of these states are zeroed in on apartment housing, not mobile home housing. Whether mobile home rent regulatory exist or not. If apartment rents become excessive as they have in mobile home parks, this action will begin, not by the work of the mobile home people, but by the apartment themselves. We question the assistance so kindly given by the apartment sector and lending institutions to the mobile home park owners. These apartment and lending investors, prefer that the rents continue to climb in mobile home living, because as these parks become more and more unaffordable, it lessens the possibility of any further rental parks being built, and will keep the mobile home sector from becoming a threat to apartment living. We do not believe that apartment investors only fear rent regulatory spreading to their housing, we also believe that if rents were kept within a reasonable

affordability to the general public, mobile home living would provided more parks, and would indeed become a threat to apartment investors. Lets look at the real estate assoc.s interest in they opposition to AB 30. Of course, they do not want rent regulatory in mobile home rental parks. They want the rents to be so high that first, new parks will not be built, and second, it will drive the estate mobile home park land so high that they will make great money on eastate park developments, when rental parks are no longer affordable.

No Gentlemen. What looks to be a simple enabling authority bill is by far grester consequence than it would have the little people believe. And in the middle of all this free interprise, none of these high powered business factions give a dam what happens to the 72,000 elderly, who are being slowly wiped by such speacil interest concerns.

Is it possible that those mobile home landlords, who have been so appreciative of the Fair Housing Coalition's help, have failed to ask themselves. If we continue with the rent increases and the elderly people continue to move out, can we replace those 72,000 with higer income people, or what if the NA fails to become a reality, where will we be if we have priced ourselves out of business. We may be a gambling state, but aren't the mobile home park owners taking a tremendous risk by pushing us out of their parks on such odds.

In closing, gentlemen, you know and we know, it is wrong to use the state's preemptive authority as a weapon of big interprise, and prevent the mobile home people from asking for help by the local governments.

We are asking that please pass AB 30. Do fail the delderly people who are depending you. Thank you.



EXHIBIT 4

*Shannon Zinn*

My name is Shannon Zinn, I live at 5900 E. Tropicana, Space 204, Las Vegas, Nev. Zip 89103.

I speak as President of the MHOHSC, which represents our members throughout the State of Nevada.

Gentlemen, it is said that mobile home people are asking for rent control in Nevada. I would like to advise you of one fact that contradicts this. Are you aware that our organization went before the Clark Commission in February of 1978, and asked for help with the then rising mobile home rents. In response they drafted a rent control ordinance, which was rent control in it's purest form. We refused to accept it because it was rent control. We asked that another ordinance be drafted that would be rent justification. We were later told that the county had no authority and we would have to go to the State to obtain this permission. If you accept the allegation that we ever intend to ask for rent control, you would be wrong.

I believe our prime purpose today, is to qualify why you should grant this enabling authority.

First, we have read the report submitted by the Las Vegas Community College, as requested by the Legislative Mobile Home Interim Study Comm. I ask that you consider when reading that survey, and our survey material, that you remember, our report is for Clark County, which has 46% of all the Nevada mobile home residents. Also our report was received from a greater percent of each park residents, which makes a great difference in the averages arrived at.

Also, we found it necessary to establish three classifications for the parks, due to the difference in the social standards and the economics, which effected the rate of rents and the incomes. This we have done in our report. I believe the greatest differences noted in both reports dealt with the number of elderly residents in the parks and the amount of the average incomes. We would adamantly challenge both computations. Perhaps, the difference would be due to the Community's College including the North.

Our survey revealed a 13% figure for Clark County mobile home owners living in rental parks. This is addressed in our report on page 5. We have researched what the costs would be if, as suggested by the opposition to AB 30, low income parks would be provided and additional Section 8 rental subsistence. As you can see, a few hundred spaces would not relieve the overall problem for those mobile home people in the critical income level. We are not unappreciative of any help offered, but it would be unrealistic to depend on low income parks and additional Section 8 rental subsistence. We would need 2417 spaces in Clark County to provide the relief needed, this would cost a total of \$19,336,000 for developing costs and additional allocation of Section 8, in the amount of \$2,592,740 per year. I am sure in these times this is an impossibility. Our survey indicated that this critical level would increase by 5% a year.

We also do not believe that future development of mobile home parks, that would provide competition by changing the supply and demand is any longer a possibility. We have addressed this problem on page 4 of our summary. Of seven parks built during 1979 and 1980, one park was built with HUD funds. This park has rents that are affordable. The park, after 20 months, now has only 14 vacant spaces. The remainder parks, built by the private sector, during the same period, and having the advantage of being closer to the Las Vegas proper, have a 77% vacancy. The reason for this is that their rents are unaffordable, and the prospective renters are unable to meet the credit requirements due to high rent and mortgage costs. Along with this problem, there is a problem in the existing parks. Hundreds of for sale signs are appearing in parks, and also space vacancies, due to the excessive amount of the rent increases, and inability of the people to pay the rents. In most instances, it is the elderly on fixed incomes who are being forced to sell and find less expensive housing. I don't believe we are being illogical when we say, that future development is the major factor any longer in mobile home parks. The problem now is simple. It

unaffordability. This is also being proven, by the fact that 14 parks that were zoned for rental mobile home parks, have applied for a change of zoning to another classification. Inquiry of why those rental zoned parks have not been built during this past year, advises that even if they want to develop the new parks, they developers cannot get the lending of the funds.

In 1979, we were told that the legislators would not grant the enabling authority, because the Clark County had 3500 spaces approved. Also, the landlords were told to ease up on the rent increases unless they wanted to see rent regulatory mandates in 1981. In our report, we have shown that instead of do this, the rent increases have become higher. Our report on page 3, Section 9, shows that the Medium standard parks, where the greater percentage of the elderly reside had the greatest amount of rent increase. It is also this classification that will be hurt the greatest if the new tax system goes into effect in 1982.

Truthfully, we <sup>believe</sup> do not any proposed resolutions have been offered that will correct the mobile home rental problems, other than the approving of AB 30. The approving of this bill does not mandate rent regulation. All it does is to open the door to negotiation that can be met on a day to day, or month to month basis. By doing so, we will not be locked in without any alternative. We feel this is of upper most importance if the MK is to become a reality. We do not know what will be done if we have the right to deal with this problem on the local level. But we want the right to do something. I believe, that there is a place of negotiation between the landlords and the tenants.

Isn't it time that mobile home people be given a different status than the work tenant. Isn't that mobile home owner more than a tenant, when he owns his dwelling. Would not it be fair to consider that we are in the truth partners in a mobile home park. We invest in a mobile home park. We do this by paying high moving costs. We maintain our own spaces at our costs. Without the tenant, or I prefer the work the resident, would the

*Handwritten:* Earl Pomer have

vialbe business? Is it not time to give owner of his own home a higher status than an apartment tenant. It not time to recognize that we are not just tenants, but home owners and be treated like home owners. There was time when a mobile home park owner acknowledged that he only rents the land to the resident, not the dwelling. *Handwritten:* He is not an apartment owner. I would ask that you note Page 6. and you will find that as a mobile home owner only renting the land, we pay much higher rent than apartment people do for the same comparable housing.

I firmly believe, that one of the greatest problems in mobile home living is that mobile home owners, are not trailer owners and feel that as a home owner, they should be treated as such, and in contrast the landlord and park managers still have the attitude that they are just tenants, even if they actually have a greater investment collectively then the landlord has.

We believe that if you give us the chance to deal with our rent problems, we can do so without destroying the mobile home industry. We feel in the end result, this legislation may be the only move that will salvage the continuation of mobile home living. We fervently urge you to give us this chance.