

# **Bond Case Briefs**

*Municipal Finance Law Since 1971*

---

## **RENT CONTROL - CALIFORNIA**

### **Western Manufactured Housing Communities Association v. City of Santa Rosa**

**Court of Appeal, First District, Division 4, California - April 17, 2026 - Cal.Rptr.3d - 2026 WL 1045608**

Nonprofit organization promoting manufactured home community interests and mobilehome park owner brought action against city, its department of housing and community services, and department's interim director, seeking a declaration that city's rent-control ordinance authorized an automatic annual rent increase on mobilehome spaces in city and state price-gouging statute did not suspend or otherwise affect the operation of ordinance during a state of emergency and a declaration that if statute limited operation of local ordinance during a state of emergency, then once the state of emergency expired, park owners were entitled to fully recoup all rental increases otherwise authorized by the local ordinance but denied by the city based on statute.

The Superior Court granted defendants' motion for summary adjudication, denied plaintiffs' motion for summary adjudication, and granted defendants' motion for summary judgment. Plaintiffs appealed.

The Court of Appeal held that:

- Phrase "the amount authorized under the local rent control ordinance" in definition of rental price in price-gouging statute refers to the amount authorized at the time the declaration of emergency took effect;
- Provision of price-gouging statute stating that statute does not preempt any local ordinance prohibiting the same or similar conduct did not allow for city's rent-control ordinance to govern in lieu of provision of statute prohibiting an increase in the rental price of a mobilehome space of more than 10% during a declared state of emergency;
- Mobilehome park owners were not entitled, once state of emergency expired, to recoup all rental increases otherwise authorized by local ordinance but denied based on price-gouging statute; and
- Trial court was not empowered to act on argument that interaction of price-gouging statute and rent control ordinance produced result that was unfair to mobilehome park owners.