

July 6, 2022

Joint Judiciary Committee Meeting. Scheduled for July 8, 2022.

Submission by Ann Z. Cox, Comstock Mobile Home Park resident of 16 years. The park is a senior park located at 2601 E. College Parkway, CC, zip code 89706. The park is owned by the Allen Family and an Allen Trust.

Background Information:

Submitted to the Legislative Counsel Bureau on February 2, 2017. Prepared by Nevada Association of Counties, 304 South Minnesota Street, Carson City, NV 89703 the following;

Introduction: During the 2015 session of the Nevada Legislature, Senate Bill 29 became law. SB29 grants counties limited functional home rule, that is, a limited form of the authority to pass ordinances and act upon matters of local concern that are not otherwise governed by state or federal laws.

Of note: this writer finds evidence of SB 29 created but following that, no action except for salvage rights granted to DMV.

To state my request for a rent stabilization in Nevada senior parks, I submit the following:

The residents of Comstock Mobile Home Park have again (on July 1) been given notice that their space rent will be increased in 90 days (October 1, 2022). The park has 260 paying spaces of various sizes and assorted lot-size rental fees. The lowest single-wide rent is \$555.00, the highest is on Gold Leaf Lane at \$600.00 presently. There is also family income from corner spaces and RV storage.

Of importance: Every two years the Allen Family has raised the space rent. This time the raise was only 21 months from the last raise. This raise equates to a raise of \$70.00 per space in 21 months.

Comstock Mobile Park is filled with seniors who will suffer an increased burden with yet another rental raise. The only authority at present who receives complaints and gathers information from around Nevada is the Department of Business and Industry, NV Housing Division, 1830 College Parkway, Suite 120, CC, zip 89706. The staff at that agency (and from their referrals in Las Vegas) is very helpful but the staff has always told me there is no Nevada Revised Statute. And because of that we cannot help you with any rent control.

We cannot stop the owners from raising the rent at any time, and in any amount! The owners of mobile home parks/RV parks can raise the rent to whatever they wish, whenever they wish! We have heard that our raises are similar to other parks. However, that only means that seniors in many cases are also experiencing financial hardship. In researching this financial issue, the writer has found similar raised rents, many very large increases, in all senior residential parks. Those would include RV parks by description. In all of these cases, it was found that most seniors are existing on social security funds and occasionally, a small retirement fund, as their only sources of income. Subsidies are available but they are humiliating in their nature and are only used in extreme cases.

I believe it is a fair economic request by Nevada seniors, to request a senior (60 and above) rent stabilization statute. This help for seniors would be very welcome during these troubling financial times. Be it noted, many seniors fall under the national poverty rate.

Also of note: any kind of “home rule” granted in 2015 under SB 29 was in effect, it has not stopped the Allen Family/Trust from raising Comstock space rents! **I can see no action by procedure, or rules (even Home Rules under SP 29), that has stopped these raises every two years.**

And so, I request action to immediately submit a Home Rule Order (or other order or bill) limiting Carson City/and Nevada mobile home, and RV park owners to hold the present rates (as of July, 2022) for the next 36 months. And, further, after the 36 months, that any rental raises be limited to .03% (three per cent) per each of the following 24 months. Let this bill be known as the Rent Stabilization Program.

I can expect most of the Nevada mobile home and RV park owners to come forth to complain. I truly believe in capitalism and their rights to a decent profit, however, by my calculation these parks' yearly proceeds push the limit on DECENT PROFIT. I believe seniors need protection and relief from a fractured economy, and they need it now, please.

Respectfully submitted, Ann Z Cox, JD
Resident in Comstock Mobile Home Park, CC, 89706