SENATE JUDICIARY COMMITTEE
Senator Thomas Umberg, Chair
2023-2024 Regular Session

SB 1190 (Laird)
Version: March 18, 2024
Hearing Date: April 23, 2024
Fiscal: No
Urgency: No
ID

SUBJECT

Mobilehomes: solar energy systems

DIGEST

This bill prohibits a mobilehome park from prohibiting or restricting the installation and use of solar energy systems on mobilehomes or their lots, as specified.

EXECUTIVE SUMMARY

Global warming is an incontrovertible fact. One solution for combating global warming is to transition the state's energy grid to renewable energy sources like solar energy. Solar energy systems have become increasingly popular and common for homeowners as a way of combating global warming and decreasing their energy costs. However, as the state and many of its residents move to sustainable practices and renewable energy, mobilehome owners have found themselves impeded from installing solar panel arrays on their mobilehomes or mobilehome sites by the management of the mobilehome park in which their mobilehome sits. To ensure that mobilehome owners who wish to can install and use solar energy systems for their mobilehomes, this bill prohibits mobilehome park management from prohibiting or restricting the installation and use of solar energy systems, and prohibits various specific acts by park management. This bill includes an exception for reasonable restrictions, as defined, and exempts mobilehome parks that rely on a master-meter system to provide residents electricity. This bill provides that an entity that willfully violates its sections is liable to an applicant mobilehome owner for actual damages, and a $1,000 civil penalty. In any action brought to enforce this bill's provisions, the prevailing party is entitled to receive attorney's fees.

This bill is sponsored by the Golden State Manufactured-Home Owners League, Inc. The Committee has received no timely opposition.

PROPOSED CHANGES TO THE LAW

Existing law:

1) Creates the Mobilehome Residency Law (MRL) to regulate the relationship between mobilehome park management and park residents, and establish various rights, responsibilities, and limits of both groups. (Civ. Code § 798 *et seq.*).

2) Requires that the rental agreement between a mobilehome owner and the mobilehome park be in writing and contain specified provisions, including the rules and the regulations of the park. (Civ. Code § 798.15.)

3) Specifies the procedures that a park must follow to change the park rules and regulations, requiring that park management meet and consult with the homeowners in the park after written notice is provided to all homeowners at least 10 days before the meeting. Provides that amendments can be implemented with the consent of the homeowner, or without the homeowner's consent upon written notice of at least six months, unless the amendments are applicable to recreational facilities, which may be amended without homeowner consent upon written notice of 60 days. (Civ. Code § 798.25.)

4) Specifies that mobilehome owners, residents, and guests must comply with the rental agreement, and any reasonable rule or regulation of the park that is part of the agreement. (Civ. Code § 798.56.)

5) Specifies that a mobilehome park may only evict a resident for: failing to comply with a local or state law or regulation on mobilehomes within a reasonable time after the homeowner receives notice of noncompliance; conduct of the resident that amounts to a substantial annoyance of other homeowners or residents; conviction for certain crimes; failure to comply with a reasonable rule of the park; or for nonpayment of rent, utilities, or other reasonable incidental services charged by the park. (Civ. Code § 798.56.)

6) Establishes the Mobilehome Parks Act (MPA) to prescribe standards and requirements for construction, maintenance, occupancy, use, and design of mobilehome and mobilehome parks to guarantee park residents maximum protection of their investment and a decent living environment. Provides the Department of Housing and Community Development (HCD) with authority over enforcement of the MPA, and requires HCD to inspect five percent of state mobilehome parks for violations annually. (Health & Saf. Code § 18400 *et seq.*)

7) Establishes the Mobilehome Residency Law Protection Program (MRLPP) within HCD to receive complaints from mobilehome park residents regarding violations of

the MRL and refer certain, meritorious valid complaints to a Legal Service Provider or appropriate enforcement agency. (Health & Saf. Code § 18800 *et seq.*).

This bill:

1) Makes any covenant, restriction, or condition contained in any rental agreement between the mobilehome park and mobilehome owner or other instrument affecting the tenancy that effectively prohibits or restricts the installation or use of a solar energy system on the mobilehome or the site, lot, or space on which the mobilehome is located, void and unenforceable.

2) Prohibits mobilehome park management from prohibiting or restricting a mobilehome owner or resident from installing or using a solar energy system on a mobilehome or the site, lot, or space on which the mobilehome rests, and prohibits management from:
    a) charging any fee on a mobilehome owner or resident in connection with the installation of use of a solar energy system;
    b) requiring a mobilehome owner or resident to use a specific solar installation contractor or solar energy system or product; or
    c) claiming or receiving any rebate, credit, or commission in connection with a homeowner or resident's installation or use of a solar energy system.

3) Specifies that its sections do not prohibit reasonable restrictions on solar energy systems, though it is the policy of the state to promote and encourage the use of solar energy systems and to remove obstacles to solar use.

4) Requires that permissible reasonable restrictions are those that do not significantly increase the cost of the system or significantly decrease its efficiency or specified performance, or that allow for an alternative system of comparable cost, efficiency, and energy conservation benefits.

5) Defines "solar energy system" as it is defined in Section 801.5(a)(1)-(2), and requires that a solar energy system:
    a) meet all applicable health and safety standards and requirements imposed by state and local permitting authorities, consistent with Government Code Section 65850.5;
    b) if the solar energy system or solar collector is used for heating water, be certified by an accredited listing agency as defined in the California Plumbing and Mechanical Codes;
    c) meet all applicable safety and performance standards established by the California Electrical Code, Institute of Electrical and Electronics Engineers, and accredited testing laboratories such as Underwriters Laboratories, and if applicable, safety and reliability rules of the Public Utilities Commission.

6) Exempts from its provisions any mobilehome park that is a master-meter park, as defined in Public Utilities Code Section 739.5.

7) Provides that any entity that willfully violates the above sections is liable to the mobilehome owner, resident, or other party for actual damages caused by the violation, and requires such violator to pay a civil penalty of up to $1,000 to the homeowner, resident, or other party.

8) Provides that, in any civil action to enforce the provisions of this bill, the prevailing party shall be awarded reasonable attorney's fees.

COMMENTS

1. Author's statement

According to the author:

> California is a leader in the transition to renewable energy sources. This includes solar adoption, and for decades the state has made it a point to remove barriers limiting the installation and use of solar energy systems. Despite the state's commitment to promoting the use of solar, there has been no consensus when it comes to whether mobilehome owners can install and use a solar energy system, and some parks have blocked the installation and use of solar in spite of a mobilehome's capability to support solar infrastructure.
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> Senate Bill 1190 strikes a balance to ensure that residents have the right to install a solar energy system on their mobilehome, if certain requirements are met, including that the park not be on a master meter system, while also adding reasonable restrictions that guarantee the safety of park residents and limit onerous responsibilities placed on park management. Mobilehome owners should not be arbitrarily restricted from installing solar on their own homes.

2. California's mobilehome parks and their residents

There are an estimated 508,589 mobilehome units in California.[1] Mobilehomes are pre-fabricated homes that are designed to be able to be transported and moved between locations. Thus, mobilehomes are unique among all residential options. However, while they are technically mobile, it often requires a significant amount of time, effort, and money to actually move a mobilehome. Costs for moving a mobilehome range from a few thousand to tens of thousands of dollars. Mobilehomes are also unique because many mobilehome residents own their mobilehome, but lease the land upon which

[1] U.S. Census Bureau, 2021 American Community Survey 1-Year Estimates (2021), available at https://data.census.gov/.

their home is located from a mobilehome park. The mobilehome sits on a lot within a park of mobilehomes and common space. The mobilehome park and the lots on which the mobilehomes sit are usually privately owned and managed by a mobilehome park company.

Under this relationship, while residents technically own their mobilehome, they pay rent to the park management, are subject to the rules of the mobilehome park set by the ownership of the park, and they often rely on the park for the provision of utilities. If they fall behind on their rent payments to the park for their mobilehome's lot, or if they violate a rule of the park, they can be evicted from the park. Considering they may have paid considerable amounts of money to buy the mobilehome that they can no longer live in, they could lose the equity they've accumulated in their mobilehome upon eviction by the park, either by having to sell the mobilehome quickly, or spending thousands of dollars to move their mobilehome elsewhere.

While most mobilehome parks owned by a private company separate from the mobilehome owners, some mobilehome parks are organized in arrangements where the mobilehome residents and owners are part-owners of the entire park. These arrangements include a subdivision of mobilehomes, a cooperative, a condominium for mobilehomes, and resident-owned mobilehome parks.

Mobilehome residents in California tend to be poorer and older than the average California renter, for which mobilehome ownership is an important option for affordable housing. In fact, the median price of a mobilehome in 2022 was $82,600, making mobilehome ownership one of the most significant, un-subsidized sources of affordable housing.[2] While mobilehome park residents are generally older than the general population, there are still many young and middle-aged individuals and families living in mobilehome parks. As housing in California continues to become more expensive, mobilehomes will likely become attractive options for low-income Californians of all ages looking for affordable home ownership.

3. The laws that regulate mobilehome parks

In light of the unique nature of mobilehome parks and issues, the Legislature passed the Mobilehome Residency Law (MRL) in 1978 to regulate the relationship between mobilehome park management and park residents, and establish various rights, responsibilities and limits of both groups. (Civ. Code § 798 *et seq.*) Over time, the MRL has been amended to include additional protections for residents and limits on charges mobilehome parks can bill residents.

[2] U.S. Census Bureau, Manufactured Housing Survey (Jun. 2022), available at https://www.census.gov/data/tables/time-series/econ/mhs/annual-data.html.

The MRL covers a variety of areas, including: permissible rental and lease contract terms; permissible park rules and mandatory notices to residents; limits on fees and charges, as well as increases to them; and conditions and limits related to mobilehome park evictions. The MRL also requires that the rules and the regulations of the park be included in the rental agreement for the mobilehome site, and specifies the procedures that a park must follow to change the park rules. (Civ. Code § 798.15.) Mobilehome owners, residents, and guests must comply with the rental agreement, and any reasonable rule or regulation of the park that are part of the agreement. (Civ. Code § 798.56.) Not complying with these rules, or applicable local ordinances or state laws and regulations relating to mobilehomes can be grounds for eviction from the park. The provision of the MRL relating to eviction specifies that a park may evict a resident only for: failing to comply with a local or state law or regulation on mobilehomes within a reasonable time after the homeowner receives notice of noncompliance; conduct of the resident that amounts to a substantial annoyance of other homeowners or residents; conviction of certain crimes; failure to comply with a reasonable rule of the park; or for nonpayment of rent, utilities, or another reasonable incidental service charged by the park. (Civ. Code § 798.56.) Additionally, a mobilehome owner may not make improvement or alterations to their space or home without following the rules and regulations of the park, and all applicable local ordinances and state laws and regulations relating to the improvement or construction, including any that require obtaining a permit. (Civ. Code § 798.56.) If the park rules require it, a mobilehome owner may have to obtain prior written approval from the park management for any alterations or improvements. (*Id.*)

One of the other subjects addressed by the MRL are utilities. Mobilehome parks can provide utilities to their residents in a number of ways, such as by allowing the utility to provide the utilities directly to the mobilehome, or by acting as a master-meter providing submetered service. In the master-meter arrangement, the mobilehome park contracts with the utility company and pays for the utilities, and then manages the distribution and metering of the utilities to residents and bills their residents separately for the service. The MRL places limitations and rules on how the park can provide master-meter services, and the types and size of charges they can charge residents for utilities services. (Civ. Code §§ 798.40-798.44.)

The Department of Housing and Community Development (HCD) is the agency that oversees a variety of areas of the MRL, including health and safety standards, the registration and titling of mobilehomes and parks, and the inspections of parks for health and safety issues. Under the Mobilehome Parks Act, HCD must annually inspect five percent of parks for compliance with health and safety requirements under the Health and Safety Code, and must accept and respond to health and safety complaints. (Cal. Health & Safety Code §§ 18200-18700.) HCD also houses the Mobilehome Ombudsman, who assists the public with questions or issues related to various aspects of mobilehome law. However, neither HCD nor the ombudsman have enforcement authority for the MRL, and cannot provide legal advice or arbitrate or mediate park

disputes. Instead, residents and mobilehome owners must go to court over a violation of the MRL. In 2018, the Mobilehome Residency Law Protection Program was created to help mobilehome park residents better resolve issues and violations of the MRL (AB 3066, Stone, Ch. 744, Stats. 2018.) The program requires HCD to receive complaints from mobilehome park residents regarding violations of the MRL and refer certain, meritorious complaints to a Legal Service Provider or appropriate enforcement agency.

4. California must transition to renewable energy to combat global warming

It is incontrovertible that man-made climate change is occurring. Models project that the state will continue to warm over the twenty-first century, with an estimate of an increase in annual average maximum daily temperature of at least 2.5 degrees Fahrenheit by 2039 and between 4.4 and 5.8 degrees Fahrenheit by 2069.[3] The primary contributor to global warming has been greenhouse gases, a group of gases that, when added to the atmosphere, act to trap in the atmosphere heat that would otherwise radiate into space. The more greenhouse gases that are present in the atmosphere, the more heat is trapped in Earth's atmosphere, thereby resulting in higher global temperatures. As the California's climate continues to warm, the state and its residents are and will be severely affected through a myriad of ways, including through coastal flooding and erosion, environmental destruction through saltwater contamination, decreased water supply and increased drought, a greater risk of significant wildfires, more frequent hazardous weather and pollution, habitat destruction, increased illness and death from extreme weather events, and increased costs due to these impacts and climate change mitigation efforts.[4]

In light of the reality of climate change and its dire consequences for California, the state has taken a variety of steps to decrease greenhouse gas emissions and combat climate change. In 2006, the Legislature passed AB 32 (Nuñez, Ch. 488, Stats. 2006) ambitiously requiring California to reduce its overall greenhouse gas emissions to 40 percent below 1990 levels by 2030. In 2022, the Legislature passed AB 1279 (Muratsuchi, Ch. 337, Stats. 2022), upping this reduction by requiring the state to achieve net negative emissions by 2024 and reduce statewide greenhouse gas emissions by 85 percent by 2045. The state also has instituted a cap-and-trade program requiring power plants and other facilities to buy and trade greenhouse gas emissions allowances to meet overall emissions reductions, a variety of programs and standards to reduce greenhouse gas emissions from vehicles, and a number of other initiatives aimed at reducing the state's greenhouse gas emissions.

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[3] Louise Bedsworth et al., California's Fourth Climate Change Assessment: Statewide Summary Report (California Natural Resources Agency 2018) p. 23.
[4] Office of the Attorney General, Climate Change Impacts in California <https://oag.ca.gov/environment/impact#:~:text=Sea%20level%20rise%2C%20coastal%20flooding,the%20end%20of%20the%20century> (as of March 18, 2024).

One of the solutions to combating climate change is to green our energy grid by transitioning from greenhouse gas-causing sources of energy, like fossil-fuel burning, to renewable sources of energy, like wind and solar. This is because greenhouse gas emissions from the energy sector account for 25 percent of total annual greenhouse gas emissions in the United States.[5] Unlike other sources of energy, wind and solar energy do not produce the greenhouse gases that contribute to global warming. Considering this, a significant push has been made by the state and environmental groups over the last decade or so to phase out greenhouse gas-emitting sources of energy and expand the state's capacity for renewable energy. This has included the promotion of the use of solar, either as power plants or as sources of power for individual homes and buildings as solar arrays on the building's roof or nearby land. Promoting and expanding the use of solar and other renewable energy sources continues to be an important strategy for the state for combating global warming.[6]

5. SB 1190 ensures that California's mobilehome owners can transition to solar energy

Many Californians across the state, taking advantage of the state's abundant supply of year-round sunlight, have moved to solar power for their homes. Solar panel arrays are usually placed on a home's roof, and when in operation can produce all or most of the home's electricity needs. In fact, solar arrays can sometimes produce more electricity than can be consumed by the home, resulting in added electricity going back into the power grid, for which residents with solar receive a credit from their electrical utility company. Thus, converting to solar on a residential home can help meet the state's goals on renewable energy and reducing greenhouse gases, while also potentially resulting in lower energy costs for the resident.

However, in the mobilehome context, the author asserts that many mobilehome owners wishing to make the move to solar have been prevented from doing so by the management of their mobilehome park. According to the author, mobilehome owners report going through the process to obtain the requisite permits needed from the city to install solar panels on their mobilehome, only to have the park management deny their request to install the solar panels on their mobilehome. In another example, the author states that a mobilehome owner obtained the permits for solar panels, believed they could install them, and then were ordered to remove them by the park management after they had been installed. While it is not clear exactly why in all instances park management denied requests to install solar panels, at least one instance involved a park claiming that the solar panels would not be aesthetically appropriate for the park.

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[5] United States Environmental Protection Agency, Sources of Greenhouse Gas Emissions (Feb. 23, 2024), available at https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions#electricity.
[6] California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality (Dec. 2022), Executive Summary p. 1, available at https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents.

Considering these issues, and the importance of transitioning to a greener economy, SB 1190 aims to ensure that mobilehome owners who wish to install solar panels on their homes and go through the requisite permitting process can do so, and cannot be prevented by the mobilehome park management from installing solar on their homes. It does so by making any covenant, restriction, or condition in a rental agreement between a mobilehome owner or resident and the mobilehome park that effectively prohibits or restricts the installation or use of a solar energy system on the mobilehome, site, lot, or space on which the mobilehome is located as void and unenforceable. This provision would act to ensure that if a mobilehome park enacts a rule that prohibits or restricts the installation of solar panels, the park would not be able to enforce or rely on such a rule. Such a rule, if violated by a mobilehome owner or resident, could not be the basis for an eviction either, as it would be void under the provisions of SB 1190.

In addition, SB 1190 specifically prohibits mobilehome park management from restricting or prohibiting the installation or use of solar panels on a mobilehome or site, and prohibits the following acts: charging a fee to the homeowner or resident in connection with the installation or use of a solar energy system; requiring a homeowner or resident to use a specific solar installation contractor or solar energy system or product; or claiming or receiving any rebate, credit, or commission in connection with a homeowner or resident's installation or use of solar. Thus, SB 1190 makes void and unenforceable any mobilehome park rule that acts to prohibit or restrict the installation or use of solar, and also prohibits a mobilehome park management from taking actions that prohibit or restrict the installation or use of solar as well. Both of the prohibitions in SB 1190 apply both to mobilehome parks where the park is owned by a company, and to mobilehome parks that are owned and governed as a cooperative, subdivision or condominium of mobilehomes, or a resident-owned mobilehome park.

SB 1190 has some exceptions and qualifications. It specifies that reasonable restrictions on solar systems are not prohibited, as long as they do not significantly increase the cost of the system or significantly decrease its efficiency or specified performance, or else that they allow for an alternative system of comparable cost, efficiency, and energy conservation benefits. It also specifies that a solar energy system must still meet all applicable health and safety standards and requirements, and all safety and performance standards. If the solar system is used for heating water, it must be certified by an accredited listing agency as defined in the Plumbing and Mechanical codes. In addition to these qualifications, SB 1190 specifically exempts mobilehome parks that utilize a master-meter system.

SB 1190's provisions are not entirely novel. In 1978, the Legislature enacted the Solar Rights Act of 1978, which established a homeowner's right to install a solar energy system in a common interest development by limiting the ability of the homeowner's association that governs the common interest development to prohibit such an installation. (AB 3250 (Levine, Ch. 1154, Stats. 1978).) Much of the language of SB 1190 mirrors the language added to the Civil Code under the Solar Rights Act of 1978. (*See*

Civ. Code § 714.) Where the Legislature previously enacted guarantees to the right to install solar for homes in a common interest development, SB 1190 is extending similar protections to owners of mobilehomes with regard to the governing bodies of the mobilehome park.

Considering SB 1190 potentially makes void and unenforceable provisions of a mobilehome resident's rental agreement, the bill may implicate the Contracts Clause of the U.S. and California Constitutions. The Contracts Clause of the U.S. Constitution provides that "[n]o state shall … pass any Law impairing the Obligation of Contracts." (U.S. Const. Art. I, § 10, cl. 1). This provision prohibits state governments from passing laws that infringe upon contracts, though it is firmly established that this prohibition only applies if a state or local law interferes with an existing contract.[7] The California Constitution, similarly, declares that "[a]… law impairing the obligation of contracts may not be passed." (Cal. Const., art. 1, § 9.) Because the two provisions are parallel, the same legal analysis applies to both. (*Campanelli v. Allstate Life Ins. Co.* (9th Cir. 2003) 322 F.3d 1086, 1097, citing *Calfarm Ins. Co. v. Deukmejian* (1989) 48 Cal.3d 805.)

Though the contract clauses speak in absolute terms, courts have long held that they do not in fact prohibit all state action that results in the modification of a contract. (*Lyon v. Flournoy* (1969) 271 Cal.App.2d 774, 782.) Instead, under current U.S. Supreme Court precedent, whether a state law violates the Contracts Clause must be determined through a two-step test. The threshold question is whether the state law operates as a "substantial impairment of a contractual relationship." (*Energy Reserves Group v. Kansas Power & Light* (1983 U.S. 400, 411.) If not, the state law does not violate the Contracts Clause. If so, then the state law may still be constitutional if it is drawn in an "appropriate" and "reasonable" way to advance "a significant and legitimate public purpose." (*Id*. at 411.) In that case, the Court upheld a Kansas law that prohibited the price to be paid for natural gas under a contract from being increased because of prices set by federal authorities, in conflict with contracts that specified that the price would be increased if federal regulators fixed a higher price. Thus, the Contracts Clause does not prohibit interference with a contract in all circumstances; even a contract that does interfere with a contract may still be constitutional if the second two factors in the *Energy Reserves Group* are met.

In the case of this bill's provisions, the provisions may well not be a substantial impairment of the contractual relationship, since it would only apply to the specific provision of the agreement that prohibits or restricts solar, and only to the extent that that agreement provision prohibits or restricts the resident's installation or use of solar. If it was determined nonetheless that such a provision substantially impairs the contractual relationship, the bill would likely meet the second two prongs of the Contracts Clause test, because the bill's provisions appropriately target mobilehome park rules only to the extent that they prohibit or restrict solar, and the state has a

[7] *See*, Erwin Chemerinsky, Constitutional Law: Principles and Policies (5th Ed., 2015) p. 657/

significant and legitimate public policy interest in protecting mobilehome residents' rights and promoting green technologies that combat global warming.

6. SB 1190 will be enforced through the courts

Like all provisions of the MRL, as previously noted, the provisions of this bill would be enforceable by an aggrieved party through a civil cause of action. This means that, if a mobilehome park were to prohibit a mobilehome owner from installing or using solar, or were to engage in one of the prohibited actions under SB 1190, the mobilehome owner could sue the park in court to prevent it from being able to enforce its unlawful rule or engage in the act prohibited by this bill. They could also obtain damages, if an act or rule prohibited by this act resulted in actual damages for the mobilehome owner. Additionally, SB 1190 includes provisions requiring an entity that violated its provisions to pay a civil penalty to the applicant or other party in an amount of up to $1,000. In any action to enforce compliance with the provisions of this bill, the prevailing party is entitled to reasonable attorney's fees. This means that, if a mobilehome owner prevails in a claim that a park violated the provisions of SB 1190, they could recover their attorney's fees, but also that, if the plaintiff mobilehome owner fails to prove the park violated SB 1190's prohibitions, the owner could be liable for the park's attorney's fees as well. Through these measures, an aggrieved mobilehome owner is provided an avenue for redress and enforcement.

7. Arguments in support

According to the Golden State Manufactured-Home Owners League, Inc., the sponsor of SB 1190:

> Currently, the MRL is silent on access, installation, or the use of solar energy systems in mobilehome parks. This has caused inconsistent interpretations and allowed some park owners to block mobilehome residents from installing solar energy systems, which could offset monthly utility bills for residents who are on fixed or modest incomes.
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> SB 1190 would amend the existing Civil Code to ensure mobilehome homeowners or residents, not living in a master-metered park, are not prevented from installing and using solar energy systems. The bill would also prohibit mobilehome parks from charging any fee in connection with the installation or use of the solar energy system; require the use of a specific solar installation contractor or solar energy system or product; or claim or receive any rebate, credit or commission in connection with the installation or use of the solar energy system.

SUPPORT

Golden State Manufactured-Home Owners League, Inc. (sponsor)

OPPOSITION

None received

RELATED LEGISLATION

Pending Legislation: AB 1132 (Friedman, Ch. 357, Stats. 2023) extends until January 1, 2034, the permit fees and limits on such fees that a city or county may charge for a residential or commercial solar energy system.

Prior Legislation:

AB 318 (Addis, Ch. 736, Stats. 2023) extended the Mobilehome Residency Law Protection Program administered by HCD until January 1, 2027, and made various changes to the requirements of eligible mobilehome resident complaints and the process for the referral of such complaints to appropriate legal services providers or enforcement agencies.

AB 3066 (Stone, Ch. 774, Stats. 2018) established the Mobilehome Residency Law Protection Act.

AB 3250 (Levine, Ch. 1154, Stats. 1978) enacted the Solar Rights Act of 1978, which established a homeowner's right to install a solar energy system in a common interest development by limiting the ability of the homeowner's association that governs the common interest development to prohibit such an installation.

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