City of Huntington Beach Planning and Building Department

STUDY SESSION REPORT

TO: Planning Commission
FROM: Scott Hess, AICP, Director of Planning and Building
BY: Jennifer Villasenor, Senior Planner
DATE: March 22, 2011

SUBJECT: **TENTATIVE TRACT MAP NO. 17397/COASTAL DEVELOPMENT PERMIT NO. 10-017 (PACIFIC MOBILE HOME PARK SUBDIVISION – CONVERSION FROM RESIDENT RENTAL TO OWNERSHIP)**

APPLICANT/ PROPERTY OWNER: Mark Hodgson, Pacific Mobile Home Park, LLC, 12838 Old Foothill Boulevard, Santa Ana, CA 92705

LOCATION: 80 Huntington Street (southeast corner of Huntington Street and Atlanta Avenue)

PROJECT REQUEST AND SPECIAL CONSIDERATIONS

The proposed project is a request by the Pacific Mobile Home Park (Park) property owner to subdivide an existing for-rent, mobile home park with a total of 252 units for ownership purposes within the non-appealable area of the coastal zone. The Park owner proposes to subdivide the 252 existing mobile home spaces into 252 numbered lots and 31 lettered lots representing interior drive aisles, landscape areas and common areas to enable the existing park residents to purchase their own lots.

Subdivision of the park for purposes of converting it from for-rent to ownership is regulated by various provisions of the Subdivision Map Act (SMA). Government Code Section 66427.5 requires the subdivider to submit a report on the impact of conversion upon residents of the mobile home park to be converted. The applicant submitted the required impact of conversion report stating that no residents would be displaced since non-purchasing residents may continue to rent their space within the mobile home park upon conversion (Attachment No. 4). In addition, the report states that State law affords non-purchasing residents protection from economic displacement by limiting rent increases following conversion of the Park. The SMA also requires the subdivider to obtain a survey of support of the mobile home park residents, for which results of the survey shall be considered by the decision making body during the public hearing for the subdivision map. The applicant submitted a report stating that surveys were sent to all resident households of the Park, which staff assumes means all 252 spaces received a survey. Of the 252 surveys, the report states that a total of 65 (26%) were returned (Attachment No. 5). Of the 65 returned surveys, 58 respondent households stated support for the conversion, three respondents declined to state their opinion, and four respondents stated that they do not support conversion of the park. 187 surveys (approximately 74%) were not returned.

Although the City has decision making authority for the requested subdivision and coastal development permit entitlements, permitting and enforcement authority over the Park would remain with the State

Department of Housing and Community Development (HCD). HCD enforces the California Code of Regulation, Title 25, which establishes development and operational standards for the mobile home park. Fire authority, however, lies with the City of Huntington Beach Fire Department.

CURRRENT LAND USE, ZONING AND GENERAL PLAN DESIGNATIONS

LOCATION	GENERAL PLAN	ZONING	LAND USE
Subject Property:	RM-15 (Residential Medium Density – 15 du/ac)	RMP-CZ (Residential Manufactured Home Park – Coastal Zone Overlay)	Mobile Home Park
North of Subject Property: (across Atlanta)	RM – 15	RM-CZ (Residential Medium Density – Coastal Zone Overlay)	Multi-Family Residential
East of Subject Property: (across Delaware)	RM-15	RM-CZ	Multi-Family Residential
South of Subject Property:	RH-30-sp (Residential High Density – 30 du/ac – Specific Plan Overlay);	SP5-CZ (Downtown Specific Plan – Coastal Zone Overlay) District 8	Waterfront development
West of Subject Property: (across Huntington)	RH-30-sp	SP5-CZ District 8	Pacific City development site

The subject site consists of one approximately 18-acre parcel. Primary resident access is located on Huntington Street with gated emergency vehicle access provided on Atlanta Avenue. Use of the site as a mobile home park was established in the 1950s. In 1989, a portion of the site, at the southwest corner, was purchased by the City in conjunction with the construction of Pacific View Avenue (referenced at the time as the extension of Walnut Avenue).

APPLICATION PROCESS AND TIMELINES

DATE OF COMPLETE APPLICATION:	MANDATORY PROCESSING DATE(S):
February 25, 2011	April 16, 2011 (Within 50 days of complete application)

An application for Vesting Tentative Tract Map (TTM) No. 17397 and Coastal Development Permit (CDP) No. 10-017 was filed on December 7, 2010. Subsequent submittals were received on January 18, 2011 and February 4, 2011. The subsequent submittals provided supplemental information requested by staff, and stated the applicant's intent to process the subdivision map as a non-vesting map, which would have required additional application materials. The application was deemed complete on February 25, 2011. The Planning Commission public hearing for the proposed tentative tract map and coastal development permit is scheduled for April 12, 2011.

CEQA ANALYSIS/REVIEW

The proposed project is Categorically Exempt pursuant to Section 15301(k), Class 1, of the California Environmental Quality Act (CEQA), which states that division of existing multiple family or single-family residences into common-interest ownership are exempt from further environmental review.

COMMENTS FROM CITY DEPARTMENTS AND OTHER PUBLIC AGENCIES

The Departments of Fire, Public Works, Community Services, Economic Development, Police, and Planning and Building have reviewed the application. Since the application was submitted pursuant to Section 66427.5 of the Government Code, no off-site design or improvement requirements, dedications, or in-lieu fees may be imposed unless necessary to mitigate a health and safety condition. No health and safety issues have been identified by the City. However, code requirements applicable to the proposed project will be forwarded to the applicant and a copy provided to the Planning Commission for information purposes with the April 12, 2011 Planning Commission staff report.

PUBLIC MEETINGS, COMMENTS AND CONCERNS

The proposed subdivision map will be reviewed by the Subdivision Committee on March 31, 2011. The recommendation and comments of the Subdivision Committee will be incorporated in the April 12, 2011 Planning Commission staff report. To date, the City has received one letter from the Pacific Mobile Home Park Homeowners' Association (Pacific MHOA) regarding this application (Attachment No. 6). The letter states that Pacific MHOA is in the process of re-organizing and requests to submit its own resident survey in-lieu of the applicant's survey. The letter is not signed and no subsequent correspondence has been received from the Pacific MHOA.

PLANNING ISSUES

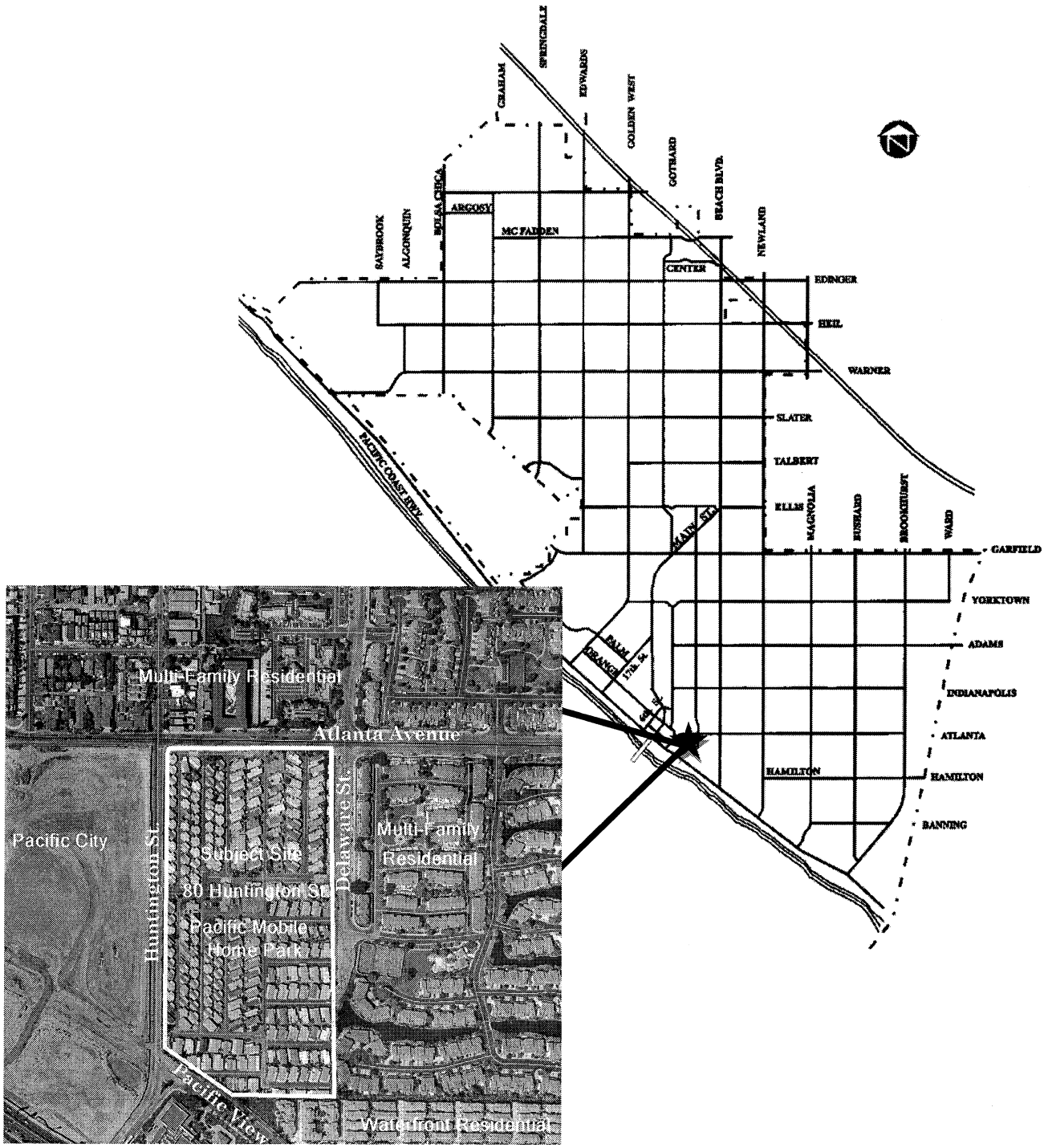
The primary issues for the Planning Commission to consider in processing the application are:

- Compliance with the Subdivision Map Act, including Section 66427.5, the California Coastal Act and applicable provisions of the Huntington Beach Zoning and Subdivision Ordinance (HBZSO) pertaining to subdivisions, coastal development permits and residential mobile home park standards;
- The City's scope of review allowable under Section 66427.5 and other applicable provisions of State law contained within the Subdivision Map Act and Coastal Act; and
- Whether findings can be made, pursuant to Chapter 245 *Coastal Development Permits* and Chapter 251 *Tentative Maps*, to approve the requested entitlements.

ATTACHMENTS:

1. Vicinity Map
2. Project Narratives received December 7, 2010, January 18, 2011 and February 4, 2011
3. Tentative Tract Map No. 17397, dated December 7, 2010
4. Report on Impact of Conversion Upon Residents, dated December 7, 2010
5. Summary of the Survey of Resident Support, dated December 7, 2010
6. Public Comments
7. Government Code Section 66427.5
8. Sections 245.30 and 251.08 of the HBZSO pertaining to findings for coastal development permits and subdivisions

SH:HF:MBB:JV:kd



VICINITY MAP

TENTATIVE TRACT MAP NO. 17397/COASTAL DEVELOMENT PERMIT NO 10-017

PACIFIC MOBILE HOME PARK CONVERSION (RENTAL TO OWNERSHIP)

ATTACHMENT NO. 1

HK&C

HART, KING & COLDREN

Mark D. Alpert
malpert@hkclaw.com

December 7, 2010

Our File Number: 36608.006/4815-7905-3576v.1

VIA HAND DELIVERY

RECEIVED
DEC 07 2010
Huntington Beach
PLANNING DEPT.

Scott Hess
Director of Planning
City of Huntington Beach Planning Dept.
2000 Main Street
P.O. Box 190
Huntington Beach, CA 92648

Re: Pacific Mobile Home Park
80 Huntington Street, Huntington Beach, CA. 92648
Subdivision Application for Tentative Tract Map No. 17397

Dear Mr. Hess:

Please find enclosed the Subdivision Application for Tentative Tract Map 17397 ("Application") for the Pacific Mobile Home Park located at 80 Huntington Street, Huntington Beach, CA. 92648 ("Pacific"). The Application is the first step in the conversion of Pacific from a rental to a resident-owned mobilehome park. The Application is to create numbered residential lots corresponding to the existing 252 rental spaces currently permitted by the California Department of Housing and Community Development ("HCD") and lettered lots corresponding to each non-contiguous portion of the existing common areas.

The Application is submitted pursuant to California Government Code Section 66427.5, which expressly preempts local agency requirements for subdivision of existing mobilehome parks to enable conversion to resident ownership. Section 66427.5 prevents physical displacement of residents by requiring that residents have the option to purchase the lot created from their existing space or to continue leasing that space. Section 66427.5 prevents economic displacement of residents by placing limits on post-conversion rent increases, especially for low income residents.

As a simple subdivision to enable conversion to resident ownership under Government Code Section 66427.5, the Application does not involve any "physical change" or "change in use" of Pacific. Instead, the subdivision simply creates legally recordable property boundaries out of the existing configuration of HCD approved rental spaces and common areas. Therefore, Section 66427.5 eliminates many of the requirements that would exist for a subdivision of raw land or for a subdivision to enable a new use of an existing development, such as requirements for environmental review, soils and engineering studies, dedications and exactions, etc.

Pursuant to Government Code Section 66427.5, all that must accompany the Application is the Tentative Tract Map, the applicable fee, a resident survey, and a conversion impact report, which conversion impact report must provide notice to residents of their option to purchase or continue leasing (the option is loosely labeled in Section 66427.5 (a) as an "offer"). (See *El Dorado Palm Springs Associates v. City of Palm Springs* (2002) 96 Cal.App.4th 1153, 1180)

ATTACHMENT NO. 2.1

Therefore, the enclosed Application includes the following attachments, some of which are enclosed with this letter, others of which are currently on file with the City or will be subsequently filed with the City:

1. Map. Eleven copies of the vesting Tentative Tract Map are submitted with the Application.

2. Fees. We are submitting filing fees based on the City's fee for a vesting tentative tract map and its per lot fees. We do not believe the fees for a standard residential subdivision application should apply to a subdivision under Section 66427.5 which is substantially more limited in scope. We are therefore submitting these fees "under protest" and request that the City adjust the fee to reflect the reduced scope of review under Government Code section 66427.5. In addition, the Applicant does not believe the City can require a coastal permit, but if City staff insists upon such an application, the Applicant will submit the fee as requested under protest. In addition, as discussed below, the Applicant contends the proposed subdivision is exempt from environmental review under CEQA. To the extent the City insists upon fees being collected for environmental review, such fees are submitted under protest.

3. Report on Impact of Conversion Upon Residents. A copy of the Report on Impact of Conversion Upon Residents is enclosed.

4. Resident Survey Results. The Report on Impact Upon Residents discusses the survey results.

5. Data and Reports. As explained above, Government Code Section 66427.5 preempts any additional City requirements for data and reports beyond those required by Section 66427.5. Therefore, most of the data and reports listed in Paragraph 5 of the Application are not applicable, as explained below:

5(a) Environmental Assessment Form.

Conversion of a rental mobile home park to residential ownership is exempt from CEQA pursuant to California Code of Regulations, Title 14, Section 15301 (k) (existing facilities-division of existing single family residences into common interest ownership where no physical changes occur), for the same reasons as the express statutory exemption for resident initiated conversions contained in Public Resources Code Section 21080.8.

5(b) Preliminary Title Report.

A Preliminary Title Report issued September 27, 2010.

5(c) Preliminary Soils and Engineering Geology Report.

There is no "physical change" or "change in use" of Pacific. Therefore, no soils or geology reports is necessary or required under Government Code Section 66427.5.

5(d) Public Notification Requirements.

Public notification materials are enclosed.

5(e) Photographs of the Subject Property.

Photographs of Pacific are enclosed.

5(f) Written Narrative:

(1) Existing Use of the Property and Present Zoning.

Pacific is situated on a single parcel (APN) consisting of approximately 18 acres and operated as a mobile home park permitted for 252 mobile home spaces. Pacific is currently zoned RMP. The General Plan Designation is RMH-25.

Pacific was initially constructed in the late 1950s, on Huntington Street, North of Pacific View.

The improvements included a clubhouse with kitchen, a workout room, a heated year-round swimming pool and Jacuzzi, a Laundromat with vending machine, a drive in hand car wash bay and an area for RV/Boat/Trailer storage

(2) Proposed Use of the Property.

There is no proposed "physical change" or "change in the use" of Pacific. The proposed use of Pacific is to maintain the existing use as a mobile home park.

(3) Statement of the Proposed Improvements and Public Utilities.

There are no proposed improvements or utilities.

(4) Public Areas Proposed.

There are no public areas proposed.

(5) Tree Planting Proposed.

There are no tree plantings proposed.

(6) Restrictive Covenants Proposed.

Upon approval of the Application, a Pacific Homeowners Association will be formed, and customary covenants, conditions and restrictions utilized in planned mobile home communities will be prepared and submitted to the California Department of Real Estate for review and approval.

5(g) Coastal Development Permit Application.

Pacific is believed to be within a coastal zone, but the Applicant does not believe a coastal permit is required as Government Code § 66427.5 prevents the imposition of a

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requirement for a coastal permit. However, while reserving its rights to proceed without a coastal permit, encloses a fee of $2971.00 for a coastal permit application.

The enclosed materials should provide the City with a complete application. Please feel free to contact me with any questions or comments you may have.

Sincerely,

HART, KING & COLDREN

Mark D. Alpert

MDA/sm

Enclosures:
Subdivision Application
Tentative Tract Map
Application Fee
Report on Impact of Conversion Upon Residents
Preliminary Title Report
Public Notification Materials
Photographs

cc: Pacific Mobile Home Park, LLC

ATTACHMENT NO. 2.4

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Mark D. Alpert
malpert@hkclaw.com

January 18, 2010

Our File Number: 36608.006/4832-6151-1432v.1

VIA EMAIL AND REGULAR MAIL

RECEIVED
JAN 18 2010
Huntington Beach
PLANNING DEPT.

Jennifer Villasenor
City of Huntington Beach Planning Dept.
2000 Main Street
P.O. Box 190
Huntington Beach, CA 92648

Re: Pacific Mobile Home Park
80 Huntington Street, Huntington Beach, CA. 92648
Subdivision Application for Tentative Tract Map No. 17392

Dear Ms Villasenor:

I am writing in response to the City's "Notice of Filing Status" for the above-referenced tentative tract map deeming the application incomplete and requesting additional "information or clarification" to act on the Application, which I interpret as items which the City of Huntington Beach will not require to deem the application complete, but which it seeks prior to acting on the application. After reviewing your notice, we respectfully disagree with the determination of staff and ask that the City reconsider its position on this matter. I will address the items utilizing the same numbering utilized in your Notice.

Purported "Incomplete" items

1. Map purportedly depicting units and structures straddling property lines and outside the proposed boundary. For many years, the Park has operated under the current configuration with some homes placed, in part, on property which is technically on the City's right-of-way. However, the Applicant is informed and believes that the City has approved this configuration, including a conditional use permit based on the current location of these homes. The Applicant believes it has a legal right to continue this use. While we recognize the City may disagree with this position, that does not render the application incomplete. The City may consider approving the tract map subject to the conditions that the Applicant demonstration that the City has relinquished its interest either formally or by operation of law, but this is not a properly a basis to deem the application incomplete.

2. The Application is intended to be a Vesting Tentative Tract Map. Please feel free to mark the submitted maps accordingly or our engineering firm can make the required change at your convenience. While we understand that the City's municipal code may purport to require an application for conditional use permit, any such municipal requirements are barred by Government Code 66427.5. This has been the repeated holding of numerous California courts, including notably *Sequoia Park Associates v. County of Sonoma*, 176 Cal.App.4th 1270 (Cal.App.1st Dist. 2009). In Sequoia, the Court recognized that state law both expressly and impliedly preempted local

ATTACHMENT NO. 2.5

government regulation, except as expressly authorized by Section 66427.5. Thus, the City cannot impose the requirement of seeking a new CUP. In addition, the park owner does not propose any new use. The subdivision application proposes a change in the form of ownership, while maintaining the same use. There is no reason the existing CUP cannot remain operative.

Finally, you request an updated narrative to correct the designation under the general plan to "Residential Medium Density – 15 units/acre" or "RM-15". Inasmuch as these facts are irrelevant to the application I do not believe any correction is necessary to "complete" the application. Certainly, this letter should suffice to clarify the issue.

On this basis, the application should be deemed complete immediately.

Requests for "information" and "clarification"

1. Two reduced sets of the tentative tract map will be provided to the City, but these are provided as additional information not required to "complete" the application.

2. Flood information—I am advised by my engineer that the flood information utilized was the most recent available at the date of submission. He can meet with you to clarify the issue but we do not believe any revisions are needed as of this time. In any event, because the City cannot impose flood mitigation requirements, this information is not necessary to complete the application.

3. Current zoning correction. Please treat this letter as correcting the Conversion Report. It is my understanding that the current zoning of the property is "Residential Manufactured Home Park –Coastal Zone overlay" or "RMP-CZ".

4. The subdivision application seeks a tentative tract map for 252 spaces approved by the existing CUP. The Applicant does not seek to subdivide the lots occupied by the four model units approved by HCD.

5. As you acknowledge, there was no active homeowners' association in place at the time the survey was conducted. The Applicant has no information regarding any effort to "reorganize" an association that was not operating. I find it notable that during repeated communications with all of the park residents, which are described in the declaration of Clarke Fairbrother which was submitted with the Application, that no resident came forward making this request and we received no objections to the conduct of the survey. My information is that there has not been a homeowner's association active within the Park for many years and that when such association existed, it was strictly social in nature and did not have a significant level of participation by the residents.

   You have provided an unsigned letter from someone purporting to be on behalf of "Pacific MHOA." The letter is dated November 22, 2010. This person had ample

opportunity to participate in the process under which the survey was conducted which was initiated in September, 2010. Neither the park owner nor his representative were advised that the residents wished to form an HOA to conduct the survey and I note that the letter from the resident in space 80 does not indicate she copied the park owner or representative with the letter. It appears that a single or small group of residents have intentionally chosen to wait until the survey was completed to delay or interfere with the application process. There is no basis to believe the resident speaks for anyone but him or herself. Indeed, the resident may be one of the few residents who oppose a subdivision.

6. The Park is effectively fully occupied. It would require speculation to determine why a substantial percentage of residents chose not to participate in the survey. They certainly had every opportunity to participate. There were two mass mailings and one community wide meeting held before the surveys were sent. It is not unusual for a large percentage of residents to choose not to participate. It is my understanding from speaking to the managers that prior efforts to revive an HOA for the Park in 2004 failed because of a lack of interest. Thus, there is a prior pattern of lack of community participation at the Park. Since all residents had ample opportunity to participate and were repeatedly advised of the planned survey, the only logical inference to make from the lack of participation these residents chose not to participate. There is no reason to expect a second survey would yield more responses. Of those residents who were interested, the vast majority supported the application.

In any event, the City may not consider the level of participation in the survey or even the lack of support in processing the subdivision application. While California courts have split on whether or not local governments could consider the absence of resident support under any circumstances, the one reported decision which concludes it is valid to consider level of resident support (not level of participants) recognizes the purpose of such consideration is to determine whether the subdivision is a "bona fide" conversion in which a single or a few lots are sold to avoid rent control. See, e.g. *Colony Cove Properties, LLC v. City of Carson*, 187 Cal.App.4th 1487, 1501 (Cal.App.2d Dist. 2010) This issue arises where there is the possibility of using conversion to get out of local rent control. *Id.* Even assuming *Colony Cove* is correctly decided, it simply has no application where, as here, there is no rent control ordinance. Because of a voter initiative, there is not even the prospect of <u>future</u> rent control. There is no reason to believe there is any potential for a sham conversion for that reason. Indeed, if the park owner were to subdivide and sell only a lot or two it would have the effect of imposing a form of rent control under state law where none existed. Since there is no potential for a "sham conversion" there simply is no reason to even consider the results of the survey. In any event, it is impossible to infer from the lack of resident responses that the conversion is not "bona fide."

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7. Regarding your concerns regarding dwelling units being "cut off" by proposed interior lot lines, we believe you are simply mistaken. Unfortunately, you have not identified specific areas or lots in question. Likewise, there are no units which abut property lines in a way that impacts access. Again, you have not identified the relevant lots in question or provided any examples. Our engineer observed to me that your comments indicate you have not actually visited the site.

We would be happy to meet with you this week to clarify these questions if you are prepared to identify specific areas in question. I want to emphasize, however, it is our position that the application is complete and any such meeting would only serve the purpose of providing additional clarifying information to assist the City in consider the application. We can also discuss an appropriate partial refund of funds given the limited scope of the City's review. It might be helpful to have your city attorney present to discuss legal issues that uniquely apply to the processing of a mobilehome subdivision under Government Code § 66427.5. Please advise me what days and times you are available this week.

Sincerely,

HART, KING & COLDREN

Mark D. Alpert

MDA/sm

cc: Pacific Mobile Home Park, LLC

HK&C
HART, KING & COLDREN

Mark D. Alpert
malpert@hkclaw.com

February 4, 2011

Our File Number: 36608.006/4843-7949-9016v.1

VIA EMAIL AND REGULAR MAIL

Jennifer Villasenor
City of Huntington Beach Planning Dept.
2000 Main Street
P.O. Box 190
Huntington Beach, CA 92648

RECEIVED
FEB 04 2011
Huntington Beach
PLANNING DEPT.

Re: Pacific Mobile Home Park
80 Huntington Street, Huntington Beach, CA. 92648
Subdivision Application for Tentative Tract Map No. 17392

Dear Ms Villasenor:

You indicated that the City was prepared to deem the above referenced subdivision application complete provided it was processed as a non-vesting application. I am writing to confirm that my client will agree to have the application processed as a non-vesting map, provided that the City will deem the application complete based on the information already submitted. I would appreciate your confirmation in writing, no later than Monday February 7, 2011, that staff will deem the application complete.

Thank you for your attention to this matter.

Sincerely,

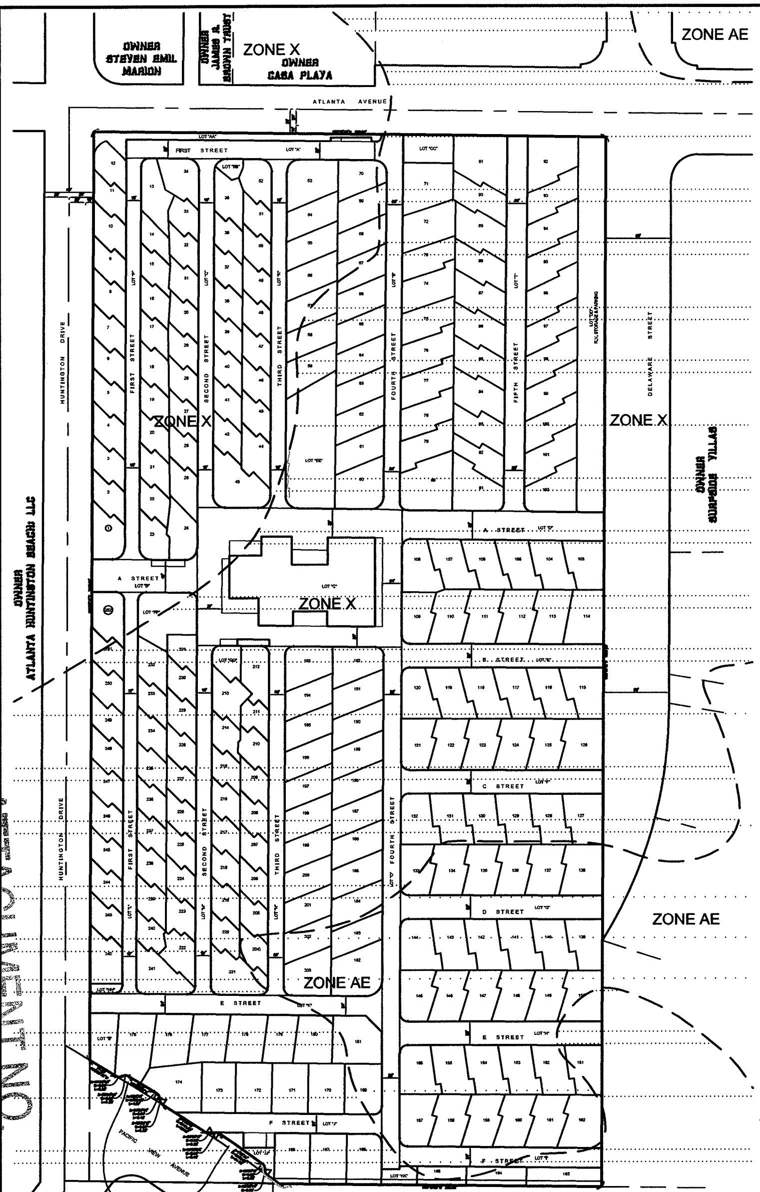
HART, KING & COLDREN

Mark D. Alpert

MDA/sm

cc: Pacific Mobile Home Park, LLC
Rob Coldren

ATTACHMENT NO. 29



TRACT MAP NO. 17397

IN THE CITY OF HUNTINGTON BEACH
COUNTY OF ORANGE, STATE OF CALIFORNIA

A PORTION OF THE NORTH HALF OF THE NORTHEAST QUARTER OF FRACTIONAL SECTION 14, TOWNSHIP 6 SOUTH, RANGE 11 WEST, SAN BERNARDINO BASE AND MERIDIAN

FOR SUBDIVISION PURPOSES

LOT AREAS (NUMBERED LOTS):

	±SQ. FT.	±ACRES		±SQ. FT.	±ACRES		±SQ. FT.	±ACRES
LOT : 1	2,220	0.05	LOT : 101	2,649	0.06	LOT : 201	2,217	0.05
LOT : 2	1,595	0.04	LOT : 102	3,070	0.07	LOT : 202	2,249	0.05
LOT : 3	1,613	0.04	LOT : 103	2,621	0.06	LOT : 203	2,892	0.07
LOT : 4	1,691	0.04	LOT : 104	2,496	0.06	LOT : 204	1,447	0.03
LOT : 5	1,634	0.04	LOT : 105	2,432	0.06	LOT : 205	1,436	0.03
LOT : 6	1,579	0.04	LOT : 106	2,455	0.06	LOT : 206	1,482	0.03
LOT : 7	1,606	0.04	LOT : 107	2,585	0.06	LOT : 207	1,417	0.03
LOT : 8	1,742	0.04	LOT : 108	2,681	0.06	LOT : 208	1,442	0.03
LOT : 9	1,584	0.04	LOT : 109	2,382	0.06	LOT : 209	1,475	0.03
LOT : 10	1,697	0.04	LOT : 110	2,758	0.06	LOT : 210	1,537	0.04
LOT : 11	1,533	0.04	LOT : 111	2,781	0.06	LOT : 211	1,253	0.03
LOT : 12	1,638	0.04	LOT : 112	2,759	0.06	LOT : 212	2,254	0.05
LOT : 13	2,397	0.06	LOT : 113	2,812	0.07	LOT : 213	2,100	0.05
LOT : 14	1,256	0.03	LOT : 114	2,930	0.07	LOT : 214	1,424	0.03
LOT : 15	1,420	0.03	LOT : 115	2,733	0.06	LOT : 215	1,396	0.03
LOT : 16	1,463	0.03	LOT : 116	2,538	0.06	LOT : 216	1,489	0.03
LOT : 17	1,282	0.03	LOT : 117	2,603	0.06	LOT : 217	1,446	0.03
LOT : 18	1,560	0.04	LOT : 118	2,650	0.06	LOT : 218	1,410	0.03
LOT : 19	1,451	0.03	LOT : 119	2,633	0.06	LOT : 219	1,482	0.03
LOT : 20	1,431	0.03	LOT : 120	2,445	0.06	LOT : 220	1,378	0.03
LOT : 21	1,561	0.04	LOT : 121	2,439	0.06	LOT : 221	3,016	0.07
LOT : 22	1,428	0.03	LOT : 122	2,538	0.06	LOT : 222	1,917	0.04
LOT : 23	1,740	0.04	LOT : 123	2,496	0.06	LOT : 223	1,572	0.04
LOT : 24	2,156	0.05	LOT : 124	2,532	0.06	LOT : 224	1,487	0.03
LOT : 25	1,775	0.04	LOT : 125	2,454	0.06	LOT : 225	1,487	0.03
LOT : 26	1,472	0.03	LOT : 126	3,143	0.07	LOT : 226	1,461	0.03
LOT : 27	1,451	0.03	LOT : 127	2,770	0.06	LOT : 227	1,487	0.03
LOT : 28	1,479	0.03	LOT : 128	2,466	0.06	LOT : 228	1,447	0.03
LOT : 29	1,493	0.03	LOT : 129	2,626	0.06	LOT : 229	1,677	0.04
LOT : 30	1,461	0.03	LOT : 130	2,486	0.06	LOT : 230	1,435	0.03
LOT : 31	1,508	0.04	LOT : 131	2,563	0.06	LOT : 231	1,403	0.03
LOT : 32	1,482	0.03	LOT : 132	2,570	0.06	LOT : 232	1,851	0.04
LOT : 33	1,411	0.03	LOT : 133	2,453	0.06	LOT : 233	1,443	0.03
LOT : 34	2,206	0.05	LOT : 134	2,543	0.06	LOT : 234	1,513	0.04
LOT : 35	1,940	0.05	LOT : 135	2,477	0.06	LOT : 235	1,536	0.04
LOT : 36	1,446	0.03	LOT : 136	2,340	0.05	LOT : 236	1,435	0.03
LOT : 37	1,456	0.03	LOT : 137	2,630	0.06	LOT : 237	1,443	0.03
LOT : 38	1,449	0.03	LOT : 138	3,036	0.07	LOT : 238	1,497	0.03
LOT : 39	1,422	0.03	LOT : 139	2,456	0.06	LOT : 239	1,591	0.04
LOT : 40	1,446	0.03	LOT : 140	2,620	0.06	LOT : 240	1,237	0.03
LOT : 41	1,494	0.03	LOT : 141	2,588	0.06	LOT : 241	2,768	0.06
LOT : 42	1,437	0.03	LOT : 142	2,583	0.06	LOT : 242	2,281	0.05
LOT : 43	3,549	0.08	LOT : 143	2,623	0.06	LOT : 243	1,606	0.04
LOT : 44	1,931	0.04	LOT : 144	2,732	0.06	LOT : 244	1,634	0.04
LOT : 45	1,473	0.03	LOT : 145	2,552	0.06	LOT : 245	1,568	0.04
LOT : 46	1,460	0.03	LOT : 146	2,456	0.06	LOT : 246	1,706	0.04
LOT : 47	1,464	0.03	LOT : 147	2,521	0.06	LOT : 247	1,592	0.04
LOT : 48	1,457	0.03	LOT : 148	2,563	0.06	LOT : 248	1,622	0.04
LOT : 49	1,449	0.03	LOT : 149	2,509	0.06	LOT : 249	1,568	0.04
LOT : 50	1,452	0.03	LOT : 150	3,001	0.07	LOT : 250	1,630	0.04
LOT : 51	1,414	0.03	LOT : 151	2,422	0.06	LOT : 251	1,582	0.04
LOT : 52	1,879	0.04	LOT : 152	2,484	0.06	LOT : 252	2,230	0.05
LOT : 53	3,193	0.07	LOT : 153	2,431	0.06			
LOT : 54	2,330	0.05	LOT : 154	2,537	0.06			
LOT : 55	2,255	0.05	LOT : 155	2,539	0.06			
LOT : 56	2,350	0.05	LOT : 156	2,570	0.06			
LOT : 57	2,444	0.05	LOT : 157	2,677	0.06			
LOT : 58	2,233	0.05	LOT : 158	2,642	0.06			
LOT : 59	2,482	0.06	LOT : 159	2,584	0.06			
LOT : 60	3,160	0.07	LOT : 160	2,540	0.06			
LOT : 61	2,199	0.05	LOT : 161	2,634	0.06			
LOT : 62	2,199	0.05	LOT : 162	3,020	0.07			
LOT : 63	2,134	0.05	LOT : 163	2,118	0.05			
LOT : 64	2,326	0.05	LOT : 164	1,691	0.04			
LOT : 65	2,166	0.05	LOT : 165	1,392	0.03			
LOT : 66	2,199	0.05	LOT : 166	2,625	0.06			
LOT : 67	2,263	0.05	LOT : 167	2,818	0.07			
LOT : 68	2,166	0.05	LOT : 168	2,714	0.06			
LOT : 69	2,328	0.05	LOT : 169	2,816	0.07			
LOT : 70	2,277	0.05	LOT : 170	2,790	0.06			
LOT : 71	3,430	0.08	LOT : 171	2,790	0.06			
LOT : 72	2,952	0.07	LOT : 172	2,790	0.06			
LOT : 73	2,186	0.05	LOT : 173	2,604	0.06			
LOT : 74	2,626	0.06	LOT : 174	3,434	0.08			
LOT : 75	2,449	0.06	LOT : 175	3,458	0.08			
LOT : 76	2,684	0.06	LOT : 176	2,907	0.07			
LOT : 77	2,632	0.06	LOT : 177	2,696	0.06			
LOT : 78	2,620	0.06	LOT : 178	2,734	0.06			
LOT : 79	2,388	0.05	LOT : 179	2,259	0.05			
LOT : 80	3,941	0.09	LOT : 180	2,681	0.06			
LOT : 81	3,154	0.07	LOT : 181	3,393	0.08			
LOT : 82	1,951	0.05	LOT : 182	3,524	0.08			
LOT : 83	2,421	0.06	LOT : 183	2,166	0.05			
LOT : 84	2,733	0.06	LOT : 184	2,436	0.06			
LOT : 85	2,428	0.06	LOT : 185	2,301	0.05			
LOT : 86	2,622	0.06	LOT : 186	2,301	0.05			
LOT : 87	2,483	0.06	LOT : 187	2,301	0.05			
LOT : 88	2,366	0.05	LOT : 188	2,301	0.05			
LOT : 89	2,838	0.07	LOT : 189	2,301	0.05			
LOT : 90	2,424	0.06	LOT : 190	2,369	0.05			
LOT : 91	3,872	0.09	LOT : 191	2,335	0.05			
LOT : 92	3,365	0.08	LOT : 192	2,477	0.06			
LOT : 93	2,428	0.06	LOT : 193	2,594	0.06			
LOT : 94	2,600	0.06	LOT : 194	2,123	0.05			
LOT : 95	2,470	0.06	LOT : 195	2,186	0.05			
LOT : 96	2,757	0.06	LOT : 196	2,186	0.05			
LOT : 97	2,276	0.05	LOT : 197	2,123	0.05			
LOT : 98	2,540	0.06	LOT : 198	2,281	0.05			
LOT : 99	2,580	0.06	LOT : 199	2,154	0.05			
LOT : 100	2,427	0.06	LOT : 200	2,154	0.05			

LOT AREAS (LETTERED LOTS):

	±SQ. FT.	±ACRES
LOT : A	7,292	0.17
LOT : B	5,230	0.12
LOT : C	42,868	0.98
LOT : D	8,703	0.20
LOT : E	7,235	0.17
LOT : F	7,235	0.17
LOT : G	7,235	0.17
LOT : H	7,235	0.17
LOT : I	5,973	0.14
LOT : J	6,424	0.15
LOT : K	8,928	0.21
LOT : L	8,478	0.20
LOT : M	8,216	0.19
LOT : N	8,686	0.20
LOT : O	4,124	0.32
LOT : P	8,999	0.21
LOT : Q	8,285	0.20
LOT : R	8,335	0.19
LOT : S	9,752	0.22
LOT : T	11,560	0.27

LOT AREAS (LETTERED LOTS):

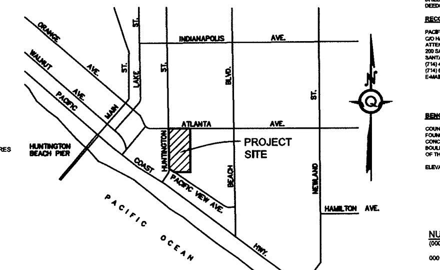
	±SQ. FT.	±ACRES
LOT : AA	3,404	0.08
LOT : BB	613	0.01
LOT : CC	2,135	0.05
LOT : DD	15,691	0.36
LOT : EE	9,348	0.22
LOT : FF	4,117	0.10
LOT : GG	1,277	0.03
LOT : HH	449	0.01
LOT : II	2,252	0.05
LOT : JJ	1,104	0.03
LOT : KK	922	0.02

AREA TABULATIONS:

		±SQ. FT.	±ACRES
LOTS 1-252	=	551,554	12.66
LETTERED LOTS A-T	=	200,808	4.62
LETTERED LOTS AA-KK	=	41,311	0.95
TOTAL AREA	=	793,673	18.22

UTILITIES COMPANIES:

ELECTRIC	SOUTHERN CALIFORNIA EDISON:	P.O. BOX 800 ROSEMEAD, CA 91772 PHONE: (800) 684-8123
GAS	SOUTHERN CALIFORNIA GAS:	P.O. BOX C MONTEREY PARK, CA 91756 PHONE: (800) 427-2200
WATER	CITY OF HUNTINGTON BEACH:	P.O. BOX 711 HUNTINGTON BEACH, CA 92648 PHONE: (949) 453-4300



VICINITY MAP

NOT TO SCALE

NOTES:

1. ASSESSORS PARCEL: 024-291-16
2. THOMAS BROS.: 887/J2 & 888/A2
3. SITE AREA: ± 793,673 S.F. / ± 18.22 AC.
4. PUBLIC UTILITIES ARE EXISTING AND AVAILABLE TO SERVE THIS PROJECT. (THE EXISTING ON SITE SEWER UTILIZES AN ON SITE LIFT STATION THAT WILL REMAIN)
5. EXISTING ZONE: RMP (MANUFACTURED HOME PARK)
6. ALL EXISTING ON SITE IMPROVEMENTS ARE TO REMAIN.
7. FLOOD ZONE: PORTIONS OF THE PROPERTY ARE ZONES "X", "X SHADED" AND "AE (EL 7)" PER FEMA MAP 060 59C 0261J DATED 2/18/04 & 060 59C 0263J DATED .
8. THE UTILITIES SHOWN ON THIS MAP ARE BASED UPON THE BEST AVAILABLE PUBLIC INFORMATION OBTAINED FROM THE CITY OF HUNTINGTON BEACH.
9. PROJECT: 252 RESIDENTIAL LOTS PLUS 1 COMMON LETTERED LOT.
10. PARKING: 415 RESIDENT SPACES (1 OR 2 PER LOT), 39 GUEST SPACES AND 2 HANDICAP SPACES (456 TOTAL SPACES) R.V PARKING IS AVAILABLE IN UNMARKED SPACES ALONG THE EASTERN EDGE OF THE PROPERTY.
11. PARKING IS NOT ALLOWED ON ANY INTERIOR STREET, EXCEPT AS INDICATED ON THIS MAP.
12. GRADING: NONE
13. SCHOOL DISTRICTS:
    HUNTINGTON BEACH UNION HIGH SCHOOL DISTRICT (HUNTINGTON BEACH HIGH SCHOOL)
    HUNTINGTON BEACH CITY SCHOOL DISTRICT (PETERSON ELEMENTARY)
14. R.T. QUINN & ASSOCIATES HAS RELIED SOLELY ON THE TITLE REPORT PREPARED BY FIRST AMERICAN TITLE INSURANCE COMPANY REPORT NO. 10-725132492-TC, DATED AS OF AUGUST 31, 2010 FOR THE LEGAL DESCRIPTION AND EASEMENTS AFFECTING THIS PROPERTY. R.T. QUINN & ASSOCIATES AND R.T. QUINN, MAKE NO STATMENT AS TO THE ACCURACY OR COMPLETENESS OF THE SUBJECT TITLE REPORT.

ITEM 4: AN IRREVOCABLE OFFER OF DEDICATION TO THE CITY OF HUNTINGTON BEACH FOR STREET PURPOSE AND INCIDENTAL PURPOSES, RECORDED JULY 21, 1950 IN BOOK 2045, PAGE 53 AND BOOK 2116, PAGE 472 BOTH OF OFFICIAL RECORDS.

ITEM 5: AN EASEMENT IN FAVOR OF SOUTHERN CALIFORNIA EDISON COMPANY FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES, RECORDED MAY 23, 1962 IN BOOK 6119, PAGE 973 OF OFFICIAL RECORDS.

ITEM 6: AN EASEMENT IN FAVOR OF GENERAL TELEPHONE COMPANY OF CALIFORNIA FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES, RECORDED JUNE 4, 1986 AS INSTRUMENT NO. 86-231638 OF OFFICIAL RECORDS. (THE EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD.)

ITEM 7: AN EASEMENT IN FAVOR OF SOUTHERN CALIFORNIA EDISON COMPANY FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES, RECORDED MAY 24, 1989 AS INSTRUMENT NO. 89-276223 OF OFFICIAL RECORDS. (THE EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD.)

BASIS OF BEARINGS:

THE BEARING NORTH 0°51'20" WEST ALONG THE CENTERLINE OF BEACH BOULEVARD AS SHOWN ON PARCEL MAP RECORDED IN BOOK 21 PAGE 24 OF PARCEL MAPS, RECORDS OF ORANGE COUNTY WAS USED AS THE BASIS OF BEARINGS FOR THIS MAP.

LEGAL DESCRIPTION:

THOSE PORTIONS OF THE NORTH HALF OF THE NORTHWEST QUARTER OF FRACTIONAL SECTION 14, TOWNSHIP 6 SOUTH, RANGE 11 WEST, SAN BERNARDINO BASE AND MERIDIAN, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEAST QUARTER OF THE WEST HALF OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION 14; THENCE EAST ALONG THE NORTH LINE OF SAID SECTION 14, A DISTANCE OF 660.02 FEET; THENCE SOUTH, PARALLEL TO THE EAST LINE OF THE WEST HALF OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION 14, A DISTANCE OF 1319.96 FEET TO A POINT ON THE SOUTH LINE OF SAID NORTH HALF; THENCE WEST ALONG THE SOUTH LINE OF SAID NORTH HALF, 660.02 FEET TO A POINT IN THE EAST LINE OF SAID WEST HALF; THENCE NORTH ALONG THE EAST LINE OF SAID WEST HALF 1319.96 FEET TO THE POINT OF BEGINNING.

EXCEPTING THEREFROM THAT PORTION OF SAID LAND AS DESCRIBED IN A DEED TO THE CITY OF HUNTINGTON BEACH, RECORDED APRIL 27, 1989 AS INSTRUMENT NO. 89-221830, OFFICIAL RECORDS, AND DESCRIBED AS FOLLOWS:

BEGINNING AT THE INTERSECTION OF THE SOUTH LINE OF SAID NORTH HALF WITH THE CENTERLINE OF HUNTINGTON STREET 60.00 FEET WIDE, AS SHOWN ON THE RECORD OF SURVEY NO. 81-1151 FILED IN RECORD OF SURVEY BOOK 103, PAGES 28 AND 29, IN THE OFFICE OF SAID COUNTY RECORDER; THENCE NORTH 0°42'59" WEST 167.07 FEET ALONG SAID CENTERLINE; THENCE THE FOLLOWING COURSES:

SOUTH 59°21'49" EAST 72.43 FEET TO THE BEGINNING OF AN 8.00 FOOT RADIUS CURVE THAT IS CONCAVE NORTHERLY;

EASTERLY 8.33 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 60°00'00" TO THE BEGINNING OF AN 8.00 RADIUS REVERSE CURVE THAT IS CONCAVE SOUTHERLY;

EASTERLY 8.38 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 60°00'00";

SOUTH 59°21'49" EAST 36.77 FEET TO THE BEGINNING OF A 2452.00 FOOT RADIUS CURVE THAT IS CONCAVE SOUTHWESTERLY;

SOUTHEASTERLY 4.51 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 0°06'19" TO THE BEGINNING OF AN 8.00 FOOT RADIUS COMPOUND CURVE THAT IS CONCAVE SOUTHWESTERLY;

SOUTHEASTERLY 8.40 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 60°09'44" TO THE BEGINNING OF AN 8.00 FOOT RADIUS REVERSE CURVE THAT IS CONCAVE NORTHEASTERLY;

SOUTHEASTERLY 8.36 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 59°50'17" TO THE BEGINNING OF A 2444.00 FOOT RADIUS REVERSE CURVE THAT IS CONCAVE SOUTHWESTERLY;

SOUTHEASTERLY 63.14 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 1°28'48" TO THE BEGINNING OF AN 8.00 FOOT RADIUS REVERSE CURVE THAT IS CONCAVE NORTHERLY;

EASTERLY 8.36 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 59°50'17" TO THE BEGINNING OF AN 8.00 FOOT RADIUS REVERSE CURVE THAT IS CONCAVE SOUTHERLY;

EASTERLY 8.40 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 60°09'44" TO THE BEGINNING OF A 2452.00 FOOT RADIUS COMPOUND CURVE THAT IS CONCAVE SOUTHWESTERLY;

SOUTHEASTERLY 64.60 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 1°30'34" TO THE BEGINNING OF AN 8.00 FOOT RADIUS COMPOUND CURVE THAT IS CONCAVE SOUTHWESTERLY;

SOUTHEASTERLY 8.40 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 60°09'44" TO THE BEGINNING OF AN 8.00 FOOT RADIUS REVERSE CURVE THAT IS CONCAVE NORTHEASTERLY;

SOUTHEASTERLY 8.36 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 59°50'17" TO THE BEGINNING OF A 2444.00 FOOT RADIUS REVERSE CURVE THAT IS CONCAVE SOUTHWESTERLY;

SOUTHEASTERLY 17.33 FEET ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 0°24'22" TO THE SOUTH LINE OF SAID NORTH HALF;

SOUTH 89°40'07" WEST 263.18 FEET ALONG SAID SOUTH LINE TO THE POINT OF BEGINNING.

ALSO EXCEPTING A TRIANGULAR PIECE OF LAND IN THE NORTHWEST CORNER DESCRIBED IN DEED FROM A.F. GOODWIN, TRUSTEE, TO H.E. HUNTINGTON, TRUSTEE, RECORDED OCTOBER 15, 1908 IN BOOK 159 PAGE 330 OF DEEDS, ALL OIL OR MINERAL RIGHTS UNDERLAYING SAID TRIANGULAR PIECE OF LAND, TOGETHER WITH THE RIGHT TO PRODUCE OIL, GAS AND OTHER HYDROCARBON SUBSTANCES BY DIRECTIONAL DRILLING OR ANY OTHER MEANS NOT REQUIRING THE OCCUPANCY OF THE SURFACE OF SAID LAND OR ANY PORTION THEREOF, INCLUDING THE RIGHT TO COMBINE SAID LAND IN ANY COMMUNITY OIL LEASE BUT NOT INCLUDING THE RIGHT TO ENTER UPON OR OCCUPY ANY PORTION OF THE SURFACE OF SAID LAND FOR SUCH PURPOSE, AS RESERVED IN THE DEED FROM PACIFIC RAILWAY COMPANY, A CALIFORNIA CORPORATION, RECORDED JULY 13, 1946 IN BOOK 1431 PAGE 105, OFFICIAL RECORDS.

ALSO EXCEPTING FROM THE REMAINDER OF SAID LAND ALL OIL, GAS, MINERALS AND HYDROCARBON SUBSTANCES LYING BELOW A DEPTH OF 500 FEET FROM THE SURFACE OF SAID LAND BUT WITHOUT THE RIGHT OF ENTRY UPON THE SURFACE OF SAID LAND OR ANY PORTION THEREOF OR WITHIN SAID 500 FEET FOR THE PURPOSE OF MINING, BORING, DRILLING, EXPLORING FOR, PROSPECTING FOR, REMOVING OR MARKETING SAID SUBSTANCES, PROVIDING THAT NO WELLS SHALL BE DRILLED ON ANY LAND RETAINED BY GRANTOR WITHIN 75 FEET OF THE EXTERIOR LIMITS OF SAID PARCEL 1, AS RESERVED IN DEEDS FROM T.B. TALBERT AND OTHERS, RECORDED NOVEMBER 24, 1953 IN BOOK 3267 PAGE 23, OFFICIAL RECORDS.

RECORD OWNERS AND SUBDIVIDERS:

PACIFIC MOBILE HOME PARK, LLC
C/O HART, KING & COLDREN
ATTENTION: MARK ALPERT
200 SANDPOINTE, 4TH FLOOR
SANTA ANA, CA 92707
(714) 432-8700
(714) 546-7457 fax
E-MAIL: malpert@hkclaw.com

BENCH MARK:

COUNTY OF ORANGE BENCHMARK HB-196-71
FOUND 3¾" OCS ALUMINUM BENCHMARK DISK STAMPED "HB-196-71", SET IN THE NORTHEAST CORNER OF A 4 FT. BY 5 FT. CONCRETE CATCH BASIN. MONUMENT IS LOCATED IN THE SOUTHEAST CORNER OF THE INTERSECTION OF BEACH BOULEVARD AND ATLANTA AVENUE, 250 FT. EASTERLY OF THE CENTERLINE OF BEACH BOULEVARD AND 42.5 FT. SOUTHERLY OF THE CENTERLINE OF ATLANTA AVENUE. MONUMENT IS SET LEVEL WITH THE SIDEWALK.

ELEVATION: 5.460 (NAVD88) (2005)

NUMBERS
(000) EXISTING MOBILE HOME SPACE NUMBER
000 NEW SPACE NUMBER
"A" LETTERED LOTS ARE COMMON AREA, STREETS OR LANDSCAPE AREAS.

RECORD BOUNDARY AND NEW LOT NUMBERS

FLOOD ZONE:

LEGEND

ZONE AE:	BASE FLOOD ELEVATIONS DETERMINED
ZONE X:	AREAS DETERMINED TO BE OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN.
ZONE X:	AREA OF 0.2% ANNUAL CHANCE FLOOD; AREAS OF 1% ANNUAL CHANCE FLOOD WITH AVERAGE DEPTHS OF LESS THAN 1 FOOT OR WITH DRAINAGE AREAS LESS THAN 1 SQUARE MILE; AND AREAS PROTECTED BY LEVEES FROM 1% ANNUAL CHANCE FLOOD.

GRAPHIC SCALE
(IN FEET)
1 inch = 60 ft.

AERIAL TOPOGRAPHY SHOWN HEREON WAS PROVIDED BY R.J. LUNG AND ASSOCIATES FOR SITE STUDY PURPOSES. AERIAL TOPOGRAPHY WAS FLOWN IN AUGUST, 2010.

DIGALERT DIAL TOLL FREE 1-800-227-2600 AT LEAST TWO DAYS BEFORE YOU DIG
UNDERGROUND SERVICE ALERT OF SOUTHERN CALIFORNIA

ANY UNDERGROUND UTILITIES OR STRUCTURES SHOWN ON THESE PLANS WERE PLOTTED FROM CITY RECORDS. NO ADDITIONAL UTILITY OR SUBSTRUCTURE RESEARCH HAS BEEN PERFORMED. THE CONTRACTOR SHALL DETERMINE THE EXISTENCE AND THE TRUE HORIZONTAL AND VERTICAL LOCATION AND SIZE OF ANY UNDERGROUND UTILITIES OR STRUCTURES AND SHALL BE RESPONSIBLE FOR PROTECTION, ADJUSTMENT, OR DAMAGE TO ANY PUBLIC OR PRIVATE UTILITIES SHOWN OR NOT SHOWN HEREON. THE CONTRACTOR SHALL ALSO BE RESPONSIBLE FOR NOTIFYING U.S.A./DIG ALERT AT 1-800-227-2600 FOR UNDERGROUND UTILITY MARKING AT LEAST 48 HOURS PRIOR TO COMMENCING ANY CONSTRUCTION. CONSTRUCTION SHALL NOT COMMENCE PRIOR TO SAID UNDERGROUND UTILITY MARKING.

REGISTERED PROFESSIONAL ENGINEER ROBERT T. QUINN No. 24088 Exp. 12/31/11 CIVIL STATE OF CALIFORNIA

PLANS PREPARED BY:
R. T. QUINN & ASSOCIATES
CIVIL ENGINEERS LAND SURVEYORS
1907 Border Avenue
Torrance, California 90501
Voice (310) 320-4125 Fax (310) 320-5125
E-Mail Address: rtq@rtquinn.net
ROBERT T. QUINN R.C.E. 24088 EXP. 12-31-11
PROJ. MNGR. BURT MAZELOW E-MAIL ADDRESS: burt@rtquinn.net
DATE: 11-02-10 JOB Nº 210035 DRAWN BY: SAZ

REVISIONS			
Nº	DATE	BY	DESCRIPTION
1			

PLANS PREPARED FOR:
PACIFIC MOBILE HOME PARK
MARK HODGSON
80 HUNTINGTON AVENUE
HUNTINGTON BEACH, CA 92648
PHONE: (714) 588-4707
E-MAIL:
Mark@pacificmobilehomepark.com

PROJECT TITLE: PACIFIC MOBILE HOME PARK
JOB ADDRESS: 80 HUNTINGTON AVENUE, HUNTINGTON BEACH, CA 92648
LEGAL DESCRIPTION: SEE ABOVE
TRACT NO. 17397
DRAWING FILE NO.
SCALE: 1"=30'
SHEET 1 OF 3
SHEET TITLE: TENTATIVE MAP

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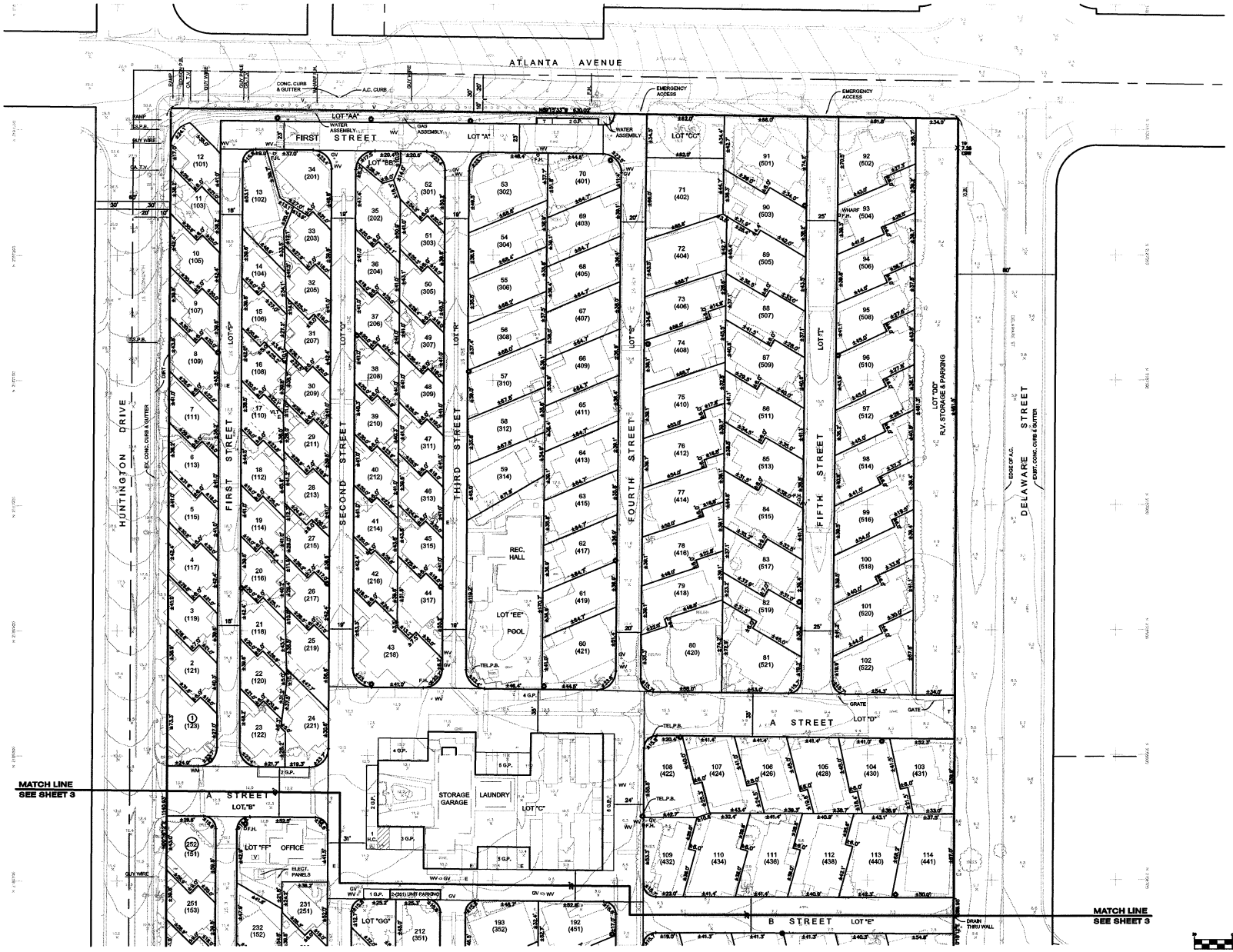
ATTACHMENT NO.



SYMBOLS LEGEND

- FIRE HYDRANT
- SIGN
- TRAFFIC SIGNAL
- STREET LIGHT
- LIGHT POLE
- POWER POLE
- PALM TREE
- TREE
- PROPERTY BOUNDARY
- CENTERLINE
- CA.T.V. — CABLE T.V. PULLBOX
- E — ELECTRIC BOX
- F.H. — FIRE HYDRANT
- G.P. — GUEST PARKING
- G.V. — GAS VALVE
- M.H. — MANHOLE
- P.P. — POWER POLE
- S.L.P.B. — STREET LIGHT PULLBOX
- T — TRASH
- T.S.P.B. — TRAFFIC STREET PULLBOX
- V — VALVE
- VLT — VAULT
- W.V. — WATER VALVE

ATTACHMENT NO. 3.2

DIGALERT
CALL TOLL FREE
1-800-227-2600
AT LEAST TWO DAYS BEFORE YOU DIG
UNDERGROUND SERVICE ALERT OF SOUTHERN CALIFORNIA

ANY UNDERGROUND UTILITIES OR STRUCTURES SHOWN ON THESE PLANS WERE PLOTTED FROM CITY RECORDS. NO ADDITIONAL UTILITY OR SUBSTRUCTURE RESEARCH HAS BEEN PERFORMED. THE CONTRACTOR SHALL DETERMINE THE EXISTENCE AND THE TRUE HORIZONTAL AND VERTICAL LOCATION AND SIZE OF ANY UNDERGROUND UTILITIES OR STRUCTURES AND SHALL BE RESPONSIBLE FOR PROTECTION, ADJUSTMENT, OR DAMAGE TO ANY PUBLIC OR PRIVATE UTILITIES SHOWN OR NOT SHOWN HEREON. THE CONTRACTOR SHALL ALSO BE RESPONSIBLE FOR NOTIFYING U.S.A./UNDERGROUND ALERT AT 1-800-227-2600 FOR UNDERGROUND UTILITY MARKING AT LEAST 48 HOURS PRIOR TO COMMENCING ANY CONSTRUCTION. CONSTRUCTION SHALL NOT COMMENCE PRIOR TO SAID UNDERGROUND UTILITY MARKING.

REGISTERED PROFESSIONAL ENGINEER — ROBERT T. QUINN — No. 24888 — Exp. 12/31/11 — CIVIL — STATE OF CALIFORNIA

PLANS PREPARED BY:
R. T. QUINN & ASSOCIATES
CIVIL ENGINEERS LAND SURVEYORS
1007 Border Avenue
Torrance, California 90501
Voice (310) 320-4125 Fax (310) 320-6125
E-mail Address: rtq@rtquinn.net
ROBERT T. QUINN — R.C.E. 24888 EXP. 12-31-11
PROJ. MNGR. BURT MAZELOW — E-MAIL ADDRESS: burt@rtquinn.net

DATE: 11-02-10 | JOB N°: 210035 | DRAWN BY: SAZ

REVISIONS

N°	DATE	BY	DESCRIPTION
1			
2			
3			
4			
5			
6			

PLANS PREPARED FOR:
PACIFIC MOBILE HOME PARK
MARK HODGSON
80 HUNTINGTON AVENUE
HUNTINGTON BEACH, CA 92648
PHONE: (714) 588-4707
E-MAIL: Mark@pacificmobilehomepark.com

PROJECT TITLE: PACIFIC MOBILE HOME PARK

TRACT NO. 17397

JOB ADDRESS: 80 HUNTINGTON AVENUE, HUNTINGTON BEACH, CA 92648

DRAWING FILE NO.

LEGAL DESCRIPTION: SEE ABOVE

SCALE: 1"=30'

SHEET 2 OF 3

SHEET TITLE: TENTATIVE MAP

11/4/2010 9:27:43 AM \\Server/grp/210035\Tentative Map\210035Sort.dwg 11/4/2010 9:29:12 AM

ATTACHMENT NO. 3.3

DIGALERT
DIAL TOLL FREE
1-800-227-2600
AT LEAST TWO DAYS BEFORE YOU DIG
UNDERGROUND SERVICE ALERT OF SOUTHERN CALIFORNIA

ANY UNDERGROUND UTILITIES OR STRUCTURES SHOWN ON THESE PLANS WERE PLOTTED FROM CITY RECORDS. NO ADDITIONAL UTILITY OR SUBSTRUCTURE RESEARCH HAS BEEN PERFORMED. THE CONTRACTOR SHALL DETERMINE THE EXISTENCE AND THE TRUE HORIZONTAL AND VERTICAL LOCATION AND SIZE OF ANY UNDERGROUND UTILITIES OR STRUCTURES AND SHALL BE RESPONSIBLE FOR PROTECTION, ADJUSTMENT, OR DAMAGE TO ANY PUBLIC OR PRIVATE UTILITIES SHOWN OR NOT SHOWN HEREON. THE CONTRACTOR SHALL ALSO BE RESPONSIBLE FOR NOTIFYING U.S.A./DIG ALERT AT 1-800-227-2600 FOR UNDERGROUND UTILITY MARKING AT LEAST 48 HOURS PRIOR TO COMMENCING ANY CONSTRUCTION. CONSTRUCTION SHALL NOT COMMENCE PRIOR TO SAID UNDERGROUND UTILITY MARKING.

REGISTERED PROFESSIONAL ENGINEER
ROBERT T. QUINN
No. 24868
Exp. 12/31/11
CIVIL
STATE OF CALIFORNIA

PLANS PREPARED BY:
R. T. QUINN & ASSOCIATES
CIVIL ENGINEERS LAND SURVEYORS
1907 Border Avenue
Torrance, California 90501
Voice (310) 320-4125 Fax (310) 320-5125
E-Mail Address: rq@rtquinn.net
ROBERT T. QUINN R.C.E. 24868 EXP. 12/31/11
PROJ. MNGR. BURT MAZZUCH E-MAIL ADDRESS: burt@rtquinn.net
DATE: 11-02-10 JOB N° 210035 DRAWN BY: SAZ

REVISIONS

No.	DATE	BY	DESCRIPTION
1			
2			
3			
4			
5			
6			

PLANS PREPARED FOR:
PACIFIC MOBILE HOME PARK
MARK HODGSON
80 HUNTINGTON AVENUE
HUNTINGTON BEACH, CA 92648
PHONE: (714) 598-4707
E-MAIL:
Mark@pacificmobilehomepark.com

PROJECT TITLE
PACIFIC MOBILE HOME PARK

TRACT NO.
17397

JOB ADDRESS
80 HUNTINGTON AVENUE
HUNTINGTON BEACH, CA 92648

DRAWING FILE NO.

LEGAL DESCRIPTION
SEE ABOVE

SCALE: 1"= 30'

SHEET
3 OF 3

SHEET TITLE
TENTATIVE MAP

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HK&C

HART, KING & COLDREN

REPORT ON IMPACT OF CONVERSION UPON RESIDENTS

Pacific Mobile Home Park

December 6, 2010

RECEIVED
DEC 07 2010
Huntington Beach
PLANNING DEPT.

SECTION I. SCOPE OF REPORT

This "Report on Impact of Conversion upon Residents" ("**Report**") is submitted by the "**Applicant**" for a Tentative Tract Map subdividing the Pacific Mobile Home Park ("**Park**") located at 80 Huntington Street, Huntington Beach, CA 92648. The subdivision will be created by the conversion of the Park from rental spaces to resident owned lots. This Report is being filed with the City of Huntington Beach ("**City**") as part of the "**Application**" and is being made available to the Park residents prior to the City's hearing on the Application, pursuant to California Government Code Section 66427.5, a copy of which is attached hereto as Exhibit "1."

This Report contains the Applicant's assessment of the economic impact upon non-purchasing Park residents of conversion to resident ownership as required by Government Code Section 66427.5 (b). The Applicant's assessment is that non-purchasing residents will not be economically displaced because they can continue renting the home site. Rents will not be increased due to the conversion. There are statutory limits on post-conversion rent increases for those non-purchasing residents.

Government Code Section 66427.5 (b) does not require that this Report discuss economic impacts of conversion upon Park residents who choose to purchase their rental spaces. Those residents are not being forced to purchase their spaces. The Applicant need not and indeed is arguably prohibited under the Subdivided Lands Act from disclosing potential lot purchase prices or homeowner association assessments. (*El Dorado Palm Springs Associates v. City of Palm Springs* (2002) 96 Cal.App.4th 1153, 1177)

SECTION II DEFINITIONS

2.1 Conversion Date: The "**Conversion Date**" is the date after the subdivision final map has been approved by the City and after the Department of Real Estate has approved the subdivision for sale and is the date on which the first Lot in the Park is sold. The Applicant is not by this Report committing to make such applications or to any certain Conversion Date.

ATTACHMENT NO. 4.1

2.2 **Hearing Date:** The "**Hearing Date**" is the date on which the subdivision Application is first heard by the City Planning Commission.

2.3 **Home:** The "**Home**" is the manufactured home that occupies the Space where the Resident is living as of the Hearing Date

2.4 **Lot:** A "**Lot**" is the land and fixed improvements within the Space on which the Resident's Home is located as of the Hearing Date.

2.5 **Resident:** A "**Resident**" is a person living in a Home in the Park who meets the requirements for receiving protections afforded by applicable law.

2.6 **Space:** The "**Space**" is the leased premises on which the Resident's Home is located as of the Hearing Date.

SECTION III NON-PURCHASING RESIDENTS WILL NOT BE ECONOMICALLY DISPLACED BY CONVERSION

Non-purchasing Residents will not be economically displaced as a result of conversion. Following the Conversion Date, all Residents will have the opportunity to either purchase the Lot on which their Home is situated or to continue renting their Space. (Govt. Code § 66427.5 (a)) The Application does not encompass rent increases for non-purchasing Residents.

Non-purchasing residents enjoy statutory protections against post conversion rent increases that would not otherwise be available without conversion. (Govt. Code § 66427.5 (f)) Therefore, upon conversion of the Park to resident ownership, non-purchasing Residents are protected against economic displacement, assuming that rent increases could result in economic displacement

3.1 Non-Purchasing Residents Are Protected From Displacement by the Option to Continue Leasing with Statutory Protections Pertaining to Rent Increases

Following the Conversion Date, Residents who do not exercise the option to purchase their Lots and instead exercise the option to continue renting their Spaces are protected from economic displacement by statutory restrictions on rent increases. The statutory provisions limit the amount and timing of rent increases following conversion. (Govt. Code, § 66427.5 (f))

For non-purchasing Residents who are not lower income households, the monthly rent, including any applicable fees or charges for use of any pre-conversion amenities, initially following the Conversion Date may only increase to market levels as determined by appraisal, and then only over a period of four years.

For non-purchasing Residents who are lower income households, the monthly rent, including any applicable fees or charges for use of any pre-conversion amenities, may only increase following the Conversion Date by an amount equal to the average monthly increase in rent in the four years immediately preceding the conversion. Post Conversion Date rent increases for lower income households are further limited in that the monthly rent cannot be increased by an amount greater than the average monthly percentage increase in the Consumer Price Index for the most recently reported period.

To qualify as a Low Income Household in Orange County, the following income limits are estimated for calendar year 2010[1].

Household Size (# of Persons)	1	2	3	4
Income Must be at or Below:	$52,050	$59,450	$66,900	$74,300

Thus, under the current statutory scheme, the Legislature has defined the exclusive and preempted scope of "mitigations" respecting any "economic displacement" to Residents, assuming, without admitting, that increases in rent can be considered an economic displacement.

3.2 Residents Cannot Be Economically Displaced by Purchase of Their Spaces Because They Are Not Forced to Purchase

Government Code Section 66427.5 (b) does not require that this Report address potential economic displacement upon residents who intend to purchase the Lots on which their Home is situated. The language of Government Code Section 66427.5 is expressly limited to steps intended to avoid economic displacement from conversion upon non-purchasing residents.

The Residents are protected from economic displacement pertaining to potential sale of the Lots upon conversion by having both the option to purchase their Lots at the eventual sales price and the option to continue renting their Space following the Conversion Date. Government Code Section 66427.5 (a) requires the subdivider to "offer

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[1] These figures are estimates based on the Applicants' research. In any event, the relevant date for determination of lower income levels is the date of conversion of the property, which is the date the first lot is sold.

each Resident an option to either purchase his or her ... subdivided unit, which is to be created by the conversion of the park to resident ownership, or to continue residency as a tenant." Thus, if the Resident cannot purchase his or her Lot, the Resident is not required to move and may continue to rent his or her Space following the Conversion Date.

This Report cannot make determinations about economic impacts to the purchasing Residents. That is because any sale price for the Lots and HOA assessments will not be established until some time after the tentative map subdivision approval. After tentative map approval, the subdivider must next follow procedures and obtain approval for the subdivision from the Department of Real Estate under the Subdivided Lands Act. Only after approval by the Department of Real Estate will all of the factors that affect the purchasing Residents be established. The purchasing Residents will then learn the price for their Lot only after the Department of Real Estate approves the subdivision and issues its public report on the subdivision. Of course, all of this will also require appropriate financing accommodations.

3.3 Benefits of Conversion

Subdivision provides Residents with a choice to own the Lot on which their Home is located. Lot ownership gives the Residents greater flexibility with regard to financing for their Homes and other credit opportunities. The Applicant will try to arrange for preferred lenders who will provide favorable financing terms for the Residents.

Lot ownership allows the Residents to control their economic future. Residents do not have to be tied to monthly rental payments if they choose. Lot ownership also gives the Residents the freedom to use their Lot without all of the restrictions or costs that a landlord might impose. The Residents will have the opportunity to control the Park amenities that they will enjoy and pay for through the HOA.

SECTION IV NO CLOSURE OR CHANGE IN ZONING

4.1 No Change in Zoning or Closure

The Park is currently zoned MHP. The Application does not request a zoning change. The Application does not request closure of the Park. The Application seeks merely to convert the existing Spaces to Lots available for purchase. Therefore, the conversion to Resident ownership will not result in economic displacement that might occur with a zoning change or closure of the Park.

This Report is not required to discuss or provide mitigation against any unlikely future closure or change of use application. It will be unlikely for the Park to close or

change use following the conversion because of the subdivision of the individual lots and the common area interests. A subsequent closure or change in use would have to take into account rights that Lot owners and the Homeowners' Association will have in their lots and in the common areas following conversion. A different report containing express mitigation pertaining to relocation would be required for any future closure or change of use application, as discussed in Section 4.3 below.

4.2 Technical "Conversion" or "Change in Use" Only

The term "conversion" relating to a mobilehome park sometimes is used to describe the closure of the park to enable an alternative use. This is NOT what is occurring as a result of subdivision of the Park. The Park will remain a manufactured housing community, with the existing Residents having the right to either buy their Lot or to remain and rent their Space.

While conversion of a rental mobilehome park to a Resident-owned mobilehome park is identified as a "change of use" under California Mobilehome Residency law and under the Chapter 234 of the City's Ordinance, it is more accurately described under the Subdivision Map Act as a change in the form of ownership. The Park is not being closed and the Residents are not being required to vacate the property.

4.3 Relocation Assistance Not Applicable

When a subdivision is created from conversion of a rental mobilehome park to resident ownership, a different type of impact report is required than when a subdivision created from a change of use to a non-mobilehome park use or when the mobilehome park is closed.

Government Code Section 66427.5 governs the type of report that must be prepared for a subdivision which is created from conversion of a rental mobilehome park to resident ownership. This Government Code Section 66427.5 Report, which does not deal with a change in use of the property or closure of the Park, is simply required to explain the options of the Residents regarding their choice to purchase their Lot or to rent their Space.

This Report need not discuss displacement of Residents, replacement housing or mitigation of the reasonable costs of relocation, which issues would be involved in any subdivision resulting from a change of use of a mobilehome park or from closure of a mobilehome park. In fact Government Code Sections 66427.4 and 65863.7, which apply to subdivisions created from change of use to a non-mobilehome park use or to closure of a mobilehome park, expressly exempt from their requirements subdivisions that are

created from conversion of a rental mobilehome park to resident ownership. (See Govt. Code §§ 66427.4 (e), 65863.7 (a))

SECTION V RESIDENT SURVEY

The Park does not have an active homeowner's association so it was not possible to conduct a survey with the agreement of an existing Homeowner's Association. In lieu of that, the park owner, acting through its management company, Newport Pacific, invited all park residents to attend a resident meeting on September 30, 2010 to initiate the survey process through a cooperative process which is described in the attached Declaration of Clarke Fairbrother. As he notes, a second notice went to all residents in the Park, again providing information regarding the subdivision and inviting their participation in the process of developing and conducting the survey.

A copy of the agreed upon survey form is attached to the Fairbrother declaration which also attaches materials which describe the agreed upon survey process. The results of the survey were as follows:

Supporting Subdivision:	58
Decline to State:	3
Do Not Support	4

Thus, of those residents who responded to the survey, the vast majority supported the conversion.

SECTION VI. CONCLUSION

This Report discusses the impacts upon the Residents of conversion to Resident ownership pursuant to subdivision of the Park. Upon conversion, the Residents are statutorily protected from economic displacement by the option to either purchase their Lots or continue renting their Spaces with statutory restrictions on rent increases. Residents with long-term leases will continue to have their rights under the leases after the Conversion Date.

All of the Resident protections discussed in this Report are based upon the Applicant's assessment of the currently existing statutory scheme and facts believed to be true, and are not a promise, representation, or warranty on the part of the Applicant or its agents. The operative date for the time frame and protections described above is the Conversion Date as described in Section 2.1 above. Of course, should the law change, the

Applicant reserves the right to implement the conversion in accordance with the applicable valid and enforceable laws.

Dated: December 3, 2010

Hart, King & Coldren

By: _____
Mark D. Alpert
Attorneys for Applicant

ATTACHMENT NO. 4.7

I, Clarke Fairbrother, declare:

1. I am an individual over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called upon at time of trial. I am a principal of Newport Pacific Capital Company, Inc ("Newport Pacific"). The Park is owned by Pacific Mobile Home Park, LLC ("Owner").

2. Newport Pacific provides the on and offsite management for Pacific Mobile Home Park, a mobile home park in Huntington Beach, California (the "Park"). Neither Newport Pacific nor myself have any ownership interest in the Park.

3. The Park does not have an official or unofficial homeowner's association to assist in the conduct of a resident survey of conversion. Rather than simply conducting the survey, Owner chose to provide an opportunity for all of the residents to participate in developing the survey and the conduct of the survey. The Owner called a park wide meeting on September 30, 2010. I conducted the meeting. We provided a basic explanation of the Owner's planned application to subdivide the Park and answered numerous questions. Near the end of the meeting, we invited all those residents who were interested in participating to form a resident committee to work with the Owner in developing the form and process of the survey. The resident committee was made up of each and every resident who wished to participate.

4. After the September 30, 2010 meeting for all residents, we followed up with a letter, a copy of which is attached as Exhibit A, in which we reiterated the invitation that all interested residents join the resident committee. As a result, there were a total of 12 residents who joined the committee. The committee members consisted of JulieAnn Rooney; Brad Rhoads; John Reger; Debbie Moore; Antonio Lopez; Connie Brockway; Kris Dgezits; Mary Bieschke; Maria Laurienzo; Christine McClure; John Sisker; and Deborah Lawson- Sisker.

5. In the next few weeks, we invited comments and worked with the Committee members to reach an agreement on the final form of the survey submission

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200 SANDPOINTE, FOURTH FLOOR
SANTA ANA, CALIFORNIA 92707

ATTACHMENT NO. 5.1

and the manner of conducting the survey. After receiving comments which were incorporated into a draft survey, on October 29, 2010, I circulated by email the proposed revised draft survey, a proposed "frequently asked questions" letter and proposed plan for conducting the survey and invited the committee members to offer any additional comments or, if they had no proposed changes, that they sign and return an enclosed agreement for conduct of the survey. (See Exhibits B, C & D)

5. In response to my email, I received no negative comments or proposed changes to the documents. Four residents on the committee affirmatively expressed their agreement. (See Exhibit E) We received no other comments from any other committee members.

6. We initiated the survey on Monday November 8, 2010, conducting the survey in accordance with the procedures set forth in Exhibit D, submitting the survey in the form of Exhibit B and the FAQ in the form of Exhibit D. The survey was to be completed by November 20, 2010. However, we have included in our tabulation several surveys received after that date, as well as 16 unsigned surveys. The results of the tally were as follows:

Supporting subdivision:	58
Decline to state	3
Do Not Support:	4

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 30th day of November at Irvine, California.

Clarke Fairbrother, Declarant

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SANTA ANA, CALIFORNIA 92707

ATTACHMENT NO. 5.2

Newport Pacific Capital Company, Inc.

October 6, 2010

Residents
Pacific Mobilehome Park
80 Huntington Street
Huntington Beach, CA 92648

EXHIBIT A

Dear Homeowner/Resident:

On September 30, 2010, an informational meeting was held concerning the planned subdivision mapping of Pacific Mobilehome Park. While no sales of lots are planned for the immediate future, we wanted to advise residents about the subdivision process, and provide them with information as to the choices that may be available in the future. **When and if** sometime in the future the owners decide to sell the property to the individual residents, each current homeowner will have the opportunity to purchase their lot and become a landowner. If they chose not to purchase, they still may continue to rent as a tenant.

In the near future, a resident survey about subdivision will be conducted. At the meeting, we asked for volunteers who would like to sit on a resident committee. The purpose of the committee is to provide us with feedback as to the form and content of the resident survey. We'd like to thank the following people who volunteered: Connie Brockway, Maria Lawrenzo, Antonio Lopez, Debbie Moore, John Reger, Brad Rhoads, Julie Ann Rooney, Deborah Sisker, and John Sisker.

If you would like to serve on this committee with the residents listed, please contact Janece Herrington, at Janece@newportpacific. A committee meeting will be scheduled in the near future to review the survey wording and content. After the committee has approved the survey wording, we will mail the survey to each household for your responses.

It is our plan to have a subdivision map filed with the City of Huntington within the next few months. If you have any questions, please call me or email clarkef@newportpacific.com.

Very truly yours,

NEWPORT PACIFIC CAPITAL COMPANY, INC.

Clarke Fairbrother

Clarke Fairbrother
President

17300 Red Hill Avenue, Suite 280, Irvine, CA 92614 ♦ (949) 852-5575 ♦ Fax (949) 852-5582

ATTACHMENT NO. 5.3

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FAMILY OF COMPANIES

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EXHIBIT B

Frequently Asked Questions About Mobilehome Park Subdivision

After the residents are notified of the owner's intent to subdivide, engineers and surveyors prepare a preliminary map to submit to the City. After the subdivision process is completed and if and when the owners decide to sell the property to the residents, each current homeowner will have the opportunity to purchase his or her lot and become a landowner, or continue to rent as a tenant. **No residents will be displaced by subdivision**. The following are some of the common questions asked by residents:

What happens if I do not purchase my lot? Current tenants that do not purchase their lots may elect to **continue as tenants indefinitely**. This commitment applies to the current and future owners of Pacific Park. No current resident will be displaced by the subdivision. Once the park is subdivided, future rent increases for qualified lower income households may increase annually, limited to the lesser of: the average of the increases over the four preceding years, or the current period CPI increase, whichever is the least. For households that do not qualify as lower income, monthly rents will continue to be at market.

How will the common areas be managed after subdivision? The residents that purchase their lots will become members of a Lot Owners Association (LOA). The LOA will own the common area. The LOA will elect a board of directors to set the policies for the operation of the community and hire management. The LOA will require monthly dues for maintenance, operation of common area facilities, and reserves for future capital improvements and replacements.

How can a new Lot Owners Association afford to pay for major replacements? A reserve study will be prepared for approval by the Department of Real Estate before lots are sold. The current owner will fund the replacement reserve for the depreciated portion of common area facilities that will require replacement in the future. The LOA will start with reserves, not from zero.

What other costs will each purchaser pay? Each lot owner will be obligated to pay the property taxes, insurance, association dues and debt service on his or her own lot.

Can I finance the purchase of my lot? Yes. Newport Pacific will help residents locate and work with lenders to finance the purchase of the lot. Residents who purchase a lot will be able to finance both their lot and home together at single-family home rates, as opposed to the much higher personal property interest rates currently available on mobile homes. The home and lot package may provide enough value to fully finance the purchase of the lot.

If I am low income, how can I finance the purchase of lot? Low-income families may be able to obtain below market rate financing with very favorable payment terms from the State of California MPROP Fund and other government sources. Low income financing in other communities has been provided at 3% interest with payments based upon the ability to pay, with unpaid interest deferred until the property is sold.

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How will I know the exact boundaries of my lot? The boundaries of the lot will be the same as current boundaries in most cases; some minor adjustments may be required. A preliminary tract map will be prepared in the next few months. After the county approves the preliminary map, the lots will be surveyed and marked. Resident input on the final map will be sought before the map is finalized. Each purchaser will get a grant deed for their individual lot and a proportionate share in the LOA, which will own the common area.

What is the difference between the proposed lot subdivision and a resident association purchasing the park?

With the lot subdivision each homeowner will be able to purchase and finance their lot as they individually choose. When the ownership of the home is merged with the lot, lenders will use single-family real estate rates and criteria for the loans. Interest rates will be lower and the amortization period will be longer. Individuals will only be responsible for the purchase of their own lot. Those homeowners that do not purchase will be able to remain as tenants and continue to pay rent. The current owner will retain the unsold lots and pay the association dues for those lots. We believe that lot ownership is the best form of resident ownership.

With resident association purchase, the association would need to obtain capital and finance the purchase of the entire park. All residents would continue to pay rent to the resident association as the new owner. Homes would continue to be financed as personal property, not as real estate.

How much will my lot cost and what will the monthly association dues be? The lot cost and association dues will not be known until much later in the process. After the final map is approved by the County and recorded, the owner will engage an appraiser to determine the value of the lots. Before the owner is allowed to quote prices for the lots or enter into contracts, a subdivision disclosure report (including prospective pricing, an association budget and an association reserve analysis) will be approved by the California Department of Real Estate. After the DRE report is approved, lot prices and association dues information will be available and the lots can be offered for sale. The total processing for all steps is expected to take about two years. Appropriate financing must be available in the marketplace before the owners will start offering the lots for sale.

Will the subdivision ensure that the property will always be a mobilehome park? The property has been under the same ownership for many years and the owners do not have plans to sell the property in the immediate future. By applying for a subdivision map the owners are indicating that they believe that selling individual lots to the residents is a viable method for selling, if and when they decide to sell the property.

How will having a subdivision map in place tie into the City's current relocation ordinance? We do not see the subdivision having any effect on relocation requirements.

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How does the subdivision affect affordable housing? Affordable housing is a term used by Cities in goals set by State and Federal government for housing programs. Mobilehome parks are arbitrarily counted as affordable housing even though there are no income limitations on living in a mobilehome park as there are in "affordable" apartments. We do not think that the subdivision map will have any impact.

Until the residents own 51% of the lots, how will their input and concerns be handled? Lot owners will elect the Lot Owners' Association board. The current owner will have a majority of the board positions as long as they have a majority of the lots, however individual lot owners will be included on the board from the beginning. The Lot Owners' Association board will set policies and hire professional management to oversee the maintenance of the common area and handle the financial affairs of the Association. The operations will continue to be regulated by the California Department of Housing and Community Development (HCD).

What happens if the current owners sell their interest in the unsold lots to a third party owner? The current owner, and any subsequent owners, must comply with State law concerning subdivided lots. Residents will be allowed to continue to rent for as long as they want. Low and moderate-income residents rent increases will be limited to CPI during their continued rental. When the current resident sells his home, the buyer may be required to purchase the lot or remove the home. The ability to provide the lot with the house upon sale may increase the value of the house.

How will the lots be valued? Just before lot sales begin, an appraiser will be hired to value the lots. He will likely use data from the sale of other lots in the area to determine value of the lots. The size and location of the lot within the park will be considered in determining the value of each lot.

What assurance is available that the lot pricing will be fair? If and when the owners want to sell lots, they will want to sell as many lots as possible in as short a time as possible. To sell the lots quickly the owners may offer discounts from market value to sell the lots as quickly as possible.

If I do not buy my lot when first offered, will I have a chance to purchase later? Yes. If and when the owners decide to sell, they will want to sell all of the lots. The expectation is that the lots will be sold over several years.

Why are some resident associations opposed to subdivision? Some residents in rent controlled areas believe that subdivision will take away some of the benefits accorded by the existing local rent control ordinance. Since there is no rent control in Huntington Beach, this logic does not apply. Web sites where this issue is discussed do not make this distinction.

How does this subdivision vary from other mobilehome park subdivision in Huntington Beach? Without knowing anything about the other subdivisions, it is likely similar except that

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this owner does not plan to make any lot sales in the immediate future. This map is being put in place to provide for a method of sale in the future.

What relationship does Newport Pacific have with Pacific Park? Newport Pacific is the property management company hired by the owners to operate the property. Newport Pacific does not have an equity interest in the property.

Subdivision provides a tremendous **opportunity for the residents of the community to obtain true real estate equity**.

October 31, 2010

EXHIBIT C

PACIFIC MOBILEHOME PARK
RESIDENT SUPPORT SURVEY AGREEMENT

Government Code Section 66427.5 (d) requires that the owners of a mobilehome park that seeks to convert the park to resident ownership obtain a survey of resident support to be considered by the local agency with the subdivision application. The purpose of this Agreement is to document the terms under which the resident survey is to be conducted and the form of the survey to be used.

1. Survey Form. The survey ballot form that shall be used for the survey of resident support for the conversion will be in substantially the form of Attachment 1. The enclosed Frequently Asked Questions will also be mailed at that time.

2. Conduct of Survey. The Newport Pacific shall be responsible for distributing the ballots to all resident households, with a single ballot per space, with an envelope to be used to return the survey. Residents have the option of signing their survey or returning it without signature. The homeowners will be instructed to return the survey in the envelope sealed to the office of Newport Pacific by mail. The survey will be distributed on November 5, 2010. The homeowners shall have 15 days to return the survey.

3. Tabulation of Results. On the 20th day following distribution of the survey, members of the Newport Pacific accounting staff will open the envelopes and tabulate the results of the completed forms.

On Behalf of Park Owner:

Signature:_____ Date:_____

Print Name:_____

On Behalf of Homeowners' Committee, (signatures may be obtained on separate copies of the agreement).

Signature:_____ Date:_____

Print Name:_____

Signature:_____ Date:_____

Print Name:_____

Signature:_____ Date:_____

Print Name:_____

ATTACHMENT NO. 5.8

Signature:_____ Date:_____

Print Name:_____

Signature:_____ Date:_____

Print Name:_____

Signature:_____ Date:_____

Print Name:_____

ATTACHMENT NO. 5.9

EXHIBIT D

PACIFIC MOBILEHOME PARK

Draft October 31, 2010

***CA Government Code 66427.5(d)(1)* SURVEY OF RESIDENTS**

This Survey requests information in two categories: (1) support for the proposed subdivision to allow residents purchase their individual lots and (2) demographics of your household. Each household should complete one (1) Survey and mail the completed Survey to Newport Pacific Capital Company, Inc. 17300 Red Hill Ave., Suite #280, Irvine, CA 92614 in the enclosed self –addressed envelope by November 15, 2010. **If there are sections of the Survey for which you do not have information or do not wish to answer, simply skip those questions**. No one in the Park will see the individual Surveys; however, it is possible that local government agencies will receive copies of the Surveys and your survey may become public record. The only information that will be provided to resident households or the management is a summary of the data gathered. The income level information is requested so that we can estimate the volume of low and moderate income financing that we might need when arranging for purchaser financing.

SECTION I.

Survey

The goal of the proposed subdivision is to provide individual titled lots in the Mobilehome Park, which in the future will allow the owners to offer residents the choice owning or renting their lots. If and when the owners decide to sell lots, residents will be able purchase their lots or may continue to rent the lot (space) on which their mobile home is located. You can support the subdivision map without a personal desire to purchase your lot. Pursuant to *California Gov't Code section 66427.5(d)(1)*, please check one box below:

1. [ ] I support the subdivision map of the mobilehome park which, if and when the owners decide to sell lots, will give me the option to buy my lot, if the purchase price of my lot [lot + percentage ownership of common areas & facilities] is affordable to me.

2. [ ] I support the subdivision map which, if and when the owners decide to sell lots, will give me the option to buy my lot, but I am low income/moderate income household and will need financial assistance to be able to purchase my lot. [See "Household Size & Income Level" chart on page 2].

3. [ ] I support the subdivision map which, if and when the owners decide to sell lots, will give me the option to buy my lot, however I believe that I would continue to rent.

4. [ ] I decline to respond at this time.

5. [ ] I do not support the subdivision of the park.

This Survey does not constitute an offer to sell a real estate interest in Pacific Mobilehome Park. An offer to sell can only be made after the issuance and delivery of the Final Public Report along with all statutorily required documents, including, without limitation, the HOA Budget, the Purchase/Sale Agreement, the HOA Articles & Bylaws, and the Declaration of Conditions, Covenants & Restrictions (CC&R's).

BY PROVIDING THE INFORMTION REQUESTED IN THIS SURVEY, YOU ARE NOT COMMITTING YOURSELF TO ANY DECISION WITH RESPECT TO THE SUBDIVION MAP, INCLUDING, WITHOUT LIMITATION, WHETHER YOU WANT TO RENT OR TO PURCHASE.

ATTACHMENT NO. 5.10

SECTION II.
Demographic Information

1. Is your home in Pacific Mobilehome Park your primary residence?
   [ ]YES [ ]NO

2. How many people [of all ages] live in your home? _____
   a. Number of Older Person [55 & older]: _____
   b. Number of Adults [18 & older]: _____
   c. Number of Children [under 18]: _____

3. Which category does your household's total gross income, before taxes, fall into? [Check only one box below]

HOUSEHOLD SIZE AND INCOME LEVELS

Check only one Box	Income Levels	1 Person Household	2 Persons Household	3 Persons Household	4 Persons Household
	Very Low	$19,500 or less	$22,300 or less	$25,100 or less	$27,850 or less
	Lower	More than $19,500but less than $32,550	More than $22,300 but less than $37,200	More than $25,100 but less than $41,850	More than $27,850 but less than $46,450
	Median	More than $32,550 but less than $39,060	More than $37,200 but less than $44,640	More than $41,850 but less than $50,220	More than $46,450 but less than $55,740
	Moderate	More than $39,060 but less than $52,050	More than $44,640 but less than $59,450	More than $50,220 but less than $66,900	More than $55,740 but less than $74,300
	Greater than Moderate	More than $52,050	More than $59,450	More than $66,900	More than $74,300

The State of California currently has a loan fund (MPROP) that provides assistance to low and moderate-income households at 3% interest with no payments until the lot is resold. The above financial information will be helpful when applying for a funding commitment. You are not obligated to provide this information.

This Survey does not constitute an offer to sell a real estate interest in Pacific Mobilehome Park. An offer to sell can only be made after the issuance and delivery of the Final Public Report along with all statutorily required documents, including, without limitation, the HOA Budget, the Purchase/Sale Agreement, the HOA Articles & Bylaws, and the Declaration of Conditions, Covenants & Restrictions (CC&R's).

BY PROVIDING THE INFORMTION REQUESTED IN THIS SURVEY, YOU ARE NOT COMMITTING YOURSELF TO ANY DECISION WITH RESPECT TO THE SUBDIVION MAP, INCLUDING, WITHOUT LIMITATION, WHETHER YOU WANT TO RENT OR TO PURCHASE.

ATTACHMENT NO. 5.11

4. Information on your Mobile home:
   a. Make/Model of Mobile home: _____
   b. Year of Manufacture: _____
   c. Size of Mobile home: (i.e.: 24 x 52) _____
   d. Number of Bedrooms: _____
   e. Do you have a mortgage on your home? [ ]YES [ ]NO
      If yes,
      i. What is the balance owed? _____
      ii. What is the monthly payment? _____

THANK YOU FOR TAKING THE YOUR TIME TO RESPOND TO THIS SURVEY!

Providing your name and address is optional. The survey results will be presented in a summary form to the City. The City may request copies of the individual responses and therefore your survey would become a part of the public record.

Date: _____ Date: _____

Signature: _____ Signature: _____

Print Name: _____ Print Name: _____

Address: _____ Address: _____

Day Tele: _____ Day Tele: _____

This Survey does not constitute an offer to sell a real estate interest in Pacific Mobilehome Park. An offer to sell can only be made after the issuance and delivery of the Final Public Report along with all statutorily required documents, including, without limitation, the HOA Budget, the Purchase/Sale Agreement, the HOA Articles & Bylaws, and the Declaration of Conditions, Covenants & Restrictions (CC&R's).

BY PROVIDING THE INFORMTION REQUESTED IN THIS SURVEY, YOU ARE NOT COMMITTING YOURSELF TO ANY DECISION WITH RESPECT TO THE SUBDIVION MAP, INCLUDING, WITHOUT LIMITATION, WHETHER YOU WANT TO RENT OR TO PURCHASE.

ATTACHMENT NO 5.12

EXHIBIT E

From: Clarke Fairbrother [clarkef@newportpacific.com]
Sent: Tuesday, November 30, 2010 11:43 AM
To: Mark Alpert
Subject: FW: Pacific Mobile Home Park Notes: Survey & FAQ's
Attachments: Resident Supprot Survey Agreement.pdf

-----Original Message-----
From: Debbie Moore [mailto:Debbie.Moore@stjoe.org]
Sent: Thursday, November 04, 2010 2:39 PM
To: Clarke Fairbrother
Subject: RE: Pacific Mobile Home Park Notes: Survey & FAQ's

Hello Clark,
I have read through all the documents and agree that everything looks fine. I have also attached a copy of the Resident Support Survey Agreement with my signature for your files.

Thank you,
Debbie

From: Clarke Fairbrother [mailto:clarkef@newportpacific.com]
Sent: Thursday, November 04, 2010 2:21 PM
To: mbies15989@aol.com; cbrockway@socal.rr.com; kris4933@hotmail.com; gdlzap123@yahoo.com; debbie.moore@stjoe.org; nolimepublishing@aol.com; brad@bradfordrhoads.com; jrooney@socal.rr.com; dsisker@sprynet.com; jsisker@sprynet.com; docmcclure@yahoo.com; angels4M@aol.com
Cc: Janece Herrington
Subject: FW: Pacific Mobile Home Park Notes: Survey & FAQ's

I have received emails from John Reger and John Sisker indicating that the enclosed revised survey and other information looks fine. I have not received any other comments.

I understand that there is not a formal homeowner's association, but your review of the form of the survey and frequently asked questions helped create the final form of the documents. **Please sign a copy of the Agreement with Homeowners**, which only indicates that you had an opportunity to make comments, and send it back to me for my files (scan and email, fax or mail). Fax number is 949-852-5582. The address is 17300 Redhill Suite 280, Irvine, Ca 92614.

We plan to mail revised survey and frequently asked questions to all of the residents next week.

I will be out of the office for two weeks starting next Monday. If you have any questions during that period of time, please contact Janece Herrington.

Clarke Fairbrother
Office 949-852-5575

-----Original Message-----
From: Clarke Fairbrother
Sent: Friday, October 29, 2010 11:09 AM
To: 'mbies15989@aol.com'; 'cbrockway@socal.rr.com'; 'kris4933@hotmail.com'; 'gdlzap123@yahoo.com'; 'debbie.moore@stjoe.org'; 'nolimepublishing@aol.com'; 'brad@bradfordrhoads.com'; 'jrooney@socal.rr.com'; 'dsisker@sprynet.com'; 'jsisker@sprynet.com'; 'docmcclure@yahoo.com'; 'angels4M@aol.com'

ATTACHMENT NO. 5.13

Cc: Janece Herrington
Subject: FW: Pacific Mobile Home Park Notes: Survey & FAQ's

Enclosed are the notes that I recieved from John.

The attached survey and frequently asked questions have been revised to incorporate all of his points.

Also attached is document that outlines how the survey is to be conducted.

Please give me your comments if any in the next few days.
We would like to get this survey and frequently asked questions in the mail next week.
If you can not open the documents, I can send PDF versions or get then to you another way.
If you have questions, send me an email with a good time and number to call. I am available this Saturday if you would like to discuss anything.

Clarke Fairbrother
Office 949-852-5575

The Survey:

Note: This 'Survey' is just to show a tentative interest among us residents, and does not commit anyone to anything. It is just for informational purposes only.

One of the most important factors and questions on this 'Survey' is actually Question No. 1 of Section I, that one would indeed be interested if it is affordable to them. That is a key factor for this park and should always be emphasized.

This 'Survey' is okay as is, with the exception of Question Number 3. It is felt that some people may be a bit reluctant to divulge their income level, possibly feeling it is an invasion of privacy. Therefore, while we still feel this information is important and should be included, we would like to see some type of wording as to just why this information is needed at this time, and as to what will be done with it.

Also, we like to see a place for residents to leave their name and contact information if they so wish, but to also emphasize that this information is entirely optional.

Frequently Asked Questions:

Frequently Asked Questions About Mobile Home Park Subdivision
(and how it relates to Pacific Mobile Home Park)

We would like to see the original FAQ's information included again with the revised 'Survey" but also expanded to include the following questions, along with Newport Pacific Capital's response...

- **Will this subdivision secure our park as a mobile home park well into the future, and how will this tie-in with the current City's Relocation Ordinance, along with the effects on affordable housing?**
- **Unless the residents have 51% interest in the park, how will their input and concerns be of any value? And what happens to those that do purchase their lot, if the current park owners sell to outside interests anyway?**
- **Once a survey on lot lines is confirmed, how will this be enforced, and is the value of each lot based on**

ATTACHMENT NO. 5.14

- its square footage? Likewise what is Newport Pacific Capitals role and interest is this subdivision?
- Why are some residents and their political groups in other mobile home parks so negative about this very concept when they imply outright purchase of the park is a better way to go? How is this subdivision the same and/or different than Huntington Shorecliffs and what may be happening in other Huntington Beach parks?

- JulieAnn Rooney, #463 (714) 960-4756 jrooney@socal.rr.com
- John Sisker, #266 (714) 536-3850 jsisker@sprynet.com - cell: (714) 815-7625
- Deborah Lawson-Sisker, #266 (714) 536-3850 dsisker@sprynet.com - cell (714) 914-7452

Notice from St. Joseph Health System:
Please note that the information contained in this message may be privileged and confidential and protected from disclosure.

ATTACHMENT NO. 5.15

PACIFIC MOBILEHOME PARK
RESIDENT SUPPORT SURVEY AGREEMENT

Government Code Section 66427.5 (d) requires that the owners of a mobilehome park that seeks to convert the park to resident ownership obtain a survey of resident support to be considered by the local agency with the subdivision application. The purpose of this Agreement is to document the terms under which the resident survey is to be conducted and the form of the survey to be used.

1. Survey Form. The survey ballot form that shall be used for the survey of resident support for the conversion will be in substantially the form of Attachment 1. The enclosed Frequently Asked Questions will also be mailed at that time.

2. Conduct of Survey. The Newport Pacific shall be responsible for distributing the ballots to all resident households, with a single ballot per space, with an envelope to be used to return the survey. Residents have the option of signing their survey or returning it without signature. The homeowners will be instructed to return the survey in the envelope sealed to the office of Newport Pacific by mail. The survey will be distributed on November 5, 2010. The homeowners shall have 15 days to return the survey.

3. Tabulation of Results. On the 20th day following distribution of the survey, members of the Newport Pacific accounting staff will open the envelopes and tabulate the results of the completed forms.

On Behalf of Park Owner:

Signature:_____ Date:_____

Print Name:_____

On Behalf of Homeowners' Committee, (signatures may be obtained on separate copies of the agreement).

Signature: Deborah E. Moore Date: 11/3/10

Print Name: Deborah E. Moore

Signature:_____ Date:_____

Print Name:_____

Signature:_____ Date:_____

Print Name:_____

ATTACHMENT NO. 5.16

From: Clarke Fairbrother [clarkef@newportpacific.com]
Sent: Tuesday, November 30, 2010 11:43 AM
To: Mark Alpert
Subject: FW: Pacific Mobile Home Park Notes: Survey & FAQ's
Attachments: Agreement with HOA re Resident Survey Form No. 2.doc

-----Original Message-----
From: Brad Rhoads [mailto:brad@bradfordrhoads.com]
Sent: Thursday, November 04, 2010 4:07 PM
To: Clarke Fairbrother
Subject: Re: Pacific Mobile Home Park Notes: Survey & FAQ's

I have attached the signed survey as you requested Clarke. Good luck and God Speed!

Brad Rhoads
Spc. # 352

----- Original Message -----
From: Clarke Fairbrother
To: mbies15989@aol.com ; cbrockway@socal.rr.com ; kris4933@hotmail.com ; gdlzap123@yahoo.com ; debbie.moore@stjoe.org ; nolimepublishing@aol.com ; brad@bradfordrhoads.com ; jrooney@socal.rr.com ; dsisker@sprynet.com ; jsisker@sprynet.com ; docmcclure@yahoo.com ; angels4M@aol.com
Cc: Janece Herrington
Sent: Thursday, November 04, 2010 2:21 PM
Subject: FW: Pacific Mobile Home Park Notes: Survey & FAQ's

I have received emails from John Reger and John Sisker indicating that the enclosed revised survey and other information looks fine. I have not received any other comments.

I understand that there is not a formal homeowner's association, but your review of the form of the survey and frequently asked questions helped create the final form of the documents. **Please sign a copy of the Agreement with Homeowners**, which only indicates that you had an opportunity to make comments, and send it back to me for my files (scan and email, fax or mail). Fax number is 949-852-5582. The address is 17300 Redhill Suite 280, Irvine, Ca 92614.

We plan to mail revised survey and frequently asked questions to all of the residents next week.

I will be out of the office for two weeks starting next Monday. If you have any questions during that period of time, please contact Janece Herrington.

Clarke Fairbrother
Office 949-852-5575

-----Original Message-----
From: Clarke Fairbrother
Sent: Friday, October 29, 2010 11:09 AM
To: 'mbies15989@aol.com'; 'cbrockway@socal.rr.com'; 'kris4933@hotmail.com'; 'gdlzap123@yahoo.com'; 'debbie.moore@stjoe.org'; 'nolimepublishing@aol.com';

ATTACHMENT NO. 5.17

'brad@bradfordrhoads.com'; 'jroon[illegible]socal.rr.com'; 'dsisker@sprynet.com'; 'jsis[illegible]r@sprynet.com'; 'docmcclure@yahoo.com'; 'angels4M[illegible]aol.com'
Cc: Janece Herrington
Subject: FW: Pacific Mobile Home Park Notes: Survey & FAQ's

Enclosed are the notes that I recieved from John.

The attached survey and frequently asked questions have been revised to incorporate all of his points.

Also attached is document that outlines how the survey is to be conducted.

Please give me your comments if any in the next few days.
We would like to get this survey and frequently asked questions in the mail next week.
If you can not open the documents, I can send PDF versions or get then to you another way.
If you have questions, send me an email with a good time and number to call. I am available this Saturday if you would like to discuss anything.

Clarke Fairbrother
Office 949-852-5575

The Survey:

Note: This 'Survey' is just to show a tentative interest among us residents, and does not commit anyone to anything. It is just for informational purposes only.

One of the most important factors and questions on this 'Survey' is actually Question No. 1 of Section I, that one would indeed be interested if it is affordable to them. That is a key factor for this park and should always be emphasized.

This 'Survey' is okay as is, with the exception of Question Number 3. It is felt that some people may be a bit reluctant to divulge their income level, possibly feeling it is an invasion of privacy. Therefore, while we still feel this information is important and should be included, we would like to see some type of wording as to just why this information is needed at this time, and as to what will be done with it.

Also, we like to see a place for residents to leave their name and contact information if they so wish, but to also emphasize that this information is entirely optional.

Frequently Asked Questions:

Frequently Asked Questions About Mobile Home Park Subdivision
(and how it relates to Pacific Mobile Home Park)

We would like to see the original FAQ's information included again with the revised 'Survey" but also expanded to include the following questions, along with Newport Pacific Capital's response...

- **Will this subdivision secure our park as a mobile home park well into the future, and how will this tie-in with the current City's Relocation Ordinance, along with the effects on affordable housing?**
- **Unless the residents have 51% interest in the park, how will their input and concerns be of any**

ATTACHMENT NO. 5.18

- value? And what happen to those that do purchase their lot, if the current park owners sell to outside interests anyway?
- Once a survey on lot lines is confirmed, how will this be enforced, and is the value of each lot based on its square footage? Likewise, what is Newport Pacific Capitals role and interest is this subdivision?
- Why are some residents and their political groups in other mobile home parks so negative about this very concept when they imply outright purchase of the park is a better way to go? How is this subdivision the same and/or different than Huntington Shorecliffs and what may be happening in other Huntington Beach parks?

- JulieAnn Rooney, #463 (714) 960-4756 jrooney@socal.rr.com
- John Sisker, #266 (714) 536-3850 jsisker@sprynet.com - cell: (714) 815-7625
- Deborah Lawson-Sisker, #266 (714) 536-3850 dsisker@sprynet.com - cell (714) 914-7452

ATTACHMENT NO. 5.19

PACIFIC MOBILEHOME PARK
RESIDENT SUPPORT SURVEY AGREEMENT

Government Code Section 66427.5 (d) requires that the owners of a mobilehome park that seeks to convert the park to resident ownership obtain a survey of resident support to be considered by the local agency with the subdivision application. The purpose of this Agreement is to document the terms under which the resident survey is to be conducted and the form of the survey to be used.

1. Survey Form. The survey ballot form that shall be used for the survey of resident support for the conversion will be in substantially the form of Attachment 1. The enclosed Frequently Asked Questions will also be mailed at that time.

2. Conduct of Survey. The Newport Pacific shall be responsible for distributing the ballots to all resident households, with a single ballot per space, with an envelope to be used to return the survey. Residents have the option of signing their survey or returning it without signature. The homeowners will be instructed to return the survey in the envelope sealed to the office of Newport Pacific by mail. The survey will be distributed on November 5, 2010. The homeowners shall have 15 days to return the survey.

3. Tabulation of Results. On the 20th day following distribution of the survey, members of the Newport Pacific accounting staff will open the envelopes and tabulate the results of the completed forms.

On Behalf of Park Owner:

Signature:_____ Date:_____

Print Name:_____

On Behalf of Homeowners' Committee, (signatures may be obtained on separate copies of the agreement).

Signature: Brad Rhoads Date: 11-04-2010

Print Name: Brad Rhoads

Signature:_____ Date:_____

Print Name:_____

Signature:_____ Date:_____

Print Name:_____

ATTACHMENT NO. 5.20

Signature:_____ Date:_____

Print Name:_____

Signature:_____ Date:_____

Print Name:_____

Signature:_____ Date:_____

Print Name:_____

ATTACHMENT NO. 5.21

From: Clarke Fairbrother [clarkef@newportpacific.com]
Sent: Tuesday, November 30, 2010 11:43 AM
To: Mark Alpert
Subject: FW: Pacific Mobile Home Park Notes: Survey & FAQ's

-----Original Message-----
From: Deborah Lawson-Sisker [mailto:dsisker@sprynet.com]
Sent: Friday, November 05, 2010 6:46 AM
To: Clarke Fairbrother
Cc: JulieAnn Rooney; Brad Rhoads; John Reger; Debbie Moore; Antonio Lopez; Connie Brockway; Kris Dgezits; Mary Bieschke; Janece Herrington; Maria Laurienzo; Christine McClure; John Sisker; Deborah Lawson-sisker
Subject: Re: Pacific Mobile Home Park Notes: Survey & FAQ's

Dear Mr. Fairbrother,

Deborah and I appreciate your feedback in regard to the possible subdivision of Pacific Mobile Home Park, and for the opportunity to incorporated some of our individual concerns and thoughts in your Survey and Frequently Asked Questions segment. Keep in mind, that such input and/or suggestions from us are just some of our thoughts only, and in no way represents and/or speaks for anyone else in the park. Likewise, it appears that all the other residents have now had amply opportunity to weigh in on this themselves, either from the initial meeting you held on September 30, 2010, and/or through your other mailing as a follow-up.

In addition, I don't think you will get many, if any at all, to sign a copy of the Agreement with Homeowners, for in our case, and as we said, our input and suggestions are just based on our own limited knowledge and awareness of this subject, for we represent and speak for no one else in this park. As pointed out, currently there is no homeowners association, and years ago when there was, we were not even part of that. Signing such an agreement, as least to us, would indicate that we represent and speak for other residents, which is definitely not the case. As we said before, we only speak for ourselves and no one else.

In addition, even our own concerns and input at this time, comes from a very limited knowledge of this subject, for we feel few residents will actually have more than a passing awareness of the inner working in reference to a subdivision. Likewise, it is also understandable that we, like many other residents, will also have to reply on you and other experts in this field, to actually guide and help the residents understand the actual benefits to all concerned, and to also compare and show the real differences and positive aspects that will happen in Pacific Mobile Home Park from the residents point of view, as compared to all the negative input around the country as to why a subdivision, or condo conversion, is not encouraged.

Sincerely,
John Sisker & Deborah Lawson-Sisker
jsisker@sprynet.com / dsisker@sprynet.com
(714) 536-3850

ATTACHMENT NO. 5.22

-----Original Message -----
From: Clarke Fairbrother
To: mbies15989@aol.com ; cbrockway@socal.rr.com ; kris4933@hotmail.com ; gdlzap123@yahoo.com ; debbie.moore@stjoe.org ; nolimepublishing@aol.com ; brad@bradfordrhoads.com ; jrooney@socal.rr.com ; dsisker@sprynet.com ; jsisker@sprynet.com ; docmcclure@yahoo.com ; angels4M@aol.com
Cc: Janece Herrington
Sent: Thursday, November 04, 2010 2:21 PM
Subject: FW: Pacific Mobile Home Park Notes: Survey & FAQ's

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I understand that there is not a formal homeowner's association, but your review of the form of the survey and frequently asked questions helped create the final form of the documents. **Please sign a copy of the Agreement with Homeowners**, which only indicates that you had an opportunity to make comments, and send it back to me for my files (scan and email, fax or mail). Fax number is 949-852-5582. The address is 17300 Redhill Suite 280, Irvine, Ca 92614.

We plan to mail revised survey and frequently asked questions to all of the residents next week.

I will be out of the office for two weeks starting next Monday. If you have any questions during that period of time, please contact Janece Herrington.

Clarke Fairbrother
Office 949-852-5575

-----Original Message-----
From: Clarke Fairbrother
Sent: Friday, October 29, 2010 11:09 AM
To: 'mbies15989@aol.com'; 'cbrockway@socal.rr.com'; 'kris4933@hotmail.com'; 'gdlzap123@yahoo.com'; 'debbie.moore@stjoe.org'; 'nolimepublishing@aol.com'; 'brad@bradfordrhoads.com'; 'jrooney@socal.rr.com'; 'dsisker@sprynet.com'; 'jsisker@sprynet.com'; 'docmcclure@yahoo.com'; 'angels4M@aol.com'
Cc: Janece Herrington
Subject: FW: Pacific Mobile Home Park Notes: Survey & FAQ's

Enclosed are the notes that I recieved from John.

The attached survey and frequently asked questions have been revised to incorporate all of his points.

Also attached is document that outlines how the survey is to be conducted.

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If you can not open the documents, I can send PDF versions or get then to you another way.
If you have questions, send me an email with a good time and number to call. I am available this Saturday if you would like to discuss anything.

Clarke Fairbrother
Office 949-852-5575

The Survey:

Note: This 'Survey' is just to show a tentative interest among us residents, and does not commit anyone to

ATTACHMENT NO. 5.23

anything. It is just for informational purposes only.

One of the most important factors and questions on this 'Survey' is actually Question No. 1 of Section I, that one would indeed be interested if it is affordable to them. That is a key factor for this park and should always be emphasized.

This 'Survey' is okay as is, with the exception of Question Number 3. It is felt that some people may be a bit reluctant to divulge their income level, possibly feeling it is an invasion of privacy. Therefore, while we still feel this information is important and should be included, we would like to see some type of wording as to just why this information is needed at this time, and as to what will be done with it.

Also, we like to see a place for residents to leave their name and contact information if they so wish, but to also emphasize that this information is entirely optional.

Frequently Asked Questions:

Frequently Asked Questions About Mobile Home Park Subdivision
(and how it relates to Pacific Mobile Home Park)

We would like to see the original FAQ's information included again with the revised 'Survey" but also expanded to include the following questions, along with Newport Pacific Capital's response...

- Will this subdivision secure our park as a mobile home park well into the future, and how will this tie-in with the current City's Relocation Ordinance, along with the effects on affordable housing?
- Unless the residents have 51% interest in the park, how will their input and concerns be of any value? And what happens to those that do purchase their lot, if the current park owners sell to outside interests anyway?
- Once a survey on lot lines is confirmed, how will this be enforced, and is the value of each lot based on its square footage? Likewise, what is Newport Pacific Capitals role and interest is this subdivision?
- Why are some residents and their political groups in other mobile home parks so negative about this very concept when they imply outright purchase of the park is a better way to go? How is this subdivision the same and/or different than Huntington Shorecliffs and what may be happening in other Huntington Beach parks?

- JulieAnn Rooney, #463 (714) 960-4756 jrooney@socal.rr.com
- John Sisker, #266 (714) 536-3850 jsisker@sprynet.com - cell: (714) 815-7625
- Deborah Lawson-Sisker, #266 (714) 536-3850 dsisker@sprynet.com - cell (714) 914-7452

ATTACHMENT NO. 5.24

Pacific MHOA

80 Huntington St. # 618
Huntington Beach, Ca. 92648

City of Huntington Beach
Scott Hess / Building and Planning
2000 Main St.
Huntington Beach, Ca.
94648

November 22, 2010

Dear Mr. Hess,

We would like it to be known that Pacific Mobile Home Park has a Home Owners Association with a history and is presently in the process of re-organizing. We understand that the owners of our park are considering sub-division and the owners are currently distributing a survey within the park to determine the feasibility of sub-division. Rather than utilizing the park owners' survey, we would prefer to draft our own. Our HOA is in the process of developing our own survey for distribution. We understand this survey is required for the sub-division process to move forward. All inquiries can be sent to Pacific MHOA, 80 Huntington St. Spc. # 618, H.B. CA. 92648.

Thank you.

Sincerely,

Pacific MHOA

ATTACHMENT NO. 6

GOVERNMENT CODE SECTION 66427.5

66427.5. At the time of filing a tentative or parcel map for a subdivision to be created from the conversion of a rental mobilehome park to resident ownership, the subdivider shall avoid the economic displacement of all nonpurchasing residents in the following manner:

(a) The subdivider shall offer each existing tenant an option to either purchase his or her condominium or subdivided unit, which is to be created by the conversion of the park to resident ownership, or to continue residency as a tenant.

(b) The subdivider shall file a report on the impact of the conversion upon residents of the mobilehome park to be converted to resident owned subdivided interest.

(c) The subdivider shall make a copy of the report available to each resident of the mobilehome park at least 15 days prior to the hearing on the map by the advisory agency or, if there is no advisory agency, by the legislative body.

(d) (1) The subdivider shall obtain a survey of support of residents of the mobilehome park for the proposed conversion.

(2) The survey of support shall be conducted in accordance with an agreement between the subdivider and a resident homeowners' association, if any, that is independent of the subdivider or mobilehome park owner.

(3) The survey shall be obtained pursuant to a written ballot.

(4) The survey shall be conducted so that each occupied mobilehome space has one vote.

(5) The results of the survey shall be submitted to the local agency upon the filing of the tentative or parcel map, to be considered as part of the subdivision map hearing prescribed by subdivision (e).

(e) The subdivider shall be subject to a hearing by a legislative body or advisory agency, which is authorized by local ordinance to approve, conditionally approve, or disapprove the map. The scope of the hearing shall be limited to the issue of compliance with this section.

(f) The subdivider shall be required to avoid the economic displacement of all nonpurchasing residents in accordance with the following:

(1) As to nonpurchasing residents who are not lower income households, as defined in Section 50079.5 of the Health and Safety Code, the monthly rent, including any applicable fees or charges for use of any preconversion amenities, may increase from the preconversion rent to market levels, as defined in an appraisal conducted in accordance with nationally recognized professional appraisal standards, in equal annual increases over a four-year period.

(2) As to nonpurchasing residents who are lower income households, as defined in Section 50079.5 of the Health and Safety Code, the monthly rent, including any applicable fees or charges for use of any preconversion amenities, may increase from the preconversion rent by an amount equal to the average monthly increase in rent in the four years immediately preceding the conversion, except that in no event shall the monthly rent be increased by an amount greater than the average monthly percentage increase in the Consumer Price Index for the most recently reported period.

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c. An appellant was denied the right of City appeal because City notice and hearing procedures for the development did not comply with the provisions of the Chapter.

d. The City charges an appeal fee for the filing or processing of appeals.

2. Where a project is appealed by any two (2) members of the Coastal Commission, there shall be no requirement of exhaustion of City appeals. Provided, however, that a City government may provide, by ordinance, that notice of commissioner appeals may be transmitted to the City's appellate body (which considers appeals from the City body that rendered the final decision), and the appeal to the Commission may be suspended pending a decision on the merits by that City appellate body. If the decision of the City appellate body modifies or reverses the previous decision, the commissioners shall be required to file a new appeal from that decision. (3334-7/96)

245.26 Precedence of Local Coastal Program

Where the plans, policies, requirements or standards of the Local Coastal Program, as applied to any project in the CZ Overlay District, conflict with those of the underlying zoning district or other provisions of this chapter, the plans, policies, requirements or standards of the Local Coastal Program shall take precedence.

245.28 Conditions

Approval of a Coastal Development Permit shall be subject to conditions as necessary to ensure conformance with, and implementation of, the Local Coastal Program. Modification and resubmittal of project plans, drawings, and specifications may be required to ensure conformance with the Local Coastal Program.

245.30 Findings

A. Required Findings. A CDP application may be approved or conditionally approved only after the approving authority has made the following specific factual findings supporting the legal conclusion:

1. Local Coastal Plan. That the development project, as proposed or as modified by conditions of approval, conforms with the General Plan, including the Local Coastal Program;

2. Zoning Provisions. That the project is consistent with the requirements of the CZ Overlay District, the base zoning district, as well as other applicable provisions of the Municipal Code;

3. Adequate Services. That at the time of occupancy the proposed development can be provided with infrastructure in a manner that is consistent with the Local Coastal Program; and

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4. California Coastal Act. That the development conforms with the public access and public recreation policies of Chapter 3 of the California Coastal Act.

245.32 Appeals

Development pursuant to an approved Coastal Development Permit shall not commence until all applicable administrative appeal periods expire or, if appealed, until all administrative appeals, including those to the Coastal Commission, have been exhausted. (3517-12/01)

A. Action by the Zoning Administrator or Planning Commission to approve, conditionally approve, or deny any Coastal Development Permit may be appealed on or before the tenth working day following such action. Action by the Zoning Administrator may be appealed to the Planning Commission. Action by the Planning Commission may be appealed to the City Council. Appeals may be made directly to the Coastal Commission pursuant to Sections 13111 and 13573 of the California Code of Regulations for appealable development. (3517-12/01)

B. Action by the City Council on a Coastal Development Permit for appealable development may be appealed directly to the Coastal Commission pursuant to Sections 13111 and 13573 of the California Code of Regulations. (3517-12/01)

C. An appeal pursuant to this chapter may be filed only by the applicant for the Coastal Development Permit in question, an aggrieved person, or any 2 members of the Coastal Commission.

D. An appeal to the Planning Commission shall be filed with the Planning Department. An appeal to the City Council shall be filed with the City Clerk. The appeal shall be accompanied by a fee set by resolution of the City Council and a statement of the grounds for the appeal. (3517-12/01)

E. Notice of the local appeal shall be given as set forth in Section 245.20 or 245.22 and shall be processed in accordance with the provisions of Section 248.20. (3517-12/01)

F. An appeal to the Coastal Commission shall be processed in accordance with the provisions of Sections 13110 through 13120 of the California Code of Regulations. (3334-7/96, 3517-12/01)

245.34 Application After Denial

Whenever a CDP request under the provisions of this section has been denied and such denial has become final, no new CDP application for the same or similar request may be accepted within 1 year of the denial date, unless the Director finds that a sufficient change in circumstances has occurred to warrant a new CDP application.

ATTACHMENT NO. 8.2

251.08 Hearings and Action

A. Subdivision Committee. Whenever a property is to be subdivided into 5 or more parcels, the Subdivision Committee may hold a public hearing prior to reporting on the tentative map for said subdivision. Notice of the time and place thereof, including a general description of the subject matter shall be given at least 10 days before the hearing. Copies of said notice shall be mailed to the subdivider, engineer, property owner of the property proposed for subdivision. Notice shall also be given to each local agency expected to provide water, sewage, streets, schools, or other essential facilities or services to the subdivision.

B. Notice of Public Hearings. Upon receipt of an application that is accepted as complete, the Department shall set a date for a public hearing, provide notice as required by Chapter 248 and prepare a report with recommendations. A copy of the Department report shall be forwarded to the subdivider at least three working days prior to the public hearing.

C. Planning Commission Action. The Planning Commission or Zoning Administrator as the case may be, shall approve, conditionally approve, or deny a tentative map within 50 days after the tentative map has been accepted. This time period shall commence after certification of the environmental impact report, adoption of the negative declaration, or determination that the project is exempt from the requirements of Division 13 (commencing with Section 21000) of the Public Resources Code.

D. Factors to be Considered. In reaching a decision upon the tentative map, the Planning Commission or Zoning Administrator shall consider the effect of that decision on the housing needs of the region and balance these needs against the public service needs of its residents and available fiscal and environmental resources.

E. Approval. The tentative map may be approved or conditionally approved if the following findings are made:

1. That the proposed map is consistent with the General Plan or any applicable specific plan, or other applicable provisions of this Code;

2. That the site is physically suitable for the type and density of development;

3. That the design of the subdivision or the proposed improvements will not cause serious health problems or substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat. Notwithstanding the foregoing, the Planning Commission or Zoning Administrator may approve such a tentative map if an environmental impact report was prepared with respect to the project and a finding was made that specific economic, social or other considerations make infeasible the mitigation measures or project alternatives identified in the environmental impact report;

ATTACHMENT NO. 8.3

4. That the design of the subdivision or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision unless alternative easements, for access or for use, will be provided.

F. Denial. The Planning Commission or Zoning Administrator shall deny approval of a tentative subdivision map if it determines that approval will result in any of the conditions as described in Government Code Section 66474.

251.10 Waiver of Time Limits for Zoning Administrator or Planning Commission Action

Any applicable time limits for acting on the tentative map may be extended by mutual consent of the subdivider and the Planning Commission or Zoning Administrator. A waiver of applicable time limits may be required to permit concurrent processing of related project approvals or environmental review on the same development project.

251.12 Appeals of Planning Commission or Zoning Administrator Action

The subdivider or any interested person adversely affected by action under Section 251.08 may, within 10 days after the decision, file an appeal under the provision of Chapter 248.

251.14 Expiration

A. The approval or conditional approval of a tentative map shall expire 24 months from its approval. The period of time may be lengthened if the project is subject to Section 66452.6(a), (b) and (c) of the Subdivision Map Act.

251.16 Extensions

A. Request by Subdivider. The subdivider may request an extension of the expiration date of the approved or conditionally approved tentative map by written application to the Department. The application and any required fee shall be filed not less than 30 days before the map is to expire and shall state the reasons for requesting the extension.

B. Action. The Department shall review the request, determine whether a public hearing is required based on changing conditions in the area, and submit the application for the extension, together with a report, to the Planning Commission or Zoning Administrator for approval, conditional approval, or denial at the next scheduled meeting. A copy of the Department's report shall be forwarded to the subdivider prior to the Planning Commission meeting on the extension. After conducting a public hearing or reviewing the request, the Planning Commission or Zoning Administrator may approve or deny the requested extension.

C. Time Limit of Extensions. The time at which the tentative map expires may be extended for a period of time of up to one year, with a maximum of three one-

ATTACHMENT NO. 8.4