



City of Huntington Beach Planning and Building Department
STUDY SESSION REPORT

TO: Planning Commission
FROM: Scott Hess, AICP, Director of Planning and Building
BY: Ethan Edwards, AICP, Associate Planner *Ee*
DATE: February 23, 2010

SUBJECT: TENTATIVE PARCEL MAP NO. 17296 (HUNTINGTON SHORECLIFFS
MOBILEHOME PARK CONVERSION)

APPLICANT: Robert Coldren, Hart, King & Coldren, 200 Sandpointe, Fourth Floor, Santa Ana, CA
92707

PROPERTY

OWNER: Shorecliff LP; Stadium, LLC; Huntington BSC Park, LP; Shorecliff Main, LP, c/o Mike
Cirillo, Star Management, 1400 E. Fourth Street, Santa Ana, CA 92701

LOCATION: 20701 Beach Blvd., 92648 (west side of Beach Blvd., south of Indianapolis Ave. –
Huntington Shorecliffs Mobilehome Park)

PROJECT REQUEST AND SPECIAL CONSIDERATIONS

The proposed tentative tract map is a request to subdivide an existing 37.06 net acre, for-rent, mobilehome park with a total of 304 units for ownership purposes. The applicant proposes to subdivide the “for rent” park to enable the existing park residents to purchase their own lots.

BACKGROUND

The mobilehome park was established in 1969 and expanded over the next several years to its current size. Permitting and enforcement authority over the mobilehome park lies 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 mobilehome park. Fire authority, however, lies with the City of Huntington Beach Fire Department.

Subdivision of the park for proposes 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 provide a report on the impact of the conversion upon residents of the mobilehome park to be converted. The applicant submitted a report that indicates no displacement of residents will occur in that those residents who decide not to purchase a unit may remain renting within the mobilehome park (Attachment No. 6). The SMA also requires the subdivder to obtain a survey of support of residents of the mobilehome park. The applicant submitted a survey that indicates out of a total of 306 surveys, 182 were returned (Attachment No. 7). Of the 182 returned surveys, 52 respondents declined to state their opinion, 105 respondents indicated that they do not support the conversion of the park, 25 respondents indicated that they support the conversion.

A subdivision application to convert the mobile home park from 304 to 309 lots was denied with findings by the Planning Commission on September 22, 2009 based on insufficient information that would substantiate compliance with the SMA and Huntington Beach Zoning & Subdivision Ordinance (HBZSO). The applicant appealed the Planning Commission’s decision to the City Council. On November 16, 2009, City Council also denied the proposed subdivision based on findings and the facts that the subdivision will result in an increase in the number of lots, lacking compliance with the common open space requirements, insufficient impact report, and lack of evidence that the survey of support was prepared in agreement with a homeowners association independent of the property owner.

CURRENT LAND USE, HISTORY OF SITE, ZONING AND GENERAL PLAN DESIGNATIONS

LOCATION	GENERAL PLAN	ZONING	LAND USE
Subject Property:	RMH-25 (Residential Medium High Density – Max. 25 units per acre)	RMP (Residential Mobilehome Park)	Mobilehome park
North of Subject Property (across Frankfort Ave.):	RMH-25	RMH-A (Residential Medium High Density – Subdistrict A Overlay)	Single family residential
East of Subject Property (across Beach Blvd.):	RL-7 (Residential Low Density – Max. 7 units per acre) RM-15 (Residential Medium Density – Max. 15 units per acre)	RL (Residential Low Density) RM (Residential Medium Density)	Single family and multi-family residential
South of Subject Property:	RM-15	RM	Multi-family residential
West of Subject Property (across Delaware St.):	RMH-25-d (Residential Medium High Density – Design Overlay) OS-P (Open Space – Park)	RMH OS-PR (Open Space – Parks and Recreation Subdistrict)	Single family and multi-family residential and public park

APPLICATION PROCESS AND TIMELINES

DATE OF COMPLETE APPLICATION:

MANDATORY PROCESSING DATE(S):

February 5, 2010

March 30, 2010

Tentative Tract Map No. 17296 was filed on January 12, 2010 and deemed complete February 5, 2010. The application is scheduled for public hearing before the Planning Commission on March 9, 2010.

CEQA ANALYSIS/REVIEW

The proposed project is Categorically Exempt pursuant to Section 15301(k), Class 1, of the California Environmental Quality Act, 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 and Planning have reviewed the application and identified suggested conditions of approval (Attachment No. 4) and applicable code requirements (Attachment No. 5).

PUBLIC MEETINGS, COMMENTS AND CONCERNS

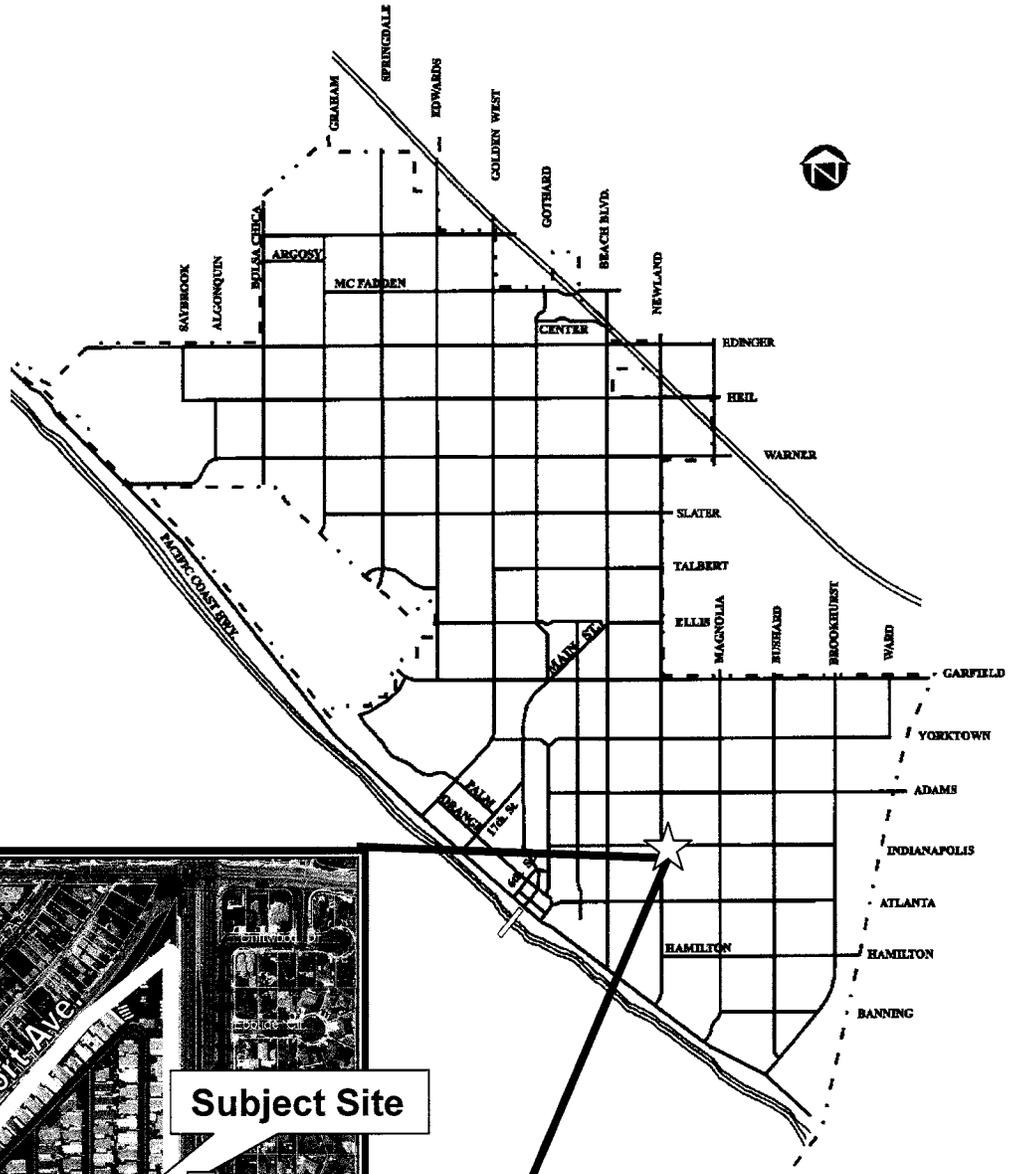
The project is scheduled for a Subdivision Committee meeting on February 25, 2009 to review the subdivision map. Subdivision Committee comments on the proposed subdivision will be provided in the March 9, 2010, Planning Commission staff report. To date, there has been 1 comment letter received from the public regarding this request. The letter is from a resident of the park citing concerns with the outdated infrastructure within the park.

PLANNING ISSUES

Major issues with the processing of the application include age of the infrastructure within the park, the impacts of conversion on the residents, and authority of the City to conditionally approve the request in compliance with the SMA to address health and safety issues (Government Code Section 66428.1, subsection (d) & (e)).

ATTACHMENTS:

1. Vicinity Map
2. Project Narratives received January 12, 2010
3. Tentative Tract Map No. 17296 dated January 22, 2010
4. Draft Suggested Conditions of Approval dated February 9, 2010
5. Code Requirements Letter dated February 9, 2010
6. Report on Impact of Conversion Upon Residents dated December 15, 2009
7. Summary of the Survey of Residents dated January 19, 2010
8. Public Comments



VICINITY MAP
TENTATIVE TRACT MAP NO. 17269
(HUNTINGTON SHORECLIFFS MOBILEHOME PARK CONVERSION
20701 BEACH BLVD., 92648)

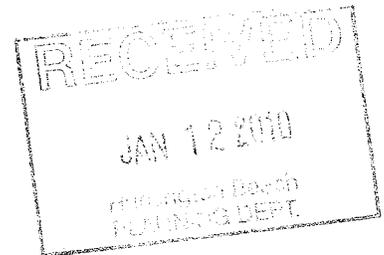
January 12, 2010

Our File Number: 36014.112/4826-6788-7621v.1

PERSONAL AND CONFIDENTIAL

Hand Delivered

Ethan Edwards, City Planner
City of Huntington Beach Planning Dept.
2000 Main Street
P.O. Box 190
Huntington Beach, CA 92648



Re: Huntington Shorecliffs Mobile Home Park
20701 Beach Boulevard, Huntington Beach, CA. 92648
Subdivision Application for Tentative Tract Map No. 17926

Dear Mr. Edwards:

Please find enclosed the Subdivision Application for Tentative Tract Map 17926 ("Application") for the Huntington Shorecliffs Mobile Home Park located at 20701 Beach Boulevard, Huntington Beach, CA. 92648 ("Shorecliffs"). The Application is the first step in the conversion of Shorecliffs from a rental to a resident-owned mobilehome park. The Application is to create numbered residential lots corresponding to the existing 304 Shorecliffs 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 Shorecliffs. 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

Ethan Edwards
January 12, 2010
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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)

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 Tentative Tract Map No. 17926, the September 8, 2009 version which shows 304 spaces, which were previously submitted to the City with our prior application. As per our telephone conversations, the City still retains those copies of that version of the Map in its file, and the City will treat those Map copies as part of this new Application.

2. Fee. The filing fee in the amount of \$10,500 is enclosed. As we discussed, the City previously reviewed the individual lots in connection with the prior application and has agreed to waive the per lot fee of \$30 for each of the 304 residential lots under this new Application.

3. Report on Impact of Conversion Upon Residents. A copy of the December 15, 2009 Report on Impact of Conversion Upon Residents is enclosed, plus an Affidavit of Mike Cirillo attesting to the mailing of copies of the Report to the Residents on December 15, 2009. As the Report explains, the California Legislature only requires that the Report discuss the potential for economic displacement upon those residents who will continue to rent their spaces upon conversion, and does not require any discussion pertaining to economic impacts upon those residents who will purchase lots.

4. Resident Survey Results. Shorecliffs entered into an agreement with the homeowner's association to conduct a survey of resident support for the conversion. A copy of that agreement is enclosed. According to that agreement, the homeowner's association was to have conducted the survey by the end of the year 2009 and was to have provided the City with the results, but the association has not done yet done so. The homeowner's association now states that it will provide the survey results to the City by mid-January. Per our conversation, the City will begin processing the Application without the survey results, but will not issue notice of completion until receipt of the survey results. It is important to note that the Government Code Section 66427.5 (d) survey requirement only pertains to whether the conversion is a "sham" to avoid local rent control, and the City has no rent control.

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 dated December 21, 2009 is enclosed.

5(c) Preliminary Soils and Engineering Geology Report.

There is no "physical change" or "change in use" of Shorecliffs. 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 Shorecliffs are enclosed.

5(f) Written Narrative:

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

Shorecliffs is situated on a single parcel (APN 024-250-72) consisting of approximately 39 acres and operated as a mobile home park permitted for 304 mobile home spaces. Shorecliffs is currently zoned RMP. The General Plan Designation is RMH-25.

Shorecliffs was constructed in 1972, is located on the west side of Beach Boulevard, south of Indianapolis Avenue, and north of Atlantic Avenue. There are approximately 1,900 feet of street frontage along Beach Boulevard and approximately 1,100 feet of street frontage along Delaware Street. Street access is provided by Beach Boulevard and Frankfort Avenue. Shorecliffs is improved with 2 clubhouses and pools, office, conference center, and laundry facilities. There is an RV storage lot on Shorecliffs property.

(2) Proposed Use of the Property.

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

Ethan Edwards
January 12, 2010
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(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 Shorecliffs Homeowners Association will be formed 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.

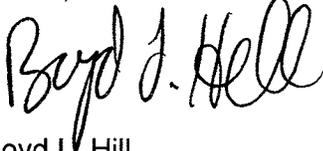
5(g) Coastal Development Permit Application.

Shorecliffs is not within the Coastal Zone and no permits are required.

The enclosed materials should provide the City with a complete Application once the survey results are submitted (assuming the homeowner's association complies with its agreement). As we discussed, please promptly advise whether the Application is complete and begin processing the Application with the Subdivision Committee so that we may hold the Subdivision Committee meeting and have Planning Commission Study Session and Hearing during the month of February. Please feel free to contact me with any questions or comments you may have.

Best Regards,

HART, KING & COLDREN



Boyd L. Hill

cc: John Saunders
Michael Cirillo
Robert S. Coldren
Burt Mazelow



Ethan Edwards
January 12, 2010
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Enclosures:

Subdivision Application
[Tentative Tract Map dated September 8, 2009 previously provided]
Application Fee
Report on Impact of Conversion Upon Residents
Affidavit of Mike Cirillo re mailing of Report
Preliminary Title Report dated December 21, 2009
Public Notification Materials
Photographs

TRACT MAP NO. 17296

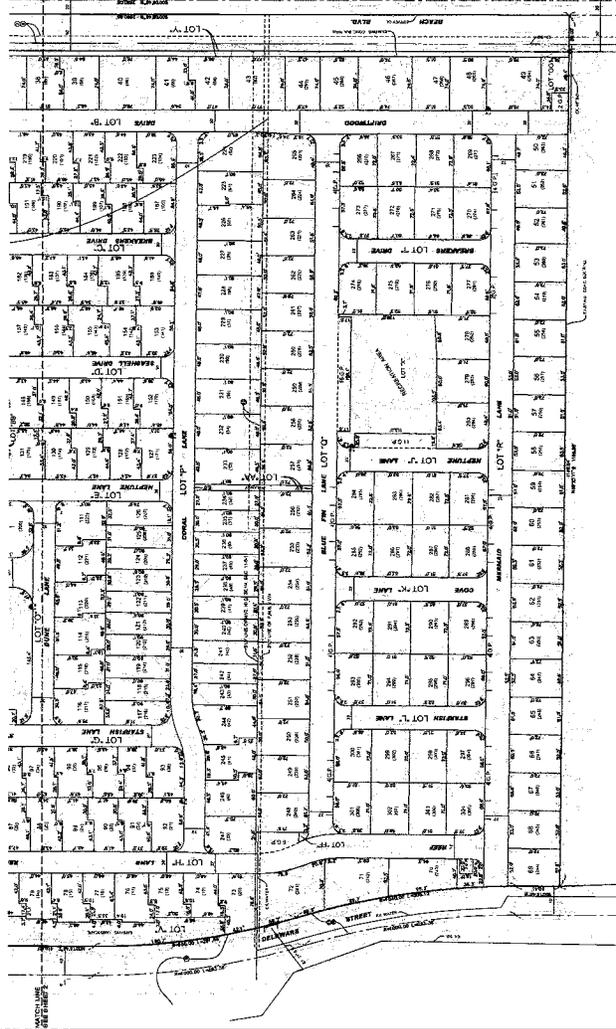
IN THE CITY OF HUNTINGTON BEACH
 COUNTY OF ORANGE, STATE OF CALIFORNIA
 A PORTION OF THE EAST ONE-HALF OF THE SOUTHEAST QUARTER OF
 SECTION 11, TOWNSHIP 6 SOUTH, RANGE 11 WEST
 FOR SUBDIVISION PURPOSES



VICINITY MAP
 1/4" = 100'



SYMBOLIC LEGEND
 LOT LINE
 EASEMENT
 UTILITY LINE
 BENCH MARK
 SURVEY POINT



NOTES:

1. THE TRACT MAP NO. 17296 IS A PRELIMINARY MAP AND IS SUBJECT TO THE APPROVAL OF THE CITY ENGINEER AND THE COUNTY ENGINEER.
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10. THE TRACT MAP NO. 17296 IS A PRELIMINARY MAP AND IS SUBJECT TO THE APPROVAL OF THE CITY ENGINEER AND THE COUNTY ENGINEER.

BASES OF BEARINGS:

THE BEARINGS AND DISTANCES ARE AS SHOWN ON THE TRACT MAP NO. 17296.

LEGAL DESCRIPTION:

A PORTION OF THE EAST ONE-HALF OF THE SOUTHEAST QUARTER OF SECTION 11, TOWNSHIP 6 SOUTH, RANGE 11 WEST, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS SHOWN ON THE TRACT MAP NO. 17296.

RECORD OWNERS AND SUBDIVISIONS:

THE RECORD OWNERS AND SUBDIVISIONS ARE AS SHOWN ON THE TRACT MAP NO. 17296.

BENCH MARK:

THE BENCH MARK IS AS SHOWN ON THE TRACT MAP NO. 17296.

PARKING TABULATION:

THE PARKING TABULATION IS AS SHOWN ON THE TRACT MAP NO. 17296.

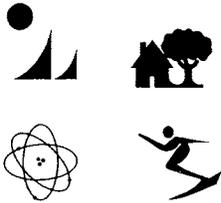
NUMBERS:

THE NUMBERS ARE AS SHOWN ON THE TRACT MAP NO. 17296.

TENTATIVE MAP

DATE OF PREPARATION	17296
DATE OF RECORDATION	
DATE OF APPROVAL	
DATE OF CANCELLATION	
DATE OF REVISION	
DATE OF AMENDMENT	
DATE OF SUPPLEMENT	
DATE OF CORRECTION	
DATE OF CANCELLATION	
DATE OF REVISION	
DATE OF AMENDMENT	
DATE OF SUPPLEMENT	
DATE OF CORRECTION	





City of Huntington Beach

2000 MAIN STREET

CALIFORNIA 92648

DEPARTMENT OF PLANNING

February 9, 2010

Boyd Hill
Hart, King & Coldren
200 Sandpointe, Fourth Floor
Santa Ana, CA 92707

**SUBJECT: TENTATIVE TRACT MAP NO. 17269 (HUNTINGTON SHORECLIFFS
SUBDIVISION) – SUGGESTED CONDITIONS OF APPROVAL**

Dear Mr. Hill,

Please find enclosed suggested conditions of approval for the aforementioned project, received from Public Works and Planning Department for the consideration by the Planning Commission. If you would like a clarification of any of these items or you would like to discuss them in further detail, please contact me at 714-536-5561 and/or the Public Works Department representative – Steve Bogart (714-374-1692).

It should be noted that these suggested conditions of approval which may be adopted by the Planning Commission if the project is approved, are in addition to applicable "code requirements" provided to you under a separate letter. Please note that if the design of your project or site conditions change, the list may also change.

Sincerely,

Ethan Edwards
Associate Planner

Enclosure

cc: Mike Vigliotta, Deputy City Attorney
Steve Bogart, Public Works – 714-536-1692
Herb Fauland, Planning Manager
Shorecliff, LP, c/o Mike Cirillo, Star Management, 1400 E Fourth Street, Santa Ana, CA 92701
Project File

ATTACHMENT NO. 4.0



CITY OF HUNTINGTON BEACH PLANNING DEPARTMENT

PROJECT SUGGESTED CONDITIONS OF APPROVAL

DATE: February 8, 2010

PROJECT NAME: HUNTINGTON SHORECLIFFS MOBILEHOME SUBDIVISION

ENTITLEMENTS: PLANNING APPLICATION NO. 08-0190; TENTATIVE TRACT MAP NO. 17296

PROJECT LOCATION: 20701 BEACH BLVD., 92648 (WEST SIDE OF BEACH BLVD., SOUTH OF INDIANAPOLIS AVE.)

PROJECT PLANNER: Ethan Edwards, Associate Planner

TELEPHONE/E-MAIL: (714) 536-5561/ ethan.edwards@surfcity-hb.org

PROJECT DESCRIPTION: TO CONVERT THE HUNTINGTON SHORECLIFFS MOBILE HOME PARK FROM RENTAL UNITS TO INDIVIDUAL OWNERSHIP.

The following is a list of suggested conditions of approval deemed applicable to the proposed project based on plans received and dated January 22, 2010. A list of conditions of approval adopted by the Planning Commission in conjunction with the requested entitlement(s), if any, will be provided upon final project approval. If you have any questions regarding these requirements, please contact the Plan Reviewer.

1. The Tentative Tract Map No. 17296 for Subdivision of an existing mobile home park received and dated September 18, 2008 shall be the approved layout with the following modifications:
 - a. The maximum number of lots created by the subdivision shall not exceed the total number mobile home units (304) approved for the site by the California Department of Housing and Community Development.
 - b. A landscaped planter between the perimeter fencing and public sidewalk improvements along Beach Boulevard shall be provided.
2. Prior to submittal of the final tract map to the Public Works Department for processing and approval, the following shall be required:
 - a. The subdivider shall obtain necessary permits from the California Department of Housing and Community Development (HCD) to re-identify the lots if determined necessary.
 - b. The Subdivider shall demonstrate to HCD compliance with all applicable provisions of Title 25 pertaining to setbacks. If the mobile home park is deficient in compliance with the applicable setbacks, the subdivider shall obtain all necessary applicable alternate approvals from HCD.

3. The subdivider shall offer each existing tenant 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. (Subdivision Map Act Section 66427.5)
4. The subdivider shall be required to avoid the economic displacement of all non-purchasing residents in accordance with the following:
 - a. As to 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, may increase from the pre-conversion 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. (Subdivision Map Act Section 66427.5)
 - b. As to 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 increase from the pre-conversion 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. (Subdivision Map Act Section 66427.5)



**HUNTINGTON BEACH
PUBLIC WORKS DEPARTMENT
SUGGESTED CONDITIONS OF APPROVAL**

DATE: FEBRUARY 2, 2010
PROJECT NAME: HUNTINGTON SHORECLIFFS MOBILE HOME PARK
ENTITLEMENTS: TENTATIVE TRACT MAP 17296
PLNG APPLICATION NO. 2010-0023
DATE OF PLANS: JANUARY 12, 2010
PROJECT LOCATION: 20701 BEACH BLVD
PROJECT PLANNER ETHAN EDWARDS, ASSOCIATE PLANNER
TELEPHONE/E-MAIL: 714-536-5561 / ETHAN.EDWARDS@SURFCITY-HB.ORG
PLAN REVIEWER: STEVE BOGART, SENIOR CIVIL ENGINEER
TELEPHONE/E-MAIL: 714-374-1692 / SBOGART@SURFCITY-HB.ORG
PROJECT DESCRIPTION: TO CONVERT THE HUNTINGTON SHORECLIFFS MOBILE HOME PARK FROM RENTAL UNITS TO INDIVIDUAL OWNERSHIP.

**THE FOLLOWING CONDITIONS ARE REQUIRED TO BE COMPLETED PRIOR TO
SUBMITTAL OF THE FINAL TRACT MAP TO THE CITY FOR REVIEW:**

1. A Project Water Quality Management Plan (WQMP) conforming to the current Waste Discharge Requirements Permit for the County of Orange (Order No. R8-2009-0030) prepared by a Licensed Civil Engineer, shall be submitted to the Department of Public Works for review and acceptance. The WQMP shall address all current surface water quality issues.
2. The subdivider shall refer to the California Department of Housing and Community Development (HCD) for domestic and irrigation water metering requirements.
3. The required Hydrology and Hydraulic Analysis for the subject project shall analyze 10, 25, and 100-year storms and back-to-back storms. In addition, this study shall include 24-hour peak back-to-back 100-year storms for onsite detention analysis. Any drainage improvements required by the aforementioned analysis shall be designed and constructed as required by the Department of Public Works to mitigate impact of increased runoff due to development or deficient downstream systems. Design of all necessary drainage improvements shall provide mitigation for all rainfall event frequencies up to a 100-year frequency.

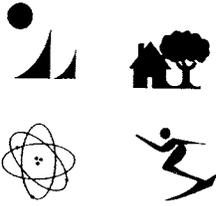
**THE FOLLOWING CONDITIONS ARE REQUIRED TO BE COMPLETED PRIOR TO
RECORDATION OF THE FINAL TRACT MAP:**

1. Encroachment permits for work within the Caltrans' right-of-way (for construction of sidewalks, driveways, water connections, etc.) shall be obtained by the applicant or contractor from Caltrans prior to start of work. A copy of each permit, traffic control plans,

environmental review and other permission granted by Caltrans shall be transmitted to Public Works.

2. The applicant shall provide an analysis of the existing onsite sanitary sewer system. If any improvements are required per said analysis, they shall be constructed and comply with all associated requirements of HCD.
3. The required Improvement Plan for the subject project shall comply with Public Works plan preparation guidelines and include the following improvements on the plan:
 - a. Existing AC curb along the Beach Boulevard frontage shall be removed and replaced with curb and gutter per Public Works Standard Plan No. 202 and per Caltrans requirements. (ZSO 255.04 and SMA 66428.1(d))
 - b. Six (6) foot wide sidewalk and a nine (9) foot wide curb adjacent landscaped parkway along the Beach Boulevard frontage shall be constructed per Public Works Standard Plan No. 207. This required sidewalk shall be constructed to accommodate or modify the adjacent earthen storm drain channel to convey the 100-year flood and supporting hydrologic and hydraulic calculations, compliant with County of Orange and City design criteria shall be submitted to the Department of Public Works for review and approval. (ZSO 255.04 and SMA 66428.1(d))
 - c. ADA compliant access ramps shall be installed on the Beach Boulevard frontage (where the new sidewalk will intersect with the existing driveway entrance to the park) per Caltrans Standard Plan A88A. (ZSO 255.04, ADA and SMA 66428.1(d))
 - d. Street lights shall be installed along the Beach Boulevard project frontage. Lighting standards shall be per City of Huntington Beach guidelines. (ZSO 255.04)
 - e. ADA compliant access ramps shall be installed on the easterly curb returns on Delaware Street at Mermaid Lane per Caltrans Standard Plan A88A. (ZSO 255.04, ADA and SMA 66428.1(d))
 - f. An ADA compliant access ramp shall be installed on the southeast corner of Delaware Street and Frankfort Avenue per Caltrans Standard Plan A88A. (ZSO 255.04, ADA and SMA 66428.1(d))
 - g. An ADA compliant access ramp shall be installed on the southeast corner of Delaware Street and Frankfort Avenue per Caltrans Standard Plan A88A. (ZSO 255.04, ADA and SMA 66428.1(d))
 - h. ADA compliant access ramps shall be installed on the south curb returns of Frankfort Avenue at Shorecliff Drive (at the subject site's northerly entrance) per Caltrans Standard Plan A88A. (ZSO 255.04, ADA and SMA 66428.1(d))
 - i. An ADA compliant access ramp shall be installed on Frankfort Avenue where it intersects Hill Street per Caltrans Standard Plan A88A. (ZSO 255.04, ADA and SMA 66428.1(d))
 - j. Damaged curb and gutter along the Frankfort Avenue frontage (at Hill Street) shall be removed and replaced per Public Works Standard Plan No. 202. (ZSO 255.04 and SMA 66428.1(d))
 - k. The existing 8-inch backflow device configuration is non-conforming placing the City's water supply at risk of potential contamination. As a result of health and safety concerns, the subdivider shall reconstruct or replace the existing backflow device to comply with current Water Standards. (Resolution 5921, Title 17 State Regulation, SMA 66411.5(a), and SMA 66428.1(d))

- I. An onsite storm drain shall be designed per the final approved hydrology and hydraulics study, City Standards and per the City adopted 2005 Master Plan of Drainage. The storm drain system located within private streets shall be private and maintained by the Homeowner's Association. A soils report, prepared by a Licensed Engineer shall be submitted for reference only. (ZSO 255.04A)
4. All required landscape planting and irrigation shall be installed, inspected and approved by the City Landscape Architect/Inspector.



City of Huntington Beach

2000 MAIN STREET

CALIFORNIA 92648

DEPARTMENT OF PLANNING

February 9, 2010

Boyd Hill
Hart, King & Coldren
200 Sandpointe, Fourth Floor
Santa Ana, CA 92707

**SUBJECT: TENTATIVE TRACT MAP NO. 17269 (HUNTINGTON SHORECLIFFS
SUBDIVISION)**

Dear Mr. Hill,

In order to assist you with your development proposal, staff has reviewed the project and identified applicable city policies, standard plans, and development and use requirements, excerpted from the City of Huntington Beach Zoning & Subdivision Ordinance and Municipal Codes. This list is intended to help you through the permitting process and various stages of project implementation should the Planning Commission approve your project.

It should be noted that this requirement list is in addition to any "conditions of approval" adopted by the Planning Commission if the project is approved. Please note that if the design of your project or site conditions change, the list may also change.

The Planning Director has interpreted the relevant Sections of the Zoning and Subdivision Ordinance to require that your project satisfy the following development standards. Should you disagree, pursuant to Section 248.24A, you have ten (10) days from the date of this notice to file an appeal with the Planning Department. The appeal fee is \$494.00.

If you would like a clarification of any of these requirements, an explanation of the Huntington Beach Zoning & Subdivision Ordinance and Municipal Codes, or believe some of the items listed do not apply to your project, and/or you would like to discuss them in further detail, please contact me at 714-536-5561 or at ethan.edwards@surfcity-hb.org and/or the respective source department (contact person below).

Sincerely,

Ethan Edwards
Associate Planner

Enclosure

cc: Mike Vigliotta, Deputy City Attorney
Gerald Caraig, Building and Safety Department – 714-374-1575
Darin Maresh, Fire Department – 714-536-5531
Steve Bogart, Public Works – 714-536-1692
Herb Fauland, Planning Manager
Jason Kelley, Planning Department
Shorecliff, LP, c/o Mike Cirillo, Star Management, 1400 E Fourth Street, Santa Ana, CA 92701
Project File

ATTACHMENT NO. 5.0



**CITY OF HUNTINGTON BEACH
PLANNING and BUILDING DEPARTMENT
PROJECT IMPLEMENTATION CODE REQUIREMENTS**

DATE: February 8, 2010
PROJECT NAME: HUNTINGTON SHORECLIFFS MOBILEHOME SUBDIVISION
ENTITLEMENTS: PLANNING APPLICATION NO. 08-0190; TENTATIVE TRACT MAP NO. 17296
PROJECT LOCATION: 20701 BEACH BLVD., 92648 (WEST SIDE OF BEACH BLVD., SOUTH OF INDIANAPOLIS AVE.)
PROJECT PLANNER: Ethan Edwards, Associate Planner
TELEPHONE/E-MAIL: (714) 536-5561/ ethan.edwards@surfcity-hb.org
PROJECT DESCRIPTION: **TO CONVERT THE HUNTINGTON SHORECLIFFS MOBILE HOME PARK FROM RENTAL UNITS TO INDIVIDUAL OWNERSHIP.**

The following is a list of code requirements deemed applicable to the proposed project based on plans received and dated January 22, 2010. The list is intended to assist the applicant by identifying requirements which must be satisfied during the various stages of project permitting and implementation. A list of conditions of approval adopted by the Planning Commission in conjunction with the requested entitlement(s), if any, will also be provided upon final project approval. If you have any questions regarding these requirements, please contact the Plan Reviewer.

1. Prior to submittal of the final tract map to the Public Works Department for processing and approval, the following shall be required:
 - a. At least 90 days before City Council action on the final map, CC&Rs shall be submitted to the Planning Department and approved by the City Attorney. The CC&Rs shall identify the common driveway access easements, and maintenance of all walls and common landscape areas by the Homeowners' Association. The CC&Rs must be in recordable form prior to recordation of the map.
 - b. Final tract map review fees shall be paid, pursuant to the fee schedule adopted by resolution of the City Council (*City of Huntington Beach Planning Department Fee Schedule*). (HBZSO Section 254.16)
 - c. Park Land In-Lieu Fees shall be paid pursuant to the requirements of HBZSO Section 254.08 – *Parkland Dedications*. The fees shall be paid and calculated according to a schedule adopted by City Council resolution (*City of Huntington Beach Planning Department Fee Schedule*).
2. Prior to conversion of the mobile home park, the following shall be completed:
 - a. The final map shall be recorded with the County of Orange.
 - b. All improvements shall be completed in accordance with approved plans.

3. The Departments of Planning, Public Works and Fire shall be responsible for ensuring compliance with all conditions of approval herein as noted after each condition. The Planning Director and Public Works Director shall be notified in writing if any changes to parcel map are proposed during the plan check process. Permits shall not be issued until the Planning Director and Public Works Director have reviewed and approved the proposed changes for conformance with the intent of the Planning Commission's action and the conditions herein. If the proposed changes are of a substantial nature, an amendment to the original entitlement reviewed by the Planning Commission may be required pursuant to the HBZSO.
4. Tentative Tract Map No. 17296 shall not become effective until the ten calendar day appeal period has elapsed Planning Commission approval.
5. Tentative Tract Map No. 17296 shall become null and void unless exercised within two (2) years of the date of final approval. An extension of time may be granted by the Director of Planning pursuant to a written request submitted to the Planning Department a minimum 60 days prior to the expiration date.
6. The subdivision shall comply with all applicable requirements of the Municipal Code, Building & Safety Department and Fire Department, as well as all applicable local, State and Federal Codes, Ordinances and standards, except as noted herein.
7. Construction shall be limited to Monday – Saturday 7:00 AM to 8:00 PM. Construction shall be prohibited Sundays and Federal holidays.
8. The applicant shall submit a check in the amount of \$50 for the posting of a Notice of Exemption at the County of Orange Clerk's Office. The check shall be made out to the County of Orange and submitted to the Planning Department within two (2) days of the Planning Commission's action.
9. All landscaping shall be maintained in a neat and clean manner, and in conformance with the HBZSO. Prior to removing or replacing any landscaped areas, check with the Departments of Planning and Public Works for Code requirements. Substantial changes may require approval by the Planning Commission.



HUNTINGTON BEACH PUBLIC WORKS DEPARTMENT

PROJECT IMPLEMENTATION CODE REQUIREMENTS

DATE: FEBRUARY 2, 2010
PROJECT NAME: HUNTINGTON SHORECLIFFS MOBILE HOME PARK
ENTITLEMENTS: TENTATIVE TRACT MAP 17296
PLNG APPLICATION NO. 2010-0023
DATE OF PLANS: JANUARY 12, 2010
PROJECT LOCATION: 20701 BEACH BLVD
PROJECT PLANNER ETHAN EDWARDS, ASSOCIATE PLANNER
TELEPHONE/E-MAIL: 714-536-5561 / ETHAN.EDWARDS@SURFCITY-HB.ORG
PLAN REVIEWER: STEVE BOGART, SENIOR CIVIL ENGINEER
TELEPHONE/E-MAIL: 714-374-1692 / SBOGART@SURFCITY-HB.ORG
PROJECT DESCRIPTION: TO CONVERT THE HUNTINGTON SHORECLIFFS MOBILE HOME PARK FROM RENTAL UNITS TO INDIVIDUAL OWNERSHIP.

The following is a list of code requirements deemed applicable to the proposed project based on plans as stated above. The items below are to meet the City of Huntington Beach's Municipal Code (HBMC), Zoning and Subdivision Ordinance (ZSO), Department of Public Works Standard Plans (Civil, Water and Landscaping) and the American Public Works Association (APWA) Standards Specifications for Public Works Construction (Green Book), the Orange County Drainage Area management Plan (DAMP), and the City Arboricultural and Landscape Standards and Specifications. The list is intended to assist the applicant by identifying requirements which shall be satisfied during the various stages of project permitting, implementation and construction. If you have any questions regarding these requirements, please contact the Plan Reviewer or Project Planner.

THE FOLLOWING CONDITIONS ARE REQUIRED TO BE COMPLETED PRIOR TO SUBMITTAL OF THE FINAL TRACT MAP TO THE CITY FOR REVIEW:

1. A Hydrology and Hydraulic Analysis for existing site drainage and tributary upstream drainage shall be submitted for Public Works review and approval. (ZSO 255.12)

THE FOLLOWING DEVELOPMENT REQUIREMENTS SHALL BE COMPLETED PRIOR TO RECORDATION OF THE FINAL TRACT MAP:

1. The Tentative Tract Map received and dated August 4, 2009 shall be the approved layout.
2. The Final Tract Map shall be submitted to the City of Huntington Beach Public Works Department for review and approval and shall include a title report to indicate the fee title owner(s) as shown on a

title report for the subject properties. The title report shall not be more than six (6) weeks old at the time of submittal of the Final Parcel Map.

3. The Final Tract Map shall be consistent with the approved Tentative Tract Map. (ZSO 253.14)
4. A reproducible Mylar copy and a print of the recorded final tract map shall be submitted to the Department of Public Works at the time of recordation.
5. The engineer or surveyor preparing the final map shall comply with Sections 7-9-330 and 7-9-337 of the Orange County Subdivision Code and Orange County Subdivision Manual, Subarticle 18 for the following item:
 - a. Tie the boundary of the map into the Horizontal Control System established by the County Surveyor.
 - b. Provide a digital-graphics file of said map to the County of Orange.
6. Provide a digital-graphics file of said map to the City per the following design criteria:
 - c. Design Specification:
 - i. Digital data shall be full size (1:1) and in compliance with the California coordinate system – STATEPLANE Zone 6 (Lambert Conformal Conic projection), NAD 83 datum in accordance with the County of Orange Ordinance 3809.
 - ii. Digital data shall have double precision accuracy (up to fifteen significant digits).
 - iii. Digital data shall have units in US FEET.
 - iv. A separate drawing file shall be submitted for each individual sheet.
 - v. Digital data shall be in compliance with the Huntington Beach Standard Sheets, drawing names, pen color and layering conventions.
 - vi. Feature compilation shall include, but shall not be limited to: Assessor's Parcel Numbers (APN), street addresses and street names with suffix.
 - d. File Format and Media Specification:
 - i. Shall be in compliance with one of the following file formats (AutoCAD DWG format preferred):
 - AutoCAD (version 2000, release 4) drawing file: _____.DWG
 - Drawing Interchange file: _____.DXF
 - ii. Shall be in compliance with the following media type:
 - CD Recordable (CD-R) 650 Megabytes
7. The improvement plans shall be submitted to the Department of Public Works for review and approval. The engineer shall submit cost estimates for determining bond amounts. (ZSO 255.16C & MC 17.05)
8. All improvement securities (Faithful Performance, Labor & Material and Monument Bonds) and Subdivision Agreement shall be posted with the Public Works Department and approved as to form by the City Attorney. (ZSO 255.16)
9. A Certificate of Insurance shall be filed with the Public Works Department and approved as to form by the City Attorney. (ZSO 253.12K)

10. If the Final Tract map is recorded before the required improvements are completed, a Subdivision Agreement may be submitted for construction in accordance with the provisions of the Subdivision Map Act. (SMA)
11. All applicable Public Works fees shall be paid. Fees shall be calculated based on the currently approved rate at the time of payment unless otherwise stated. (ZSO 250.16)
12. A Homeowners' Association(s) (HOA) shall be formed and described in the CC&R's to manage the following for the total project area:
 - a. Onsite landscaping and irrigation improvements
 - b. On-site sewer and drainage systems
 - c. Best Management Practices (BMP's) as per the approved Water Quality Management Plan (WQMP)

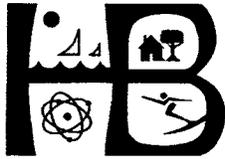
The aforementioned items shall be addressed in the development's CC&R's.

13. Improvement Plans, prepared by a Licensed Civil Engineer, shall be submitted to the Public Works Department for review and approval. (MC 17.05/ZSO 230.84)
14. A Landscape and Irrigation Plan, prepared by a Licensed Landscape Architect shall be submitted to the Public Works Department for review and approval by the Public Works and Planning Departments. (ZSO 232.04)
 - a. Existing mature trees that are to be removed must be replaced at a 2 for 1 ratio with a 36" box tree or palm equivalent (13'-14' of trunk height for Queen Palms and 8'-9' of brown trunk).
 - b. "Smart irrigation controllers" and/or other innovative means to reduce the quantity of runoff shall be installed. (ZSO 232.04D)
15. All landscape planting, irrigation and maintenance shall comply with the City Arboricultural and Landscape Standards and Specifications. (ZSO 232.04B)
16. Landscaping plans shall utilize native, drought-tolerant landscape materials where appropriate and feasible. (DAMP)
17. A Consulting Arborist (approved by the City Landscape Architect) shall review the final landscape tree-planting plan and approve in writing the selection and locations proposed for new trees and the protection measures and locations of existing trees to remain. Said Arborist signature shall be incorporated onto the Landscape Architect's plans and shall include the Arborist's name, certificate number and the Arborist's wet signature on the final plan. (Resolution 4545)
18. A Drainage Fee for the subject development shall be paid at the rate applicable at the time of Building Permit issuance. The current rate of \$13,880 per gross acre is subject to periodic adjustments. This project consists of 41.223 gross acres (including its tributary area portions along the half street frontages) for a total required drainage fee of \$572,175. City records indicate the current use on the subject property has never paid this required fee. Per provisions of the City Municipal Code, this one time fee shall be paid for all subdivisions or development of land. (MC 14.48) In lieu of the payment of the aforementioned Drainage Fee \$572,175, Public Works will accept the construction of the on-site master planned facilities per the City of Huntington Beach, Municipal Code Section 14.38.030.
19. The current tree code requirements shall apply to this site. (ZSO 232)
 - a. Existing trees to remain on site shall not be disfigured or mutilated, (ZSO 232.04E) and,
 - b. General tree requirements, regarding quantities and sizes. (ZSO 232.08B and C)

20. All landscape irrigation and planting installation shall be certified to be in conformance to the City approved landscape plans by the Landscape Architect of record in written form to the City Landscape Architect. (ZSO 232.04D)
21. Applicant shall provide City with CD media TIFF images (in City format) and CD (AutoCAD only) copy of complete City Approved landscape construction drawings as stamped "Permanent File Copy" prior to starting landscape work. Copies shall be given to the City Landscape Architect for permanent City record.
22. The Water Ordinance #14.52, the "Water Efficient Landscape Requirements" apply for projects with 2500 square feet of landscaping and larger. (MC 14.52) Based upon these requirements, a separate water meter and backflow prevention device shall be provided for landscaping along Beach Blvd.

THE FOLLOWING DEVELOPMENT REQUIREMENTS ARE REQUIRED TO BE COMPLETED PRIOR TO RELEASE OF IMPROVEMENT SECURITIES:

1. Complete all improvements as shown on the approved Improvement, Storm Drain and Landscape Plans.



CITY OF HUNTINGTON BEACH
FIRE DEPARTMENT

PROJECT IMPLEMENTATION CODE REQUIREMENTS

DATE: FEBRUARY 9, 2010
PROJECT NAME: HUNTINGTON SHORECLIFFS MOBILEHOME SUBDIVISION
ENTITLEMENTS: PLANNING APPLICATION NO. 2010-023: TENTATIVE TRACT MAP NO. 2010-005 (17296)
PROJECT LOCATION: 20701 BEACH BLVD., HUNTINGTON BEACH, CA
PLANNER: ETHAN EDWARDS, ASSOCIATE PLANNER
TELEPHONE / E-MAIL: 714.536.5561 / ethan.edwards@surfcity-hb.org
PLAN REVIEWER-FIRE: DARIN MARESH, FIRE DEVELOPMENT SPECIALIST
TELEPHONE-MAIL: 714.536.5531 / dmaresh@surfcity-hb-org
PROJECT DESCRIPTION: TO CONVERT THE HUNTINGTON SHORECLIFFS MOBILE HOME PARK FROM RENTAL UNITS TO INDIVIDUAL OWNERSHIP

The following is a list of code requirements deemed applicable to the proposed project based on plans received and dated January 22, 2010. The list is intended to assist the applicant by identifying requirements which must be satisfied during the various stages of project permitting and implementation. A list of conditions of approval adopted by the Planning Commission in conjunction with the requested entitlement(s), if any, will also be provided upon final project approval. If you have any questions regarding these requirements, please contact the Plan Reviewer - Fire: DARIN MARESH, FIRE DEVELOPMENT SPECIALIST.

1. Tract Map No. 17296 for the subdivision of the Huntington Shorecliffs Mobile home park for purposes, of converting an existing 304-space for-rent mobile home park for ownership purposes shall comply with the following requirements:
 - a. Fire hydrant and water supply systems shall meet NFPA 24, 1977 Edition.
 - b. Fire hydrant and water supply systems shall meet the requirements set forth in Title 25 California Code of Regulations, Chapter 2, Subchapter I. Article 6-Fire Protection Standards for Parks (this can be found at www.hcd.ca.gov/codes/mp/mpRegs.html).
 - c. Per Title 25 CCR §1308, if additional lots are installed, each lot shall have installed an accessible three-quarter (3/4)-inch valved water outlet, with an approved vacuum breaker installed, designed for connecting a three-quarter (3/4)-inch female swivel hose connection for fire suppression use.
 - d. The following areas shall be in compliance with the Huntington Beach Fire Code unless conditions legally existed prior to September 26, 2002 or if the fire chief determines that such a condition constitutes a distinct threat to life or property:
 - i. Fire equipment access, posting of fire equipment access, parking, lot identification, weed abatement, debris abatement, combustible storage abatement and burglar bars.
2. Prior to submittal of the final tract map to the Public Works Department for processing and approval, the following shall be complied with:
 - a. Documentation of a current flow test in compliance with Title 25 shall be submitted to the Huntington Beach Fire Department on the current HCD MP532 form.
 - b. Documentation of the fire hydrant and water supply system's compliance with NFPA24, 1977

Edition, shall be submitted to the Huntington Beach Fire Department by a licensed C-16 contractor or licensed Fire Protection Engineer.

- c. Fire Lanes shall be posted, marked, and maintained per City Specification #415, Fire Lanes Signage and Markings Private, Residential, Commercial and Industrial Properties. No parking shall be allowed in the designated 24-foot wide fire apparatus access road or supplemental fire access per City Specification # 415. Roadways must maintain compliance with City Specification # 401 *Minimum Standards for Fire Apparatus Access*.
 - i. An inspection is required to confirm the parks compliance with regard to fire lane and apparatus access. This inspection may be scheduled by calling 714.536.5411.
3. Prior to recordation of the final tract map, the following conditions shall be complied with:
 - a. Residential address numbers shall be installed to comply with City Specification #428, Premise Identification. Number sets are required on front of the structure in a contrasting color with the background and shall be a minimum of four inches (4") high with one and one half inch (1-1/2") brush stroke.
 - i. An inspection is required to confirm the parks compliance with regard to premise identification. This inspection may be scheduled by calling 714.536.5411.
4. The following conditions shall be maintained during construction:
 - a. Fire/Emergency Access and Site Safety shall be maintained during project construction phases in compliance with HBFC Chapter 14, Fire Safety During Construction and Demolition.
 - b. Fire/Emergency Access and Site Safety shall be maintained during project construction phases in compliance with City Specification #426, Fire Safety Requirements for Construction Sites.

OTHER:

- a. Discovery of additional soil contamination or underground pipelines, etc., must be reported to the Fire Department immediately and the approved work plan modified accordingly in compliance with City Specification #431-92 Soil Clear-Up Standards. (FD)
- b. Outside City Consultants: The Fire Department review of this project and subsequent plans may require the use of City Consultants. The Huntington Beach City Council approved fee schedule allows the Fire Department to recover consultant fees from the applicant, developer or other responsible party. (FD)
- c. The Huntington Beach Fire Department reserves the right to apply additional specific requirements as necessary to reach compliance with code requirement No. 1, referenced on page one of this document.

Fire Department City Specifications may be obtained at:

Huntington Beach Fire Department Administrative Office
City Hall ~ 2000 Main Street, 5th Floor
Huntington Beach, CA 92648

or through the City's website at www.huntingtonbeachca.gov

If you have any questions, please contact the Fire Prevention Division at 714.536.5411

S:\Prevention\1-Development\1-Planning Department - Planning Applications, CUP's\2010 CUP's\Shorecliff Mobile Home CUP letter

PA#2010-023 02-09-10 DM 09-04-09.rtf

December 15, 2009

File No. 36014.112/4837-1724-7749v.1

TO: Huntington Shorecliffs Mobilehome Park Residents

**Re: Huntington Shorecliffs Mobilehome Park
Application for Tentative Tract Map to Subdivide Park
Conversion Impact Report**

Dear Resident:

Please take notice that Shorecliff, LP, Huntington BSC Park, LP, JS Stadium, LLC and Shorecliff Main, LP, the Owners of the Huntington Shorecliffs Mobilehome Park, will submitting within the next two to three weeks an Application to the City of Huntington Beach for a Tentative Tract Map to subdivide the Park.

The purpose of the subdivision will be to give the residents the option if they so choose to purchase their spaces that they are currently renting. No resident one will be forced to purchase his or her space, and the residents may continue renting their spaces.

We are providing the residents with the enclosed "Report on Impact of Conversion Upon Residents" that will be filed as part of the Application. The Report explains the legal protections against economic displacement for those residents who will continue renting their spaces following the conversion.

You will also soon receive from the Huntington Shorecliffs Homeowner's Association a tenant survey form that will ask your opinion about the conversion. Please promptly complete and return that survey.

Once the Application has been submitted to and accepted by the City, there will be public meetings and a hearing before the City Planning Commission. We will provide you with advance notice of the hearing once it is scheduled.

We also anticipate having one or more meetings with the residents to discuss the conversion and its implications prior to the City hearing. We will keep you posted.

Very truly yours,

HART, KING & COLDREN

Robert S. Coldren

Enclosure: Report on Impact of Conversion Upon Residents



REPORT ON IMPACT OF CONVERSION UPON RESIDENTS

Huntington Shorecliffs Mobilehome Park

December 15, 2009

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 Huntington Shorecliffs Mobile Home Park ("**Park**") located at 20701 Beach Boulevard, 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 "A."

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 Ltd. v. City of Palm Springs, supra*, 96 Cal.App.4th at 1177)

Notwithstanding the limited requirements for this Report, the City and Homeowner's Association ("HOA") have requested that it include additional information that might assist Park residents choosing to purchase their spaces. By including that additional information, the Applicant does not admit that such information can lawfully required to be included and does not waive its legal rights to contend that the Report complies with Government Code Section 66427.5 without that additional information. That additional information does not constitute a legally binding commitment or offer on the part of the Applicant.

Report on Impact of Subdivision to Residents
December 15, 2009
Page 2

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.

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 were established for calendar year 2008.

Household Size (# of Persons)	1	2	3	4
Income Must be at or Below:	\$52,100	\$59,500	\$66,950	\$74,400

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

Report on Impact of Subdivision to Residents

December 15, 2009

Page 4

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 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.

Nevertheless, as previously explained, because the Resident has the option to either purchase his or her Lot or to continue renting his or her Space under whatever rental arrangement may be existing on the Conversion Date, with the statutory rental rate protections discussed below, the Residents will be protected against economic displacement from sale of the Lots upon conversion.

By way of accommodation to the HOA and the City, and without waiving any rights to claim that this Report is adequate without any information pertaining to purchasing residents or to estimates of value as of the yet unidentified Conversion Date, the Applicant provides the following information requested by the City and the HOA:

- a. Current estimate of potential Lot value: Approximately \$275,000-385,000, depending on the size and location of the lot.
- b. Current estimate of potential monthly assessment: “Base” assessment of approximately \$210 per Lot, with an additional “utility” assessment of approximately \$80 per Lot, and a budgeted reserve contribution of approximately \$45 per Lot per month

Report on Impact of Subdivision to Residents
December 15, 2009
Page 5

(assuming the accrued reserves are fully funded prior to close of the first escrow)

- c. Current estimate of potential market rent: Approximately \$1,600 to \$1,850, inclusive of the approximately \$250 in “pass-throughs” many residents currently pay.
- d. Statement re Water Drainage Issues. The City and residents are concerned about surface and percolating groundwater drainage from the Park. The Applicant has retained an expert to analyze Park water drainage and will consider reasonable and economically feasible measures in cooperation with the City and HOA to address water drainage issues that might exist within the Park.

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

Report on Impact of Subdivision to Residents
December 15, 2009
Page 6

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))

Report on Impact of Subdivision to Residents
December 15, 2009
Page 7

SECTION V. 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 15, 2009

Hart, King & Coldren

By: _____

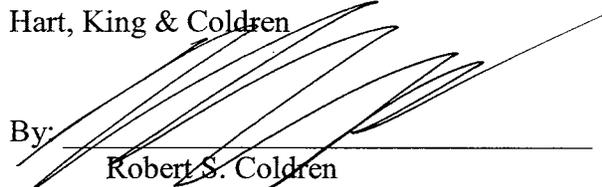

Robert S. Coldren
Attorneys for Applicant
Shorecliff L.P.
JS Stadium, LLC
Huntington BSC Park, LP
Shorecliff Main, LP

Exhibit A
California Government Code Section 66427.5

Section 66427.5 of the Government Code:

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 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 Sec. 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.

Huntington Shorecliffs Homeowners Association
20701 Beach Blvd.
Huntington Beach, Ca. 92648

January 18, 2010

Mr. Ethan Edwards
City of Huntington Beach Planning Department
100 S. Main Street
Huntington Beach, Ca. 92648

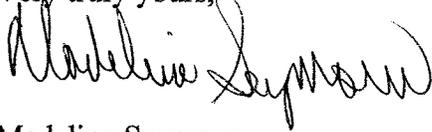
RE: Huntington Shorecliffs Sub-Division Application
Resident Survey Results 1-15-2010

Dear Mr. Edwards:

Attached please find the results of the current survey from the residents of Huntington Shorecliffs with a re-cap attached.

Thanking you in advance for your attention to this matter.

Very truly yours,



Madeline Seymour
Huntington Shorecliffs Homeowners Association
Board Member



Huntington Shorecliffs
Survey 1-15-10

Sp. #	Name	Sup.	Op.	Decline	Vacant	P. O.	No Info	Comment
1	Baur	1						
2	Heini		1					
3	Evans		1					
4	Edwards			1				
5	Ladow			1				
6	Liberatore		1					
7	Colletta							
8	Seymour		1					
9	Schock			1				
10	Edwards			1				
11	Fordell			1				
12	Fribley			1				
13	Long	1						
14	Wells							
15	Bell			1				
16	Mills							
17	Hill		1					
18	Nielsen		1					
19	Sanders		1					
20	Iovan		1					
21	Calderon		1					
22	Clyde							
23	Brown							
24					1			
25					1	1		
26	Curatola	1						
27	Thompson			1				
28	Stover/Whissen	1						
29	Crew			1				
30	McGowan			1				
31	Haarbison	1						
32	Huffman	1						
33	Morgan		1					
34	Primromse		1					
35	Morhouse	1						
36	Hammer							
37	Steele							
38	Keenum			1				
39	Mallard		1					
40	Sturock							
41	LaChapelle			1				
42							1	
43	Dahlen		1					
44							1	
45	Tague	1						1
46	Cluff		1					
47	Sykes	1						
48	Simms		1					1
49						1		

Huntington Shorecliffs
Survey 1-15-10

Sp. #	Name	Sup.	Op.	Decline	Vacant	P. O.	No Info	Comment
50						1		
51	Bennett							
52	Hogan							
53	Plummer		1					
54	Kini			1				
55	Laurin							
56	Gywnn			1				
57	Williams			1				
58	Jordan		1					1
59							1	
60	Smith		1					
61	Hanson		1					1
62	Kershaw		1					
63	Speiser			1				1
64	Ewald			1				
65	Burki							
66	Warren		1					
68	Argirakis		1					
69	Hadden		1					
70							1	
72	Wiessmer			1				
73	O'Brien							
74	Atchur							
75	Butts	1						
76	Hamel		1					
77	Schumacher		1					
78	Bennett							
79	Zeller		1					
81	Rasmussen		1					
82							1	
83	Sheneman		1					
85	Vaughn			1				
86	Schwenneber							
87					1			
88	Merritt			1				
89	Bergeron			1				
90	Krueger	1						
91	Ford		1					1
92	Bohl				1			
93	Warren							
94							1	
95	Tran	1						
96	Roberts		1					
97	Gordon		1					
98							1	
99	Dalton		1					
100	Long		1					
101	Jaffe							
102	Richter		1					
103	Van Horn		1					

Huntington Shorecliffs
Survey 1-15-10

Sp. #	Name	Sup.	Op.	Decline	Vacant	P. O.	No Info	Comment
104	Delloso							
105	Mascorro							
106	Weber							
107	Crandlemire			1				
108	Bewley			1				
109	Festini							
110	Harris							
111							1	
112	Harrington			1				
113	Fieweger			1				1
114	Buckland							
115	Morgan							
116	Kent							
117	Gross		1					
118	Slavin							
119	Asendorf							No vote
120	Potter		1				1	
121	Champion		1					
122	Rasch							
123	Lyons		1					
124	Berry			1				
125	Bondick			1				
126	King	1						
127							1	
128	Hetrick	1						
129	Ludt		1					
130						1		
131							1	
132	McCabe		1					
133	Goodman	1						
134					1			
135	Clark		1					
136							1	
137					1			
138							1	
139	Evans							
140	Stanton		1					
141	Mc Culloch							
142	Logins		1					
143	Sullivan			1				
144							1	
145	Bradford							
146	Moskewich							
147	Carlson		1					
148							1	
149	Peach		1					
150	Smith		1				1	
151	Reese							
152	Crosby							
153							1	

Huntington Shorecliffs
Survey 1-15-10

Sp. #	Name	Sup.	Op.	Decline	Vacant	P. O.	No Info	Comment
154							1	
155	Ibarra		1					
156						1		
157	Landin		1					
158							1	
159							1	
160	Brown			1				1
161	McGrew			1				
162	Hall		1					
163	Jones		1					
164	Evans		1					
165	Drew		1					
166	Ackermann		1					
167	Truitt		1					
168	Hudson		1					
169	Steele		1					
170	Megennis		1					
171	Gilday							
172	Cargill			1				
173	Smith		1					
174	Cobb		1					
175	Weber							
176	Prince		1				1	
177							1	
178	McClinton							
179	Bastien		1					
180	Starnes	1						
181							1	
182							1	
183	Schrock			1				1
184	Lupo				1			
185	Beck							
186	Ellsworth		1					
187					1	und	1	
188							1	
189							1	
190	Nelson		1					
191	Burke							
192	Gorman							
193							1	
194	Elstad			1				
195	Blackman							
196	Mills							
197	Hill			1				1
198	Kimes							
199	Strada		1					
200	Dana		1					

Huntington Shorecliffs
Survey 1-15-10

Sp. #	Name	Sup.	Op.	Decline	Vacant	P. O.	No Info	Comment
201	Cummings	1						
202	Criswell				1			
203	Wilson							
204	Steeper	1						
205	Lomond		1					
206	Ruttman		1					
207	Nelson		1					
208	Noss							
209	Goldman							
210					1			
211					1			
212	Sollazzo		1					
213					1			
214	Vliss		1					
215	Mancinelli		1					
216	Bright			1				1
217							1	
218	Young			1				
219							1	
220	Danell		1					
221	Robinson	1						
222					1	1		
223	Brown		1					
224	Lyons			1				
225	Sutherland							
226	Schoenherz							
227	Lewis							
228	Reed	1						
229	Hoeflich		1					
230	Bove							
231	Moore		1					
232	Robison							
233	Wiessmer			1				
234	Kraehling							
235	underage				1			
236							1	
237	Gray		1					
238	Davis			1			1	
239	Berens		1					
240	Williams	1						
241	Alden		1					
242							1	
243	Riley			1				
244	Gillespie			1				
245	Walker							
246	Rennegarhe		1					
247	Jordan		1					
248	Burns		1					

Huntington Shorecliffs
Survey 1-15-10

Sp. #	Name	Sup.	Op.	Decline	Vacant	P. O.	No Info	Comment
249	Smith		1					
250	Lewis		1					
251	Mulloy		1					
252	Terjenian							
253	Gardner		1					
254	Morrey		1					
255	Rogers		1					
256	Haney		1					
257	Luckham		1					
258	Cannon			1				
259	Mc Kennell	1						
260	Hall							
261	Razanskas			1				
262							1	
263					1			
264	Walker			1				
265	Gardner		1					1
266	Richardson							
267	Porch							
268	Hamilton			1				
269	Calderone			1				
270	Palmer							
271	Myer		1					
272	Reed			1				
273	Fieldhouse	1						
274	Coscione			1				
275	Van Orden							
276	Davison							
277	Knutson	1						
278	McGrew			1				
279	Stockton		1					
280	Rasmussen		1					
281	Athey							
282	Lytle		1					
283	Miller		1					
284	Moore		1					
285	Casino		1					
286					1			
287	Lippard							
288	Eberly			1				
289	Bradley		1					1
290	Seymour		1					1
291	Lohert		1					
292	Turrill							
293	Gargano							
294	Krafka		1					
295	Bowers		1					
296	Hames							
297	Daquila	1						
298	Faber							

Huntington Shorecliffs
Survey 1-15-10

Sp. #	Name	Sup.	Op.	Decline	Vacant	P. O.	No Info	Comment
299	Ritter		1					
300	Garfield			1				
301	O'Neil		1					
302	Bonillas							
303	Runnels							
304	Kallister							
305	Maloney							
306	Stephenson			1				1
307					1			
308					1			
		25	105	52	18	6	34	15

Total Returns 182

2/3/10

From: Mary F. Vaughn
20501 Beach Bl #85
Huntington Shorecliffs
D.B., CA 92648
714-969-4388

FEB 05 2010

To whom it May Concern:

To: Orange County Transit

✓ City of Huntington Beach

John R. Saunders, J.B. Stadium Corp.

Star Management, Michell Cirillo

Robert A. Caddres, Attorney

Kent G. Maricanda, Attorney

Subject: Flooding of Beach Bld drain 1/19/10

Flooding in Huntington Shorecliffs streets 1/19/10

Enclosure: Pictures upon request taken 1/30/10

On 1/19/10 Beach Bld drain ^{and} street over-
flood its banks under the Cinder block
wall ^{and} into my back yard ^{and} under
my home. Today after using almost a
gallon of simple green cleaner, most of
the gross black grease is gone from the
yard, however, still under my house.

At the same time the back of the house was
flooding the front of the house was being

ATTACHMENT NO. 8.0

flooded because my street drifted at
apture. The water was going 4 foot up
my side entrance handicap ramp.
After taking the pictures 1/30/10 Castle
Construction said there was still at
least a foot of water under house.

Last year Castle Construction installed
a large pump that had pumped
daily, until the motor burned out
because of the depth of 1/19/10 storm
and the street unable to drain properly.

This has been an on going problem under
my house. Last year my house was
sinking, walls cracking, musty smell,
I submitted a bill ^{any} management didn't
pay it, I did, however months latter
Pacific Const. installed moisture barrier. This
barrier must now be removed due to it
covered with water, a new pump is
a must, ^{any} new piers ^{any} re leveling
is again needed, I need mgn't fast,
Your immediate attention please, as
this is unhealthy ^{any} very stressful.
Thankyou, Mary J. Vaughn