



City of Huntington Beach Planning and Building Department
STAFF REPORT

TO: Planning Commission
FROM: Scott Hess, AICP, Director of Planning and Building
BY: Rosemary Medel, Associate Planner *RM*
DATE: January 28, 2014
SUBJECT: **ZONING MAP AMENDMENT NO. 13-002 (SENIOR RESIDENTIAL MOBILEHOME PARK OVERLAY)**
APPLICANT: City of Huntington Beach
PROPERTY OWNERS: Zoning Map Amendment No. 13-002 affects two properties. The list of property owners is provided in Attachment No. 4.
LOCATION: The location of the two mobilehome parks included in Zoning Map Amendment No. 13-002 is provided on page 3.

STATEMENT OF ISSUE:

- Zoning Map Amendment (ZMP) No. 13-002 request:
 - To add Senior Residential Overlay (-SR) to two existing Senior Mobilehome Parks identified in location map (Attachment No.2).
- Staff's Recommendation:
Approve Zoning Map Amendment No. 13-002 and forward to the City Council for adoption for the following reasons:
 - Consistent with City Council direction and City Attorney's Office recommendations;
 - Conforms to the General Plan Land Use and Housing Elements to provide and retain housing senior housing options;
 - Compatible with the existing zoning and standards for mobilehome parks; and
 - Will not have any adverse environmental impacts as analyzed under Negative Declaration No. 13-001.

RECOMMENDATION:

Motion to:

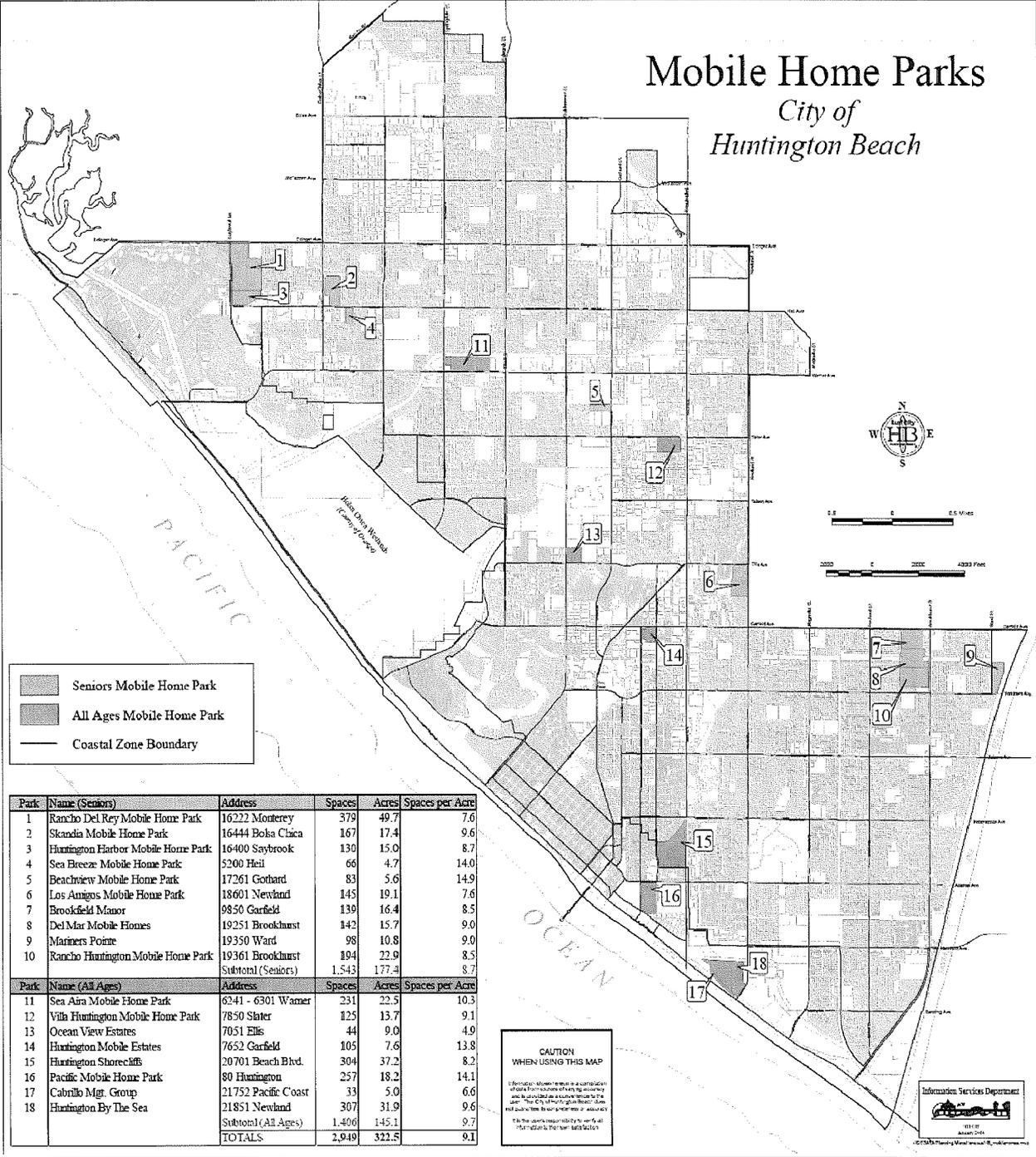
"Approve Zoning Map Amendment No. 13-002 with findings (Attachment No. 1) and forward draft ordinances (Attachment No. 3) to the City Council."

ALTERNATIVE ACTION(S):

The Planning Commission may take alternative actions such as:

- A. "Deny Zoning Map Amendment No. 13-002."
- B. "Continue Zoning Map Amendment No. 13-002 and direct staff accordingly."

Mobile Home Parks City of Huntington Beach



VICINITY MAP LEGEND ZONING MAP AMENDMENT 13-002 SENIOR PARKS

PROJECT PROPOSAL:

Zoning Map Amendment No. 13-002 involves establishment of the Senior Residential (-SR) Overlay designation to two existing (as of August 5, 2013) senior mobilehome parks in the City pursuant to Huntington Beach Zoning and Subdivision Ordinance (HBZSO) Chapter 247.

The Senior Mobilehome parks included in this ZMA are listed below and shown on the vicinity map as sites 1 and 3. Although none of the senior mobilehome parks are located within the Coastal Zone, the zoning district map for Rancho Del Rey and Huntington Harbor senior mobilehome parks includes property within the Coastal Zone boundary. Therefore, if ultimately approved, the City must forward Zoning Map Amendment No. 13-002 to the Coastal Commission as a minor amendment to the City's certified Local Coastal Program. Additional information for each site is provided in Attachment No. 2. Sites 2 and 4-10 are included in Zoning Map Amendment No. 13-001. The standards for the -SR designated mobilehome parks are in a companion report for Zoning Text Amendment No. 13-002.

LOCATION OF SENIOR MOBILEHOME PARKS

PARK NO. *	PARK NAME	ADDRESS/ZIP CODE	NUMBER OF SPACES
1.	Rancho Del Rey Mobilehome Park	16222 Monterey Lane, 92647	403
2.*	Skandia Mobilehome Park	16444 Bolsa Chica Street, 92649	167
3.	Huntington Harbor Mobilehome Park	16400 Saybrook Lane, 92649	106
4.*	Sea Breeze Mobilehome Park	5200 Heil Avenue, 92649	65
5.*	Beachview Mobilehome Park	17261 Gothard Street, 92647	82
6.*	Los Amigos Mobilehome Park	18601 Newland Street, 92646	145
7.*	Brookfield Manor	9850 Garfield Avenue, 92646	139
8.*	Del Mar Mobilehomes	19251 Brookhurst Street, 92646	142
9.*	Mariners Pointe	19350 Ward Street, 92646	98
10.*	Rancho Huntington Mobilehome Park	19361 Brookhurst Street, 92646	194
		Total	1,541

**Processed under ZMA No.13-001*

The City Council directed staff to prepare a draft Senior Mobilehome Park Overlay ordinance in order to retain existing senior mobilehome parks in response to the concerns expressed by park residents. Proposed Zoning Map Amendment No. 13-002 and companion report ZMA No. 13-001 add the proposed senior overlay designation.

Background:

On July 15, 2013, City Council directed staff to prepare a draft interim ordinance to commence the process of retaining 10 existing senior mobilehome parks citywide. On August 5, 2013, the City Council adopted Ordinance No. 3986, an Interim Ordinance establishing a moratorium on the conversion of senior mobilehome parks due to the lack of senior housing options in and around the City of Huntington Beach. On September 16, 2013, the City Council adopted Ordinance No. 3990, an Interim Urgency Ordinance extending the moratorium on the conversion of senior mobilehome parks (established by Ordinance No. 3986 on August 5, 2013) for an additional 10 months and 15 days. The

moratorium was extended to allow the City time to create a regulatory framework (i.e. the –SR Overlay district) to address the City’s senior housing issues and is set to expire on April 30, 2014. These background materials are provided in the Planning Commission staff report for the Zoning Text Amendment No. 13-002.

Study Session:

The Planning Commission held a study session on January 14, 2014. Staff introduced the proposed overlay district and provided background as described. The Planning Commission asked questions related to the zoning text amendment. Responses are addressed in the staff report for Zoning Text Amendment No. 13-002.

ISSUES:

General Plan Conformance:

The project creates the overlay to designate existing senior mobilehome parks as senior parks with the Senior Residential designation in an effort to retain existing senior housing. The proposed project would be consistent with the goals, objectives and policies of the City’s Land Use Element and Housing Element of the General Plan as follows:

A. Land Use Element

Objective LU 9.5: Provide for the development of housing for senior citizens, the physically and mentally challenged, and very low, low, and moderate income families.

Objective LU 15.6: Facilitate the preservation and development of Residential Mobilehome Parks.

B. Housing Element

Policy HE 1.5 Protection of Existing Affordable Housing: Work with property owners, tenants, and non-profit purchasers to facilitate preservation of assisted rental housing at risk of conversion to market rents.

Policy HE 2.1: Variety of Housing Choices: Provide site opportunities for development of housing types, cost and location, emphasizing locations near services and transit that promote walkability.

Policy HE 5.2: Housing Options for Seniors: Support development and maintenance of affordable senior rental and ownership housing and supportive services to facilitate maximum independence and the ability of seniors to remain in their homes and/or in the community.

Zoning Map Amendment No. 13-002 would amend the Huntington Beach General Plan Map and Zoning maps to add a Senior Residential (-SR) Overlay zoning district designation to two mobilehome parks. The purpose of the –SR Overlay district is to protect mobilehome parks primarily occupied by senior 55 years of age and older from conversion to family (non age-restricted) parks in an effort to preserve affordable housing for seniors.

Zoning Compliance: See Attachment No. 2.

Urban Design Guidelines Conformance: Not applicable.

Environmental Status:

On November 5, 2013, the Environmental Assessment Committee approved the processing of a Negative Declaration for the proposed project. The 30-day public review and comment period started on November 14, 2013, and ended on Monday, December 16, 2013. A total of three comment letters were received.

Coastal Status:

Although none of the senior mobilehome parks are located within the Coastal Zone, the zoning district map for Rancho Del Rey and Huntington Harbor senior mobilehome parks includes property within the Coastal Zone boundary. Therefore, if ultimately approved, the City must forward Zoning Map Amendment No. 13-002 to the Coastal Commission as a minor amendment to the City's certified Local Coastal Program.

Redevelopment Status: Not applicable.

Design Review Board: Not applicable.

Subdivision Committee: Not applicable.

Other Departments Concerns and Requirements:

The City Attorney's Office prepared the subject ordinances. There are no concerns from other departments.

Public Notification:

Legal notice was published in the Huntington Beach/Fountain Valley Independent on January 16, 2014. Notices were sent to all property owners and tenants within the existing senior mobilehomes as well as interested agencies/organizations including the property owners of all existing mobilehome parks. As of January 21, 2014, no other communications regarding ZMA No. 13-002 have been received.

Application Processing Dates:

This is a City Council directed project and mandatory processing dates are not applicable.

ANALYSIS:

Zoning Map Amendment No. 13-002 would amend the Huntington Beach Zoning maps to add the Senior Residential (-SR) Overlay zoning district designation to eight mobilehome parks. These are existing senior mobilehome parks that would be restricted to those residents 55 years of age and older. The senior overlay will prevent the conversion of existing senior parks to family (non age-restricted) parks.

The eight remaining family parks in the City will not be affected by the proposed –SR Overlay district. However, they could apply to have the -SR Overlay designation in the future. In addition, a senior mobilehome park with the –SR Overlay designation could apply to remove the overlay designation pursuant to applicable city code requirements.

The project is consistent with the Land Use and Housing Elements of the General Plan because it retains existing senior housing and maintains the same land use currently in effect. Zoning Map Amendment No. 13-002 is compatible with the uses and the standards for the zoning district. This amendment does not change the base district zoning, and is consistent with the new zoning provisions for the –SR designated properties.

Staff recommends approval of ZMA No. 13-002 based on the following:

- Consistent with City Council direction and City Attorney’s Office recommendations;
- Conforms to the General Plan Land Use and Housing Elements to provide and retain housing senior housing options;
- Compatible with the existing zoning and standards for mobilehome parks; and
- Will not have any adverse environmental impacts as analyzed under Negative Declaration No. 13-001.

ATTACHMENTS:

1. Suggested Findings of Approval
2. Site Specific Information and Vicinity Maps
3. Draft City Council Ordinances for Zoning Map Amendment No. 13-002
4. List of Property Owners

SH:MBB:rm

ATTACHMENT NO. 1

SUGGESTED FINDINGS OF APPROVAL

ZONING MAP AMENDMENT NO. 13-002

SUGGESTED FINDINGS OF APPROVAL – ZONING MAP AMENDMENT NO. 13-002

SUGGESTED FINDINGS OF APPROVAL – ZONING MAP AMENDMENT NO. 13-002

1. Zoning Map Amendment No. 13-002 to amend the Huntington Beach Zoning and Subdivision Ordinance (HBZSO) to add the SR Senior Residential Overlay District designation to two existing senior mobilehome parks is consistent with the objectives, policies, general land uses and programs specified in the General Plan and any applicable specific plan. The goals and policies of the General Plan Housing Element state that the City will promote, retain, and provide affordable housing. This overlay will identify senior housing.
2. In the case of a general land use provision, Zoning Map Amendment No. 13-002 is compatible with the uses authorized in, and the standards prescribed for, the zoning district for which it is proposed. This amendment does not change the base district or zoning land use designation. It is consistent with the new zoning provisions for –SR designated properties.
3. A community need is demonstrated for the proposed amendment as the amendment will ensure that the city retains a variety of senior housing options. The new overlay will permit the senior parks to continue and does not displace residents but allows for the transition of those residents that would not be in compliance with the age restriction or percentage of seniors criteria pursuant to Chapter 228.
4. Its adoption will be in conformity with public convenience, general welfare and good zoning practice. The proposed amendment will add -SR to the existing RMP zoning designation. The SR designation will signify that the park is age restricted to seniors, which is consistent with the proposed zoning standards and General Plan goals for accommodating a variety of housing to benefit the senior population of the community.

ATTACHMENT NO. 1

Attachment No. 2

Site No. 1

Rancho Del Rey Mobile Home Park

LOCATION: 16222 Monterey Ln. (south of Edinger, east side of Saybrook)

PROPERTY OWNER: Houser Brothers Co., LP, 17610 Beach Blvd., #32, Huntington Beach, CA 92647

REQUEST: Amend zoning map for subject property from RMP to RMP-SR

SUBJECT PROEPRTY AND SURROUNDING LAND USE, ZONING AND GENERAL PLAN DEISGNATIONS

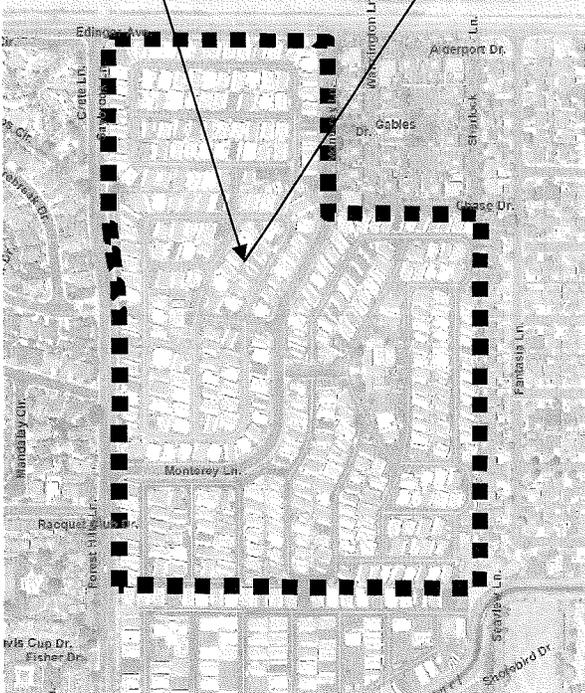
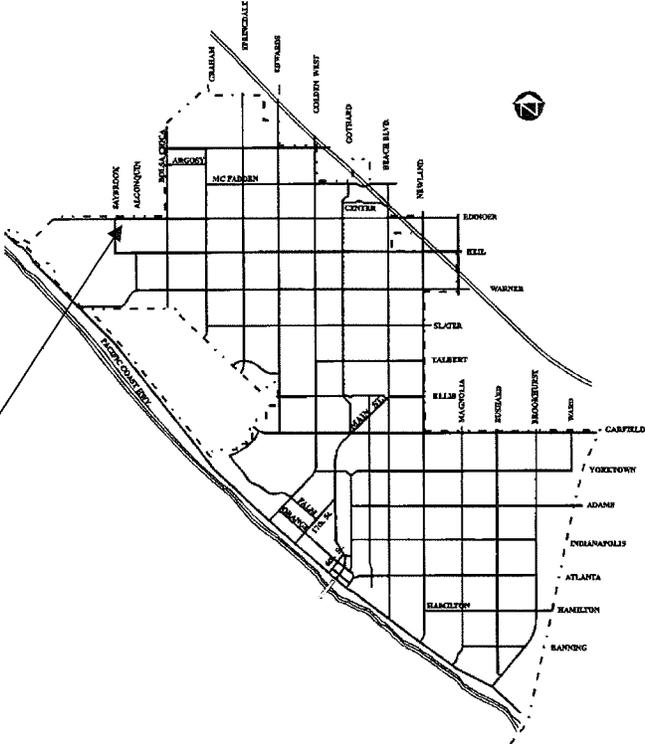
LOCATION	GENERAL PLAN	ZONING	LAND USE
Subject Property:	RM-15 (Residential Medium Density-15 units/acre)	RMP (Manufactured Home Park)	Mobilehome Park
North of Subject Property	City of Seal Beach	City of Seal Beach	Seal Beach Naval weapons station
East of Subject Property	RL-7	RL (Residential Low Density)	Residential single family
South of Subject Property:	CG-F1 (Commercial General – F1 Density 0.35), RL-7	RMP	Mobilehome Park
West of Subject Property:	CG-F1, RL-7	RL	Residential single family

Zoning Compliance:

The mobilehome park is located on 49.7 acres and provides 379 spaces (7.6 units per acre). The current zoning classification is RMP. The park is an existing senior mobilehome park and will be retained as such in compliance with the RMP zone designation. The only change will be to add the SR Overlay to the existing zoning map.

ATTACHMENT NO. 2.1

Subject Property



VICINITY MAP (Site 1#)
ZMA NO. 13-002
16222 MONTEREY LN.

Site No. 3
Huntington Harbor Mobile Home Park

LOCATION: 16400 Saybrook Street (East of Saybrook, north side of Heil Ave.)

PROPERTY OWNER: Huntington Mobile Home Inv., LLC, 430 s. San Dimas Ave., San Dimas, CA 91733

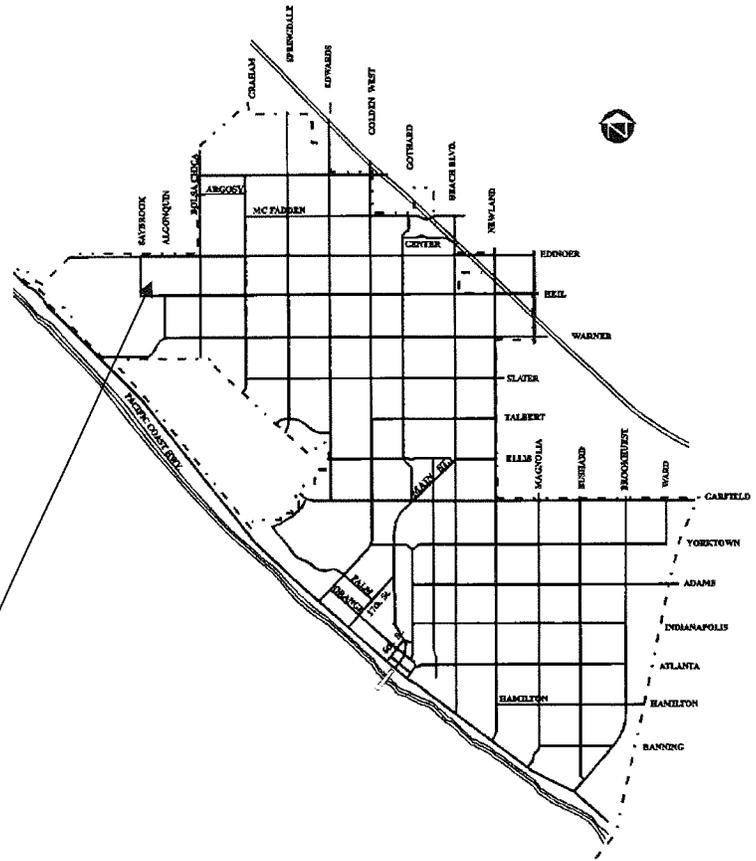
REQUEST: Amend zoning map for subject property from RMP to RMP-SR

SUBJECT PROEPRTY AND SURROUNDING LAND USE, ZONING AND GENERAL PLAN DEISGNATIONS

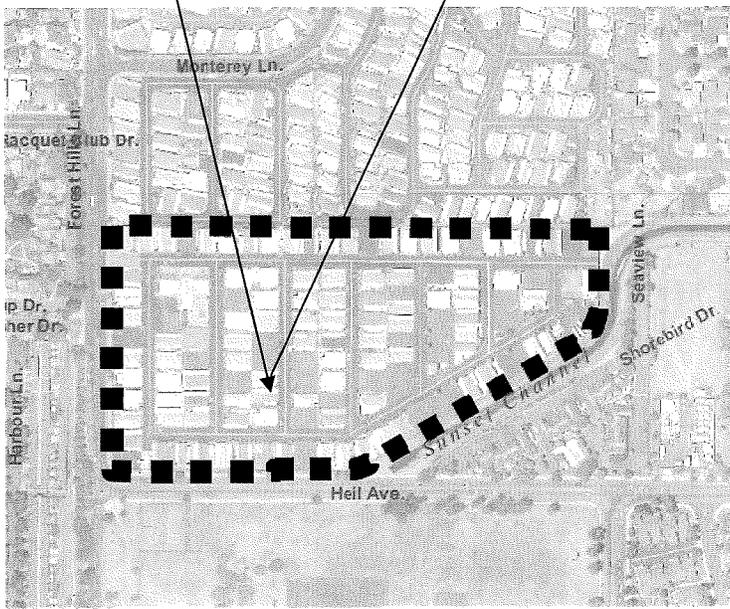
LOCATION	GENERAL PLAN	ZONING	LAND USE
Subject Property:	RM-15 (Residential Medium Density-15 units/acre)	RMP (Manufactured Home Park)	Mobilehome Park
North of Subject Property	RL-7 (Residential Low Density)	RMP	Residential single family
East of Subject Property	RL-7	RM (Residential Medium Density)	Residential single family
South of Subject Property, across Heil Ave.:	P-(RL) (Public-Residential Low Density)	PS (Public Semi Public)	School
West of Subject Propert:	RMH-25(Residential Medium Density)	RMH (Residential Medium High Density)	Multiple family rsidential

Zoning Compliance:

The mobilehome park is located on 15 acres and provides 130 spaces (8.7 units per acre). The current zoning classification is RMP. The park is an existing senior mobilehome park and will be retained as such in compliance with the RMP zone designation. The only change will be to add the SR Overlay to the existing zoning map.



Subject Property



**VICINITY MAP (Site #3)
ZMA NO. 13-002
16400 SAYBROOK ST.**

DRAFT

ORDINANCE NO. _____

AN ORDINANCE OF THE CITY OF HUNTINGTON BEACH,
CALIFORNIA AMENDING DISTRICT MAP 23Z OF THE CITY OF
HUNTINGTON BEACH ZONING AND SUBDIVISION ORDINANCE
TO ADD THE SR SENIOR RESIDENTIAL OVERLAY TO REAL
PROPERTY LOCATED AT 16222 MONTEREY LANE
(EAST SIDE OF SAYBROOK SOUTH OF EDINGER)
ZONING MAP AMENDMENT NO. 13-002

WHEREAS, the lack of affordable housing options in and around the City of Huntington Beach continues to create housing problems for senior citizens living in the City; and

One affordable housing option for senior citizens is a mobilehome park that permits exclusive residence by those individuals age fifty-five (55) years and older; and

Pursuant to California State Planning and Zoning Law, the Huntington Beach Planning Commission and Huntington Beach City Council have held separate, duly noticed public hearings to consider Zoning Map Amendment No. 13-002, wherein, after due consideration of the findings and recommendations of the Planning Commission and all other evidence presented, the City Council has determined that the aforesaid amendment is proper and consistent with the General Plan;

NOW, THEREFORE, the City Council of the City of Huntington Beach does hereby ordain as follows:

SECTION 1. That the real property located at the southeast corner of Saybrook Ln. and Edinger Ave., and more particularly described in the legal description and sketch collectively attached hereto as Exhibit A and incorporated by this reference as though fully set forth herein, is hereby changed from RMP (Manufactured Home Park) to RMP-SR (Manufactured Home Park-Senior Residential Overlay).

SECTION 2. That the Director of Planning and Building is hereby directed to amend Sectional District Map 23Z of the Huntington Beach Zoning and Subdivision Ordinance to reflect the changes contained in this ordinance. The Director of Planning and Building is further directed to file the amended map. A copy of such map, as amended, shall be available for inspection in the Office of the City Clerk.

DRAFT

SECTION 3. This ordinance shall take effect thirty (30) days after its adoption.

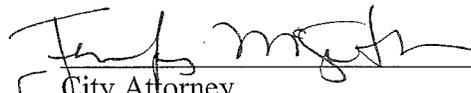
PASSED AND ADOPTED by the City Council of the City of Huntington Beach at a regular meeting held on _____, 2014.

Mayor

ATTEST:

APPROVED AS TO FORM:

City Clerk



City Attorney
1.15.14

pre
11/14/2014

REVIEWED AND APPROVED:

INITIATED AND APPROVED:

City Manager

Director of Planning and Building

ATTACHMENTS

Exhibit "A": Location Map and Legal Description

95-03

THIS MAP WAS PREPARED FOR ORANGE COUNTY ASSESSOR LEIF BUNNEN BY THE ASSessor's MAP MAKER MO QUADANTE AS TO THE ACCURACY OF THE INFORMATION CONTAINED HEREIN, THE ASSessor'S OFFICE AND THE COUNTY ENGINEER DO NOT BEAR ANY LIABILITY FOR THE INFORMATION. COPYRIGHT ORANGE COUNTY ASSESSOR

FOR E. 1/2, NW 1/4, SEC. 20, T. 5 S., R. 11 W.

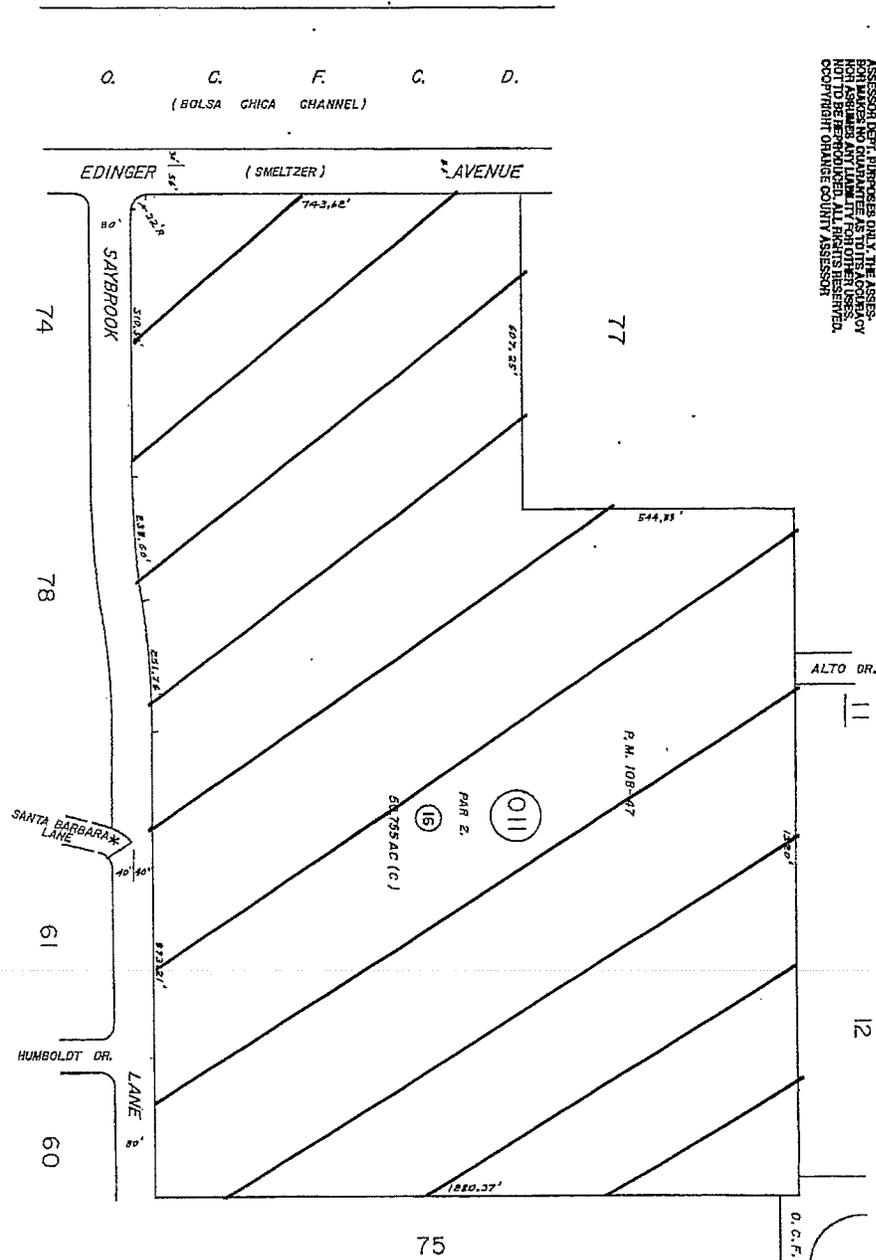
MARCH 1966

PARCEL MAP

P. M. 108-47

NOTE - ASSESSOR'S BLOCK & PARCEL NUMBERS SHOWN IN CIRCLES

ASSESSOR'S MAP BOOK 178 PAGE 01 COUNTY OF ORANGE



* PRIVATE STREET

EXHIBIT A

178-01

ATTACHMENT NO. 3.3

Legal Description of Property

16222 Monterey Lane, Huntington Beach, CA 92649-6214

APN: 178-011-16

Parcel 2 as per Parcel Map recorded in Book 108, Pages 47 and 48, in the City of Huntington Beach, County of Orange, State of California, inclusive, Official Records of Orange, California

ATTACHMENT NO. 3.4

AN ORDINANCE OF THE CITY OF HUNTINGTON BEACH,
CALIFORNIA AMENDING DISTRICT MAP 23Z OF THE CITY OF
HUNTINGTON BEACH ZONING AND SUBDIVISION ORDINANCE
TO ADD THE SR SENIOR RESIDENTIAL OVERLAY TO REAL
PROPERTY LOCATED AT 16400 SAYBROOK (NORTHEAST
CORNER OF SAYBROOK AND HEIL)
ZONING MAP AMENDMENT NO. 13-002

WHEREAS, the lack of affordable housing options in and around the City of Huntington Beach continues to create housing problems for senior citizens living in the City; and

One affordable housing option for senior citizens is a mobilehome park that permits exclusive residence by those individuals age fifty-five (55) years and older; and

The conversion of existing senior mobilehome parks may unduly burden and irreparably harm senior citizens within the community; and

Pursuant to California State Planning and Zoning Law, the Huntington Beach Planning Commission and Huntington Beach City Council have held separate, duly noticed public hearings to consider Zoning Map Amendment No. 13-002, wherein, after due consideration of the findings and recommendations of the Planning Commission and all other evidence presented, the City Council has determined that the aforesaid amendment is proper and consistent with the General Plan;

NOW, THEREFORE, the City Council of the City of Huntington Beach does hereby ordain as follows:

SECTION 1. That the real property located at the northeast corner of Saybrook Ln. and Heil Ave., and more particularly described in the legal description and sketch collectively attached hereto as Exhibit A and incorporated by this reference as though fully set forth herein, is hereby changed from RMP (Manufactured Home Park) to RMP-SR (Manufactured Home Park-Senior Residential Overlay).

SECTION 2. That the Director of Planning and Building is hereby directed to amend Sectional District Map 23Z of the Huntington Beach Zoning and Subdivision Ordinance to reflect the changes contained in this ordinance. The Director of Planning and Building is further directed to file the amended map. A copy of such map, as amended, shall be available for inspection in the Office of the City Clerk.

DRAFT

SECTION 3. This ordinance shall take effect thirty (30) days after its adoption.

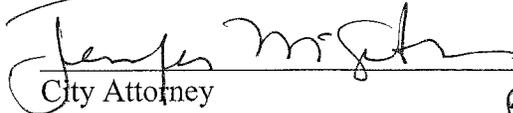
PASSED AND ADOPTED by the City Council of the City of Huntington Beach at a regular meeting held on _____, 2014.

Mayor

ATTEST:

City Clerk

APPROVED AS TO FORM:



City Attorney

1-15-14

pe
1/14/2014

REVIEWED AND APPROVED:

City Manager

INITIATED AND APPROVED:

Director of Planning and Building

ATTACHMENTS

Exhibit "A": Location Map and Legal Description

THIS MAP WAS PREPARED FOR ORANGE COUNTY ASSESSOR'S DEPT. PURPOSES ONLY. THE ASSESSOR'S DEPT. MAKES NO WARRANTY OR LIABILITY FOR OTHER USERS. NOT TO BE REPRODUCED. ALL RIGHTS RESERVED. COPYRIGHT ORANGE COUNTY ASSESSOR

S1/2, SE1/4, NW1/4, SEC. 20, T5S, R11W

178-75

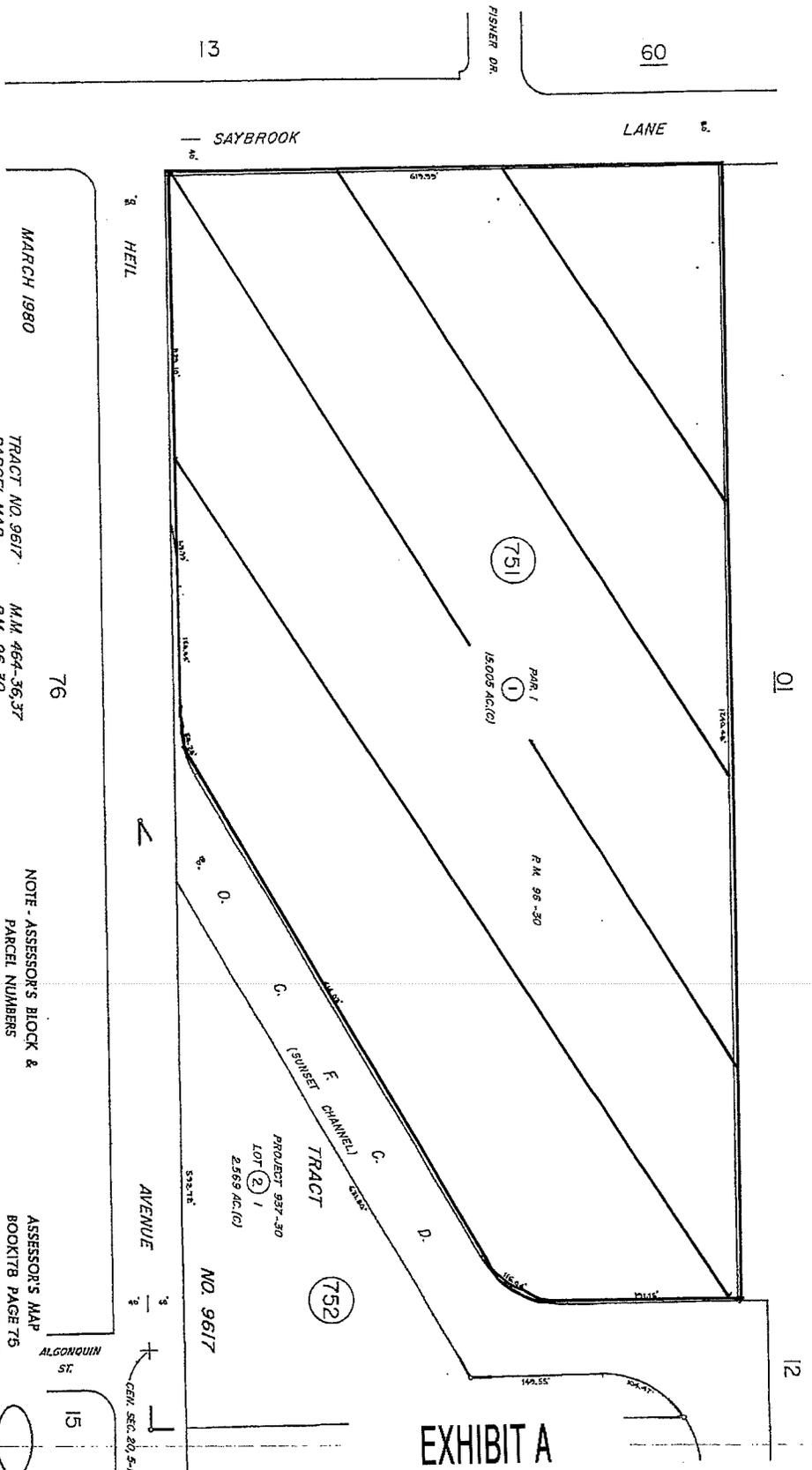


EXHIBIT A

ATTACHMENT NO. 3.7

MARCH 1980

TRACT NO. 9617
PARCEL MAP
M.M. 464-36,37
P.M. 96-30

NOTE - ASSESSOR'S BLOCK & PARCEL NUMBERS SHOWN IN CIRCLES

ASSESSOR'S MAP
BOOK 178 PAGE 75
COUNTY OF ORANGE



LEGAL DESCRIPTION OF PROPERTY

Parcel A: An undivided 1/130th interest in and to Parcel 1, as shown and defined in Certificate of Compliance No. 11-020, recorded on October 26, 2011, as Document No. 2011000537042 of Official Records of Orange County together with all improvements thereon.

Except therefrom Residential Units RU-1 through RU-130, inclusive, as shown and defined upon the Condominium Plan, recorded on January 17, 2012 as Document No. 2012000025065 of Official Records.

Except therefrom an undivided 25% interest, in and all of the oil gas and other hydrocarbons substances and minerals in and under and that may be produced from said land as granted to Norman Macbeth and Jacqueline Smith Phelps by Deed recorded September 15, 1915 in Book 3205, Page 361 of Official Records.

Parcel B: Residential Unit 50, as shown and defined on the Condominium Plan.

Parcel C: An exclusive easement appurtenant to each unit for the use and occupancy of those portions of the exclusive use areas depicted in the Condominium Plan and provided for in the Declaration of Establishment of Covenants, Conditions and Restrictions, recorded on January 17, 2012, as Document No. 2012000025066 of Official Records.

Mail Tax Statements To: **SAME AS ABOVE** or Address Shown Below

ATTACHMENT NO. 3.8

MOBILEHOME PARKS PROPERTY OWNERS LIST

1. Stephen B. Fabeck, Beach View Mobile Home Park, 80 South Lake #719, Pasadena, CA 91101 (Senior Park)*
2. Joanna Bruce, Mariners Point Mobile Home Park, 1837 Pine St., Huntington Beach, CA 92648 (Senior Park)*
3. Sea Breeze Mobile Estates LLC, Sea Breeze Mobile Estates, 5200 Heil Ave., Huntington Beach, CA 92647 (Senior Park)*
4. Brookfield Manor Inc., Brookfield Manor Mobile Home Park, 9850 Garfield Ave., Huntington Beach, CA 92646 (Senior Park)*
5. Del Mar Mobile Home Estates, Inc., Del Mar Mobile Home Estates, 921 Emerald Bay, Laguna Beach, CA 92651-1260 (Senior Park)*
6. Houser Brothers Company, LP, Rancho Del Rey Mobile Home Park, 17610 Beach Blvd., #32, Huntington Beach, CA 92647 (Senior Park)*
7. Sierra Corporate Management Inc., Rancho Huntington Mobile Home Park, 320 N. Park Vista St., Anaheim, CA., 92806 (Senior Park)*
8. Hubbell Family LLC, Skandia Mobile Home Park, 1161 Bryant Rd., Long Beach, CA 90805 (Senior Park)*
9. Kato & Associates LLC, Los Amigos Mobile Home Park, 18182 Bushard St., Fountain Valley, CA 92708 (Senior Park)*
10. Huntington Mobile Home Inv., LLC, Huntington Harbour Village, 430 S. San Dimas Ave., San Dimas, CA 91733 (Senior Park)*
11. Mills PCH LLC, Cabrillo Mobile Home Park, 430 S. San Dimas Ave., San Dimas, CA 91733
12. Mills HBS, Huntington by the Sea Mobile Home Park, 430 S. San Dimas Ave., San Dimas, CA 91733
13. John Sanders Property, Huntington Shorecliff Mobile Home Park, PO Box 11427, Santa Ana, CA 92711
14. City of Huntington Beach, Ocean View Estates, Economic Development, 2000 Main St., Huntington Beach, CA 92648;
15. Huntington Mobile Home Inv LLC, Huntington Harbour Village, 430 S. San Dimas Ave., San Dimas, CA 91733
16. JS Stadium LLC, Pacific Mobile Home Park, PO Box 11427, Santa Ana, CA 92711
17. Sea Aira Mobile Home LP, Sea Aira Mobile Home Park, 9597 Central Montclair, CA 91763
18. Villa Huntington Beach LP, Villa Huntington Mobile Castles, 1818 Gilberth Rd., Ste 240, Burlingame, CA 94010-1217.

*Existing Senior park, as of August 5, 2013, analyzed for –SR Overlay.

ATTACHMENT NO. 4