



CITY OF CARSON

PLANNING COMMISSION STAFF REPORT

PUBLIC HEARING: February 23, 2010
SUBJECT: Tentative Parcel Map No. 071206
APPLICANT: Imperial Avalon Mobile Estates, LLC
REPRESENTATIVE: Sid Goldstien Civil Engineer, Inc
650 Alamo Pintado Road, Suite 302
Solvang, CA 93463
REQUEST: To approve a tentative parcel map to convert an existing 225-unit mobilehome park to nominal resident ownership.
PROPERTY INVOLVED: 21207 S. Avalon Boulevard

COMMISSION ACTION

☐ Concurred with staff
☐ Did not concur with staff
☐ Other

COMMISSIONERS' VOTE

AYE	NO		AYE	NO	
		Chairperson Faletogo			Gordon
		Vice-Chair Saenz			Graber
		Brimmer			Park
		Díaz			Schaefer
					Verrett

Item No. 11A

I. Introduction

The applicant is requesting approval of Tentative Parcel Map No. 071206 to convert an existing rental mobilehome park to nominal "resident ownership." The subject property is approximately 27 acres in size, zoned RM-8-D (Residential, Multi-family – 8 units per acre – Design Review) and CR (Commercial, Regional), and located at 21207 S. Avalon Boulevard.

II. Background

This project application was submitted on September 24, 2009, and reviewed for application completeness pursuant to California Government Code Section 66427.5 (Exhibit No. 1). The mobile home park is subject to the city's Mobile Home Park Rent Control Ordinance. Under existing State law, the conversion of a mobile home park from a landlord-tenant arrangement to resident ownership is governed by Government Code Section 66427.5. The city also has a Mobile Home Park Conversion Ordinance, Sections 9209.1 through 9209.6 of the Carson Municipal Code (Exhibit No. 2).

As described in the published opinion of one California Court of Appeal in *El Dorado v. Palm Springs* (2002) 96 Cal.App.4th 1153, with respect to economic displacement issues, local government hearings on a park owner's application to subdivide units within a mobilehome park are limited to whether the park owner has complied with statutory requirements of Government Code Section 66427.5.

On August 21, 2009, the Court of Appeal in San Francisco issued a unanimous decision in the Sonoma County mobilehome park conversion litigation. That court invalidated the entirety of the Sonoma County's conversion ordinance ("Ordinance") holding that the Ordinance is pre-empted by Government Code Section 66427.5.

The Ordinance required that certain information be contained in the Tenant Impact Report, whereas Government Code Section 66427.5 lacked any specificity as to the required contents of a Tenant Impact Report. This is similar to the requirements in the Carson conversion ordinance. The Ordinance also required that the survey of resident support demonstrate that the conversion is a bona fide resident conversion, and established certain "presumptions" regarding the same depending on the results of the resident survey. This is also similar to the requirements of the Carson conversion ordinance. The Court determined that local agencies lacked the authority to establish such regulatory presumptions.

There has been tremendous focus on the issues associated with the conversion of mobilehome parks. The city has utilized extensive resources in an effort to advance a balanced approach to allow for mobilehome park conversions while acknowledging the interests of the residents. Recent court decisions and the veto of AB 566 present little option as it relates to the processing of the Imperial Avalon mobile home park condominium conversion. The City Council has instructed staff and the City Attorney's Office to explore opportunities to settle all pending legal cases involving mobilehome park conversions and to process any pending conversion applications consistent with these recent court decisions.



Pursuant to Government Code Section 66427.5, the applicant has complied with the minimum requirements to allow for the approval of the requested subdivision and conversion to condominium ownership. The city is unable to condition the approval and must decide on the application based upon the narrow findings allowed by the Subdivision Map Act and Government Code Section 66427.5. As such, a resolution has been prepared with the necessary affirmative findings required to approve the application.

Having said the forgoing, however, it is important to note that the city is currently awaiting a decision from the 2nd District Court of Appeals in the matter of *Carson Harbor Village, Ltd. vs. City of Carson*, case No. B211777 ("CHV Case"), which was argued on December 17, 2009 -- a decision is expected by March 1, 2010. The decision in the CHV Case may have significant legal implications in this area of the law. Hence, if this matter is appealed to the City Council, staff's recommendation to the City Council may change depending on the ruling of the Court of Appeals in the CHV case decision.

III. Analysis

Government Code Section 66427.5

When a park is converted from a rental mobilehome park to resident ownership, existing residents have the option to purchase a subdivided unit in the park or remain as renters. If the households are determined to be lower income as defined in the State Health and Safety Code, and the residents elect to remain as renters, then their monthly rent, including any applicable fees or charges for use of any pre-conversion amenities, may increase from the pre-conversion rent but only 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 increase by an amount greater than the average monthly percentage increase in the Consumer Price Index for the most recently reported period.

The Tenant Impact Report submitted in October, 2009 (Exhibit No. 3) includes low-income qualification level information for Los Angeles County, which are as follows:

Household Size	Lower Income Category Maximum
1	\$44,400
2	\$50,750
3	\$57,100
4	\$63,450

If a resident chooses to remain as a renter and is not lower income as determined by the State, their monthly rent, including all applicable fees or charges for use of any pre-conversion amenities, may increase from pre-conversion rent to market levels, as defined in an appraisal conducted in the manner specified by law, in equal annual increases over a four year period. The other option is to purchase a space, known as an air space condominium, in the park. Upon the "date of conversion" state law mandates that the park will no longer be under the City's Rent Control Ordinance.

The applicant has provided written verification that the residents of the Imperial Avalon Mobile Home Park have received proper and timely notification of the proposed subdivision pursuant to the requirements found in Section 66427.5 of the Government Code.

The 60-day Notice of Intent to subdivide was sent to existing tenants on July 17, 2009. The applicant held a general meeting on September 1, 2009 inviting all residents to discuss the conversion to resident ownership. Staff is unaware of any comments sent to the Planning Division as a result of this meeting. At the time of this writing, the applicant intends to hold an additional general meeting on February 18, 2010.

Issue of Concern: Resident Survey of Support

A resident survey was conducted by Hoffman, Stermer and Associates, Inc. pursuant to California Government Code Section 66427.5(d)(1) and CMC Section 9209.3(B)(2) in September, 2009 (Exhibit No. 4). The results of which indicated that of 83 responses, 18 were in support of a resident conversion and 46 were opposed.

As previously stated, the Planning Commission must decide on the application based upon the narrow findings allowed by the Subdivision Map Act and Government Code Section 66427.5. As such, no conditions have been included to address the lack of resident support.

III. Environmental Review

Pursuant to Section 15282(e) of the California Environmental Quality Act (CEQA), a conversion of a rental mobile home park to a condominium subdivision is deemed Exempt from further environmental review as the proposed project will generate no significant environmental impacts.

IV. Recommendation

That the Planning Commission:

- WAIVE further reading and ADOPT Resolution No._____, entitled, "A Resolution of the Planning Commission of the city of Carson recommending approval of Tentative Parcel Map No. 071206 to the City Council to permit a mobile home park conversion to resident ownership for Imperial Avalon Mobile Estates located at 21207 S. Avalon Boulevard."

V. Exhibits

1. Government Code Section 66427.5
2. Mobile Home Park Conversion Ordinance, Sections 9209.1 through 9209.6 of the CMC
3. Tenant Impact Report dated October, 2009
4. Resident Survey of Support – Summary Dated October 6, 2009




5. Zoning Map
6. Tentative Parcel Map No. 071206 (under separate cover)
7. Draft Resolution

Prepared by:



Steven G. Newberg, AICP, Associate Planner

Reviewed and Approved by:



Sheri Repp Loadsman, Planning Officer

California Government Code Section 66427.5

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

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

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

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

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

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

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

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

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

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

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

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

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



PART 9. MOBILEHOME PARK RESIDENTIAL CONVERSIONS

Sections:

- § 9209.1 Purpose.
- § 9209.2 Applicability.
- § 9209.3 Application Requirements.
- § 9209.4 Tenant Notification.
- § 9209.5 Tentative Map and Preliminary Parcel Map Approval.
- § 9209.6 Effective Date of Decision and Appeals.

§ 9209.1 Purpose.

The purpose of these provisions is to promote greater individual choice in type, quality, price and location of housing; to provide for the housing needs of all segments of the population; to provide increased homeownership opportunities for all segments of the population; to mitigate the hardship caused by displacement of tenants, particularly those in low to moderate cost housing and those who are elderly, families with minor dependent children, the handicapped and the disabled; to promote the safety of conversion projects and correction of Building Code violations in such projects; to provide adequate off-street parking; to encourage construction of new rental units to replace units lost due to conversions; to protect the existing rental housing stock by reducing conversions; to ensure that conversions of mobilehome parks to resident ownership are bona fide resident conversions in accordance with state law; and to generally regulate projects in accordance with applicable general and specific plans and with the public health, safety and welfare. (Ord. 06-1358, § 1; Ord. 08-1401, § 1)

§ 9209.2 Applicability.

The provisions of this Part shall apply to all mobilehome park conversions and all tentative maps and preliminary parcel maps submitted for consideration subsequent to the date upon which the ordinance codified in this Part becomes effective. (Ord. 06-1358, § 1)

§ 9209.3 Application Requirements.

A. Compliance with Law. A conversion project shall comply with the Division of Land regulations in Chapter 2 of Article IX of the Carson Municipal Code, the provisions of this Part, and local ordinances and other applicable State laws such as

Government Code Sections 66427.5 and/or 66428.1.

B. Information Required. In addition to the information required by other applicable sections of this Code and other applicable law, the following information shall be submitted at the time of filing:

1. Building Plans. Building plans or other documents containing the following information pertaining to the project and certified as to its accuracy by a licensed engineer:

(a) A description of the features of the type of common area building and project, including age, type of construction, number of dwelling units, excluding manufactured housing units; and

(b) A site plan, including common area buildings, structures, open spaces, and accessory storage areas and buildings including trash storage areas, and the footprint of each manufactured housing unit and other dwelling unit (if applicable); and

(c) A parking plan, including the total number of spaces actually provided and the total number required at the time of the original entitlement of the mobilehome park if different from that actually provided; dimensions of stalls, aisles and driveways; locations of columns, walls and other obstructions; and total number of covered and uncovered parking spaces and location and number of guest parking spaces; and

(d) A phase I and, if indicated from the phase I report, a phase II environmental report; and

(e) A soils report, if that same is required by the County of Los Angeles or indicated from the phase I report; and

(f) A Department of Real Estate budget (Form No. 623, as the same may be modified from time to time), which includes, but is not limited to, information regarding: (i) the condition of park infrastructure and common facilities and the necessity for any replacements of infrastructure and common area facilities or major repairs estimated for the remaining useful life; (ii) building component reports indicating conditions and estimated remaining useful life of the roof, foundation, plumbing, electrical, heating, air conditioning, other mechanical and structural systems, prepared by a registered civil or structural engineer, licensed general building contractor, licensed general engineering contractor or architect; (iii) a reserve study estimating the cost of replacing all these facilities



over their useful life and a plan that provides adequate funding for same; and (iv) an estimate of the cost of all overhead and operating costs of maintaining the park, including, but not limited to, maintaining the park's open space areas over the next thirty (30) years; and

(g) Floor and elevation plans, including indications of common and private areas (excluding manufactured housing units) and required exits; and

(h) All existing building inspection reports (if any such report has already been submitted to the California Department of Real Estate, a copy of such report shall be furnished to the City); and

(i) A structural pest control report, prepared by a licensed pest control contractor for all common areas; and

(j) A utility report, if the spaces within a park are not individually metered, confirming (i) the existence of adequate utility services, and (ii) indicating the feasibility of individual or submetering, prepared by qualified engineers; and

(k) All legal documents confirming the legal status of the park, including, but not limited to, documents (i) prepared for and defining the powers and duties of the proposed homeowners' association, including articles of incorporation, bylaws, and conditions, covenants and restrictions; and (ii) any notice(s) from the Department of Housing and Community Development of claimed violations; and (iii) a general title report.

2. Survey of Residential Support. A survey of residential support conducted in compliance with subdivision (d) of Government Code Section 66427.5. The subdivider shall demonstrate that the survey was conducted in accordance with an agreement between the subdivider and an independent resident homeowners' association, if any, was obtained pursuant to a written ballot, and was conducted so that each occupied mobilehome space had one (1) vote. The completed survey of resident support ballots shall be submitted with the application. In the event that more than one (1) resident homeowners' association purports to represent residents in the park, the agreement shall be with the resident homeowners' association which represents the greatest number of resident homeowners in the park. For purposes of determining whether a

proposed conversion is a bona fide resident conversion, the following criteria shall be used:

(a) Where the survey of resident support conducted in accordance with Government Code Section 66427.5 shows that more than fifty (50) percent of resident households support the conversion to resident ownership, the conversion shall be presumed to be a bona fide resident conversion.

(b) Where the survey of resident support conducted in accordance with Government Code Section 66427.5 shows that at least thirty-five (35) percent but not more than fifty (50) percent of residents support the conversion to resident ownership, the subdivider shall have the burden of demonstrating that the proposed conversion is a bona fide resident conversion. In such cases, the subdivider shall demonstrate, at a minimum, that a viable plan, with a reasonable likelihood of success as determined by the decision maker, is in place to convey the majority of the lots to current residents of the park within a reasonable period of time.

(c) Where the survey of resident support conducted in accordance with Government Code Section 66427.5 shows that less than thirty-five (35) percent of residents support the conversion ownership, the conversion shall be presumed not to be a bona fide resident conversion.

3. Tenant Impact Report. The tenant impact report shall include all information required by State law or by the provisions of this Part, including the following:

(a) Identify the anticipated timetable for compliance with Government Code Section 66427.5(a); and

(b) Identify the method and anticipated timetable for making rent determinations required by Government Code Section 66427.5(f)(1); and

(c) Identify the number of tenants likely to be determined to be subject to Government Code Section 66427.5(f)(1); and

(d) Upon conversion, identify the number of tenants likely to be determined to be subject to Government Code Section 66427.5(f)(1) during the period within five (5) years following conversion; and

(e) Upon conversion, identify the number of tenants likely to be determined to be subject to Government Code Section 66427.5(f)(2); and

(f) Upon conversion, and during the period within five (5) years following conversion,

identify the number of tenants likely to be determined to be subject to Government Code Section 66427.5(f)(2); and

(g) Include an analysis of the then-feasible mitigation measures to mitigate adverse impacts of the conversion on the ability of the mobilehome park residents, if such residents so choose, to find adequate comparable replacement space in a mobilehome park. The mitigation measures shall include all measures appropriate to assure that residents: (i) are not displaced by being given a reasonable opportunity to purchase in the park; or (ii) if displaced, through relocation assistance services, are substantially likely to be relocated to a comparable mobilehome park; and

(h) Include a survey of resident support meeting the requirements of Government Code Section 66427.5; provided, that the agreement between the subdivider and a resident homeowners' association shall be subject to reasonable review by the City prior to approval by any resident homeowners' association; and

(i) Include an analysis of how the subdivider will avoid the displacement of nonpurchasing tenants by providing the phased increase to market rent as outlined in Government Code Section 66427.5, and include the same in its tenant notice; and

(j) Include a showing that any assistance being provided to tenants to assist with housing purchase and the extent to which such assistance will be likely to permit purchase by eligible tenants, including, as applicable, assistance from private and public sources, including Federal and State. The subdivider shall meet with the City's Redevelopment Agency staff and/or Housing Division staff to determine the resources in any public housing funding which may be set aside to assist in purchase, including the conditions of such assistance and which tenants can qualify and include this information in the report.

4. Resident Information. The following information shall be requested, but cannot be required, for all existing residents:

(a) Name and address of each resident; and

(b) Household size and total number of project occupants; and

(c) Consistent with Government Code Section 66427.5(f)(2), the subdivider shall provide

a rent schedule for four (4) years preceding the application date and relocation assistance plan, if any, or if required by law; and

(d) Information concerning the number of residents in the park who are moderate-income, low-income, and very low-income persons as defined by the U.S. Department of Housing and Urban Development; and

(e) Information concerning the number of residents in the park who are disabled or handicapped; and

(f) Information concerning the number of the residents in the park who are senior citizens as defined by law.

5. Required Submittals and Notices. No application for tentative map or preliminary parcel map approval of a residential conversion project or a residential-to-other-use conversion project shall be accepted until the filing of the tenant impact report as required in subsection (B)(2)(g) of this Section and without adequate evidence from the subdivider that each resident of the project has received notice of the application as of the date of application and notice of the relocation assistance provisions of CMC 9209.4. Any person who becomes a resident of a residential rental unit proposed for conversion project after the date of such application shall be given written notice by the subdivider of the pendency of such application prior to entering into any written or oral rental agreement. (Ord. 06-1358, § 1; Ord. 08-1401, § 2)

§ 9209.4 Tenant Notification.

A. Notice of Tenant Impact Report. The subdivider shall give existing residents a copy of the tenant impact report within fifteen (15) days of the completion of such report, but not later than fifteen (15) days before the first public hearing pursuant to CMC 9209.5, and shall also provide a copy to new or prospective residents prior to acquiring their interest after the initial distribution of such report.

B. Notification of Exclusive Right to Purchase. In addition to all notification requirements by other provisions of State law, and by other applicable law, the subdivider shall give each resident of any proposed residential conversion project written notice of an exclusive right to contract for the purchase of the dwelling unit occupied by the tenant or purchase of a share in the corporation entitling the shareholder to enjoy exclusive occupancy of the unit upon the same or more favorable terms and



conditions than those on which such unit or share will be initially offered to the general public. The right shall run for a period of not less than ninety (90) days from the issuance of the subdivision public report pursuant to California Business and Professions Code Section 11018.2, unless the subdivider receives prior written notice of the resident's intention not to exercise such right.

C. Residential Conversion Project – Notification of Right to Continue Residency as a Resident. In addition to all notification requirements by other provisions of this Code and by other applicable law, the subdivider shall give each resident of any proposed residential conversion project written notice of the right to continue residency as a tenant in the park as required by Government Code Section 66427.5(a). (Ord. 06-1358, § 1)

§ 9209.5 Tentative Map and Preliminary Parcel Map Approval.

A. Maps Subject to General and Specific Plans and City Ordinances and Applicable Law. All tentative maps and preliminary parcel maps filed in connection with residential conversion projects shall be subject to the Division of Land Regulations contained in Chapter 2 of Article IX of the Carson Municipal Code, except as herein otherwise provided, all City ordinances and other applicable law. All such maps shall be subject to the general plan and any applicable specific plan. Pursuant to Government Code Sections 66427.5(e) and 66474, the Planning Commission and/or City Council are authorized to approve, conditionally approve, or disapprove a map. The Planning Commission and/or City Council may impose such other conditions in excess of those provided in this Part as are reasonably necessary to protect the public health, safety and general welfare.

B. Inconsistent with General or Specific Plans. The Planning Commission and/or City Council shall disapprove a tentative map or preliminary parcel map for a residential conversion project as required in the City's Division of Land Regulations contained in Chapter 2 of Article IX of the Carson Municipal Code and Government Code Section 66474.

C. Inconsistent with Zoning and Land Pattern. The Planning Commission and/or City Council shall disapprove a tentative map or preliminary parcel map for a residential conversion project where the conversion would be inconsistent with

either the existing zoning pattern or land use pattern, unless it finds that there are special circumstances which justify approval of the map. Such circumstances may exist only with respect to the following facts: (i) the prevailing pattern of residential and other land use in the vicinity of the project site; and (ii) the existing and anticipated need for other use development in the planning area in which the project is located.

D. Violations of Code. The Planning Commission and/or City Council shall disapprove a tentative map or preliminary parcel map for a residential conversion project if it finds that there are uncorrected violations of this Code, or that the conversion plan will not protect the health and safety and general welfare of residents, and that an adequate plan to correct such violations or to correct the factors adversely affecting health and safety has not been developed or accomplished.

E. Inadequate Tenant Impact Report. The Planning Commission and/or City Council shall disapprove a tentative map or preliminary parcel map for a residential conversion project if it finds that the tenant impact report is inadequate under the terms of Government Code Section 66427.5 or the provisions of this Part. (Ord. 06-1358, § 1)

§ 9209.6 Effective Date of Decision and Appeals.

The decision of the Planning Commission shall become effective and final fifteen (15) days after the date of its decision unless an appeal is filed in accordance with CMC 9173.4. An appeal shall be considered by the Council as provided in CMC 9173.4. (Ord. 06-1358, § 1)



TENANT IMPACT REPORT

IMPERIAL AVALON MOBILEHOME PARK

October 2009

1. **Purpose of Tenant Impact Report.** This Tenant Impact Report ("TIR" or "Tenant Impact Report") is being prepared pursuant to California Government Code § 66427.5. The purpose of this TIR is to explain the protections afforded to those Resident Households¹ that elect not to purchase a condominium interest in Imperial Avalon Mobilehome Park ("Park"), located at 21207 South Avalon Boulevard, Carson, California. All Resident Households will be afforded the opportunity to either (i) buy the space on which their mobilehome is situated or (ii) continue to rent the space on which their mobilehome is situated. For purposes of this TIR, the term "mobilehome" shall have the same meaning as defined under California Civil Code § 798.3, which, among other things, includes a "manufactured home" as defined under California Health & Safety Code § 18007.

1.1 **Change of Ownership.** Whenever a mobilehome park is to be converted from a rental-only park to one where spaces/lots may be owned by the residents, the Subdivision Map Act, found in the California Government Code § 66427.5, requires the entity which is converting the mobilehome park to file a report on the impact that the conversion to another use will have on the residents and occupants of the mobilehome park. The Park will remain a manufactured housing community, with the existing Resident Households having the right to either buy their Condominium Unit² or to remain and rent their lot. The Park is not being closed and the Residents are not vacating the property, but rather, the Resident Households have available to them additional options that were not available to them before the conversion occurs. After conversion, the Resident Households will be able to either purchase their individual spaces and a share in the common area and facilities from the Park owner ("Park Owner"), and participate in the operation of the Park through a homeowners' association ("Homeowners' Association"), or continue to rent their individual spaces.

The State of California recognizes the substantial difference between a change of use, which results in the closure of a mobilehome park from a change in the method of ownership by the implementation of different State of California statutes applicable to each. For all purposes hereunder, California Government Code § 66427.5 controls for purposes of

¹ "Resident Household" or "Resident Households" means any person(s), entity, or group of person(s) who has a tenancy in the Park under a Rental Agreement or Lease (as defined under Section 2) on the date of the issuance and delivery of the Final Public Report (as defined under Section 4.2(c)). Please note that this definition does not mean the same as Resident or Residents as defined in Section 1.2 herein.

² "Condominium Unit" means the airspace unit which is defined as 1 foot below grade and 40 feet above grade, with the lateral and horizontal planes demarked by the lot lines established on the ground (in other words, the space the Resident is currently occupying), plus 1/225th fee simple ownership of the common area and facilities and one membership in the Homeowners' Association to be formed as part of the entitlement process. For those who elect to remain renters, this means that those households will continue to rent the same space they were renting prior to the conversion of the Park.



determining what rights the non-purchasing Resident Households will have after the conversion is completed. As detailed below, the conversion of the Park will result in neither actual nor economic displacement of its Residents.

1.2 Definition of Resident(s).

(a) Categories of Resident Households within the Park. California Government Code § 66427.5 divides the Residents of the Park into two (2) income categories for the Resident Households: (1) non-lower income and (2) lower income households. Lower income households are defined in Health & Safety Code § 50079.5 as "those persons and families whose income does not exceed the qualifying limits for low income families as established and amended from time to time pursuant to Section 8 of the United States Housing Act of 1937." The greatest protections are given to the lower-income households. The income limits are based on the county median income and the household size as prepared and distributed under the United States Housing Act. To qualify as a lower-income household, the following income limits were established for calendar year 2009.³

Household Size # of Persons	1	2	3	4
Income Must be at or Below:	\$44,400	\$50,750	\$57,100	\$63,450

(b) Definition of Resident(s). As used in this Tenant Impact Report, a "Resident" or "Residents" is a homeowner or other person who lawfully occupies a mobilehome in the Park.

1.3 Description of the Property. The Park was constructed in approximately 1963 and is a two-hundred and twenty-five (225)-space "Family" Park (no age restriction applies), situated on approximately twenty-seven (27) acres. The Park has wide asphalt streets with center gutters; utilities are underground. The common area contains a clubhouse with a full kitchen, bathrooms and pool tables. There is a shuffleboard court, a swimming pool and jacuzzi. The pool area is furnished including chaise lounges and chairs. There is a separate laundry room.

2. Residents' Current Position/Rights.

2.1 Current Occupancy. Currently, all of the Resident occupants reside in the Park on a month-to-month written rental agreement ("**Rental Agreement**").

For those Residents who are on a one (1)-year or month-to-month tenancy, the City of Carson ("**City**") Rent Control Ordinance currently regulates the rent increases.

2.2 Residents' Rights. In addition to the terms of the Leases and Rental Agreements, the tenancy rights of Residents residing in the Park are governed by California Civil Code § 798 et seq. ("**Mobilehome Residency Law**"), and other applicable California statutory and case law, and the City Rent Control ordinances.

³ 2009 State Income Limits for Los Angeles County.



3. **Park Owner's Rights Upon Conversion.**

3.1 **Right to Change Use.** Generally the Park Owner, pursuant to the California Government Code and Mobilehome Residency Law, has the right to terminate all existing tenancies and require the Residents to vacate the property and go out of business or change the use of the property, providing all applicable laws are followed. The Park Owner, however, through this TIR, agrees to waive the right to terminate any tenancies and existing Leases or require that the Residents vacate the property. Under this scenario, non-purchasing Resident Households will NOT be required to vacate their space and, as described in more detail in Section 4 below, will have occupancy rights subject to any Lease or Rental Agreement, Mobilehome Residency Law, and California law, as applicable. Therefore, there will be no actual eviction or displacement due to the conversion and Resident-purchase of the Park.

4. **No Actual or Economic Displacement.**

4.1 **Impact of Conversion.** Under the California Government Code and the Mobilehome Residency Law, the subdivider is required, as a condition of conversion, to prepare a TIR to set forth the impact of the conversion. Further, the rental increase amount, which may be charged by the owner of the space subsequent to the conversion, is specified and is mandatory in California Government Code § 66427.5. As a result of the conversion, there will be no physical change of use. The property was before and will be after the conversion, operated as a mobilehome park. The difference is that instead of an investor/operator owner, a Homeowners' Association will operate the property.

4.2 **Rental Rate Increases: No Economic Displacement.** To the extent there is any economic displacement of Resident Households who elect to not purchase the space on which their mobilehome is situated, it is mitigated by allowing such non-purchasing Resident Households to continue their tenancy in the Park under the California Subdivision Map Act rental increases restrictions pursuant to California Government Code § 66427.5 (f) (1 & 2) ("Map Act Rents"). The Map Act Rents are based upon two (2) formulas: one formula for non-lower income permanent Residents and one formula for lower income permanent Resident Households, as defined in California Health and Safety Code § 50079.5.

(a) **Non-Lower Income Resident Households.** For the non-lower income Residents, the base rent may be increased in equal annual increases over a four (4)-year period to market rent. Base rent is defined as that rent which is in effect prior to the Conversion Date. Market Rent is established by an appraisal "conducted in accordance with nationally recognized professional appraisal standards." The reason the rents are raised to market over a four (4)-year period is to allow the adjustment of rents, which under rent control have remained artificially low, to occur gradually. This protection provides time for those non-lower income households to plan for the rental adjustment to market.

(b) **Lower Income Residents.** The State of California has emphasized its goal of protecting housing for the lower income population of California under California Government Code § 66427.5. The lower income households receive a guarantee of reduced rental increases beyond that which any local jurisdiction can enact under the current rent control cases and laws of California. Lower income is defined in California Government Code § 66427.5



by referencing California Health and Safety Code § 50079.5, which in turn defines lower income persons as persons and families whose income does not exceed the qualifying limits for lower income families as established and amended from time to time pursuant to Section 8 of the United States Housing Act of 1937. Lower income Residents are protected for the entire term of their tenancy.

(1) **Rent Increase Formula.** The base rental increase is the average increase for the previous four (4) years immediately preceding the conversion, but shall not exceed the Consumer Price Index ("CPI") average monthly percentage increase for the most recently reported period.

(2) **Application Process.** The Residents must provide the same information and confirmation of the Resident's income as though that Resident were applying for a State of California, Mobilehome Park Ownership Program ("MPROP") loan each year. In the event that program is no longer in existence, the last application documents will become the permanent documents, and the qualifying income levels will be those established by either the State of California Housing and Community Development Department ("HCD") or the United States Housing and Community Development Department, at the election of the owner of the space.

(c) **Effective Date of Map Act Rents.** The effective date of the Map Act Rents shall be the Conversion Date (as defined in Section 4.3 herein). As part of the distribution of the final public report ("Final Public Report") issued by the California Department of Real Estate ("DRE"), the Leases and qualifying information shall be simultaneously distributed.

4.3 **"Conversion Date"**. Conversion Date is defined as the date of the first sale of a space/lot.

4.4 **No Actual Displacement.** Each Resident Household will be given the choice to buy the lot on which their mobilehome is situated or to continue their tenancy in the Park under this Tenant Impact Report. To receive the protections provided herein and under the California Subdivision Map Act, the Resident must be a Resident, as defined in Section 1.2(b). Further, the Park Owner has specifically waived its right to terminate tenancies (See Section 3). Therefore, there will be no actual eviction of any Resident or relocation of their mobilehome by reason of the Park conversion to Resident ownership.

4.5 **Conclusion: No Actual Nor Economic Evictions.** The legislative intent behind relocation mitigation assistance as contained in Government Code § 66427.4 is to ensure that Residents who would be evicted due to the conversion of a mobilehome park to another use are protected, and that a plan is submitted and approved to ensure that protection. The purpose for the impact report is to explain how and when the Residents have to vacate the property, and what financial assistance the Residents would be receiving to assist in the costs of removing their mobilehome and other personal effects. However, under the present conversion, which will not result in another use and vacation of the property, the purpose of this Tenant Impact Report is to explain the options of the Residents and Resident Households regarding their choice to purchase or to rent their space. The Park Owner has agreed, by this TIR, to waive its right to terminate existing tenancies and Leases upon the conversion (See Section 3 above), and any Resident who

14

chooses not to purchase a PUD/Condominium Interest (defined below) may reside in the Park as set forth in Section 3 and Section 4.2 above. Thus, there will be no economic displacement based on the Map Act Rents nor actual eviction of any Resident Household because of the conversion and, therefore, no relocation mitigation is required.

5. **PUD/Condominium Interest: Ninety (90) Day Right of First Refusal to Purchase.**

5.1 **PUD/Condominium Interest.** The conversion provides the Resident Households with the opportunity to acquire an ownership interest in the Park. As stated above, the form of ownership will be a PUD/Condominium Interest. "**PUD/Condominium Interest**" means a real property ownership interest that (i) will be transferred by a grant deed, (ii) will be insured by a policy of title insurance, (iii) contains front and back lot line boundaries properly marked by a licensed land surveyor and specific legal descriptions set forth on a "Condominium Plan", (iv) will be a matter of public record when recorded, and (v) comprises the airspace directly over the current rental spaces, a one-in-one hundred forty seventh (1/225th) interest in the Park's common areas, and 1/225th interest in the common area lot, as tenants in common. All PUD/Condominium Interests are held pursuant to the description of general rights and associated factors as set forth in the articles and bylaws of the Homeowners' Association, certain conditions, covenants and restrictions, and California law pertaining to such ownership.

5.2 **Right of First Refusal.** As required by California Government Code § 66459, each Resident Household shall be informed that they have a ninety (90)-day right of first refusal period. The right of first refusal period commences upon the issuance by the DRE and delivery of the Final Public Report. During the ninety (90) day period each Resident Household shall have the exclusive right to decide whether or not to purchase a PUD/Condominium Interest or continue to rent his or her space.

6. **Legal Notices.** The Resident Households have received the Notice of Intent to File a Map with the City of Carson and will also receive all additional required legal notices in the manner and within the time frame required by the state and local laws and ordinances. All prospective tenants have and will receive the Notice to Prospective Tenant(s).

7. **Purchase Impact.** Pursuant to the Park's governing documents, after conversion to Resident ownership, in the event a Resident or Resident Household wishes to sell his or her mobilehome, the purchaser of the mobilehome will be required to buy the lot as well. After conversion, however, the purchaser will have financing options that were unavailable prior to the conversion. Financing options include conventional real estate secured home loans secured by both the lot and the mobilehome, as opposed to personal property loans secured only by the mobilehome before conversion. The advantages of conventional real estate secured home loans as opposed to personal property secured loans are described in Section 9 below, and certain specific financing options available to certain purchasers are described in Sections 8 and 9 below.

All Resident Households electing to purchase their lots will benefit from the advantages of home ownership over renting, including building equity, benefiting from the appreciation of the value of real property, acquiring deeded land to leave to heirs, and participating as a voting member in the Homeowners' Association that governs the Park in which they live.



8. **Financing Options for Lower Income Households.** MPROP is a State of California funded program operated through the HCD. MPROP was established to finance the preservation of affordable homes by conversion to resident ownership as described under California Health & Safety Code §§ 50780-50786.5. MPROP is available to Resident Households who elect to purchase their unit and who qualify as a lower-income household as defined by the lower income limits provided by the HCD each year. Income limits for lower income households established for calendar year 2009 for Los Angeles County are described under Section 1.2(a) above. The likelihood of there being sufficient MPROP funding for Resident Households that qualify as lower income households will be increased if the City agrees to serve as the "applicant" for MPROP funding in accordance with MPROP regulations and if the City assists Resident Households and the Park Owner in obtaining such MPROP funding.

The MPROP program offers long-term (30-year) loans at 3% simple annual interest, to lower-income residents of a mobilehome park that has been converted, to ensure housing affordability for residents who purchase a unit in the mobilehome park. An MPROP loan does not usually cover the entire purchase price; it is often paired with a conventional loan and other sources of financing, and provides, on a sliding scale, an amount sufficient to secure a monthly payment so that total monthly costs should not exceed 30% of the resident's monthly income.

MPROP exists solely to provide lower-income residents the opportunity to own an interest in the mobilehome park in which they live and to secure and maintain affordable housing through the conversion of existing rental mobilehome parks to resident owned mobilehome parks.

9. **Financing Options for Non-Lower Income Households.** After conversion to Resident ownership, non-lower income Resident Households that have elected to purchase their lot will have various options available to them to finance their purchase. Lending institutions consider mobilehomes on leased land to be personal property or "chattel". Chattel financing is shorter term with higher interest rates. Once a mobilehome park is subdivided in connection with conversion, the mobilehome and the subdivided real property can be financed with a conventional real estate secured home loan. Real estate secured loan rates are historically lower than chattel financing and lending institutions offer many decades to make payments because of the value and security of the land.

Low-interest funding is also available through the Cal Vets program. Many cities also make partial funding/loans available through programs such as First Time Home Buyer, Cal Loan, AHIF, Redevelopment Agency Fund, etc.

10. **Tax Advantages.** Property taxes will be based on the sales price of the lot. However, if more than 50% of the lots are purchased within the first year following the Conversion Date, a purchaser's property taxes will be based on the seller's property tax base under applicable California law. This would mean a significant savings if Resident Households choose to act on this right. A Resident Household that elects to buy instead of rent is also able to deduct mortgage interest on their tax return, affording additional savings.

11. **Assurance of Operating and Maintenance Funds for Common Area Facilities and Services.** To assure the availability and source of funds to defray the cost of common area



facilities and services (collectively, "**Common Area Costs**") during the early period of Resident ownership and operation of the Park by the Homeowners' Association, the Park Owner is required by the DRE, pursuant to California Business and Professions Code § 11018.5 and 10 California Code of Regulations § 2792.9, to furnish funds, a surety bond or other security convertible to cash to an escrow depository, before the sale of any spaces to assure the Park Owner's fulfillment of the Park Owner's obligations as an owner of spaces to pay assessments in order to cover such Common Area Costs. The aforementioned security requirement is ordinarily in an amount equal to six (6) months' regular assessments for each space covered by the Final Public Report and is subject to terms assuring that the Park Owner pays all assessments levied by the Homeowners' Association against spaces owned by the Park Owner (i.e., unsold spaces) until 80% of the spaces covered by the Final Public Report have been sold. Such security requirements are DRE requirements that must be complied with by the Park Owner before the DRE issues the Final Public Report permitting the sale of spaces in the Park.

12. **Homeowners' Association Reserve Account Requirements.** With respect to the Park's major components which the Homeowners' Association is obligated to repair, replace, restore or maintain pursuant to California Civil Code § 1365.5(e) ("**Major Components**"), the Park Owner is required by the DRE to deposit funds into escrow equal to an amount designated by the DRE ("**DRE Required Reserve Deposit Amount**"), which is a portion of certain reserve component amounts determined in accordance with a study of reserve account requirements ("**Reserve Account Requirements Study**") prepared by the Park Owner and accepted by the DRE. The DRE Required Reserve Deposit Amount will be based upon the cost amount attributable to the already used portion of the useful life estimated for the Major Components in accordance with the Reserve Account Requirements Study. Among other things, the Reserve Account Requirements Study is required to (i) identify the Major Components that have a useful life of less than 30 years, (ii) determine the remaining useful life of the Major Components, (iii) estimate the cost of repair, replacement, restoration, or maintenance of the Major Components, (iv) estimate the total annual contribution necessary to defray such costs during and at the end of the useful life of the Major Components, and (v) provide a reserve funding plan describing how the Homeowners' Association plans to fund the amounts described in clause (iv) above to meet the Homeowners' Association's obligation to repair and replace all Major Components with an expected remaining life of 30 years or less. Before any spaces are permitted to be sold, the DRE will require that the escrow release the DRE Required Reserve Deposit Amount to the Homeowners' Association to help defray certain of the costs to repair, replace, restore, or maintain Major Components in accordance with the Reserve Account Requirements Study as accepted by the DRE.

13. **Benefits of Conversion.** The purpose of the conversion of the Park from a rental park to a Resident-owned park is to provide the Resident Households with a choice. The Resident Households may either choose to purchase an ownership interest in the Park, which would take the form of a PUD/Condominium Interest (as defined in Section 5.1), or continue to rent a space in the Park, thereby allowing the Residents to control their economic future. The conversion provides the Residents the opportunity to operate and control the Park. Since the new owners of the Park will not be motivated to make a profit, but rather are motivated to ensure the best possible living conditions at the most affordable rates, payable through the Homeowners' Association dues, directly or through rent, both buyers and renters benefit from the conversion.



14. **Conclusion.**

14.1 The above described purchase rights and protections will be offered only if the Park is converted to a Resident-owned mobilehome park. Such programs become effective on the Conversion Date.

14.2 Upon conversion of the Park to Resident ownership, the current owner of the Park, as well as subsequent owners of PUD/Condominium Interests in the Park, shall abide by all terms and conditions set forth in this TIR. This TIR is a covenant that encumbers each individual unit.

14.3 All Resident Households choosing to continue to rent will have occupancy rights exactly as they have now, and all existing Leases and/or Rental Agreements will be honored, subject to California Government Code § 66427.5, Mobilehome Residency Law, and other California law, as applicable.

14.4 The conversion of the Park from a rental park to a Resident-owned park provides the Residents with an opportunity of choice. Resident Households may choose to purchase a PUD/Condominium Interest or continue to rent. The conversion also provides the potential for Residents to enjoy the security of living in a Resident-owned, controlled, and managed Park, whose motivation is not profit, but rather, achieving the best living environment at the most affordable rate.



HOFFMAN, STERMER & ASSOCIATES, INC
AN ACCOUNTANCY CORPORATION

16321 Pacific Coast Highway, Suite C, Pacific Palisades, California 90272

T: 310-203-4145 F: 310-230-1098

maria@hoffmanstermer.com

October 6, 2009

Susy Forbath
Gilchrist & Rutter
1299 Ocean Avenue, Suite 900
Santa Monica, CA 90401

Re: Mobile Home Park Survey Results – Imperial Avalon

Dear Susy:

In accordance with the executed Mobile Home Park Survey Agreement between Hoffman, Stermer & Associates, Inc. and your firm, Gilchrist & Rutter, this letter constitutes the written evaluation of our agreed upon procedures.

Summary of Procedures

1. **Collection** - Hoffman, Stermer & Associates, Inc. collected resident surveys mailed to our address in connection with your survey. We agreed to have the ballots mailed directly to our office address. Only ballots postmarked by September 23, 2009 were included in our tabulation. There was only 1 ballot postmarked on September 24, 2009 that was not included and remains unopened.

2. **Verified Eligibility** - We verified the eligibility of the ballot by matching the information provided on the outside of the ballot envelope or by matching the name of the resident on the ballot with the master list of eligible addresses and the names of corresponding residents provided by your firm. Total ballots received was 83, including 3 ballots with no answer, and one ballot not counted as it was postmarked after the cut-off date of September 23, 2009.

4. **Tabulate Results** - Following the agreed upon cut off date of September 23, 2009, we tabulated the survey and prepared a report which summarizes the procedures followed and the results of the survey.

Tabulation of Results

Total number of ballots received:	83
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Total number of ballots with a "SUPPORT – YES" vote:	18
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Exhibit No. 4



Total number of ballots with a "DO NOT SUPPORT" vote:	46
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Total number of ballots with an unmarked vote:	3
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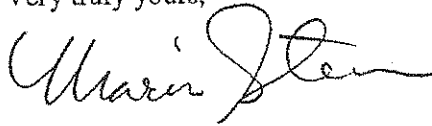
Total number of ballots with "DECLINE TO STATE" vote:	15
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Total number of ballots received after cut-off date:	1
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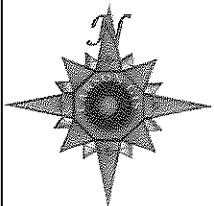
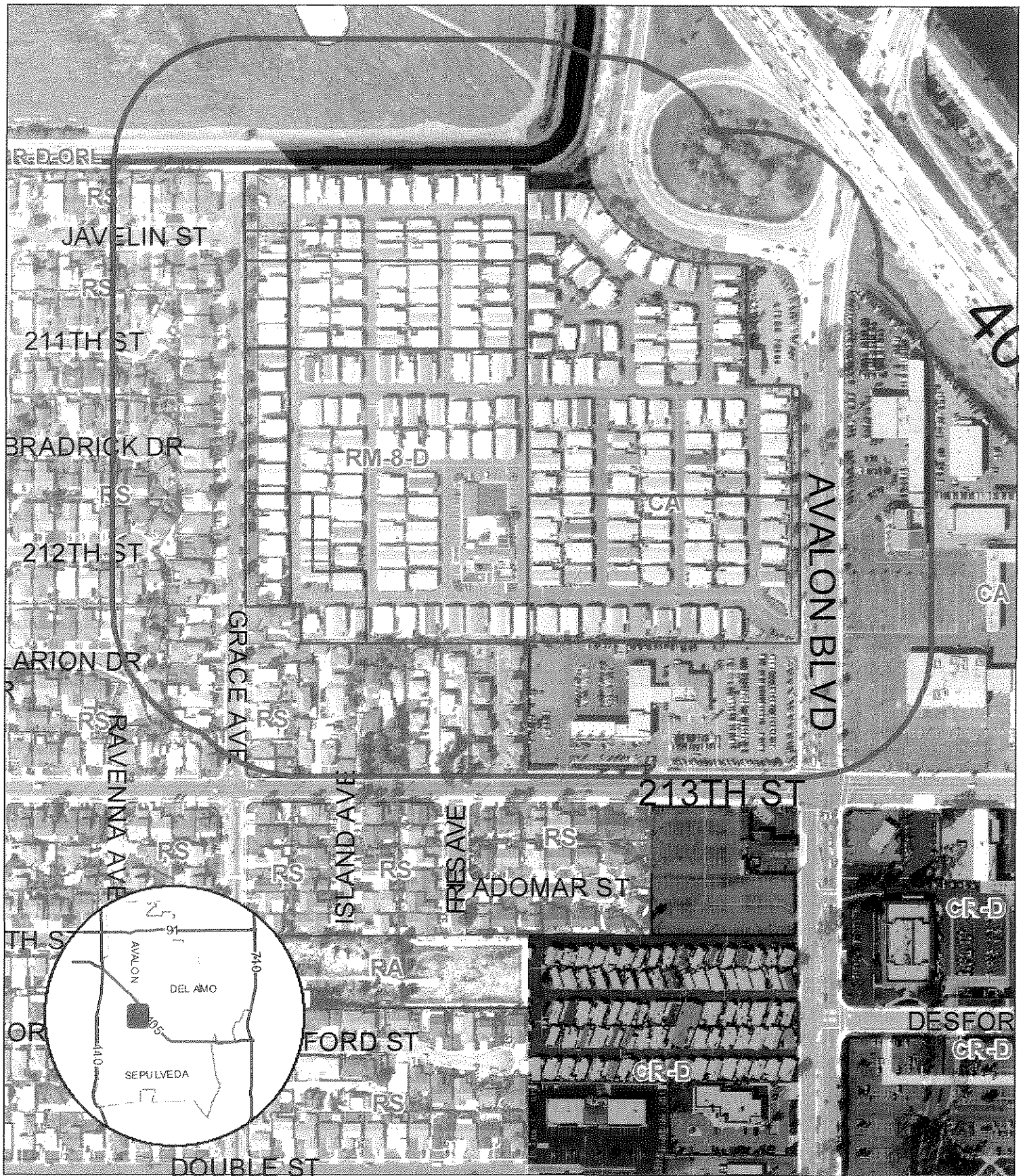
Maintenance of Records

Hoffman, Stermer & Associates, Inc. will retain the original ballots for a period of one year from the date of this report. We will not disclose the results to any residents or third parties.

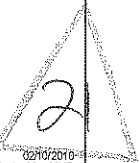
Very truly yours,



Maria Serafica-Stermer, C.P.A.
Vice-President



City of Carson
 300 Foot Radius Map Exhibit No. 5
 21207 Avalon Blvd



**CITY OF CARSON
PLANNING COMMISSION**

RESOLUTION NO. 10-

**A RESOLUTION OF THE PLANNING COMMISSION OF
THE CITY OF CARSON RECOMMENDING APPROVAL
OF TENTATIVE PARCEL MAP NO. 071206 TO THE CITY
COUNCIL TO PERMIT A MOBILE HOME PARK
CONVERSION TO RESIDENT OWNERSHIP FOR
IMPERIAL AVALON MOBILE ESTATES LOCATED AT
21207 S. AVALON BOULEVARD**

**THE PLANNING COMMISSION OF THE CITY OF CARSON, CALIFORNIA,
HEREBY FINDS, RESOLVES AND ORDERS AS FOLLOWS:**

Section 1. An application was duly filed by the applicant, Imperial Avalon Mobile Estates, LLC, with respect to real property located at 21207 Avalon Boulevard and described in Exhibit "A" attached hereto. The application requests approval of Tentative Parcel Map No. 071206 to convert an existing 225-unit mobile home rental park ("Imperial Avalon Mobile Estates") to a nominal residential ownership park in the RM-8-D (Residential, Multi-family – 8 units per acre – Design Overlay) and CA (Commercial, Automotive) zones and within Redevelopment Project Area No. 1.

Section 2. A public hearing was held on February 23, 2010, at 6:30 P.M. at City Hall, Council Chambers, 701 East Carson Street, Carson, California. Notice of the time, place and purpose of the aforesaid meeting was duly given pursuant to applicable law. Evidence, both written and oral, was duly presented to and considered by the Planning Commission at the aforesaid meeting.

Section 3. The Planning Commission finds that:

- a) The General Plan Land Use Map designates the area for low-density residential use and Regional Commercial. The zoning is RM-8-D (Residential, Multi-family-8 dwelling units per acre-Design-Overlay-Review) and CA (Commercial, Automotive). The existing and proposed use is in conformance with the General Plan and Zoning.
- b) Special Use Permit No. 92-73 was approved on April 24, 1973, by way of Planning Commission Resolution No. 73-245, which allowed Imperial Avalon Mobile Estates, a 225-unit mobile home park, to be constructed on the site.
- c) Section 66428.2 of the Subdivision Map Act does not apply to this application since the mobilehome park conversion to resident ownership is proposed by the park owner.

Section 4 Pursuant to Government Code Section 66473.5, the Planning Commission finds that the proposed subdivision and the provisions for its design are compatible with the objectives, policies and general land use and programs provided in the City's General Plan.

Section 5 Pursuant to Section 66474 of the Subdivision Map Act, a city shall deny approval of a parcel map if it makes any of the findings listed below. The Planning Commission affirms the following findings:



- a) *That the proposed map is not consistent with applicable general and specific plans as specified in Section 65451.*

Pursuant to the General Plan, the proposed subdivision map is consistent with the density, goals, policies and objectives for low density residential development applicable to the property in question. The affordability of the units for low and moderate income residents are assured through the conditions of approval and the State requirements for rent control.

- b) *That the design or improvement of the proposed subdivision is not consistent with applicable general and specific plans.*

The design of the existing Imperial Avalon Mobile Home Park which will remain in its present configuration with the proposed subdivision, is consistent with the City of Carson General Plan for low density development.

- c) *That the site is not physically suitable for the type of development.*

The existing Imperial Avalon Mobile Home Park was approved by the Planning Commission in 1973. The park was built in compliance with Special Use Permit No. 92-73 and the development standards in effect at the time for mobile home parks. The subdivision meets all applicable development criteria specified for Special Use Permit No.92-73, and the criteria for mobile home parks in the RM-8-D (Residential, multi-family, 8 dwelling units per acre-Design Overlay Review) and CA (Commercial, Automotive) zones for the property.

- d) *That the site is not physically suitable for the proposed density or development.*

There is adequate space on the site to meet the goals and objectives related to residential density contained in the zoning ordinance and the General Plan Housing and Land Use Elements. The property is currently occupied by a mobile home park and the land was developed to accommodate such a use.

- e) *That the design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and unavoidably injure fish or wildlife or their habitat.*

The site of the proposed condominium conversion is already developed and the subdivision application does not contemplate any additional development on the property.

- f) *That the design of the subdivision or type of improvements are likely to cause serious public health problems.*

Conditions have been included to ensure that the design of the subdivision or improvements is not likely to cause serious public health problems.

- g) *That the design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision. In this*

connection, the governing body may approve a map if it finds that alternate easements for access or for use, will be provided, and that these will be substantially equivalent to ones previously acquired by the public. This subsection shall apply only to easements of record or to easements established by judgment of a court or competent jurisdiction and no authority is hereby granted to a legislative body to determine that the public at large has acquired easements for access through or use of property within the proposed subdivision.

The project will not conflict with existing traffic flow adjacent to the property on Avalon Boulevard.

Section 6. Pursuant to California Subdivision Map Act Sections 66427, 66451, 66452 and the City of Carson Municipal Code Sections 9202.1 through 9209.6, the Planning Commission has determined that the application was noticed in accordance with all applicable provisions and will also require:

- a) That each resident of the park has received all applicable notices and rights now or hereafter required by Section 66427 and in Chapter 3 of the California Subdivision Map Act (commencing with Section 66451);
- b) That each resident of the park shall receive a 10 day written notice that an application for a public report will be, or has been submitted to the Department of Real Estate, and that such a report will be available upon request;
- c) That each resident of the park shall receive a written notification within 10 days of approval of a Final Map for the proposed subdivision conversion;
- d) Each resident of the park shall receive 180 days written notice of intention to convert prior to the termination of tenancy due to the conversion or proposed conversion; and
- e) Each tenant of the proposed condominium shall be given notice of an exclusive right to purchase his or her respective unit pursuant to Section 11018.2 of the Business and Professional Code, unless the tenant gives prior written notice of his or her intention not to exercise such right.

Section 4. Pursuant to Government Code Sections 66427.5, the Planning Commission further determines as follows:

- a) That the applicant has demonstrated that a survey of support was conducted in conformance with Government Code § 66427.5;
- b) That the applicant has complied with Government Code § 66427.5 with respect to submitting a Tenant Impact Report which adequately meets the requirements to consider the impact of the proposed conversion upon the residents of the park.



Section 5. Pursuant to Section 15282(e) of the California Environmental Quality Act (CEQA), a conversion of a rental mobile home park to a condominium subdivision is deemed Exempt from further environmental review as the proposed project will generate no significant environmental impacts.

Section 7. Based on the aforementioned findings, the Commission hereby approves Tentative Parcel Map No. 071206.

Section 8. The Secretary shall certify to the adoption of the Resolution and shall transmit copies of the same to the applicant.

Section 9. This action shall become final and effective fifteen days after the adoption of this Resolution unless within such time an appeal is filed with the City Clerk in accordance with the provisions of the Carson Zoning Ordinance.

PASSED, APPROVED AND ADOPTED THIS 23rd DAY OF FEBRUARY, 2010

CHAIRMAN

ATTEST:

SECRETARY



LEGAL DESCRIPTION

PARCEL 1

THAT PORTION OF LOT 45 OF TRACT 3848, IN THE CITY OF CARSON, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 42 PAGES 68 AND 69 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEAST CORNER OF SAID LOT; THENCE NORTHERLY ALONG THE EASTERLY LINE OF SAID LOT, 197.41 FEET TO THE SOUTHEAST CORNER OF LAND DESCRIBED IN THE DEED TO MARY ELBERT RECORDED ON JANUARY 2, 1925 INSTRUMENT NO 1085, IN BOOK 4236 PAGE 313 OF OFFICIAL RECORDS; THENCE WESTERLY ALONG THE SOUTHERLY LINE OF SAID LAND OF ELBERT 635 FEET TO THE SOUTHWEST CORNER OF SAID LAND; THENCE SOUTHERLY ALONG THE WESTERLY LINE OF SAID LAND 198.285 FEET TO THE SOUTHWEST CORNER OF SAID LOT; THENCE EASTERLY ALONG THE SOUTHERLY LINE OF SAID LOT 635 FEET TO THE POINT OF BEGINNING

PARCEL 2

THAT PORTION OF LOT 45 OF TRACT NO 3848, IN THE CITY OF CARSON, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 42 PAGES 68 AND 69 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE EASTERLY LINE OF SAID LOT DISTANT NORTHERLY THEREON 197.41 FEET FROM THE SOUTHEAST CORNER OF SAID LOT; THENCE CONTINUING NORTHERLY ALONG SAID EASTERLY LINE 66 FEET; THENCE WESTERLY IN A DIRECT LINE TO A POINT IN THE WESTERLY LINE OF SAID LOT, DISTANT NORTHERLY THEREON 264.285 FEET FROM THE SOUTHWEST CORNER OF SAID LOT; THENCE SOUTHERLY ALONG SAID WESTERLY LINE 66 FEET; THENCE EASTERLY IN A DIRECT LINE TO THE POINT OF BEGINNING

PARCEL 3

THAT PORTION OF LOT 45 OF TRACT 3848, IN THE CITY OF CARSON, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 42 PAGES 68 AND 69 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEASTERLY CORNER OF SAID LOT 45; THENCE WESTERLY ALONG THE NORTHERLY LINE OF SAID LOT 45, 317.5 FEET; THENCE SOUTHERLY PARALLEL WITH THE WESTERLY LINE OF SAID LOT 45, 131.85 FEET TO THE NORTHERLY LINE OF THE LAND DESCRIBED IN THE DEED TO MARY ELBERT, RECORDED IN BOOK 4236 PAGE 313 OFFICIAL RECORDS; THENCE EASTERLY ALONG SAID NORTHERLY LINE 317.5 FEET TO A POINT IN THE EASTERLY LINE OF SAID LOT 45, DISTANT SOUTHERLY FROM THE NORTHEASTERLY CORNER THEREOF; 131.41 FEET; THENCE NORTHERLY ALONG THE EASTERLY LINE OF SAID LOT 45 TO THE POINT OF BEGINNING



LEGAL DESCRIPTION

(continued)

PARCEL 4

THAT PORTION OF LOT 45 OF TRACT NO 3848, IN THE CITY OF CARSON, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 42 PAGES 68 AND 69 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF SAID LOT; THENCE EASTERLY ALONG THE NORTHERLY LINE OF SAID LOT 317.5 FEET TO A POINT DISTANT WESTERLY THEREON 317.5 FEET FROM THE NORTHEAST CORNER OF SAID LOT; THENCE SOUTHERLY PARALLEL WITH THE EASTERLY LINE OF SAID LOT, 131.5 FEET TO THE NORTHERLY LINE OF THE LAND DESCRIBED IN THE DEED TO MARY ELBERT RECORDED ON JANUARY 2, 1925 INSTRUMENT NO 1085 IN BOOK 4236 PAGE 313 OF OFFICIAL RECORDS; THENCE WESTERLY ALONG THE NORTHERLY LINE OF SAID LAND OF ELBERT 317.5 FEET TO THE WESTERLY LINE OF SAID LOT; THENCE NORTHERLY ALONG SAID WESTERLY LINE 131.85 FEET TO THE POINT OF BEGINNING.

PARCEL 5

LOTS 43 AND 44 OF TRACT NO 3848, IN THE CITY OF CARSON, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 42, PAGES 68 AND 69 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXCEPT FROM SAID LOT 43, THE SOUTHERLY 81.00 FEET OF THE WESTERLY 126.00 FEET THEREOF.

PARCEL 6

THOSE PORTIONS OF LOTS 46 AND 47 OF TRACT NO 3848, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 42, PAGES 68 AND 69 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWESTERLY CORNER OF THE SOUTHERLY 66.00 FEET OF SAID LOT 46; THENCE ALONG THE NORTHERLY LINE OF SAID SOUTHERLY 66.00 FEET, NORTH 89 DEGREES 44' 53" EAST 610.22 FEET, TO THE TRUE POINT OF BEGINNING OF THIS DESCRIPTION; THENCE NORTH 03 DEGREES 38' 07" WEST, 10.39 FEET TO A NON-TANGENT CURVE CONCAVE SOUTHWESTERLY AND HAVING A RADIUS OF 106.00 FEET; THENCE FROM A TANGENT BEARING NORTH 02 DEGREES 58' 48" EAST, NORTHERLY, NORTHWESTERLY, AND WESTERLY ALONG SAID CURVE THROUGH AN ANGLE OF 90 DEGREES 43' 52" AND ARC DISTANCE OF 167.86 FEET; THENCE NORTH 86 DEGREES 30' 38" WEST, 119.08 FEET TO A NON-TANGENT CURVE CONCAVE NORTHEASTERLY AND HAVING A RADIUS OF 260.00 FEET; THENCE FROM A TANGENT BEARING NORTH 87 DEGREES 18' 37" WEST, NORTHWESTERLY, ALONG SAID CURVE THROUGH AN ANGLE OF 64 DEGREES 04' 32" AN ARC DISTANCE OF 290.77 FEET; THENCE WESTERLY IN A DIRECT LINE TO A POINT IN THE WESTERLY LINE OF SAID LOT 46, DISTANT NORTHERLY THEREON 290.22 FEET FROM SAID NORTHWESTERLY CORNER OF THE SOUTHERLY 66 FEET OF LOT 46; THENCE SOUTHERLY ALONG SAID WESTERLY LINE AND THE WESTERLY LINE OF SAID LOT 47, 686.22 FEET, MORE OR LESS, TO THE SOUTHWESTERLY



LEGAL DESCRIPTION

(continued)

CORNER OF SAID LOT 47; THENCE EASTERLY, ALONG THE SOUTHERLY LINE OF SAID LOT 47, 635.00 FEET TO THE SOUTHEASTERLY CORNER OF SAID LOT 47; THENCE NORTHERLY ALONG THE EASTERLY LINES OF SAID LOTS 47 AND 46 TO SAID NORTHERLY LINE OF THE SOUTHERLY 66.00 FEET OF SAID LOT 46; THENCE WESTERLY, ALONG SAID NORTHERLY LINE TO THE TRUE LINE OF BEGINNING.

EXCEPT THEREFROM, THAT PORTION THEREOF DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE NORTHERLY LINE OF THE SOUTHERLY 66.00 FEET OF SAID LOT 46 DISTANT NORTH 89 DEGREES 44' 53" EAST THEREON 610.22 FEET FROM THE WESTERLY LINE OF SAID LOT 46 SAID POINT BEING ALSO THE SOUTHEAST CORNER OF THE LAND DESCRIBED IN THE DEED TO NEW HORIZON LAND COMPANY, INC, RECORDED FEBRUARY 2, 1966 IN BOOK D-3196 PAGE 110 OFFICIAL RECORDS; THENCE ALONG THE EASTERLY LINE OF SAID LAND OF NEW HORIZON LAND COMPANY, INC , NORTH 0 DEGREES 38' 07" WEST 10.39 FEET TO A NON-TANGENT CURVE CONCAVE SOUTHWESTERLY AND HAVING A RADIUS OF 106.00 FEET, A RADIAL TO SAID CURVE BEARS SOUTH 87 DEGREES 01' 12" EAST; THENCE NORTHERLY, NORTHEASTERLY AND WESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 90 DEGREES 43' 52" AN ARC DISTANCE OF 167.86 FEET; THENCE NORTH 86 DEGREES 30' 38" WEST 18.35 FEET MORE OR LESS, TO THE WESTERLY LINE OF THE EASTERLY 145.00 FEET OF SAID LOTS; THENCE SOUTH 0 DEGREES 12' 34" EAST ALONG LAST MENTIONED WESTERLY LINE, 273.44 FEET, MORE OR LESS, TO A LINE PARALLEL WITH AND DISTANT SOUTHERLY 84.00 FEET, MEASURED ALONG THE EASTERLY LINE OF SAID LOTS FROM THE NORTHERLY LINE OF SAID LOT 47; THENCE NORTH 89 DEGREES 44' 53" EAST ALONG SAID PARALLEL LINE 145.00 FEET MORE OR LESS, TO THE EASTERLY LINE OF SAID LOTS; THENCE NORTH 0 DEGREE 12' 34" WEST ALONG SAID EASTERLY LINE 150.00 FEET, MORE OR LESS, TO SAID NORTHERLY LINE OF THE SOUTHERLY 66.00 FEET OF SAID LOT 46; THENCE SOUTH 89 DEGREES 44' 53" WEST ALONG LAST MENTIONED NORTHERLY LINE 24.78 FEET, MORE OR LESS, TO THE POINT OF BEGINNING

ALSO EXCEPTING THEREFROM ALL OIL, OIL RIGHT, MINERALS, MINERAL RIGHTS, NATURAL GAS, NATURAL GAS RIGHTS, AND OTHER HYDROCARBONS BY WHATSOEVER NAME KNOWN THAT MAY BE WITHIN OR UNDER LOT 46, EXCEPT THE SOUTH 66 FEET TOGETHER WITH THE PERPETUAL RIGHT OF DRILLING, MINING, EXPLORING AND OPERATING THEREFOR AND REMOVING THE SAME FROM SAID LAND OR ANY OTHER LAND, INCLUDING THE RIGHT TO WHIPSTOCK OR DIRECTIONALLY DRILL AND MINE FROM LANDS OTHER THAN THOSE HEREINABOVE DESCRIBED, OIL OR GAS WELLS, TUNNELS AND SHAFTS INTO, THROUGH OR ACROSS THE SUBSURFACE OF THE LAND HEREINABOVE DESCRIBED, AND TO BOTTOM SUCH WHIPSTOCKED OR DIRECTIONALLY DRILLED WELLS, TUNNELS AND SHAFTS UNDER AND BENEATH OR BEYOND THE EXTERIOR LIMITS THEREOF, AND TO REDRILL, RETUNNEL, EQUIP, MAINTAIN, REPAIR, DEEPEN, AND OPERATE ANY SUCH WELLS OR MINES, WITHOUT, HOWEVER, THE RIGHT TO DRILL MINE, EXPLORE AND OPERATE THROUGH THE SURFACE OR THE UPPER 100 FEET OF THE SUBSURFACE OF THE LAND HEREINABOVE DESCRIBED OR OTHERWISE IN SUCH MANNER AS TO ENDANGER THE SAFETY OF ANY HIGHWAY THAT MAY BE CONSTRUCTED BY SAID LANDS, AS EXCEPTED BY TAKAKO MORI, A MARRIED WOMAN, PRESENTLY KNOWN AS TAKAKO HAMACHI, WHO ACQUIRED TITLE AS TAKAKO MORI, A SINGLE WOMAN, ET AL, IN DEED RECORDED DECEMBER 8, 1960 AS INSTRUMENT NO 1520 IN BOOK D-1058 PAGE 734, OFFICIAL RECORDS,



LEGAL DESCRIPTION

(continued)

ALSO EXCEPTING ALL OIL, GAS AND OTHER HYDROCARBON SUBSTANCES IN, UNDER AND/OR THAT MAY BE PRODUCED FROM A DEPTH BELOW 500 FEET FROM THE SURFACE OF LOT 47, PROVIDED, THAT SUCH RESERVATION SHALL NOT ENTITLE THE GRANTORS, THEIR SUCCESSORS OR ASSIGNS, TO ANY USE OF OR RIGHTS IN OR TO ANY PORTION OF THE SURFACE OF SAID PROPERTY TO A DEPTH OF 500 FEET BELOW THE SURFACE THEREOF AND FURTHER RESERVING TO GRANTORS, AS JOINT TENANTS, WITH RIGHT OF SURVIVORSHIP, THEIR SUCCESSORS AND ASSIGNS, THE RIGHT TO DRILL INTO THROUGH AND ACROSS AND TO PRODUCE, HAVE AND TAKE OIL, GAS, AND OTHER HYDROCARBON SUBSTANCES, FROM, THROUGH AND ACROSS THAT PORTION OF SAID PROPERTY FROM WELLS LOCATED IN THAT PORTION OF SAID PROPERTY WHICH LIES AT A DEPTH BELOW 500 FEET FROM THE SURFACE OF SAID PROPERTY AND/OR FROM WELLS LOCATED IN OR ON PROPERTY OUTSIDE THE BOUNDARIES OF SAID LAND AS RESERVED BY I. B. HOUSE AND ANNAH L. HOUSE, HUSBAND AND WIFE, IN DEED RECORDED MAY 18, 1959 AS INSTRUMENT NO 590 IN BOOK D469 PAGE 610, OFFICIAL RECORDS.

PARCEL 6A:

A NON-EXCLUSIVE EASEMENT FOR INGRESS AND EGRESS FOR DRIVEWAY PURPOSES OVER THAT PORTION OF LOT 47 OF TRACT NO 3848, IN THE CITY OF CARSON, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 42 PAGES 68 AND 69 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE INTERSECTION OF THE EASTERLY LINE OF SAID LOT WITH THE SOUTHERLY LINE OF THE NORTHERLY 84.00 FEET OF SAID LOT, MEASURED ALONG THE EASTERLY LINE OF SAID LOT; THENCE NORTH 0 DEGREES 12' 34" WEST ALONG THE EASTERLY LINE 25.00 FEET; THENCE SOUTH 89 DEGREES 44' 53" WEST PARALLEL WITH THE NORTHERLY LINE OF SAID LOT, 25.00 FEET TO THE WESTERLY LINE OF THE EASTERLY 25.00 FEET OF SAID LOT; THENCE SOUTH 44 DEGREES 46' 10" WEST 35.27 FEET, MORE OR LESS, IN A DIRECT LINE TO A POINT ON THE AFOREMENTIONED SOUTHERLY LINE DISTANT SOUTH 89 DEGREES 44' 53" WEST THEREON 50.00 FEET FROM SAID EASTERLY LINE OF SAID LOT; THENCE NORTH 89 DEGREES 44' 53" EAST ALONG SAID AFOREMENTIONED SOUTHERLY LINE 50.00 FEET TO THE POINT OF BEGINNING

PARCEL 7:

LOT 48 OF TRACT NO 3848, IN THE CITY OF CARSON, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 42, PAGES 68 AND 69 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXCEPT THE SOUTH 66 FEET THEREOF.

PARCEL 8:

THE SOUTH 66 FEET LOT 48 OF TRACT NO 3848, IN THE CITY OF CARSON, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 42, PAGES 68 AND 69 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

END OF LEGAL DESCRIPTION



CITY OF CARSON
ECONOMIC DEVELOPMENT SERVICES
PLANNING DIVISION
EXHIBIT "B"
CONDITIONS OF APPROVAL
TENTATIVE PARCEL MAP NO. 071206

GENERAL CONDITIONS

1. The subdivider shall comply with all city, county, state and federal regulations applicable to this project.
2. The proposed development is subject to all applicable provisions of the California Subdivision Map Act, including but not limited to, applicable provisions of Government Code Sections 66427.1, 66427.5, 66451 and 66452, and evidence of compliance therewith shall be submitted to the city Department of Development Services, as required by law.
3. The subdivider shall comply with Section 66427.5(f1 and f2) of the California Subdivision Map Act as follows:
 - a. Following the Map Act Rent Date, as to non-purchasing 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 pre-conversion amenities, may increase from the pre-conversion rate 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; and
 - b. Following the Map Act Rent Date, as to non-purchasing residents who are lower income households, as defined in Section 50079.5 of the Health and Safety Code, the monthly rent, including any applicable fees or charges for use of any 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 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.
4. The subdivider shall comply with the findings and recommendations of the Tenant Impact Report prepared for the condominium conversion of the Imperial Avalon Mobile Home Park, including, but not limited to:



- a. Each resident shall be given a right to purchase the air space condominium upon which the mobile home is situated or to continue the existing tenancy in the park pursuant to the provisions of the Tenant Impact Report;
 - b. The subdivider shall not terminate any existing tenancies or any existing leases or require that the residents vacate the property, after the Map Act Rent Date for failure to purchase an air space condominium upon which the mobile home is located.
5. Conditions not required to be fulfilled prior to, or shown on the final map, shall be stated on a separate document to be recorded with the final map.
 6. The recorded map shall conform to the tentative map approved as Exhibit C and to the Conditions of Approval. Two copies of the final recorded map shall be submitted to the Planning Division.
 7. Except with respect for claims, damages, actions or proceedings between the subdivider and the City that subdivider shall defend, indemnify and hold harmless the City of Carson, its agents, officers, or employees from any claims, damages, action, or proceeding against the City or its agents, officers, or employees to attack, set aside, void or annul, and approval of the City, its advisory agencies, appeal boards, or legislative body concerning Tentative Parcel Map No. 071206. The City will promptly notify the subdivider of any such claim, action, or proceeding against the City and the subdivider will either undertake defense of the matter and pay the City's associated legal costs or will advance funds to pay for defense of the matter by the City Attorney. The City will cooperate fully in the defense. Notwithstanding the foregoing, the City retains the right to settle or abandon the matter without the subdivider's consent but should it do so, the City shall waive the indemnification herein, except, the City's decision to settle or abandon a matter following an adverse judgment or failure to appeal, shall not cause a waiver of the indemnification rights herein.

ENGINEERING SERVICES DIVISION – CITY OF CARSON

9. A construction permit is required for any work to be done in the public right of way.
10. Any improvements damaged during the construction shall be removed and reconstructed per City Standards plan and to the satisfaction of the City Engineer.
11. All infrastructure necessary to serve the proposed development (water, sewer, storm drain, and street improvements) shall be in operation prior to recordation of the Final Map.

COUNTY OF LOS ANGELES

Geology/Soils



12. A geology/soils report shall be submitted to the County of Los Angeles for review and approval prior to the recordation of the Final Map.

Road

13. The subdivider shall label all interior access streets as private driveway and fire lane.

Subdivision

14. The subdivider shall place a note on the final map, to the satisfaction of the City Engineer, indicating that this map is approved as a mobile home park conversion project for 225 units.
15. The subdivider shall label driveways and multiple access strips as a private driveway, and fire lane and delineate on the final map to the satisfaction of the City Engineer.
16. The subdivider shall provide, if required, suitable turnaround and label the driveway private driveway and fire lane on the final map to the satisfaction of the City Engineer.
17. The subdivider shall provide reciprocal easements for adjoining properties for drainage, ingress/egress, sewer, water, utilities, and maintenance purposes, etc., over the common driveway in the document to the satisfaction of the City Engineer.
18. The subdivider shall provide for the continual maintenance of the common areas. This can be achieved by the formation of a homeowner's association, comprised of the owners of the units, responsible for the maintenance of the common areas.
19. The subdivider shall provide a numeric reference for all parcels to the satisfaction of the City Engineer.
20. The subdivider shall provide addressing information in Microsoft Excel format to the satisfaction of the City Engineer.
21. The subdivider shall not grant or record private easements within areas proposed to be granted, dedicated, or offered for dedication until after the final map is filed with the Registrar-Recorder/County Clerk's office. If easements are granted after the date of tentative approval, a subordination must be executed by the easement holder prior to the filing of the final map.
22. A final guarantee will be required at the time of the filing of the final map with the Registrar-Recorder/County Clerk's office.

23. A final map prepared by, or under the direction of, a pre-1982 registered Civil Engineer or licensed Land Surveyor must be processed through the City Engineer prior to being to being filed with the Registrar-Recorder/County Clerk's office.

BUSINESS LICENSE DIVISION - CITY OF CARSON

24. Per section 6310 of the Carson Municipal Code, all parties involved in the project, including but not limited to contractors and subcontractors, will need to obtain a City Business License.

