



CITY OF CARSON

PLANNING COMMISSION STAFF REPORT

PUBLIC HEARING: January 13, 2009
SUBJECT: Relocation Impact Report No. 3036-07
APPLICANT: Shadrow and Shadrow
Attention: Vicky Cook
334 E. Gardena Boulevard
Gardena, CA 90248
OWNER: Same as applicant
REQUEST: Relocation Impact Report No. 3036-07 for the
closure of a Mobilehome Park (Bel Abbey) with 49
units and 50 spaces located in the ML
(Manufacturing Light) zone
PROPERTY INVOLVED: 200 E. Gardena Boulevard

COMMISSION ACTION

Concurred with staff
 Did not concur with staff

COMMISSIONERS' VOTE

AYE	NO		AYE	NO	
		Chairman Faletogo			Brown
		Vice-Chair Saenz			Gordon
		Cannon			Graber
		Brimmer			Verrett

Item No. 10B

I. Introduction

Date Application Received

- August 20, 2008: Relocation Impact Report No. 3036-07.

Applicant

- Shadrow and Shadrow, 334 E. Gardena Boulevard, Gardena, CA 90248

Property Owner

- Same as applicant

Project Address

- 200 E. Gardena Boulevard, Carson CA

Project Description

- Proposed Relocation Impact Report for the closure of the Bel Abbey Mobilehome Park with 49 units and 50 spaces. Forty-nine occupied units will be displaced as a result of the park closure (five mobilehomes are renter occupied and 44 are homeowner occupied).

II. Updated Report

At the November 25, 2008 Planning Commission meeting, the Commission continued the public hearing to January 13, 2009 in order to allow for the applicant to meet with mobilehome park residents and provide clarification to the proposed relocation benefits and address any questions the residents may raise regarding the park closure. Staff met with the park owner and relocation specialist to determine the best alternatives to assist residents in their understanding of the process and to assure residents took full opportunity to utilize relocation assistance provided by the applicant and the Carson based mobilehome park organization known as Homeowner's Against Rent Decontrol. Staff has visited the park to confirm all residents have copies of the Relocation Impact Report (RIR) and met with several park residents.

The park owner's relocation specialist met several times at the mobilehome park with various residents' owner/tenants and explained the proposed relocation benefits and offered financial incentives to owner/tenants if they agreed to move before the park's final closure date. The park owner's relocation specialist met with approximately nine (9) owner/tenants and offered an incentive of \$2,500 dollars in addition to the relocation benefits proposed in the RIR if residents moved by January 31, 2009 and \$2,000 dollars if residents moved out by February 28, 2009. The proposed incentive would decrease by \$500 dollars each month thereafter. Completion of relocation assistance is complicated by the fact that many owners do not hold clear title to their mobilehomes.

During the November 25, 2008 public hearing, questions were raised regarding the adequacy of notices to residents. Staff has attached copies of park closure notices



provided by the applicant that were inadvertently left out of the Relocation Impact Report. Staff also checked available records and found that all resident owner/tenants of the 49 units were provided written notice of the park's closure. Also, of the 49 mobilehomes, space number 34 has been abandoned prior to the initiation of the public hearing process on the RIR but the relocation benefits for this owner are pending since the documentation has not been finalized. The applicant continues to meet with interested residents to further clarify relocation benefits and offer early move out incentives.

Please refer to the November 25, 2008 staff report for the background/analysis, proposed mitigation and exhibits. Subsequent to the last meeting staff has evaluated the Relocation Impact Report relocation benefits and determined that the proposed benefits are justified based upon the legal nonconforming status of the park, the extended amortization period and the establishment of residency for most homeowners subsequent to the extension approved in 1987. In addition, staff finds that the public noticing procedures meets all requirements of the Carson Municipal Code. Although some park residents expressed confusion on the Planning Commission's April 8, 2003 intent of allowing the mobilehome park to operate until August of 2017, the Planning Commission did not approve the extension to August 30, 2017 and the park was still required to close by August of 2007.

III. Recommendation

That the Planning Commission approve Relocation Impact Report No. 3036-07 and:

1. WAIVE further reading and ADOPT Resolution No. _____, entitled, "A Resolution of the Planning Commission of the City of Carson approving Relocation Impact Report No. 3036-07 for the closure of Bel Abbey Mobilehome Park located at 200 E. Gardena Boulevard pursuant to conditions providing relocation assistance to displaced residents."

Prepared by: _____

Zak Gonzalez II, Associate Planner

Approved by: _____

Sheri Répp Loadsman, Planning Manager

RIR No. 3036-07_200_Gardena_Blvd_4



**CITY OF CARSON
PLANNING COMMISSION
RESOLUTION NO.**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF
CARSON APPROVING RELOCATION IMPACT REPORT NO. 3036-07 FOR
THE CLOSURE OF BEL ABBEY MOBILEHOME PARK PURSUANT TO
CONDITIONS PROVIDING RELOCATION ASSISTANCE TO DISPLACED
RESIDENTS**

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

Section 1. An application was duly filed by the applicant, Sandy Shadow, with respect to real property located at 200 E. Gardena Boulevard and described in Exhibit "A" attached hereto, requesting the approval of Relocation Impact Report (RIR) No. 3036-07 application to close Bel Abbey Mobilehome Park. The applicant contemplates developing the property for industrial development purposes.

A public hearing was duly held on January 13, 2009 at 6:30 P.M. at City Hall, Council Chambers, 701 East Carson Street, Carson, California. A notice of time, place and purpose of the aforesaid meeting was duly given.

Section 2. Evidence, both written and oral, was duly presented to and considered by the Planning Commission at the aforesaid meetings.

Section 3. The Planning Commission finds that:

- a) Bel Abbey Mobilehome Park was established in approximately 1950, prior to the incorporation of the City of Carson. The park contains fifty (50) spaces with forty-nine (49) of those spaces being currently occupied. The mobilehome units in the park range between 480 to 1,800 square feet in size. The park has a small swimming pool with no other amenities. The property is paved. Limited guest and resident parking results in the fire lane being utilized for parking. The overall condition of the park is fair considering the age of the infrastructure and structures. The monthly rate charged for each space at the time of the preparation of the Relocation Impact Report (August 20, 2008) was between \$230 and \$300. There have been no rent increases since the current owner purchased the property in 2003.
- b) The subject property is located within the Carson General Plan Light Industrial land use designation, is currently zoned ML (Manufacturing, Light), and is 3.2 acres in size. The property is located within Redevelopment Project Area No. 1.
- c) On April 28, 1987, the Carson Planning Commission determined that "the termination day of August 30, 1987, had resulted in insufficient time for each mobilehome tenant to realize a reasonable rate of return on their fixed investment and allowed more time to complete the RIR as required by CMC Section 9128.21. Additionally, the Planning Commission granted one final 20 year extension of the Park's legal nonconforming status to allow the residents to realize a reasonable rate of return on their investments.



- d) On April 8, 2003, the Planning Commission met and indicated intent to allow the mobilehome park to operate until August of 2017. The Planning Commission continued the matter on the May 27, 2003 meeting to allow consideration of a Resolution to confirm an approval to extend the legal, nonconforming status.
- e) On May 27, 2003, the Planning Commission discussed the difficulties in extending the park's termination date and approved to continue the matter indefinitely, allowing all parties to conduct further negotiations. As a result, the Planning Commission did not approve the extension to August 30, 2017 and the park was still required to close by August 2007. Further, the city never gave "official notice" to the residents that the park's closure date of August 2007 had changed.
- f) On June 17, 2003, the mobilehome park property owners: Mr. James R. Peters and Mrs. Joan T. Peters provided a written notice to the city requesting that the city immediately stop all further action on this issue and allow the park to remain open until August 30, 2007.
- g) On October 11, 2004, the City Council adopted the General Plan Update. The public hearing process for the General Plan Update included specific discussion and analysis of various study areas to determine if the land use designation was appropriate or should be changed to reflect city goals and objectives. Both the Bel Abbey Mobilehome Park located at 200 E. Gardena Boulevard and another mobilehome park located at 425 E. Gardena Boulevard were evaluated from the perspective of a residential use located in the industrial land use designation. Both the Planning Commission and City Council determined that the land use designation should remain industrial and that the mobilehome park uses should be amortized pursuant to the CMC.
- h) On September 4, 2007, the city sent notice to the park owner re-affirming that the extension for the legal non-conforming mobilehome park use had expired on August 30, 2007. Further, the notice identified that the owner had to file an application with the city and obtain approval of a "relocation impact report" pursuant to CMC Section 9128.21.
- i) On August 20, 2008, the park owner Sandy Shadrow submitted the Relocation Impact Report for the proposed closure of the Bel Abbey Mobilehome Park.
- j) In preparation for the November 25, 2008 Public Hearing, and in accordance with applicable City and State regulations, staff provided notification to all park tenants, legal owners (if other than the tenant), the applicant, and the City Attorney, as appropriate, including copies of the public hearing notice, RIR, field appraisal documentation and moving estimates. The transmittals were made by registered mail, personal delivery or first class mail in accordance with the requirements outlined in Section 9128.21 of the Municipal Code. Notifications of the public hearing were transmitted a minimum of thirty (30) days prior to the November 25, 2008 Public Hearing. Notification was also sent via a courtesy advisory letter dated November 12, 2008 provided in both English and Spanish, and delivered regular mail. .
- k) On October 22, 2008, the public hearing notice was posted throughout the city in locations designated for such postings, including the public county library and city parks.

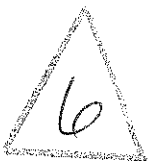
The project involves no potential for any adverse effect, either individually or cumulatively, on wildlife resources and therefore a De Minimis Impact Finding is made relative to AB 3158, Chapter 1706, Statutes of 1990.

Section 4. The Planning Commission further finds that the closure of Bel Abbey Mobilehome Park use permitted by the approval of RIR No. 3036-07 will not have a significant effect on the environment as indicated in the Initial Study and Negative Declaration prepared for this project. The cessation of the mobilehome use will not alter the industrial character of the surrounding area and meets or exceeds all City standards for protection of the environment, with the relocation benefits adopted as part of this resolution to mitigate the economic impact to the residents resulting from the park closure.

On October 22, 2008, the Public Notice-Negative Declaration was posted in five (5) public locations throughout the city designated for such postings and filed with the County of Los Angeles Registrar-Recorder Office.

Section 5. Based on the evidence, both written and oral, received at the Public Hearing, the Planning Commission hereby further finds that:

- a) The fair market value of mobilehomes in place is dependent on several factors, including the location, condition and amenities of the park. In this instance, the park is located in the ML (Manufacturing, Light) zone, and is bordered on all sides by uses typical of the manufacturing zone, including warehouse uses. The industrial character of the surrounding neighborhood, along with the size, age, quality, amenities and condition of the mobilehome unit, are also factors in determining the fair market value of the unit.
- b) Section 9128.21 of the Carson Municipal Code requires appraisals of the mobilehomes in the park as part of the contents of a RIR application. This appraisal information was utilized by the Planning Commission to establish the values of the mobilehome units and determine adequate benefits to mitigate the adverse impacts of the park closure on its tenants.
- c) The purpose of the RIR Ordinance is to protect resident owners with considerable investments in their homes (which include the costs of improvements, maintenance and financing) and to assist them in obtaining replacement housing when the park closes. The RIR Ordinance is also intended to allow the park owner to change the use of the property without incurring unreasonable burdens.
- d) The purpose of the City's Rent Control Ordinance is to protect mobilehome tenants from excessive rents. The Ordinance is also intended to permit the park owner to receive a fair profit from the operation of their mobilehome park. Concerns have been raised at RIR hearings in the past that the City's Mobilehome Park Space Rent Control Ordinance may have a tendency to increase the fair market value (based upon comparable sales) of mobilehome units placed in a park located in the City. No such evidence has been provided at the previous RIR hearings to document the existence, or amount of any such effect, and no such evidence was submitted in connection with this application. The applicant has not applied for a rent increase since purchasing the property in 2003.
- e) The issues, as discussed above, raise questions concerning whether the "Comparable Sales" appraisal method or the "Depreciated Replacement Cost" appraisal method is the most appropriate appraisal methodology in



reviewing the adverse impacts of park closures on displaced mobilehome tenants. As a result of numerous public hearings before the Planning Commission and City Council on other park closure proposals, it has been determined that the mandate of the City's RIR Ordinance and Section 65863.7 of the California Government Code that the relocation benefits imposed not exceed the "Reasonable Costs of Relocation" provide reasons for the use of the Depreciated Replacement Cost appraisal method. This appraisal method is based on a guide, such as the Marshall & Swift Manual. This manual is used to establish the cost of replacing the home and then appraising the then depreciated cost based on the age and condition of the dwelling. This eliminates any value that might be attributable to the Rent Control Ordinance. The use of the Depreciated Replacement Cost appraisal method results in a value for the mobilehome and no value for the underlying land except to the limited extent that it assumes that the unit can be located on another theoretical site in Southern California.

- f) The applicant provided an appraisal for the consideration of the Planning Commission at the November 25, 2008 meeting. The appraisal was prepared by Desmond, Marcello & Aamster during July of 2007 utilizing the Depreciated Replacement Cost appraisal method. The appraisal was considered to establish the values on which the recommended benefits were based.
- g) The size of each mobilehome, the date of manufacture and appraised on-site and off-site value for the mobilehome units are presented in the RIR report. However, the on-site value is illusory because the Park owner is required by law to close the Park. As a result the law would preclude anyone from selling their mobilehome in the Park, making the "on-site value" both misleading and legally unobtainable. The perceived loss in value caused by the termination of the mobilehome park use and resulting park closure caused the city in 1987 to extend the CUP's termination date for 20 years so that the mobilehome owners would be able to amortize their investments. Any mobilehome owner that has sold their unit since 1987 should have properly advised the prospective buyer of the mobilehome that the park was closing. As such, any resell of units should have been at discounted rates since the new residents could not expect to have unlimited residency.

Section 6. Based on evidence, both written and oral, received at the public hearing, the Planning Commission further finds that:

- a) In preparation of the RIR document, the applicant, with assistance from Overland, Pacific & Cutler, Inc. Relocation Consultants conducted a survey of vacant mobilehome spaces in Los Angeles and Orange County (or 50 mile radius from the Park) identified 42 available spaces in family parks (and an additional 43 spaces in senior parks) that may potentially accept mobilehomes from the Park. Green Systems indicated that mobilehome manufactured prior to 1980 will not likely be accepted at any of the Southern California mobilehome parks. Based on that criterion only five mobilehomes are anticipated to be moved to another park. Overland, Pacific & Cutler advised that, based on their relocation experience, any mobilehome older than 10 years will not be able to find a park to move into.

- b) The applicant contacted professional moving companies to determine the potential moving expenses related to relocating the mobilehomes at Bel Abbey Mobilehome Park. The two companies submitting estimates include Green Systems and Whitt Construction. Both firms have substantial experience in moving mobilehomes. The moving estimates ranged from \$4,500 for a standard-single wide and \$6,100 for a standard-double. The estimated costs include the units tear down, set up and transport fee within a 50 mile radius. The amounts recommended were based upon previous mobilehome closure moving-related benefits from the most recent available mobilehome park closures.
- c) The applicant's August, 2008 survey of rental apartment housing found 219 units available in Gardena, Hawthorne, Inglewood, Lawndale, Westchester, Lomita and Long Beach area. Unit size ranged from singles to three bedroom/two bath. The monthly rents ranged from \$695 for the least expensive one-bedroom unit, to \$950 for the least expensive two-bedroom unit, to \$1,295 for the least expensive three bedroom unit. The most expensive unit identified in the survey was a three-bedroom unit offered for \$2,800.
- d) The applicant's August, 2008 survey of 584 mobilehome units available for sale in the Los Angeles, Orange, Riverside and San Bernardino counties. The prices ranging from \$7,000 to \$100,000.
- e) Current monthly rate charged for each space is between \$230 and \$300, with the last approved rent increase having occurred in Fall 1991. Displaced tenants will incur higher rents for replacement mobilehome space, apartment rentals or other housing.
- f) The units at Bel Abbey Mobilehome have been appraised by Desmond, Marcello & Amster and are valid as of July 23, 2007. Appraisals at "Depreciated Replacement Values" range from \$2,650 to \$11,500 (Fair Market Value/Off-Site).
- g) Neither the Rent Control Ordinance nor the RIR Ordinance is intended to protect increases in market value (when the unit is in place within a park) which are in excess of the amount required to obtain replacement housing, greater than the investment made by the tenants, or greater than the remaining mortgage obligations, if those obligations exceed the actual investments. If the mobilehome owner is unable to relocate the mobilehome to a comparable park and does not receive the value of the mortgage obligation, the tenant will lose the value of the investment while still having a portion of the remaining mortgage to pay to the lien holders. If the mobilehome owner purchased after 1987, there was significant knowledge of the intended park closure. As such, any investment made by the tenant should have been proportional to the anticipated time to continue residency in the mobilehome park. All mobilehome owners are assumed to have amortized their investments.

Section 7. Based on the aforementioned findings, the Commission hereby finds that the relocation assistance proposed in the applicant's RIR is adequate. Therefore, the Planning Commission approves Relocation Impact Report No. 3036-07 pertaining to the closure of Bel Abbey Mobilehome Park, with respect to the property described in Section 1 hereof, subject to the conditions set forth as follows:

- a) Moving Estimates: If the mobilehome unit can be moved the owner will pay the cost to move a mobilehome owner's trailer/mobilehome, personal

property, legally constructed rooms, awnings, steps, skirting and other items and all costs associated with the connection of the trailer/mobilehome to utilities and if the relocation takes one or more days, pay the cost of lodging the owner in a local motel until the relocation of his or her unit is complete.

- b) Estimates for the Moving of Personal Effects: While the Park owner has no obligation under law to mitigate relocation costs for tenant-occupied households, the owner will provide each tenant household a maximum of \$1,500 for the moving of their personal belongings. An extra \$1,000 will be provided to those household that contain one or more elderly (62 years of age or older) and /or disabled.
- c) For mobilehomes that cannot be moved, all mobilehome owner/occupants who have resided in their mobilehome in the Park continually since prior to the date the RIR was filed with the City, shall be provided compensation equal to the appraised off-site value and a lump sum of \$1,800 for a one bedroom mobilehome, \$2,200 for a two bedroom mobilehome and \$2,600 for a three bedroom mobilehome as rental assistance in the form of first and last month's rent for subsequent housing. Additionally, each mobilehome owner/occupant will be compensated for moving their personal belongings with a maximum benefit of \$1,500. An extra \$1,000 will be provided to those households that are elderly (62 years of age or older) and/or disabled.
- d) Resident Owner Relocation Benefits plus Off-Site Value: The following lists the relocation benefits plus payment of appraised off-site value proposed to be paid by the Park owner for the mobilehome owner/occupants at the Bel Abbey Mobilehome Park. These benefits are based upon not being able to move the units based on their structural old moving age which precludes their relocation to other mobilehome parks in Southern California or surrounding counties. The Park owner proposes the following financial payment of "Last Resort":

Bel Abbey Mobile Home Park Owner / Tenant Benefits/Last Resort				
Unit No.	Tenant/ Vacant/ Elderly/ Disabled	Appraised Value (Off-Site Value) (rounded)	Relocation Benefits (Moving & Relocation) *Varies based on size of unit & disabled/elderly)	Total Payment Value & Relo. Total Value & Relo.
1		\$5,700	\$4,100	\$9,800
2		\$7,850	\$3,700	\$11,550
3		\$4,600	\$3,700	\$8,300
4		\$5,600	\$3,700	\$9,300
5		\$5,350	\$3,700	\$9,050
6		\$5,750	\$4,100	\$9,850
7		\$8,000	\$4,100	\$12,100
8		\$9,100	\$3,300	\$12,400
9		\$4,400	\$3,700	\$8,100
10	Tenant	\$3,750	\$1,500	\$1,500
11	Tenant	\$5,800	\$1,500	\$1,500
12		\$6,900	\$4,100	\$11,000



13		\$5,000	\$4,100	\$9,100
14		\$4,500	\$4,100	\$8,600
15		\$6,350	\$4,100	\$10,450
16	Elderly	\$7,150	\$4,700	\$11,850
17	Elderly	\$7,100	\$4,700	\$11,800
18		\$3,900	\$3,700	\$7,600
19	Elderly	\$8,300	\$5,100	\$13,400
20		\$4,650	\$3,700	\$8,350
21	Tenant	\$7,850	\$1,500	\$1,500
22	Vacant	\$4,250		\$4,250
23		\$11,500	\$3,700	\$15,200
24		\$3,000	\$3,700	\$6,700
25		\$8,400	\$3,700	\$12,100
26	Tenant	\$5,600	\$1,500	\$1,500
27		\$4,650	\$3,700	\$8,350
28		\$7,500	\$3,700	\$11,200
29		\$3,950	\$3,700	\$7,650
30	Elderly	\$6,450	\$5,100	\$11,550
31		\$4,300	\$4,100	\$8,400
32		\$4,600	\$3,700	\$8,300
33		\$6,600	\$4,100	\$10,700
34	Elderly	\$8,100	\$4,700	\$12,800
35		\$6,550	\$4,100	\$10,650
36		\$5,700	\$4,100	\$9,800
37		\$5,300	\$4,100	\$9,400
38		\$3,750	\$3,700	\$7,450
39	Disabled	\$3,400	\$5,100	\$8,500
40		\$4,100	\$3,700	\$7,800
41		\$2,900	\$3,700	\$6,600
42		\$4,300	\$4,100	\$8,400
43		\$4,500	\$3,700	\$8,200
44		\$2,200	\$4,100	\$6,300
45		\$4,250	\$4,100	\$8,350
46		\$8,250	\$4,100	\$12,350
47		\$5,200	\$4,100	\$9,300
48		\$2,650	\$3,700	\$6,350
49		\$5,250	\$3,300	\$8,550
50		\$4,000	\$3,700	\$7,700

e) Bonus Relocation Benefit: In addition to the above proposed payment, the Park owner will agree to a bonus relocation benefit if the mobilehome owner/occupants are able to relocate within 90 days of the approval and adoption by the Planning Commission of the RIR resolution. This bonus relocation benefit would be provided on a case by case basis depending on the special needs/requirements of each mobilehome owner/occupant.

f) Relocation Specialist Services: Overland, Pacific and Cutler, Inc. or another relocation specialist designee of the applicant's approved by the Planning Division, shall assist the tenants at Bel Abbey Mobilehome Park in finding appropriate housing. The relocation specialist must make the relocation services

available to all tenants during sufficient hours to adequately serve the need of those being displaced from the park continuing up to the time the park is closed, whether at the conclusion of the six-month closure period, or longer (if the time period is extended with the City's approval). The services of the relocation specialist shall be paid for by the applicant.

The duties of the relocation specialist shall include, but not be limited to, the following:

1. Development of a program to conduct meetings with individual tenants to completely review the relocation benefits adopted by the City and determine the tenant's specific needs.
2. Survey mobilehome parks located in this region within a fifty (50)-mile radius of Bel Abbey Mobilehome Park to determine the current availability of new and used mobilehomes which may be for rent or purchase in comparable parks.
3. Survey the aforementioned areas to determine the availability of comparable apartments and condominiums (similar to the tenant's current unit in terms of the number of rooms) for rent or purchase, if sufficient mobilehome spaces are not available in comparable parks.
4. Provide referral services to federally assisted housing or wherever referrals to social service agencies are needed.
5. Maintain individual files on each mobilehome space in the park to document the progress of the relocation process, including benefit payment receipts, written offers of comparable mobilehome spaces, and other related information.
6. Administer the payment of relocation benefits to ensure the efficient and orderly disbursement of payments to residents. Provide documentation of the same to the City as required.
7. Verify whether any of the tenants qualify for additional benefits based upon age (62 years of age or older) or disability. In the event there are such qualifying households, ensure that they are informed about the availability of these additional benefits.

g) **Comparable Space Provision:** It is the applicant's responsibility, and that of the applicant's representatives, to make every reasonable effort to relocate the residents of each space in the park during the six (6) month park closure period to comparable space within a fifty (50)-mile radius. The alternate park must meet the following criteria:

1. Provide a space adequate to relocate the resident's existing mobilehome and all movable appurtenances.
2. The management of the alternate park must be willing to accept the resident's home as acceptable for relocation in regard to the age, style and physical condition of the unit.
3. The amenities of the alternate park must be equal or greater than Bel Abbey Mobilehome Park; however, the amenities should not be so extensive that the new rents are unreasonably higher because of added on-site facilities in the new park.



4. Although location in a rent-controlled community is not a requirement, the rents should be reasonable, and in reasonable conformity with rents for similar parks in the general area.
5. Regulations governing resident age and lifestyle issues, such as permission to keep pets on premises, should not restrict the displaced household from enjoying a similar lifestyle at the new park.
6. The parking facilities at the alternate park must be adequate to accommodate the resident's existing vehicles.
7. The alternate park should provide reasonable proximity to comparable shopping and medical facilities for the convenience of the relocated residents.
8. Any disputes about the adequacy or the comparability of the alternate park, including the type of services available in the community in which the alternate park is located, shall be submitted to the Planning Division for resolution.

It is noted that mobilehomes generally have no practical use when they cannot be placed in mobilehome park. This is because their main value is derived from their use as residences in a permanent location.

The relocation specialist shall allow the resident a minimum of five (5) days to visit the alternate comparable park and make a decision regarding whether to accept the new location. It is the responsibility of the relocation specialist to document in writing all offers for comparable spaces. If it is determined that due to the age or physical condition of the mobilehome/trailer coach/travel trailer unit it cannot be relocated, the tenant (owner of unit) shall be eligible for Last Resort Benefits. If the tenant (owner of unit) refuses to accept a valid, documented offer to relocate a movable unit to a comparable park within six-(6) month park closure period, the eligible tenant (owner of unit) shall forfeit all rights to claims for Last Resort Benefits. In this case, the tenant is eligible only for the appropriate lump sum (moving expenses) payment, and additional Dislocation Benefit payments for the elderly or disabled, if applicable.

h) Conclusion:

In order to proceed with the park closure, the applicant shall agree to all conditions as outlined in the adopted Planning Commission Resolution. In this case, the applicant shall complete the execution, recordation and filing of the Affidavit of Acceptance documentation with the Office of the Los Angeles County Recorder and with the Planning Division within thirty (30) days of that date that the Resolution becomes final (as noted above). If the affidavit of Acceptance is not filed within the thirty (30) days specified, the approval of this Resolution shall lapse.

Prior to the issuance of the Notice of Termination by the applicant, the park tenants eligible for relocation benefits (as specified in the adopted Planning Commission Resolution) may submit written requests to the applicant to the applicant and/or the relocation specialist to receive appropriate relocation benefits. Upon receipt of the written request, the applicant or relocation specialist shall be required to disburse the requested payments to the tenant within three (3) business days of the time they vacate the park. These relocation benefits may be disbursed prior to the actual vacation of the park provided that the displaced tenant provides assurances to the satisfaction of the Planning Division that

adequate arrangements have been made to vacate the park and that advance funding is needed to pay the relocation expenses.

Within three (3) business days of the date that the applicant transmits the Notice of Termination to the park tenants, the applicant shall deposit funds into an interest bearing account to cover the initial relocation-related benefit payments. This account shall be established per the directions of the Economic Development Department, City of Carson.

If relocation payments to the tenants are delayed, the applicant shall pay each household an additional relocation benefit of \$75 per diem for each calendar day in excess of the initial three (3) business day's payment period. This additional relocation benefit is provided for lodging and any other expenses which may occur as a result of the delay in disbursement of the relocation benefits during the actual move of the displaced tenant to a new location. If the delay prevents relocation to a space in a comparable mobilehome park, the tenant (owner of unit) shall be entitled to Last Resort Benefits.

The Planning Commission finds that the above described measures for mitigating the adverse impacts of the park closure on the displaced tenants are reasonable and do not exceed the reasonable costs of relocation.

The subject mobilehome park shall not be closed until all tenants (resident and non-resident) have received the relocation assistance set forth above. No tenant may be required to move prior to the end of the six (6)-month closure period, which commences after each tenant is given the Notice of Termination, as required by Section 798.56 and 798.57 of the California Civil Code. Said notice shall not be given prior to the date the adopted Planning Commission Resolution becomes final. This Resolution shall be final at the termination of the fifteen (15) day appeal period, if an appeal had not been filed within that period.

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 Municipal Code.

PASSED, APPROVED AND ADOPTED THIS 13TH DAY OF JANUARY, 2009.

CHAIRMAN

ATTEST:

SECRETARY

13

IMPORTANT NOTICE

Date 2-28-98

I/WE Isidro Velasquez understand that the city of Carson has granted to Bel Abbey Mobile Home park a extension of the legal non-conforming permit to operate a mobile home park in this location. This extension will terminate on **August 30, 2007** and by that time all mobile homes must be removed from the park.

It is also understood that this document becomes part of the space rental agreement and by signing below I/we acknowledge and agree to its' terms.

Space # 13

Occupant Isidro Velasquez

Note: A copy must be given to each occupant and one copy attached to the parks copy of the rental agreement.



IMPORTANT NOTICE

Date 4/20/2004

I/WE JOSE PONCE BECERRA understand that the city of Carson has granted to Bel Abbey Mobile Home park a extension of the legal non-conforming permit to operate a mobile home park in this location. This extension will terminate on **August 30, 2007** and by that time all mobile homes must be removed from the park.

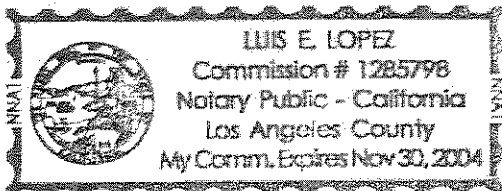
It is also understood that this document becomes part of the space rental agreement and by signing below I/we acknowledge and agree to its' terms.

Space 12

Occupant X

Jose P. Becerra

Note: A copy must be given to each occupant and one copy attached to the parks copy of the rental agreement.



[Signature] . MAY 8, 2004

IMPORTANT NOTICE

Rosa Muelle

Date 12-16-07

I/WE ~~*Rosa Muelle*~~ understand that the city of Carson has granted to Bel Abbey Mobile Home park a extension of the legal non-conforming permit to operate a mobile home park in this location. This extension will terminate on **August 30, 2007** and by that time all mobile homes must be removed from the park.

It is also understood that this document becomes part of the space rental agreement and by signing below I/we acknowledge and agree to its' terms.

Space #3

Occupant _____

Note: A copy must be given to each occupant and one copy attached to the parks copy of the rental agreement.



IMPORTANT NOTICE

Date 3-13-06

I/WE Rolando Velazquez understand that the city of Carson has granted to Bel Abbey Mobile Home park a extension of the legal non-conforming permit to operate a mobile home park in this location. This extension will terminate on August 30, 2007 and by that time all mobile homes must be removed from the park.


It is also understood that this document becomes part of the space rental agreement and by signing below I/we acknowledge and agree to its' terms.

Space -15

\$240 DEPOSIT
4/01/06

Occupant Rolando Velazquez

Note: A copy must be given to each occupant and one copy attached to the parks copy of the rental agreement.



ROLANDO VELASQUEZ.

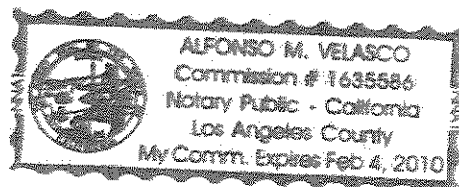
STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 13 DAY OF MARCH, 2006.

BY


NOTARY PUBLIC

Sara Lizarraga
SARA LIZARRAGA

IMPORTANT NOTICE

Date 7-15-04

I/WE JUAN MIGUEL G understand that the city of Carson has granted to Bel Abbey Mobile Home park a extension of the legal non-conforming permit to operate a mobile home park in this location. This extension will terminate on August 30, 2007 and by that time all mobile homes must be removed from the park.

It is also understood that this document becomes part of the space rental agreement and by signing below I/we acknowledge and agree to its' terms.

Space # 21

Occupant Miguel h. l

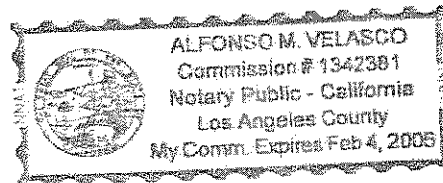
JUAN MIGUEL G

Note: A copy must be given to each occupant and one copy attached to the parks copy of the rental agreement.

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

SUBSCRIBED AND SWORN TO BEFORE ME
THIS 15 DAY OF July, 2004.

BY JUAN MIGUEL G
Alfonso M. Velasco
NOTARY PUBLIC



IMPORTANT NOTICE

Date: 8/31/07

I/WE RICARDO MIENZAL understand that the city of Carson has granted to Bel Abbey Mobile Home park a extension of the legal non-conforming permit to operate a mobile home park in this location. This extension will terminate on August 30, 2007 and by that time all mobile homes must be removed from the park.

It is also understood that this document becomes part of the space rental agreement and by signing below I/we acknowledge and agree to its' terms.

Space 28

Occupant Jhy Astorja

Ricardo Mienzal

John O. Bell

Note: A copy must be given to each occupant and one copy attached to the parks copy of the rental agreement.

have a deposit 220.66
10/01/07

IMPORTANT NOTICE

Date: Sept 29, 2007

I/we Olisa Jimenez understand that the city of Carson has granted to Bel Abbey Mobile Home park a extension of the legal non-conforming permit to operate a mobile home park in this location. This extension will terminate on August 30, 2007 and by that time all mobile homes must be removed from the park. It is also understood that this document becomes part of the space rental agreement and by signing below I/we acknowledge and agree to its' terms.

Space 36

Occupant Olisa Jimenez

Edna Jimenez

Note: A copy must be given to each occupant and one copy attached to the parks copy of the rental agreement.

have a month deposite

229, 17


IMPORTANT NOTICE

Date 2-11-98

I/WE Amario Guerra understand that the city of Carson has granted to Bel Abbey Mobile Home park a extension of the legal non-conforming permit to operate a mobile home park in this location. This extension will terminate on **August 30, 2007** and by that time all mobile homes must be removed from the park.

It is also understood that this document becomes part of the space rental agreement and by signing below I/we acknowledge and agree to its' terms.

Space 33

Occupant Mario Guerra


Note: A copy must be given to each occupant and one copy attached to the parks copy of the rental agreement.

IMPORTANT NOTICE

Date 1-29-07

Juan Manuel Muñoz
I/WE Leticia Aguilar understand that the city of Carson has granted to Bel Abbey Mobile Home park a extension of the legal non-conforming permit to operate a mobile home park in this location. This extension will terminate on August 30, 2007 and by that time all mobile homes must be removed from the park.

It is also understood that this document becomes part of the space rental agreement and by signing below I/we acknowledge and agree to its' terms.

Space 33

Occupant Juan Manuel Muñoz

Juan Manuel Muñoz

Note: A copy must be given to each occupant and one copy attached to the parks copy of the rental agreement.

27

IMPORTANT NOTICE

Date 9-11-05

M. De Jesus Reyes

I/WE Nicolas Guerrero understand that the city of Carson has granted to Bel Abbey Mobile Home park a extension of the legal non-conforming permit to operate a mobile home park in this location. This extension will terminate on August 30, 2007 and by that time all mobile homes must be removed from the park.

It is also understood that this document becomes part of the space rental agreement and by signing below I/we acknowledge and agree to its' terms.

Space 45

Occupant Maria de Jesus Reyes

Note: A copy must be given to each occupant and one copy attached to the parks copy of the rental agreement.

STATE OF CALIFORNIA

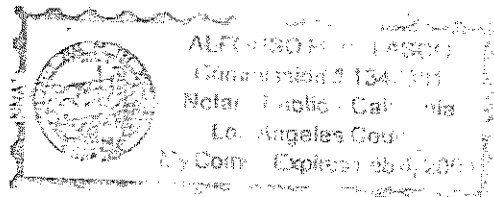
COUNTY OF LOS ANGELES

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 28 DAY OF SEPTEMBER 2005

BY MARIA DE JESUS REYES

[Signature]
NOTARY PUBLIC



23

Happy Trails Park, Inc.

**334 E. Gardena Blvd.
Gardena, CA. 90248
(310) 217-8777**

2/6/2008

Rosario Sanchez
200 E Gardena Blvd – Space #40
Carson, CA 90248

Re: Park Closure

Dear Rosario

We hope your holiday season was healthy and enjoyable.

As you know, our mobilehome park is operated under a permit from the City of Carson. The permit was issued in 1950. In 1960, the City rezoned the property in a way which prohibited mobilehome parks. As a result, the permit was scheduled to expire on August 30, 1987. On April 28, 1987, the City Planning Commission decided to extend the permit for an additional 20 years so that the mobilehome owners could realize a reasonable rate of return on their mobilehomes. As you know from the various notices you have received and/or meetings you have attended, the City permit to operate the Park expired on August 30, 2007 and, therefore, the Park is in the process of closing. This process involves the preparation of a "Relocation Impact Report" which will be submitted to the City to explain the relocation benefits the Park proposes to provide to you prior to closing. That report will be reviewed by the City's Planning Commission.

The park will be going through the required processes this year to finalize closure and removal. While this process commences, rental agreements and park rules are still in effect. Rents are still due on the 1st of each month and late fees of \$25 will still be enforced. Any past or current code violations from the Department of Housing and Community Development will also be enforced.

Sincerely,

Happy Trails Park Management

24

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

*Reserve Shirts
200 E. Colburn Blvd. Suite 740
Canton, IL 60248*

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
X RTF 4819 Addressee

B. Received by (Printed Name) C. Date of Delivery
Rosario Sanchez *2/13/01*

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number **7003 3330 0005 7042 8740**

(Transfer from service label)

PS Form 3811, August 2001 Domestic Return Receipt 2ACPRI-03-P-4081

25