



CITY OF CARSON

PLANNING COMMISSION STAFF REPORT

PUBLIC HEARING: April 27, 2021

SUBJECT: Relocation Impact Report (RIR) No. 04-19

APPLICANT: Richard H. Close, Esq.
Cozen O'Connor
1299 Ocean Ave., Suite 900
Santa Monica, CA 90401

PROPERTY OWNER: Carter-Spencer Enterprises, LLC
60 W. 57th St., #17L
New York, NY 10019

REQUEST: Consider Relocation Impact Report No. 04-19 related to the Closure of Rancho Dominguez Mobile Estates Mobile Home Park

PROPERTY INVOLVED: Rancho Dominguez Mobile Estates (425-435 E. Gardena Blvd.)

COMMISSION ACTION

AYE	NO		AYE	NO	
		Chairperson Thomas			Monteclaro
		Vice-Chair Palmer			D. Thomas
		Diaz			Rashad
		Guerra			
		Huff			Alt. Alt. Alt.

Item No. 6B

I. Introduction

Applicant

Richard H. Close, Esq.
Cozen O'Connor
1299 Ocean Ave., Suite 900
Santa Monica, CA 90401

Property Owner

Carter-Spencer Enterprises, LLC
60 W. 57th St., #17L
New York, NY 10019

II. Background; Project Description

The applicant requests approval of RIR No. 04-19, including the proposed measures to be taken by Carter-Spencer Enterprises, LLC (the "Park Owner"), owner of Rancho Dominguez Mobile Estates mobilehome park (the "Park"), to mitigate the adverse impacts of the Park's closure on the ability of Park residents to find alternative housing.

Carson Municipal Code ("CMC") Section 9128.21 (Relocation Impact Report) requires Planning Commission review of relocation impact reports related to mobilehome park closures.

The Park is located in an industrial zone and surrounded by industrial uses. The Park is a nonconforming use in its zone (the "Manufacturing-Light," or "M-L" zone) as a result of a zoning ordinance adopted by the City in 1977 providing that mobilehome parks are not permitted uses in the M-L zone, and establishing a 35-year amortization period during which the Park was allowed to remain in operation as a legal nonconforming use. That period expired in 2012, but the Park Owner continued to operate the Park and the City took no code enforcement action to compel the Park Owner to terminate the use.

Likely because of its industrial character, according to the California Office of Environmental Health Hazard Assessment, the Census Tract in which the Park is located is in the top 10% of the state for the levels of diesel emissions and toxic substance pollution. Additionally, while staff is not aware of any testing having been conducted to confirm whether or not ground/soil contamination exists on the subject property, the subject property was previously an agricultural/farm use, which is a type of use that can sometimes cause such contamination, and contamination has been found in other properties in the vicinity due to former landfill uses or other former or current industrial uses in the area. Accordingly, there may be health risks associated with the existing residential use and occupancy of the Park without proper remediation. (Exh. 2).

These concerns, or consideration of the industrial character of the area generally, may explain why the subject property was zoned M-L and accorded a general plan land use designation of light industrial by the City years ago. Closure of the Park would pave the way for the pollution issues affecting the subject property to be redressed as a prerequisite of any subsequent redevelopment thereof. Even properties affected by severe air pollution and ground contamination are capable of being remediated to a level that is safe for future use, sometimes even as a residential use. One example in the City is Cell 1 of the 157-acre former Cal-Compact Landfill property, which has been approved by the Department of Toxic Substances Control (DTSC) for residential development of hundreds of units upon successful completion of a remediation plan. Air pollution

concerns similarly can be redressed in connection with redevelopment via remedial measures including but not limited to installation of trees and landscaping.

Based on these considerations, staff is of the opinion that closure of the Park is in the best interest of all parties, including the Park residents, and that the Commission's focus, rather than preventing Park closure, should be on ensuring that adequate, legally-compliant measures are taken by the Park Owner to mitigate the adverse impacts of the closure on the ability of the Park residents, all of whom would be displaced, to find adequate alternative housing, and that the City, in cooperation with the Park Owner, aggressively pursue remediation of the property in connection with any potential redevelopment.

The applicant has stated it anticipates redeveloping the Park property into "denser workforce housing and possible mixed use appropriate to the industrial location." Attached to the Park Owner's Relocation Impact Report ("RIR") as exhibit I, the applicant has provided a site/yield study demonstrating potential redevelopment of the property from its current 81 mobilehome spaces into 174 one, two and three-bedroom apartments. (Exhibit 1.B, pp. 5, 62). However, the applicant has not applied to the City for approval of any subsequent development project for the Park property, and has not indicated whether the anticipated future development would include affordable housing units.

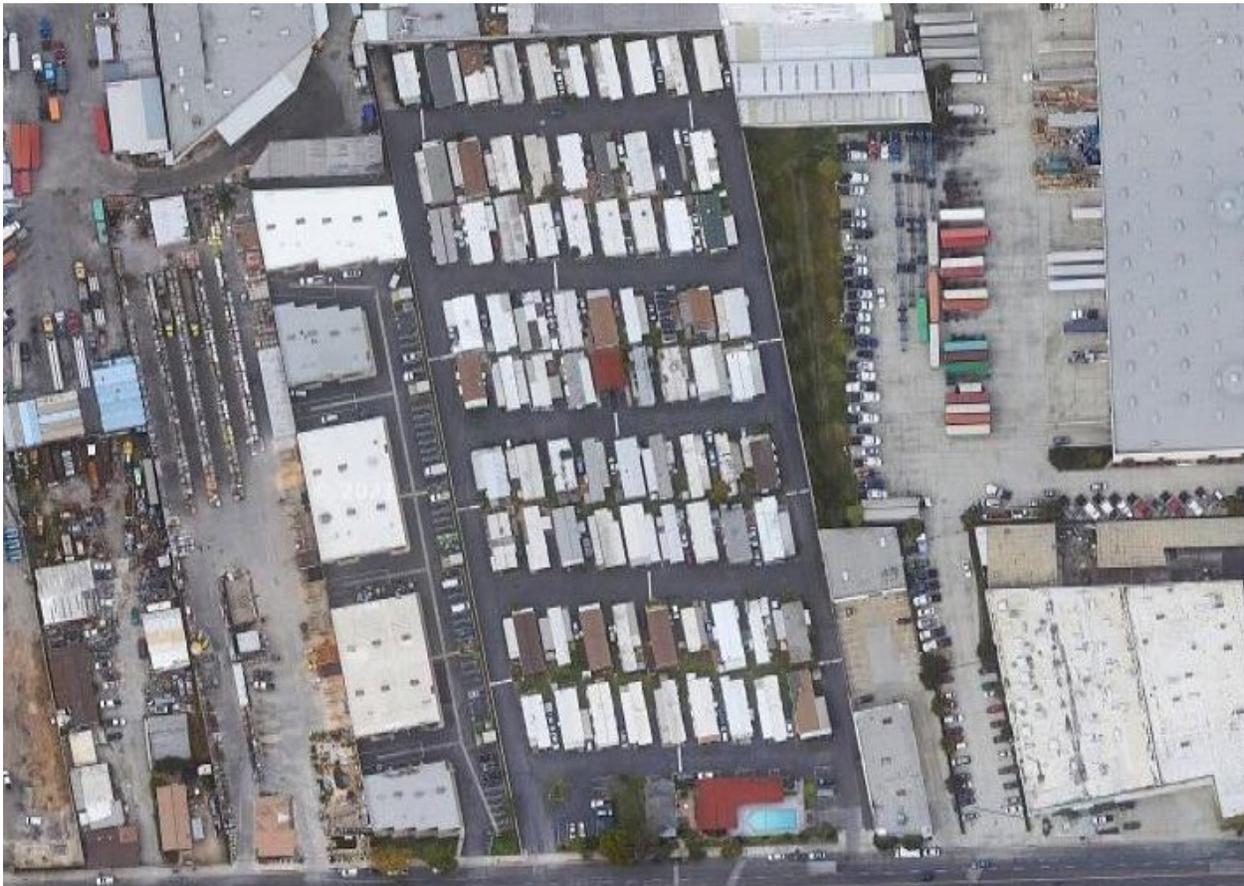
Importantly, approval of the proposed RIR does not include, relate to, or commit the City to any potential subsequent development project, or any aspect thereof, on the subject property or any other property. Instead, the Commission's consideration of the RIR relates only to the determination of the impacts that closure of the Park will have on the Park residents and what measures the Park Owner must take to mitigate those impacts. State law and the City's ordinance applicable to review of relocation impact reports for mobilehome park closures (CMC §9128.21) is discussed in Section IV.B, below.

Upon effectiveness of any final City approval of the RIR (including a Planning Commission approval and a City Council approval in the event of an appeal), the Park Owner would be required to give Park residents at least six months' notice to terminate their Park space tenancies due to Park closure in accordance with the Mobilehome Residency Law. Upon effectiveness of such termination of tenancies, the Park Owner would be authorized to compel residents to vacate the Park. The Park Owner has not committed to allowing the Park to remain open beyond said time frame.

III. Project Site and Surrounding Land Uses

The Park is located on the north side of E. Gardena Blvd. between S. Avalon Blvd. and Main St., and is comprised of two parcels, one located in the M-L zone and one located in the M-L-D (Manufacturing-Light, Design Overlay) zone. The parcels have a General Plan Land Use designation of light industrial. The Park is a nonconforming use in the ML zone.

Land uses surrounding the Park are industrial.



[Figure (a): Aerial photo of Rancho Dominguez Mobile Estates]

The following table provides a summary of information regarding the subject property:

Site Information	
General Plan Land Use	Light Industrial
Zone District	ML-D (APN 6125013057); ML (APN 6125013010)
Site Size	5.74 acres
Present Use and Development	Mobile home park – Rancho Dominguez Mobile Estates
Surrounding Uses/Zoning	North: Industrial, zoned ML South: Industrial, zoned ML East: Industrial, zoned ML-D West: Industrial, zoned ML
Access	Ingress/Egress: E. Gardena Blvd.

IV. Analysis

A. Site History; Community Outreach; Application Processing; Hearing Notice

The Park was developed around 1962, according to the appraisal report submitted by the applicant. This preceded incorporation of the City.

The Park Owner filed an incomplete application for approval of a relocation impact report for the Park with the City on February 22, 2019. The applicant hosted three informational meetings with the residents regarding the Park closure on October 21, 2019, and October 23, 2019.

The applicant filed an initial version of the RIR, together with the Brabant appraisal report, completed questionnaires from 39 residents¹ pursuant to CMC Section 9128.21(B), and other related documentation, on October 26, 2020. On December 30, 2020, the applicant submitted a revised version of the RIR to address certain application incompleteness items. The RIR application was completed on January 29, 2021, and on February 4, 2021, the Director of Community Development (“Director”), assigned the applicant the Planning Commission hearing date of April 27, 2021. The applicant agreed to this hearing date in communications with the City Attorney’s office despite the 45-day provision of CMC Section 9128.21(D), in light of the conflicting provision of Government Code (“Gov’t Code”) Section 65863.7(b), which, as amended by AB 2782 effective January 1, 2021, requires “the person proposing the change in use” (discussed further in Section IV.D, below) to provide a copy of the RIR to the Park residents at least 60 days prior to the Commission hearing.

On February 24, 2021, the Director, with assistance from the applicant, gave the Park residents notice of the April 27, 2021 public hearing before the Commission pursuant to CMC §9128.21(D). The notice of public hearing was posted to the Park property and mailed to each of the residents and coach owners via certified mail together with a cover letter from the Director, a copy of the RIR, individualized appraisal information (see Section IV.E, below), and a copy of the survey required by Section 207(B)(10) of the City’s Charter. All notices were confirmed received in accordance with applicable law. The notice materials are on file with the Community Development Department.

Charter Section 207(B)(10) (second sentence) requires the City, in determining reasonable measures to mitigate the adverse impacts of mobilehome park closures, to consider the results of a survey of the park residents’ support for the closure. The City received 35 responses to the Survey; 27 of the responses stated that they do not support the closure of the Park; two (2) stated that they support the closure of the Park on the Park Owner’s proposed relocation benefit terms; and five (5) stated that they support the closure of the Park on other relocation benefit terms – the desired terms varied, but related primarily to concerns that the appraised values of their homes were too low. Of the 35 responses, one person indicated they declined to answer the survey.

The notice of public hearing informed the residents of the opportunities they would have to participate in the public hearing, including that all residents who wish to submit public comments can do so via email or written note submitted in advance of the hearing, or can submit public comments telephonically in real-time during the hearing by joining the meeting on the zoom application.

The notice of public hearing also informed residents that due to then-current State and County COVID-19 restrictions, City was precluded from making its Community Center available as a location from which residents could provide live public comment during

¹ The number of completed questionnaires provided to the City was subsequently increased to 41.

the public hearing, but that in the event restrictions were modified prior to the hearing date so as to permit the City to lawfully provide this option, the City would do so, and in that event, a further notice would issue, providing further details regarding this method of participation. A further notice confirming availability of this option and providing details was issued on April 15, 2021.

As stated in the notice, those who wish to simply observe the hearing in real-time without offering public comment can do so by watching it live on the City's PEG channel and/or online on the City's website, where the hearing will be live-streamed.

Public comments submitted in advance of the posting of the Planning Commission Agenda for the relevant meeting are attached hereto as Exhibit 4.

B. Legal Standard; Authority to Require Relocation Assistance

Gov't Code Section 65863.7(a)(1) provides that prior to closure of a mobile home park, the person or entity proposing the change of use shall file a report on the impact of the closure of the park. The report shall include a replacement and relocation plan that adequately mitigates the impact upon the ability of the displaced residents to find adequate housing in a mobilehome park.

Pursuant to this requirement and CMC §9128.21, the Park Owner has filed the RIR (Exhibit 1.B). The RIR details replacement housing resources at pp. 8-10 and exhibits F-H. Moving costs are discussed on page 11, mobile home values are discussed on pp. 11-12 and in the Brabant appraisal report, and impacts and proposed mitigation measures are discussed on pp. 12-17. A "Relocation Plan/Explanation of Services" is provided on pp. 18-20.

Under Gov't Code §65863.7(e)(1), the Planning Commission is required, prior to approval of any change in use, to review the RIR and any additional relevant documentation and make a finding as to whether or not approval of the Park closure and the Park's conversion into its intended new use, taking into consideration both the RIR as a whole and the overall housing availability within the City, will result in or materially contribute to a shortage of housing opportunities and choices for low- and moderate-income households within the City. Under subsection (e)(2), the Commission may require, as a condition of the change, the person or entity proposing the change in use to take steps to mitigate any adverse impact of the Park closure on the ability of the displaced Park residents to find adequate housing in a mobilehome park.

Additionally, CMC §9128.21(E), in part, provides as follows:

"In approving an RIR, the Commission may impose reasonable measures not exceeding the reasonable costs of relocation to mitigate adverse impacts created by the conversion, which may include, but not be limited to, any of the following:

1. Provision for payment of the cost of physically moving the mobile home to a new site, including tear-down and setup of mobile homes, including, but not limited to, movable improvements such as patios, carports and porches.
2. Payment of a lump sum to compensate for payment of the first and last month's rent and any security deposit at the new mobile home park.

3. Payment of a lump sum to compensate for any differential between rental rates at the closing mobile home park and the new mobile home park during the first year of the new tenancy.

4. For those mobile home residents who move to apartments or other rental housing alternatives, provision for the first and last month's rent, plus security deposit, cleaning fees, not to exceed the Fair Market Rents for new construction and substantial rehabilitation for the Los Angeles area as established by the U.S. Department of Housing and Urban Development. Mobile home households may be compensated based on the number of bedrooms in the mobile home so that a one (1) bedroom mobile home may be compensated based on a one (1) bedroom apartment, a two (2) bedroom mobile home based on a two (2) room apartment, etc.

5. For those mobile home residents who move to apartments or other rental housing alternatives, a lump sum payment to compensate for any differential between rental rates at the closing mobile home park and the rental housing alternative during the first year of tenancy. Mobile home households may be compensated based on the Fair Market Rents for new construction and substantial rehabilitation for the Los Angeles area as established by the U.S. Department of Housing and Urban Development. Mobile home households may be compensated based on the number of bedrooms in the mobile home so that a one (1) bedroom mobile home may be compensated based on a one (1) bedroom apartment, a two (2) bedroom mobile home based on a two (2) bedroom apartment, etc.

6. Provision of a replacement space within a reasonable distance of the mobile home park or trailer park.

7. A requirement that a resident whose mobile home cannot be relocated within a reasonable distance to a comparable park be compensated by a lump sum payment based upon consideration of the fair market value of the mobile home on-site, including resident improvements (i.e., landscaping, porches, carports, etc.), any mortgage obligations of the resident on the mobile home, and the costs of purchasing a mobile home on-site in a comparable park or acquiring other comparable replacement housing.

8. A provision for setting aside a certain number of units for the residents of the park if the park is to be converted to another residential use."

CMC §9128.21(E) also provides that the Commission "shall approve the RIR if it is able to make an affirmative finding that reasonable measures have been provided in an effort to mitigate the adverse impact of the conversion on the ability of the park residents to be displaced to find alternative housing." Conversely, "if the Commission does not make this finding and is unable to impose reasonable measures to mitigate the adverse impact, the Commission may disapprove the RIR. No other permit or approval shall be granted in furtherance of the proposed conversion and no change of use shall occur until and unless an RIR has been approved."

C. Dispute re: Applicability of AB 2782

The foregoing discussion refers to state law as amended by AB 2782, a bill that was signed by the Governor on August 31, 2020, and took effect as law on January 1, 2021. AB 2782 amended several statutory provisions including, most notably, Gov't Code Section 65863.7. AB 2782 (without limitation) made the following key changes to Gov't Code §65863.7:

- Added a requirement that a relocation impact report, rather than “address[ing] the availability of adequate replacement housing in mobilehome parks and relocation costs,” to include “a replacement and relocation plan that adequately mitigates the impact upon the ability of the displaced residents of the mobilehome park to be converted or closed to find adequate housing in a mobilehome park.”
- Added a requirement that “if a displaced resident cannot obtain adequate housing in another mobilehome park, the person or entity proposing the change of use shall pay to the displaced resident the in-place market value of the displaced resident’s mobilehome.”
 - To facilitate this requirement, provides that “in-place market value shall be determined by a state-certified appraiser with experience establishing the value of mobilehomes. The appraisal shall be based upon the current in-place location of the mobilehome and shall assume the continuation of the mobilehome park.”
- Added a requirement that a city legislative or advisory body, before approving any closure/change of use, “make a finding as to whether or not approval of the park closure and the park’s conversion into its intended new use, taking into consideration both the impact report as a whole and the overall housing availability within the local jurisdiction, will result in or materially contribute to a shortage of housing opportunities and choices for low- and moderate-income households within the local jurisdiction.”
- Removed the limitation from prior Gov’t Code §65863.7(e) that “the steps required to be taken to mitigate shall not exceed the reasonable costs of relocation.” With removal of this limitation, Gov’t Code §65863.7(e)(2) now provides in full, “The legislative body, or its delegated advisory agency, may require, as a condition of the change, the person or entity proposing the change in use to take steps to mitigate any adverse impact of the conversion, closure, or cessation of use on the ability of displaced mobilehome park residents to find adequate housing in a mobilehome park.”

As mentioned above, AB 2782 also changed the timeframe in Gov’t Code §65863.7 from 15 days to 60 days for the “person or entity proposing the change in use” to provide a copy of the RIR to the residents prior to the hearing, and changed the timeframe in Civil Code §798.56(g) from 15 days to 60 days for the Park management to notify residents that it would be appearing before the City to request permits for a change of use of the Park.

The Park Owner proposes to pay only Brabant off-site values (plus other small lump sum amounts depending on household size or for persons with disabilities, as detailed in Section IV.E, below), ostensibly asserting it has a right to approval of the RIR on these benefits under prior law based on a contention that the RIR application was submitted and/or completed prior to effectiveness of AB 2782, and/or to the extent it was not, that was due to intentional delays by the City in processing the application for the purpose of triggering AB 2782 (see Exhibit 3.D).

These contentions are unfounded and erroneous, and to the extent they assert intentional delay by the City in processing the application for purposes of triggering AB

2782, they represent a fabricated narrative, all designed to pressure the City into approving the RIR on terms that keep the Park Owner's costs of closing the Park as low as possible, regardless of the impacts to the residents.

To be clear, AB 2782 applies to the Commission decision on the RIR, as it would to any City decision on the RIR rendered on or after January 1, 2021. The City expressly notified the applicant of this in an application incompleteness determination letter sent to applicant on November 24, 2020, stating that "AB 2782 will take effect as law on January 1, 2021, and as such will apply to any administrative determination on your application that is rendered effective on or after said date." (Exhibit 3.E).

The RIR application was not completed until January 29, 2021, and even if it had been completed prior to January 1, 2021, it would not have resulted in any right of the Park Owner to proceed to a decision on the RIR under prior law, because applicable law does not provide or allow for the RIR application to "vest" or be grandfathered in so as to proceed under prior law. Additionally, the City has not engaged in any delay tactics or taken any action for the purpose of delaying the application as was contended by the applicant. To the contrary, the City has adhered to all legal timeframes and deadlines applicable to processing of Park Owner's RIR application.

D. Dispute re: Person or Entity Proposing Change in Use

Gov't Code Section 65863.7(i) provides that Section 65863.7 "is applicable when the closure, cessation, or change of use is the result of a decision by a local governmental entity or planning agency not to renew a conditional use permit or zoning variance under which the mobilehome park has operated, or as a result of any other zoning or planning decision, action, or inaction. In this case, the local governmental agency is the person proposing the change in use for the purposes of preparing the impact report required by this section and is required to take steps to mitigate the adverse impact of the change as may be required in subdivision (e)."

The applicant contends that "City is the 'person proposing the change in use' of Rancho Dominguez Mobile Estates because the closure is the result of a 'zoning or planning decision, action or inaction' by the City, and City is the person required to take steps to mitigate the adverse impact of the closure on Park residents." (RIR, p. 12; see also RIR p. 4).

The Park Owner's contention is more fully detailed in its letter to the City dated April 5, 2019 (Exhibit 3.A), and is based on the City's 1977 zoning ordinance discussed above.

The City responded to the letter on April 30, 2019, pointing out that the City had taken no code enforcement action to require the termination of the Park use, and that the filing of the RIR application was at the sole volition of the Park Owner and came as a surprise to the City. The City also noted that the amortization period remained ongoing as applied to the Park, notwithstanding that the 35-year amortization period, which operates as a safe harbor period during which City could not initiate code enforcement action, has expired. The letter expressly informed the Park Owner that the City was not requiring initiation of the RIR application or approval process and that the applicant was free to withdraw its application and abandon the proposed closure if it wished to do so.

Further, the letter informed the Park Owner that the City was in the process of updating its general plan, and that said update or related processes may result in modifications to the City's mobilehome park land use and zoning standards, inviting the Park Owner to participate in these public processes moving forward, thereby suggesting that the Park Owner could work with the City toward effectuating land use or zoning changes that would allow continuation of the Park moving forward if it wished to do so. (Exh. 3.B).²

The Park Owner did reach out to the City in regards to potential land use or zoning changes to the Park property, but for the purpose of seeking to "receive a zoning designation that would support a mixed-use development, at a minimum density of 30 units per acre," revealing its motivation to redevelop the Park property for a more profitable use. (Exh. 3.E). This plan is also reflected in the RIR (p. 5, Exh. "I"), and the applicant has also met with City representatives in an attempt to ascertain the development terms/allowances to which City staff would be amenable related to the contemplated residential development project.

As stated in the City's January 25, 2021 letter to the applicant:

"Park Owner has ostensibly taken no interest in the City's overtures . . . regarding potential changes to the Park's zoning to remove the nonconforming status. If the Park Owner wished to continue operating the Park, the Park Owner would be actively seeking such a change from the City, rather than ignoring these possibilities. The City has refrained from pursuing any zoning change for the Park because Park Owner has neither applied for nor shown any interest in same, and because City is and has been under the impression that the Park Owner's true desire is to close the Park . . . If the Park Owner truly wishes to continue operating the Park but is perturbed by the lack of certainty associated with the Park's current zoning status, please notify [City staff] within the next three (3) business days, and [City staff] will be happy to work with you toward Park Owner's submittal and processing of a zone change application pursuant to [CMC] Section 9172.13. However, in that case, the RIR application should be withdrawn, or applicable processing timelines tolled."

Exhibit 3.G. The Applicant responded on January 27, 2021, stating "As soon as our client has determined action that they are interested in pursuing, I will respond to the suggestion of rezoning." Exhibit 3.H. However, on January 29, 2021, the Applicant responded by asserting (incorrectly) that the City's January 25, 2021 letter had deemed the RIR application complete, requesting that a hearing on the application be scheduled, and disagreeing with the remainder of the letter. Exhibit 3.I. Thus, the applicant made clear it preferred to pursue Park closure and is not interested in continuing to operate the Park. As a result, the City set the matter for the instant hearing.

² The City reiterated these assertions in its letter to the applicant dated November 24, 2020 (Exhibit 3.E).

E. Proposed Relocation Impact Mitigation Measures

The applicant has proposed one of two benefit packages for resident-homeowners, depending on whether it is feasible for the resident's mobilehome to be relocated to another mobilehome park.

As stated in the RIR, a survey was conducted of (i) all parks located within 30 miles, and (ii) comparable parks located between 30-50 miles, and only 37 available spaces were identified. Furthermore, generally accepted industry standards dictate that parks with available spaces will only allow mobile homes to be moved into the park if they are less than five years old, and will deny homes that are more than 10 years old. None of the coaches in the Park meet the 10-year age criteria. Therefore, as stated in the RIR, "it is a reasonable assumption that none of the Park mobile homes may be relocated to a comparable park within the vicinity of the Park." (RIR, pp. 8-9).

Relocation Assistance for Resident Homeowners who can Relocate their Coaches

In situations where it is feasible to relocate the mobilehome, the Park Owner will: (i) reimburse actual costs of relocation, including costs to disassemble, transport, reassemble and level the mobile home and all permitted moveable accessory structures; (ii) arrange and provide for transportation of the mobile home and disconnection and reconnection of utilities; (iii) pay costs of moving all personal property, allowance to be determined based on the federal fixed move schedule for the State of California and the size of the displacement dwelling and/or professional mover bids; and (iv) pay up to \$1,500 for necessary modifications to the mobile home to accommodate a disabled person within the replacement park, if the current mobile home has already been modified. Also, all residents will have access to up to eight hours' of services of a relocation specialist to help them with all aspects of the relocation process at no charge.

However, as noted above, the RIR states that it is a reasonable assumption that none of the Park mobile homes will be able to be relocated to a comparable park within the vicinity of the Park. So, it is expected that this relocation benefit package option would not apply to any residents, and instead the appraised-value benefit package option discussed below would apply to all Park residents who own their mobilehomes.

Relocation Assistance for Resident Homeowners who cannot Relocate their Coaches

In situations where it is not feasible to relocate the mobilehome, and the "Eligible Resident Owner"³ rents or buys a replacement dwelling, the Park Owner proposes to pay the homeowner a lump sum payment equal to the NADA off-site value as determined by Jim Brabant, MAI (discussed below), in addition to: (1) a lump sum payment in the amount of \$3,200 for a one-bedroom mobilehome, \$3,800 for a two-bedroom mobilehome, and \$4,800 for a three-bedroom mobilehome, as rental assistance in the form of first and last month's rent for subsequent housing; (2) an extra

³ This term is defined in the RIR as the registered owner(s) of the mobilehome with clear title, or trustors or beneficiaries of living trusts holding clear title to the mobilehome or a life estate in the mobilehome, whose mobilehome is located in the Park and who has resided in the mobilehome continually since prior to the date the RIR was filed with the City. (RIR p. 15).

\$1,000 to Eligible Resident Owners who are 62 years of age or older and/or disabled; (3) costs of moving all personal property; (4) payment of the costs of disposing of the existing mobilehome if the home owner chooses to transfer the mobilehome to the Park Owner; and (5) services of a relocation specialist as stated above.

As required by CMC §9128.21(C)(6), the on-site and off-site value of all resident-owned mobilehomes in the Park was appraised by state-certified MAI appraiser James Brabant.

The total appraised off-site value of the 57 resident-owned mobilehomes according to Mr. Brabant's appraisal was \$775,700, representing an average of \$13,608.77 per space. As stated in Mr. Brabant's appraisal report, "For the opinions of off-site value we have used the NADA Appraisal Guides and have assumed that the homes are not located in a rental mobile home park. This is a hypothetical condition that is necessary for the analysis." (Exhibit 1.C, p. 7).

The appraised off-site values were naturally far lower than the appraised on-site values, because the off-site values do not take into account the location of the coach, being sited in a rent-controlled mobilehome park in the City of Carson. The total appraised on-site value was \$1,599,000, representing an average of \$28,052.63 per space.

The Park Owner proposes to pay each Eligible Resident Owner whose coach cannot feasibly be relocated to another park the appraised *off-site* value of his/her coach (plus the other small lump sum payments discussed above). This proposal is based on Park Owner's contentions discussed above regarding non-applicability of AB 2782 to the RIR, and on the City's 2008 approval of a relocation impact report for closure of a nonconforming mobilehome park known as Bel Abbey with required relocation impact mitigation measures in the form of appraised off-site values of the Bel Abbey homes, which ranged from \$2,650 to 11,500, as well as moving/relocation costs ranging from \$1,500-\$5,100. The Park Owner contends that the same standard should apply to Rancho Dominguez, and offers to pay only what is proposed in the RIR, stating that if the City seeks to impose mitigation measures beyond what is proposed by the Park Owner, it must pay the entirety of the mitigation measures itself. (see RIR p. 15).

Despite these contentions and contingencies, which are indicative of the Park Owner's tactics discussed in Section 3.C and apparent lack of genuine concern for the residents' welfare, the Planning Commission is obligated by AB 2782 to require the Park Owner to pay the Brabant-appraised *on-site* values to resident owners who cannot relocate their coaches to adequate housing in another park, because the on-site values, not the off-site values, constitute the "in-place market value" of the homes within the meaning of AB 2782.

Per the RIR, Park Owner will pay the costs of removal and disposition of the mobilehome IF the homeowner chooses to transfer the mobilehome to the Park Owner. (See RIR p. 17). To transfer the mobilehome to the Park Owner, the homeowner would need to convey the mobilehome title to the Park Owner, so presumably the homeowner would be responsible for paying off any liens or encumbrances (or otherwise, for paying the costs of removal and disposition of the coach). However, the RIR notes that none of

the 41 households that responded to the resident questionnaire reported any existing loans on their homes.

The RIR identified 230 mobilehomes available for purchase within comparable parks within 50 miles of the Park, with purchase prices ranging from \$12,500 to \$299,900, although the majority of the dwellings were listed between \$50,000 - \$150,000. In addition, rental apartments within a 15-mile radius of the Park were available as follows: (i) 9 studio apartments with monthly rent ranging from \$950 to \$1,795; (2) 25 one-bedroom apartments with monthly rent ranging from \$1,329 to \$2,200; (3) 62 two-bedroom apartments with monthly rent ranging from \$1,695 to \$3,950; and (4) 42 three-bedroom apartments with rent ranging from \$2,095 to \$3,700. Finally, there were 97 condominiums available for sale at prices ranging from \$230,000 to \$460,000.

As an example of an apartment or mobilehome rental scenario, a resident homeowner who cannot relocate his/her mobilehome and who nets \$30,000 in payment as mitigation assistance after transferring the mobilehome would be able to use the funds to pay for 30 months' worth of rent for an apartment/mobilehome at \$1,000 per month, 20 months' worth of rent at \$1,500 per month, 15 months' worth of rent at \$2,000 per month, or 12 months' worth of rent at \$2,500 per month, before the funds run out. If the household nets \$20,000 in relocation assistance, these numbers drop to 20 months at \$1,000 per month, 13.33 months at \$1,500 per month, 10 months at \$2,000 per month, or 8 months at \$2,500 per month.

Alternatively, as an example of a mobilehome purchase scenario, a 20% down payment for purchase of a mobilehome costing \$90,000 would be \$18,000, leaving \$12,000 remaining for a household that nets \$30,000 in relocation assistance. However, the household would then be obligated to pay mortgage payments on such purchase (\$72,000 mortgage amount @ 5% interest for 30 years = \$387/month) in addition to space rents at rates that may not be subject to local rent control in the jurisdiction in which the home is sited. Assuming a mortgage payment of \$387 per month and a space rent of \$1,000 per month, a household that receives \$30,000 in relocation assistance would be able to pay for the home using relocation assistance for between 8-9 months before the funds run out. Assuming a mortgage payment of \$387 per month and a space rent of \$500 per month, a household that receives \$30,000 in relocation assistance would be able to pay for the home using relocation assistance for approximately 13.5 months before the funds run out. A household that nets \$20,000 in relocation assistance would have just \$2,000 remaining after the down payment for the purchase in this scenario.

In regards to the timing of relocation benefit payments, the RIR provides that upon issuance of the 6-month notice of termination of tenancy, Eligible Resident Owners (discussed in section F, below) may submit written requests to the Park Owner and/or relocation specialist to receive appropriate relocation benefits and will be immediately entitled to the services of the relocation specialist. All or some portion of the monetary benefits may be paid prior to the resident's actual vacation of the Park provided that the resident provides assurances to the satisfaction of the Park Owner that adequate arrangements have been made to vacate the Park and that advance funding is needed to pay the relocation expense. Otherwise, monetary benefits will be paid in full within three (3) days of vacation of the Park by the Eligible Resident Owner.

Proposed Mitigation to Other Residents/Lesseees

For residents who do not own their coaches (i.e., those who are tenants in Park-owned coaches), the RIR states the Park Owner has no obligation to mitigate relocation costs, and offers only to provide a fixed payment to “Eligible Home Renters”⁴ based on the federal fixed move schedule to assist with moving their personal property to a replacement dwelling provided the renter and all other occupants permanently vacate the Park. Subleasing is prohibited in the Park, and as such, Park Owner offers no mitigation to subleasing tenants or non-residents. (RIR p. 17).

Affordable Housing Options/Impacts

The RIR does not propose any affordable housing options or subsidies for displaced residents. However, the RIR does identify an anticipated future use of the Property, describing it as including “denser workforce housing” consisting of 174 one, two and three bedroom apartments (RIR p. 5). The RIR does not specify whether such use would include actual deed-restricted affordable housing units, but does assert that it would include and contribute to housing opportunities for low- and moderate-income households within the City and would not materially contribute to a shortage of housing opportunities for low- and moderate-income households.

As noted above, AB 2782 requires the City to make a finding as to whether or not approval of the Park closure and the Park's conversion into its intended new use, taking into consideration both the RIR as a whole and the overall housing availability within the City, will result in or materially contribute to a shortage of housing opportunities and choices for low- and moderate-income households within the City.

The City commissioned a study performed by City consultant RSG, Inc., in order to assist in making this finding. (Exhibit 2). The study found that the closure of the Park will materially contribute to the shortage of affordable housing in the City for several reasons: (1) The potential future of the use of the site is uncertain and may take several years to develop; (2) there are no available mobile home spaces for lease within the City; (3) while there is a supply of market rate units, the existing marketplace cannot accommodate the displaced residents at their income levels; and (4) although the City is in negotiations with two private developers for the potential provision of over 200 affordable housing units to be included in projects in the housing development pipeline, at this time only 83 affordable units are in the pipeline. The study further found that the RIR as proposed does not adequately mitigate the effect of the closure of the Park on the displaced residents, and recommended five potential mitigation measure options including increasing relocation rental assistance.

⁴ The RIR defines this term as “those who occupy a Park-owned mobilehome and are named on its lease agreement with Park Owner at the time of filing the Impact Report.”

F. Proposed Resolution and Conditions

Adoption of the proposed resolution (Exhibit 1) would approve the RIR subject to the “Conditions of RIR No. 04-19” attached to the proposed resolution as Exhibit “D” (the “Conditions”).

Based on the RSG study and other relevant documentation, the proposed resolution (Exhibit 1) contains a finding, pursuant to Gov’t Code Section 65863.7(e)(1)(B), that the Park closure as proposed in the RIR will materially contribute to a shortage of housing opportunities and choices for low- and moderate-income households within the City.

The Conditions would require Park Owner to pay the appraised *on-site* values to Eligible Resident Owners whose homes cannot be relocated to available spaces in comparable parks within 50 miles of the Park, rather than the appraised *off-site* values as proposed in the RIR. This modification is required pursuant to AB 2782, and also reflects substantial implementation of option 3 (“increase relocation assistance”) of the potential mitigation measures suggested in the RSG study. Although the laws referenced in the discussion of option 3 in the Study do not apply here because the City is not acquiring the subject property for a public use, the basic premise of increasing the relocation benefits required to be paid by the Park Owner under applicable law (e.g., AB 2782) applies and is advanced by this modification.

Other changes recommended by staff and reflected in the Conditions relate to the eligibility criteria for residents to qualify to receive the foregoing payments. These include adding a caveat in Condition 9 to the effect that Option A shall apply only when it is feasible to relocate a mobile home *to an available space in a comparable mobilehome park within a reasonable distance of the Park*, and otherwise Option B will apply to Eligible Resident Owners. “Within a reasonable distance” is defined to mean within 50 miles, unless a resident expressly agrees to a further distance in writing. Additionally, the definition of “Eligible Resident Owners” has been modified to remove the “clear” title and continuous occupancy requirements, because these constitute additional restrictions not found in AB 2782 and capable of creating a conflict therewith. Finally, the provision suggesting that an Eligible Resident Owner must rent or buy a replacement dwelling as a condition of entitlement to Option B payments has been removed because it is inconsistent with AB 2782 and because renting or buying a replacement dwelling right away may not be feasible or in the best interest of a particular homeowner depending on the timing and amount of mitigation payment received and other considerations, and therefore should not be condition of entitlement to receipt of Option B benefits. The Conditions also provide that the Option B benefits shall be paid to the Eligible Resident Owner *or successor-in-interest*, to clarify that if an Eligible Resident Owner passes away, or if his or her interest is transferred to a successor in some other way prior to payment, the benefits will not be forfeited and instead shall be paid to the Eligible Resident Owner’s successor-in-interest.

In regards to the timing of payment of Option B benefits, the Conditions require full payment to be made to an Eligible Resident Owner at least 30 days prior to the date the Eligible Resident Owner vacates the Park, provided that the resident provides assurances to the satisfaction of the Park Owner that adequate arrangements have been made to vacate the Park and that advance funding is needed to pay the relocation

expense. Otherwise, the Conditions change the latest possible date of payment from 3 days after the date the Eligible Resident Owner vacates the Park, as proposed in the RIR, to the date the Eligible Resident Owner vacates the Park.

Many of the Conditions are procedural in nature, for the purpose ensuring the fair and orderly implementation of the City's decision and the relocation impact mitigation measures. The Conditions are generally similar to those imposed in connection with approval of the relocation impact report for Imperial Avalon Mobile Estates in 2020. However, there are some differences arising from different circumstances such as applicability of AB 2782 and the different proposed mitigation measures and timeline for Park closure.

For example, the Rancho Dominguez Park Owner, unlike the Imperial Avalon owner, has not agreed to additional time for residents to vacate the Park after approval of the RIR beyond the required six months' notice of termination of tenancy. Accordingly, the condition related to early termination of space tenancies (i.e., allowing residents to enter into agreements to leave the park prior to park closure subject to payment of full benefits) that was included for Imperial Avalon has been omitted. For this same reason, Section 4 of the proposed resolution provides for the RIR approval to remain valid only for the default period of 12 months pursuant to CMC Section 9128.21(l).

Notable Conditions include (among others):

- A condition providing that if an Eligible Resident Owner has failed or refused to select a benefit package by the date of termination of their Park tenancy, subject to a final 30-day notice given by the Park Owner, Option A will apply where it is feasible to relocate the mobile home to a comparable mobile home park within a reasonable distance of the Park, and Option B will apply where it is not. If the Park Owner fails to give the required 30-day notice, Option B will apply. (Condition No. 12).
- A condition requiring execution of a relocation agreement on a City Attorney-approved form for all resident-homeowners who are subject to Option B and elect to transfer their mobilehomes to the Park Owner, which agreement shall provide for Park Owner to pay all escrow closing costs (Condition No. 14);
- A condition establishing a process whereby residents may apply for appraisal adjustments to correct errors or omissions made in the Brabant appraisal regarding the improvements or characteristics of their home. This does not allow for a new appraisal or for use of a different appraisal methodology. (Condition No. 17);
- A condition providing for appointment of a special master to resolve benefit entitlement disputes between the Park Owner and Park residents related to interpretation or implementation of the City's decision on the RIR (Condition No. 18); and
- A provision for the City to retain jurisdiction to enforce the Conditions until after the Park closure process is complete and all residents have vacated. (Condition No. 19).

V. Zoning and General Plan Consistency

The proposed RIR does not involve any change to the existing zoning designations or General Plan land use designations.

VI. Environmental Review

The City's consideration of the proposed RIR is not subject to review under the California Environmental Quality Act (CEQA), because it does not constitute a "project" within the meaning of CEQA. (Pub. Res. Code §21065; 14 CCR §15378). Approval of the RIR does not have the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. Approval of the RIR relates only to the determination of the measures required to be taken by the applicant to mitigate the adverse impacts on Park residents who will be displaced by the closure of the Park, as authorized and required by applicable law. Additionally, approval of the RIR does not constitute "approval" of any "project" for purposes of CEQA, because the RIR is not a project, and because approval of the RIR does not commit the City to a definite course of action or foreclose options or alternatives in regard to any project intended to be carried out by any person, including the applicant, and because it does not constitute a commitment to issue or the issuance of a discretionary contract, grant, subsidy, loan, or other form of financial assistance, lease, permit, license, certificate, or other entitlement for use of a project (14 CCR §15352). No application has been filed for any proposed development or use of the subject property after cessation of the mobilehome park use.

VII. Public Notice

Notice of the public hearing was posted to the subject property, and copies of the notice of public hearing and the RIR were mailed to all residents and mobile home owners of the Park via certified mail by the Director with assistance from the applicant pursuant to CMC §9128.21(D) on February 24, 2021. The Director, with assistance from the applicant, verified that all Park residents and mobilehome owners received these documents and were therefore notified of the public hearing in accordance with applicable law. The meeting agenda was posted on the City's website and at City Hall no less than 72 hours prior to the Planning Commission meeting.

VIII. Recommendation

That the Planning Commission:

- ADOPT Resolution No. 21-2708, A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CARSON CONDITIONALLY APPROVING RELOCATION IMPACT REPORT NO. 04-19 FOR MITIGATION OF RELOCATION IMPACTS OF CLOSURE OF RANCHO DOMINGUEZ MOBILE ESTATES.

IX. Exhibits

1. Draft Resolution No. 21-2708
 - A. Legal Description of Park Property
 - B. RIR
 - C. Brabant Appraisal Report (Main Introduction and Narrative Portion)

- D. Conditions of RIR No. 04-19
- 2. RSG Low- and Moderate-Income Housing Impact Analysis
- 3. Correspondence with Applicant (non-exclusive list)
 - A. Applicant Letter Dated April 5, 2019
 - B. City Letter Dated April 30, 2019
 - C. Applicant Letter Dated June 3, 2019
 - D. Email Correspondence Dated 7/15/20-10/9/20 re: Rancho Dominguez Home Appraisals
 - E. City Letter Dated November 24, 2020
 - F. Applicant Letter Dated December 30, 2020
 - G. City Letter Dated January 25, 2021
 - H. Applicant Email Dated 1/27/21 re: Rancho Dominguez Mobile Estates
 - I. Applicant Letter Dated January 29, 2021
- 4. Public Comments

Prepared by: Saied Naaseh, Community Development Director; Alvie Betancourt, Planning Manager; McKina Alexander, Associate Planner; City Attorney's Office

**CITY OF CARSON
PLANNING COMMISSION**

RESOLUTION NO. 21-2708

**A RESOLUTION OF THE PLANNING COMMISSION OF
THE CITY OF CARSON CONDITIONALLY APPROVING
RELOCATION IMPACT REPORT NO. 04-19 FOR
MITIGATION OF RELOCATION IMPACTS OF CLOSURE
OF RANCHO DOMINGUEZ MOBILE ESTATES**

WHEREAS, on February 22, 2019, the Department of Community Development received an application from Richard H. Close, Esq. of Cozen O'Connor for real property owned by Carter-Spencer Enterprises, LLC ("Park Owner") located at 435 E. Gardena Blvd. and legally described in Exhibit "A" attached hereto, which is currently in operation as an 81-space mobilehome park known as Rancho Dominguez Mobile Estates (the "Park"), requesting approval of a relocation impact report (designated by the City as relocation impact report no. 04-19) to determine relocation impacts and relocation impact mitigation measures related to the applicant's proposed closure of the Park. However, no relocation impact report was submitted with the application. The application is on file with the Department of Community Development.

WHEREAS, after correspondence between the applicant and the City related to application incompleteness and a dispute regarding the identification of the "person proposing the change in use" pursuant to Government Code Section 65863.7(i), an initial relocation impact report was submitted on or about October 26, 2020. An appraisal of the 57 resident-owned homes in the Park was also conducted and submitted in connection therewith. After further correspondence regarding the foregoing issues and the impending effectiveness of a new state law, AB 2782, a revised relocation impact report (the "RIR") was submitted on or about December 30, 2020. A copy of the RIR is attached hereto as Exhibit "B" and incorporated herein by reference. The application for approval of the RIR was completed on January 29, 2021.

WHEREAS, on February 24, 2021, pursuant to Carson Municipal Code Section 9128.21(D), the Director, with assistance from the applicant, mailed a copy of the RIR and individualized appraisal documentation via certified mail to all residents and owners of mobile homes in the Park, and gave notice by certified mail to the applicant, the residents, and any nonresident owners of mobile homes in the Park of the date, time and place for hearing of the application by the City's Planning Commission on April 27, 2021, and confirmed that such materials were received in accordance with applicable law; and

WHEREAS, studies and investigations were made and a staff report with recommendations was submitted, and the Planning Commission, upon giving the required notice, did on the 27th day of April, 2021, conduct a duly noticed public hearing as required by law to consider the RIR.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF CARSON, CALIFORNIA, HEREBY RESOLVES AS FOLLOWS:

SECTION 1. The Planning Commission finds that the foregoing recitals are true and correct, and the same are incorporated herein by reference as findings of fact.

SECTION 2. Upon review of the RIR and consideration of the written and oral evidence received at the hearing, the Planning Commission further finds as follows:

- a) The Park Owner is the “person or entity proposing the change in use” for purposes of Gov’t Code Section 65863.7. Without limitation, some of the facts highlighting this unmistakable reality are as set forth below.

The City did not initiate or pursue any code enforcement or other legal or administrative action or proceeding against the Park Owner or any predecessor-in-interest at any time related to termination of the Park use. The Park Owner initiated this application process by filing the RIR and related application materials. The application filing was of the Park Owner’s own volition. The City was unaware of Park Owner’s intent to file the application prior to its filing and did not inform the Park Owner that it was required to file an RIR application. Conversely, the City expressly informed the Park Owner that it was not required to proceed with the RIR application, and that it was free to withdraw its application and abandon the proposed closure if it wished to do so, via written correspondence on April 30, 2019. Also on said date, the City informed the Park Owner that it was considering, or was open to the possibility of, changing the land use or zoning designation of the Park in connection with the City’s pending General Plan update process or otherwise, and invited the Park Owner to participate in that process. The Park Owner reached out to City staff, not to address the nonconforming zoning status for purposes of continuing the Park use, but rather for the purpose of exploring potential development terms and allowances for a future residential or mixed use development and obtaining a zoning designation that would support a mixed-use development, at a minimum density of 30 units per acre, revealing its true desire of closing and subsequently redeveloping the Park property to increase profitability. The Park Owner’s desired future development plan is reflected in the RIR (p. 5, Exh. “I”).

The City reiterated its position via written correspondence on November 24, 2020, and in an application incompleteness determination letter to the Park Owner dated January 25, 2021, the City observed and informed the Park Owner as follows:

“the Park Owner has ostensibly taken no interest in the City’s overtures . . . regarding potential changes to the Park’s zoning to remove the nonconforming status. If the Park Owner wished to continue operating the Park, the Park Owner would be actively seeking such a change from the City, rather than ignoring these possibilities,” and informed the Park Owner that “[t]he City has refrained from pursuing any zoning change for the Park because Park Owner has neither applied for nor shown any interest in same, and because City is and has been under the impression that the Park Owner’s true desire is to close the Park . . . If the Park Owner truly wishes to continue operating the Park but is perturbed by the lack of certainty associated with the Park’s current zoning status, please notify [City staff] within the next three (3) business days, and

[City staff] will be happy to work with you toward Park Owner's submittal and processing of a zone change application pursuant to Carson Municipal Code Section 9172.13. However, in that case, the RIR application should be withdrawn, or applicable processing timelines tolled."

The Applicant responded on January 27, 2021, stating "As soon as our client has determined action that they are interested in pursuing, I will respond to the suggestion of rezoning." However, on January 29, 2021, the Applicant followed up by incorrectly asserting that the City's January 25, 2021 letter had deemed the RIR application complete, requesting that a hearing on the application be scheduled, and stating the applicant's disagreement with the remainder of the letter. Thus, the applicant made clear it preferred to pursue Park closure and was not interested in continuing to operate the Park even if the nonconforming status were removed. So, the City moved forward with setting the RIR application for hearing. To date, the City is willing to allow the Park Owner to withdraw the RIR application and work cooperatively with the Park Owner toward rezoning the Park to eliminate the nonconforming status, but the Park Owner declines to do so.

- b) In accordance with Gov't Code Section 65863.8, on February 5, 2021, the City informed the applicant in writing of the provisions of Section 798.56 of the Civil Code and all applicable local requirements which impose upon the applicant a duty to notify residents and mobilehome owners of the Park of the proposed change in use, and specified the manner in which the applicant shall verify that residents and mobilehome owners of the Park have been notified of the proposed change in use. The City's Community Development Director and Planning Division staff, with assistance from the applicant as stated in the foregoing recitals, and while denying that the City is the "person or entity proposing the change in use," has verified that a copy of the RIR has been provided to all Park residents and mobilehome owners at least 60 days in advance of the hearing as required by Gov't Code Section 65863.7(b), thereby also satisfying the required that the RIR be provided to all Park residents and nonresident mobilehome owners at least 30 days in advance of the hearing as required by Carson Municipal Code ("CMC") Section 9128.21(D), and that the Park residents and homeowners have been notified of the proposed Park closure and the Planning Commission's hearing on the RIR at least 60 days in advance of the hearing in the manner prescribed by Section 798.56(g)(1) of the Civil Code, and that the Park residents and homeowners have been notified of the hearing and provided with the required individual appraisal documentation at least 30 days in advance of the hearing in the manner prescribed by CMC Section 9128.21(D). Additionally, a survey of resident's support for the proposed closure was issued in accordance with City Charter Section 207(B)(10), and the responses have been duly reviewed and considered by the Commission. Based on the foregoing, the Commission finds that Gov't Code Section 65863.8 has been complied with.
- c) As required by CMC Section 9128.21(C)(6), the "on-site" and "off-site" value of each of the mobilehomes in the Park has been appraised by an appraiser selected by the City with the cost borne by the applicant. The appraisal report determining the on-site and off-site values was submitted with the RIR application. The appraisal was

conducted by James Brabant, MAI, a state-certified appraiser with experience establishing the value of mobilehomes. The main introduction and narrative portion of Mr. Brabant's appraisal report is attached hereto as Exhibit "C" and incorporated herein by reference, and the individualized appraisal documentation (consisting of individual home summaries) is available at <https://ci.carson.ca.us/content/files/pdfs/planning/sr/2021-04-27/RDME-Brabant-Individual-Home-Appraisal-Summaries.pdf> and incorporated herein by reference.

The Commission finds that the "on-site" values of the homes, as appraised by Mr. Brabant, also constitute the "in-place market values" of the homes within the meaning of AB 2782. The appraisal was conducted using a "Sales Comparison Approach", which compares the subject homes to similar homes that have recently sold and takes into account the current in-place location of the homes in the Park, a rent-controlled mobilehome park in the City of Carson. The report was prepared prior to January 1, 2021 (the effective date of AB 2782), but contemplated the impending effectiveness of AB 2782 and its potential applicability to the City's decision on the RIR depending on timing, and provides that the comparable sales used for purposes of the appraisal would not be affected by applicability of AB 2782. The report provides that due to the nonconforming status of the Park, the in-place market value cannot be based on a hypothetical condition that the Park was not going to close and sales from mobilehome parks that are not nonconforming uses cannot be utilized. For that reason, Mr. Brabant did not utilize such sales, instead using only comparable sales from within the Park.

Based on review of AB 2782 and the appraisal report and other relevant documentation, the Commission finds that Mr. Brabant's appraisal of the "on-site values" of the coaches, which also constitute the "in-place market value" of the coaches within the meaning of AB 2782, complies with AB 2782.

- d) The Park closure as proposed in the RIR would permanently displace all Park residents.
- e) For residents who own their homes and meet the Option B Eligibility Criteria (as defined below), the RIR proposes to pay Brabant's appraised off-site values, in addition to lump sum payments of \$3,200 for a one-bedroom mobilehome, \$3,800 for a two-bedroom mobilehome, and \$4,800 for a three-bedroom mobilehome as rental assistance in the form of first and last month's rent for subsequent housing, and an additional \$1,000 for elderly and/or disabled residents (collectively, the "Additional Payments").
- f) Approving the RIR as proposed for the resident-homeowners who cannot relocate their coaches would violate AB 2782, which requires payment of the in-place market values to all residents who cannot relocate their coaches to adequate housing in another mobilehome park. This is expected to include all 57 resident-homeowners in the Park, because as stated on p.9 of the RIR, "it is a reasonable assumption that none of the Park mobile homes may be relocated to a comparable mobilehome park within the vicinity of the Park," and because as stated on p.5 of the Study (as defined below),

“it is extremely unlikely that many of the coaches, due to their age, will be able to be transported.” AB 2782 applies to the City’s decision on the RIR. Accordingly, compliance with AB 2782 is mandatory, including (but not limited to) requiring Park Owner to pay the Brabant-appraised on-site values to all of the aforementioned Park resident-homeowners.

- g) Additionally, payment of off-site values as proposed in the RIR would violate CMC Section 9128.21(E) because it does not represent “reasonable measures . . . provided in an effort to mitigate the adverse impact of the conversion on the ability of the park residents to be displaced to find alternative housing” in light of the current price of obtaining alternative housing.

From the RIR’s discussion of “Replacement Housing Resources” on pages 8-10 of the RIR, and from the supporting Exhibits F-G thereto, it is clear that the current cost of finding replacement housing within the vicinity of the Park, whether buying or renting for any significant period of time, is extremely high in relation to the proposed payment of appraised off-site values, which average \$13,608.77 per resident-owned coach. As such, payment of the proposed off-site values would not be sufficient to allow residents to secure alternative housing for any significant period of time.

Furthermore, according to the RIR (p. 7), of 35 reporting Park households, 11 reported being extremely low income (less than 30% of Area Median Income [“AMI”]), 10 reported being very low income (31-50% of AMI), and 11 reported being low income (51-80% of AMI), whereas only 3 households reported being above low income.

No affordable housing options or alternatives are proposed in the RIR, and according to the Study (as defined below), there are “few existing affordable housing options within the City of Carson for the displaced residents,” including no available rent-controlled mobilehome spaces for lease in the City. (Study p. 8). Also according to the Study, “while there is a supply of market rate units, the existing marketplace cannot accommodate the displaced residents at their income levels.” (Study p. 10).

Therefore, there is a very real threat that if the RIR were approved on the proposed off-site values, a significant number of the Park residents would face homelessness within a short period of time after being displaced.

- h) By contrast, the average on-site value/in-place market value of the resident-owned homes in the Park as appraised by Mr. Brabant is \$28,052.63, more than double the average appraised off-site value. Adding the Additional Payment to this amount would result in the average Park resident-homeowner receiving between \$31,252.63 and \$33,852.63, which, together with the additional modifications discussed below and set forth in the conditions attached hereto as Exhibit “D” (“Conditions”) the Commission finds constitutes reasonable measures to mitigate the adverse impact of the Park closure on the ability of the Park residents to be displaced to find alternative housing within the meaning of CMC Section 9128.21(E).

- i) The RIR provides that the foregoing payments will only be available to residents who meet the following criteria: (1) it is not feasible to relocate the mobilehome; (2) the resident constitutes an “Eligible Resident Owner,” defined as a registered owner(s) of the mobilehome with clear title, or trustors or beneficiaries of living trusts holding clear title to the mobilehome or hold a life estate in the mobilehome, whose mobilehome was located in the Park and who have resided in that mobilehome continually since prior to the date the RIR was filed with the City; and (3) the Eligible Resident Owner rents or buys a replacement dwelling (collectively, the Option B Eligibility Criteria”).
- j) In regards to the first Option B Eligibility Criterion, the Commission finds that adding the caveat “to an available space in a comparable mobilehome park within a reasonable distance of the Park,” in addition to the other mitigation measures and conditions discussed herein and set forth in the Conditions, is necessary to provide reasonable measures to mitigate the adverse impact of the Park closure on the ability of the Park residents to be displaced to find alternative housing within the meaning of CMC Section 9128.21(E), and such mitigation measure is authorized pursuant to CMC §9128.21 and Gov’t Code §65863.7(e)(2), and therefore the Commission sees fit to do so. Within a “reasonable distance” shall for all purposes mean within 50 miles of the Park, unless a resident expressly agrees in writing to a greater distance. Accordingly, as set forth in the Conditions, Option A will only apply when it is feasible to relocate a mobilehome to an available space in a comparable mobilehome park within a reasonable distance of the Park, and when doing so is not feasible, Option B will apply, subject to the other Option B Eligibility Criteria with modifications as discussed below and set forth in the Conditions.
- k) In regards to the second Option B Eligibility Criterion, the Commission desires to ensure that the definition of “Eligible Resident Owner” is not capable of producing a situation wherein a resident who is entitled to payment of in-place market value pursuant to AB 2782 is precluded from receiving such payment based on not falling within the definition of “Eligible Resident Owner.” As such, the Commission sees fit to revise the definition to remove the “clear” title and continuous occupancy requirements, because these constitute additional restrictions engrafted onto AB 2782 capable of creating a conflict therewith. While clear title may be needed for a homeowner to convey the mobilehome title to the Park Owner, doing so is not a requirement of eligibility to receive the benefit payment, but rather only carries the benefit to the resident of having the Park Owner provide for removal and disposition of the mobilehome. Accordingly, the revised definition of “Eligible Resident Owner,” for all purposes, as set forth in the Conditions, shall read as follows: “registered owner(s) of the mobilehome with title, or trustors or beneficiaries of living trusts holding title to the mobilehome or holding a life estate in the mobilehome, whose mobilehome was located in the Park and who resided in the mobilehome as of the Effective Date of the Resolution.” Additionally, in the event an Eligible Resident Owner passes away before receiving payment or his or her interest in the relocation benefits is for some other reason transferred to a successor before being paid out to the Eligible Resident Owner, the benefit entitlement should not be forfeited, and

should instead be paid to the successor-in-interest; this modification is reflected in this Conditions.

- l) In regards to the third Option B Eligibility Criterion, the Commission sees fit to remove this criterion as it is not consistent with AB 2782, and because renting or buying a replacement dwelling right away may not be feasible or in the best interest of a particular homeowner depending on the timing and amount of mitigation payment received and other considerations, and therefore should not be condition of entitlement to receipt of Option B benefits.
- m) In regards to timing of payment of Option B benefits, the RIR (p. 17, paragraph B.7) proposes to pay benefits by, at latest, within three (3) days of vacation of the Park by the Eligible Resident Owner, and provides that the Park Owner may pay all or some portion of the benefits earlier if the resident provides assurances to the satisfaction of the Park Owner that adequate arrangements have been made to vacate the Park and that advance funding is needed to pay the relocation expense. The Commission sees fit to change this such that all of the monetary benefits shall be paid by 30 days prior to the Eligible Resident Owner's actual vacation of the Park provided that the resident provides assurances to the satisfaction of the Park Owner that adequate arrangements have been made to vacate the Park and that advance funding is needed to pay the relocation expense, and otherwise, the latest possible date of payment to the Eligible Resident Owner is the date the Eligible Resident Owner vacates the Park, as set forth in the Conditions.
- n) Requiring the Park Owner to take the relocation impact mitigation measures identified in the RIR, subject to the modifications and additional requirements set forth in the Conditions and discussed herein, constitutes reasonable measures to mitigate the adverse impact of the Park closure on the ability of the Park residents to be displaced to find alternative housing within the meaning of CMC Section 9128.21(E), and such measures are authorized to be imposed by the Commission as Conditions pursuant to CMC §9128.21 and Gov't Code §65863.7(e)(2).
- o) The RIR addresses the availability of adequate replacement housing in mobilehome parks. The RIR also addresses relocation costs, including the costs of moving a mobilehome and purchasing an available mobilehome in another park or other available housing.
- p) In preparation of the RIR, the applicant, with assistance from Overland, Pacific & Cutler, Inc., conducted a survey of all mobilehome parks within a 30 mile radius of the Park, and all comparable mobilehome parks within a 50 mile radius of the Park, and identified 37 available spaces. The RIR also asserted that according to generally accepted standards and practices among mobile home park operators, a park will generally accept mobilehomes that are less than 5 years old and deny homes that are more than 10 years old. None of the existing mobilehomes in the Park meet the 10-year age standard based on information provided, regardless of condition. Therefore, under generally accepted standards and practices, it is a reasonable assumption that none of the mobilehomes in the Park may be relocated to a comparable mobilehome

park within the vicinity of the Park. Therefore, it is anticipated that all of mobilehome Park resident-homeowners will ultimately select and be provided with relocation benefits in accordance with their appraised on-site value benefit package.

- q) The RIR identified 230 mobilehomes available for purchase within comparable parks within a 50-mile radius of the Park, with purchase prices ranging from \$12,500 to \$299,900, although the majority of the dwellings were listed between \$50,000 - \$150,000. In addition, rental apartments were available within a 15-mile radius of the Park as follows: (i) 9 studio apartments with monthly rent ranging from \$950 to \$1,795; (2) 25 one-bedroom apartments with monthly rent ranging from \$1,329 to \$2,200; (3) 62 two-bedroom apartments with monthly rent ranging from \$1,695 to \$3,950; and (4) 42 three-bedroom apartments with rent ranging from \$2,095 to \$3,700. Finally, there were 97 condominiums available for sale at prices ranging from \$230,000 to \$460,000. Residents who cannot feasibly relocate their mobilehome and who select the appraised value benefit package could use their lump sum payment to purchase or rent such available housing.
- r) AB 2782 requires the Commission to “make a finding as to whether or not approval of the [P]ark closure and the [P]ark’s conversion into its intended new use, taking into consideration both the impact report as a whole and the overall housing availability within the [City], will result in or materially contribute to a shortage of housing opportunities and choices for low- and moderate-income households within the [City].” Gov’t Code §65863.7(e)(1)(B).

The City commissioned a study by an independent consultant (RSG, Inc.) for the purpose of assisting the Commission in making this finding, and the study is available at: <https://ci.carson.ca.us/content/files/pdfs/planning/sr/2021-04-27/Exb2RanchoDominguezRSGStudyLMIHAnalysisMemo.pdf>

and incorporated herein by reference (the “Study”). The Commission has reviewed the RIR, any additional relevant documentation, and the Study. Based on said review, the Commission finds that approval of the Park closure and the Park’s conversion into its intended new use on the terms proposed in the RIR, taking into consideration both the RIR as a whole and the overall housing availability within the City, will materially contribute to a shortage of housing opportunities and choices for low- and moderate-income households within the City for several reasons:

- (1) The potential future of the use of the site is uncertain and may take several years to develop due to the requirement of discretionary approvals issued by City;
- (2) there are no available mobile home spaces for lease within the City;
- (3) while there is a supply of market rate units, the existing marketplace cannot accommodate the displaced residents at their income levels; and
- (4) there are few additional affordable housing units in the development pipeline.

The Study recommended five potential mitigation measure options that the City may consider imposing as a condition of approval of the RIR pursuant to Gov't Code Section 65863.7, including increasing relocation rental assistance (the third suggested option, p. 12). Although the laws referenced in the discussion of said option in the Study do not apply here because the City is not acquiring the subject property for a public use, the basic premise of increasing the relocation benefits required to be paid by the Park Owner under applicable law (e.g., AB 2782) is relevant here.

The Commission has considered the suggested options, and finds that conditioning approval of the RIR so as to require payment of Mr. Brabant's appraised on-site values for all Park resident-homeowners who cannot relocate their coaches to available spaces in comparable mobilehome parks within a reasonable distance of the Park constitutes substantial implementation of option (3) suggested in the Study, and constitutes a mitigation measure that the Commission is authorized to impose pursuant to Gov't Code Section 65863.7(e)(2), and indeed required to impose pursuant to Gov't Code Section 65863.7(a)(2)(A) as noted above, and together with the other required mitigation measures discussed herein and reflected in the Conditions, constitutes reasonable measures to be provided by the Park Owner in an effort to mitigate the adverse impact of the conversion on the ability of the Park residents to find alternative housing pursuant to CMC Section 9128.21(E) as noted above. Accordingly, the Commission sees fit to impose said requirement, as shown in the Conditions.

- s) Based on the foregoing findings and a review of the RIR, the RIR, as modified and conditioned pursuant to the Conditions, includes a replacement and relocation plan that adequately mitigates the impact upon the ability of the displaced residents of the Park to find adequate housing in a mobilehome park, as required by Gov't Code Section 65863.7(a)(1).

SECTION 3. The Planning Commission further finds that the City's review of/decision upon the RIR is not subject to review under the California Environmental Quality Act ("CEQA") because the RIR does not constitute a "project" within the meaning of CEQA. (Pub. Res. Code §21065; 14 CCR §15378). Approval of the RIR does not have the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. Approval of the RIR relates only to the determination of the measures required to be taken by the applicant to mitigate the adverse impacts on Park residents who will be displaced by the closure of the Park, as authorized and required by applicable law. Additionally, approval of the RIR does not constitute "approval" of any "project" for purposes of CEQA, because the RIR is not a project, and because approval of the RIR does not commit the City to a definite course of action or foreclose options or alternatives in regard to any project intended to be carried out by any person, including the applicant, with respect to the subject property or any other property, and because it does not constitute a commitment to issue or the issuance of a discretionary contract, grant, subsidy, loan, or other form of financial assistance, lease, permit, license, certificate, or other entitlement for use of a project (14 CCR §15352).

SECTION 4. The Planning Commission of the City of Carson, pursuant to the findings noted above, does hereby approve RIR No. 04-19, attached hereto as Exhibit “B,” subject to the “Conditions of RIR No. 04-19” attached hereto as Exhibit “D.”

SECTION 5. This decision of the Planning Commission shall become effective and final 15 days after the date of adoption of this Resolution unless an appeal is filed in accordance with Sections 9128.21(F) and 9173.4 of the Zoning Ordinance.

SECTION 6. The Secretary of the Planning Commission shall certify to the adoption of this Resolution.

PASSED, APPROVED and ADOPTED this 27th day of April, 2021.

CHAIRPERSON

ATTEST:

SECRETARY

EXHIBIT "A"

LEGAL DESCRIPTION

PARCEL 1: THAT PORTION OF LOT 14 OF THE BASSETT TRACT, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, IN BOOK 2, PAGE 44 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEAST CORNER OF SAID LOT; THENCE NORTHWESTERLY ALONG THE EAST LINE 369.80 FEET TO THE NORTH LINE, THENCE WESTERLY ALONG THE NORTH LINE 330.71 FEET TO A POINT, THENCE SOUTHWESTERLY 367.17 FEET MORE OR LESS, TO A POINT IN THE SOUTH LINE OF SAID LOT, DISTANT WESTERLY 331.10 FEET, FROM THE SOUTHEAST CORNER; THENCE EASTERLY ALONG THE SOUTH LINE 331.10 FEET TO THE POINT OF BEGINNING.

EXCEPT THEREFROM THE NORTH 233.05 FEET OF SAID PORTION.

PARCEL 2:

THE EASTERLY 5 ACRES OF LOT 15, (ACREAGE ESTIMATED TO THE CENTER OF PALM AVENUE, NOW 165TH STREET, AND THE WESTERLY LINE OF SAID 5 ACRES BEING PARALLEL WITH THE EASTERLY LINE OF SAID LOT) OF THE BASSETT TRACT, AS PER MAP RECORDED IN BOOK 2 PAGE 44 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXHIBIT “B”

RELOCATION IMPACT REPORT NO. 04-19

[RIR to be attached]

EXHIBIT “C”

BRABANT APPRAISAL REPORT

[main introduction and narrative portion -to be attached]

EXHIBIT “D”

CONDITIONS OF RIR NO. 04-19

1. The property owner and applicant shall execute and record a certificate of acceptance of these conditions within 30 days of the date of effectiveness of Planning Commission Resolution No. 21-2708 (the “Resolution”), approving RIR No. 04-19 (the “RIR”) on the terms set forth in the Resolution and subject to these conditions.
2. The RIR approval that is the subject of these conditions may not be transferred or assigned without the prior written consent of the Director, which may be withheld only if the proposed transferee is financially insolvent or otherwise incapable of fulfilling these conditions.
3. The property owner and applicant, and their successors and assigns (“Park Owner”) shall comply with all applicable state and local laws and regulations, and these conditions, in connection with implementation of the RIR, including with respect to all required relocation impact mitigation measures.
4. Any proceeding for revocation of the RIR approval that is the subject of these conditions shall be initiated and conducted in accordance with Carson Municipal Code (“CMC”) Section 9128.21(I)(3).
5. Any modification of these conditions, including additions or deletions, may be considered upon filing of an application by the Park Owner in accordance with CMC Section 9173.1. Notwithstanding the foregoing, any modification of relocation impact mitigation measures subsequent to adoption of the Resolution shall be processed in accordance with CMC Section 9128.21(G).
6. If any of these conditions alters a commitment made by the Park Owner in another document, the conditions enumerated herein shall take precedence unless superseded by a Development Agreement, which shall govern over any conflicting provisions of any other approval. These conditions shall prevail and supersede over any conflicting provisions of the RIR to the extent of a conflict.
7. All approvals by City, unless otherwise specified, shall be by the head of the department requiring the condition. Unless otherwise specified herein, all agreements, deposits and other documents required herein where City is a party shall be in a form approved by the City Attorney. The Park Owner shall pay the cost for review and approval of such agreements and deposit necessary funds pursuant to the Reimbursement Agreement entered into between the City and Park Owner dated July 15, 2020 (“Reimbursement Agreement”).
8. Park Owner, and each of them, for themselves and their successors in interest (“Indemnitors”), agree to defend, indemnify and hold harmless the City of Carson, its agents, officers, and employees, and each of them (“Indemnitees”), from and against any and all claims, liabilities, damages, losses, costs, fees, expenses, penalties, errors, omissions, forfeitures, actions, and proceedings (collectively, “Claims”) against Indemnitees to attack, set aside, void, or annul the RIR approval that is the subject of these conditions, and any Claims against Indemnitees which are in any way related to Indemnitees’ review of or decision upon the RIR (including without limitation any Claims related to any finding, determination, or claim of exemption made by Indemnitees pursuant to the requirements of the California Environmental Quality Act), and any Claims against Indemnitees which are in any way related to any damage or harm to people

or property, real or personal, arising from consideration or approval of the RIR or Indemnitors' operations related thereto or in furtherance thereof. The City will promptly notify Indemnitors of any such claim, action or proceeding against Indemnitees, and, at the option of the City, Indemnitors shall either undertake the defense of the matter or pay Indemnitees' associated legal costs, or shall advance funds assessed by the City to pay for the defense of the matter by the City Attorney. In the event the City opts for Indemnitors to undertake defense of the matter, the City will cooperate reasonably in the defense, but retains the right to settle or abandon the matter subject to Indemnitors' consent, which consent shall not be unreasonably withheld. In the event the City undertakes defense of the matter, Indemnitors shall provide a deposit to the City in the amount of 20% of the City's estimate, in its reasonable discretion, of the cost of litigation, and shall make additional deposits as requested by the City to keep the deposit at such level. If Indemnitors fail to provide or maintain the deposit, Indemnitees may abandon defense of the action and Indemnitors shall pay all costs resulting therefrom and Indemnitees shall have no liability to Indemnitors.

9. Park Owner shall perform the relocation impact mitigation measures set forth in the RIR as approved with modifications pursuant to the Resolution, including these conditions (the "Approved RIR"), in accordance with the procedures, terms, conditions and requirements set forth in the Approved RIR. The required relocation impact mitigation measures include but are not limited to the following:

- a. (Option A) In situations where it is feasible to relocate a mobile home to an available space in a comparable mobilehome park within a reasonable distance of the Park, payment will be provided as set forth below to Eligible Resident Owners or their successors-in-interest (Eligible Resident Owners are registered owner(s) of the mobilehome with title, or trustors or beneficiaries of living trusts holding title to the mobilehome or holding a life estate in the mobilehome, whose mobilehome was located in the Park and who resided in the mobilehome as of the Effective Date of the Resolution):
 - i. Reimburse the actual cost to relocate the mobile home, including without limitation, to disassemble, transport, reassemble and level the mobile home and all permitted moveable accessory structures (awnings, skirting, porches, carports, storage structures, skirting, etc.) to another mobile home park within a reasonable distance of the Park. Transportation of the mobile home will be arranged by the relocation specialist and provided by a licensed, bonded and insured mover, who will disconnect and reconnect all utilities and obtain all required permits;
 - ii. Payment of moving costs associated with moving all personal property, allowance to be determined based on the most current federal fixed move schedule for the state of California and the size of the displacement dwelling and/or professional mover bids;
 - iii. Payment up to \$1,500 for necessary modifications to the mobile home to accommodate a handicapped or disabled person within the replacement park, if the current mobile home has already been modified;
 - iv. Services of a relocation specialist to assist owners through aspects of the relocation to include, but not be limited to, explaining options and relocation

assistance program details, identifying replacement units, coordinate moving arrangements and payment of benefits, not to exceed eight hours of assistance from the relocation specialist.

- b. (Option B) In situations where it is not feasible to relocate the mobile home to an available space in a comparable mobilehome park within a reasonable distance of the Park, payment will be provided to an Eligible Resident Owner as follows:
- i. Lump sum payment equal to the on-site value of the mobile home as determined by James Brabant, MAI, set forth in the appraisal report attached to the Resolution as Exhibit “C”, plus additional moving and relocation assistance provided below, with any outstanding liens, unpaid property taxes, HCD registration fees, or any other outstanding or required payments first deducted;
 - ii. An additional lump sum of \$3,200 for a one-bedroom mobilehome, \$3,800 for a two-bedroom, and \$4,800 for a three-bedroom as rental assistance in the form of first and last month’s rent for subsequent housing;
 - iii. An extra \$1,000 will be provided to Eligible Resident Owners who are 62 years of age or older and/or disabled.
 - iv. Payment of moving costs associated with moving all personal property, allowance to be determined based on the most current federal fixed move schedule for the state of California and the size of the displacement dwelling and/or professional mover bids;
 - v. Services of a relocation specialist to assist Eligible Resident Owners through aspects of the relocation to include, but not be limited to, explaining options and relocation assistance program details, identifying replacement units, coordinate moving arrangements and payment of benefits, not to exceed eight hours of assistance from the relocation specialist;
 - vi. If the Eligible Resident Owner chooses to transfer the mobilehome to the Park Owner, the Park Owner will be physically and financially responsible for any disposal or disposition of the dwelling;
 - vii. Upon the issuance of the six-month Notice of Termination by the Park Owner, Eligible Resident Owners may submit written requests to the Park Owner and/or relocation specialist to receive appropriate relocation benefits and will be immediately entitled to the services of the relocation specialist. All of the monetary benefits shall be paid by 30 days prior to the resident’s actual vacation of the Park provided that the resident provides assurances to the satisfaction of the Park Owner that adequate arrangements have been made to vacate the Park and that advance funding is needed to pay the relocation expense. Otherwise, monetary benefits shall be paid in full on or before the date of vacation of the Park by the Eligible Resident Owner.
- c. For Eligible Home Renters (those who occupy a Park-owned mobilehome and are named on its lease agreement with Park Owner at the time the Impact Report was filed with the City (December 30, 2020), the Park Owner will provide a fixed payment based on the federal fixed move schedule for the State of California to assist

with moving their personal property to a replacement dwelling provided the renter and all other occupants permanently vacate the Park.

- d. Where services of a relocation specialist are to be provided as set forth herein, a relocation specialist shall be made available to assist mobile home owner residents with their relocation assistance needs, up to 8 hours per household or more as may be granted by the Park Owner, which shall include the following:
 - i. Be available to provide an explanation of benefits, so residents have a full understanding of the issues related to the closure of the Park;
 - ii. Provide assistance as needed and requested to lessen hardships by working with real estate agents, property managers, lenders, health care providers and others;
 - iii. Search for available replacement dwellings within and outside the City of Carson or in the area desired by the resident;
 - iv. Provide assistance in claiming relocation assistance funds from the Park Owner; and
 - v. Other individual assistance that may be required on a case-by-case basis.

10. Procedures for claiming of benefits and other relocation plan logistics not addressed in these conditions shall be as stated in the RIR. In the event of any ambiguity or uncertainty, the relocation specialist will work with the affected resident(s) to resolve the issue in a mutually agreeable fashion, and any such issues that cannot be resolved between the relocation specialist and the resident(s) shall be subject to final determination by the Director, or the Special Master pursuant to Condition No. 18 where applicable.

11. Pursuant to CMC Section 9128.21(H), within 45 days of effectiveness of the Resolution, Park Owner shall give: (1) a notice of the Approved RIR, including a copy of the Resolution; and (2) a 6-month notice of termination of the termination of tenancy and closure of the Park as required by Civil Code section 798.56(g)(2)(A) (as renumbered pursuant to AB 2782) and CMC Section 9128.21(H). At the appropriate time(s), Park Owner shall also provide any further notice as may be required for termination of tenancy under applicable law, including but not limited to Civil Code sections 798.56 and 798.57. When necessary, Park Owner shall also provide any the notices required by Condition No. 12, below.

12. Eligible Resident Owners shall select in writing their choice of a relocation impact mitigation assistance package option after the effective date of the Resolution and after the resident receives the required 6-month notice of termination of tenancy pursuant to Condition 11. If an Eligible Resident Owner has failed or refused to select a relocation assistance option by the date of termination of their Park tenancy, the following relocation assistance packages shall be automatically applied, provided the Park Owner has given the Eligible Resident Owner a final notice (via personal delivery or certified mail, with delivery to the Eligible Resident Owner or a member of his/her household confirmed) 30 days in advance of same: (i) in situations where it is feasible to relocate the mobile home to a comparable mobile home park within a reasonable distance of the Park – Option A; (ii) in situations where it is not feasible to relocate the mobile home to a comparable mobile home park within a reasonable distance of the Park – Option B. If by the date of termination of the Park tenancy the Eligible Resident Owner has failed or refused

to select a relocation assistance option and the Park Owner has failed to give the notice required by this condition, Option B shall apply.

13. The determination of whether it is feasible to relocate a mobile home to an available space in a comparable mobilehome park within a reasonable distance of the Park, for purposes of determining applicability of Option A vs. Option B, is to be made initially by the relocation specialist in accordance with these conditions and the language of CMC Section 9128.21(E)(7) (i.e., “a mobile home [that] cannot be relocated within a reasonable distance to a comparable park”), and is subject to final approval of the Special Master pursuant to Condition No. 18 in the event a mobile home owner disputes the determination of the relocation specialist. “Within a reasonable distance,” for purposes of this determination, shall mean and be interpreted as “within 50 miles” of the Park, unless the resident mobile home owner expressly agrees in writing to a greater distance.

14. Any relocation impact mitigation benefits provided by the Park Owner may be conditioned on (i) the completion of actual arrangements to move a mobile home and improvements (if Option A applies), or the conveyance of title to the existing mobile home to the Park Owner (if Option B applies and the resident wishes to have the Park Owner pay the costs of removal and disposition of the mobilehome), and/or (ii) the resident agreeing in writing to permanently vacate the Park no later than the date of termination of his or her Park tenancy in accordance with the Approved RIR. Where Option B applies and an Eligible Resident Owner wishes to convey title to their mobilehome to the Park Owner in order to have the Park Owner pay the costs of removal and disposition of the mobilehome, the Eligible Resident Owner and the Park Owner shall enter into a relocation agreement which specifies and requires payment of the applicable Option B relocation impact mitigation measures in accordance with the Approved RIR, and any additional benefits as may be as mutually agreed upon. All relocation agreements entered into between the Park Owner and Park residents shall be in a form approved by the City Attorney and shall provide for the Park Owner to pay any and all escrow closing costs in connection with the conveyance of title to the mobilehome.

15. For all Park residents, the Park Owner may take into consideration individual circumstances of documented hardship to provide additional relief to the resident beyond the required mitigation measures set forth in the Approved RIR, at the sole discretion of the Park Owner.

16. Unless otherwise expressly provided in the applicable relocation assistance mitigation measure, all relocation impact mitigation measures provided for in the Approved RIR shall be fully performed as to each Park resident after Park Owner provides the 6-month notice of termination of tenancy and at least 30 days prior to the earlier of (i) the move-out date mutually agreed upon by and between the Park resident and the Park owner in a relocation agreement, or (2) the date of termination of the Park resident’s tenancy, provided that in either event, all applicable conditions to payment of relocation assistance set forth in the Approved RIR shall have been satisfied prior to the resident being entitled to payment. No resident shall be required to vacate a space in the Park unless Park Owner is in substantial compliance with all relocation impact mitigation measures imposed in the Approved RIR pertaining to such resident, and has otherwise fulfilled the notice requirements of Civil Code Sections 798.56 and 798.57, and the notice required in CMC Sections 4700 through 4709 to the extent applicable.

17. Park residents who believe that the appraisal relied upon for purposes of the Resolution failed to adequately consider or account for any upgrade or improvement made to their mobile home may submit an application to the Director for an adjusted appraisal of their mobile home within 30 days of the effective date of the Resolution (as set forth in Section 5 thereof). For the application to be eligible for consideration, the resident must provide all of the following information:

- a) resident's name;
- b) resident's space number;
- c) the specific improvement or upgrade the resident contends was not taken into account in the appraisal;
- d) proof of the cost of the asserted improvement or upgrade;
- e) the date when the asserted improvement or upgrade was made;
- f) photographs depicting the asserted improvement or upgrade; and
- g) copies of any and all permits required for the asserted improvement or upgrade.

Following initial review by the Director or his designee to address and/or correct any errors or omissions, if the Director or his designee determines that the application demonstrates a reasonable likelihood that an upgrade or improvement was not adequately considered or accounted for in the appraisal, the Director will direct the City's appraiser (James Brabant, MAI) to inspect (by remote means if necessary) the mobile home and/or any relevant documentation, and if necessary, adjust the appraisal of the mobile home only with respect to the upgrade or improvement in question in accordance with the following parameters:

- 1) Identified improvement(s) or upgrade(s) must be absent from appraisal and NADA sheets, and with a reported cost in excess of \$1,000;
- 2) Paid invoice or other verifiable proofs of purchase and required permits (if applicable) must be provided with initial adjustment application;
- 3) Non-structural upgrades must have been completed within the last five (5) years;
- 4) Structural upgrades must have been permitted (if required) and completed within the last ten (10) years;

Any modification to the appraised value of the mobile home pursuant to any such adjusted appraisal will be deemed integrated into the appraised in-place market value payment amount approved for the subject mobile home for purposes of Option B, and this modified value will control over the original appraised value for purposes of relocation impact mitigation assistance entitlement pursuant to the Approved RIR. The adjusted appraisal shall not change the method of appraisal or standards previously applied to the original appraisal, but shall only take into account the value of the upgrade or improvement previously not taken into account.

18. At the sole expense of the Park Owner, the City shall retain an independent third-party Special Master who shall have final administrative authority to decide, in accordance with the provisions of the Approved RIR: (i) disputes as to who is entitled to receive the relocation benefits pursuant to the Approved RIR, including who constitutes an Eligible Resident Owner or an Eligible Home Renter; (ii) disputes as to which benefit package (i.e., Option A or B) an Eligible Resident Owner qualifies for or is entitled to, including whether it is feasible to relocate a mobilehome to an available space in a comparable mobilehome park within a reasonable distance of the Park pursuant to Condition No. 13; and (iii) demonstrated special circumstance

claims (e.g., medical or disability) of Park residents related to the Park closure. The services of the Special Master shall be funded by the Park Owner pursuant to the Reimbursement Agreement or another reimbursement agreement to be negotiated. The Special Master shall at all times be and remain neutral and unbiased.

19. The City shall retain jurisdiction to enforce these conditions until the later of the following dates: (i) one year after expiration of the effective period of Approved RIR; or (ii) one year after all Park residents have vacated the Park pursuant to the Approved RIR. In the event the effective period of the Approved RIR is extended pursuant to CMC Section 9128.21(I)(2), the City Council's jurisdiction to enforce these conditions (subject to any modifications made in connection with the extension approval in accordance with CMC Section 9128.21(I)(2)) shall extend to the corresponding dates with reference to the extension period.

Exhibit A – Legal Description of the Park

PARCEL 1:

THAT PORTION OF LOT 14 OF THE BASSETT TRACT, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, IN BOOK 2, PAGE 44 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEAST CORNER OF SAID LOT; THENCE NORTHWESTERLY ALONG THE EAST LINE 369.80 FEET TO THE NORTH LINE, THENCE WESTERLY ALONG THE NORTH LINE 330.71 FEET TO A POINT, THENCE SOUTHWESTERLY 367.17 FEET MORE OR LESS, TO A POINT IN THE SOUTH LINE OF SAID LOT, DISTANT WESTERLY 331.10 FEET, FROM THE SOUTHEAST CORNER; THENCE EASTERLY ALONG THE SOUTH LINE 331.10 FEET TO THE POINT OF BEGINNING.

EXCEPT THEREFROM THE NORTH 233.05 FEET OF SAID PORTION.

PARCEL 2:

THE EASTERLY 5 ACRES OF LOT 15, (ACREAGE ESTIMATED TO THE CENTER OF PALM AVENUE, NOW 165TH STREET, AND THE WESTERLY LINE OF SAID 5 ACRES BEING PARALLEL WITH THE EASTERLY LINE OF SAID LOT) OF THE BASSETT TRACT, AS PER MAP RECORDED IN BOOK 2 PAGE 44 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.



RELOCATION IMPACT REPORT

Rancho Dominguez Mobile Estates

Prepared for:

Carter-Spencer Enterprises, LLC
435 E. Gardena Boulevard
Gardena, CA, 90248

Prepared by:

OPC
3750 Schauffele Avenue, Suite 150
Long Beach, CA 90808
(562) 304-2000

December 29, 2020

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Introduction

Rancho Dominguez Mobile Estates is an 81-space residential mobile home park (“Park”) situated on real property located in Carson, CA. The property is currently owned and operated by Carter-Spencer Enterprises, LLC (“Owner”). The Owner of the Park has submitted an application to the City of Carson to close the Park.

As a result of the proposed Park closure, a Relocation Impact Report must be prepared in accordance with the State of California Government Code and Mobile Home Residency Law and the City of Carson’s Municipal Code Chapter 8 – 9128.21 (“Ordinance”); the purpose of which is to report on the impact of the proposed Park closure upon the residents of the Park.

In 1978, the California Legislature enacted the Mobile Home Residency Law (Civil Code Section 798 et seq.) (“MRL”) which provides a comprehensive statewide regulatory scheme governing the use and closure of mobile home parks (Civil Code sections 798 et seq. and Government Code sections 65863.7-65863.8.). In anticipation of the need to prepare for closure of the Park, Overland, Pacific & Cutler, LLC (OPC) has been contracted to prepare a Relocation Impact Report (Report or RIR) as required by the MRL, the Government Code and the Ordinance.

Among the mandates of Code Section 65863.7 are the requirements to “...*report on the impact of the conversion, closure or cessation of use upon the displaced residents of the mobile home park to be converted or closed*” and “...*address the availability of adequate replacement housing in mobile home parks and relocation costs.*” The measures required to mitigate any adverse impact of the conversion, closure, or cessation of use on the ability of displaced mobilehome park residents to find adequate housing in a mobilehome park shall not exceed the reasonable costs of relocation pursuant to Section 65863.7. In addition, the Owner must notify residents of the Park of the proposed change in use, in accordance with Section 65863.8.

Prior to the closure of the Park, the Owner and all residents of the Park shall have the right to, and the availability of, a public hearing before the legislative body on the sufficiency of this Report and the proposed relocation assistance described in Section 65863.7 of the Government Code and Section D of the Ordinance. This Report will address all homeowners and occupants of the Park as of January 2020.

In order to prepare this Report, OPC reviewed resident data that was provided to us by the residents and the Owner and performed a comprehensive study of mobile home park resources and other housing resources. Consistent with MRL, the Government Code, and the Ordinance, this Report presents recommendations concerning the mitigation of relocation impacts associated with the closure of the Park.

Mobile Home Park Location and Description

A. Regional Location

The Park is a residential mobile home park situated on the real property located at 435 E. Gardena Boulevard, Gardena, CA 90248 within Los Angeles County, CA (Figure 1: *Regional Mobile Home Park Location*).

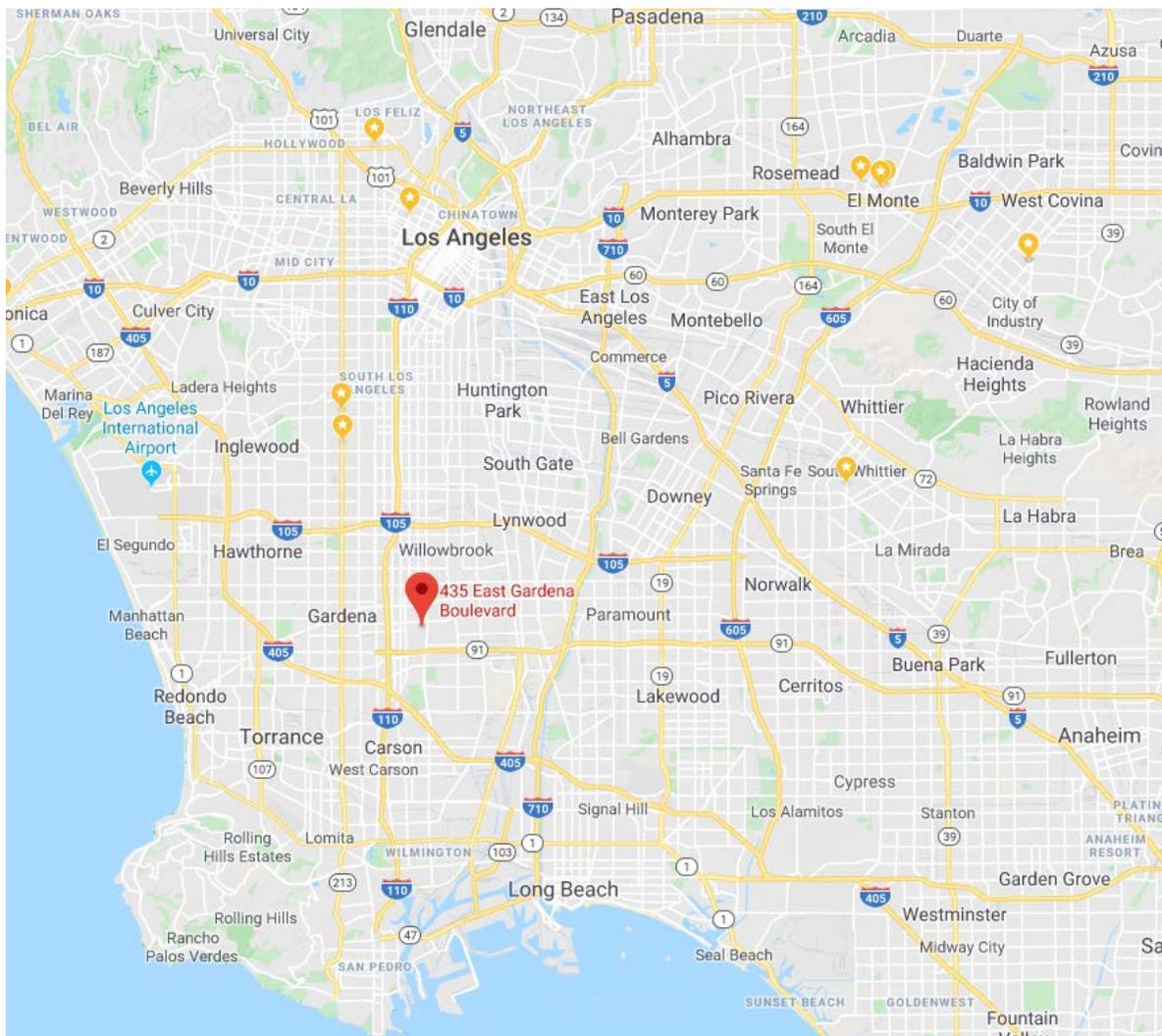


Figure 1: Regional Mobile Home Park Location

B. Park Site Location

The Park, situated on approximately 5.74 acres, is bounded by E. Alondra Boulevard to the north, E. Gardena Boulevard to the south, S. Avalon Boulevard to the east, and S. Main Street to the west (Figure 2: *Mobile Home Park Site Location*). The legal description of the Park property is found in **Exhibit A**.

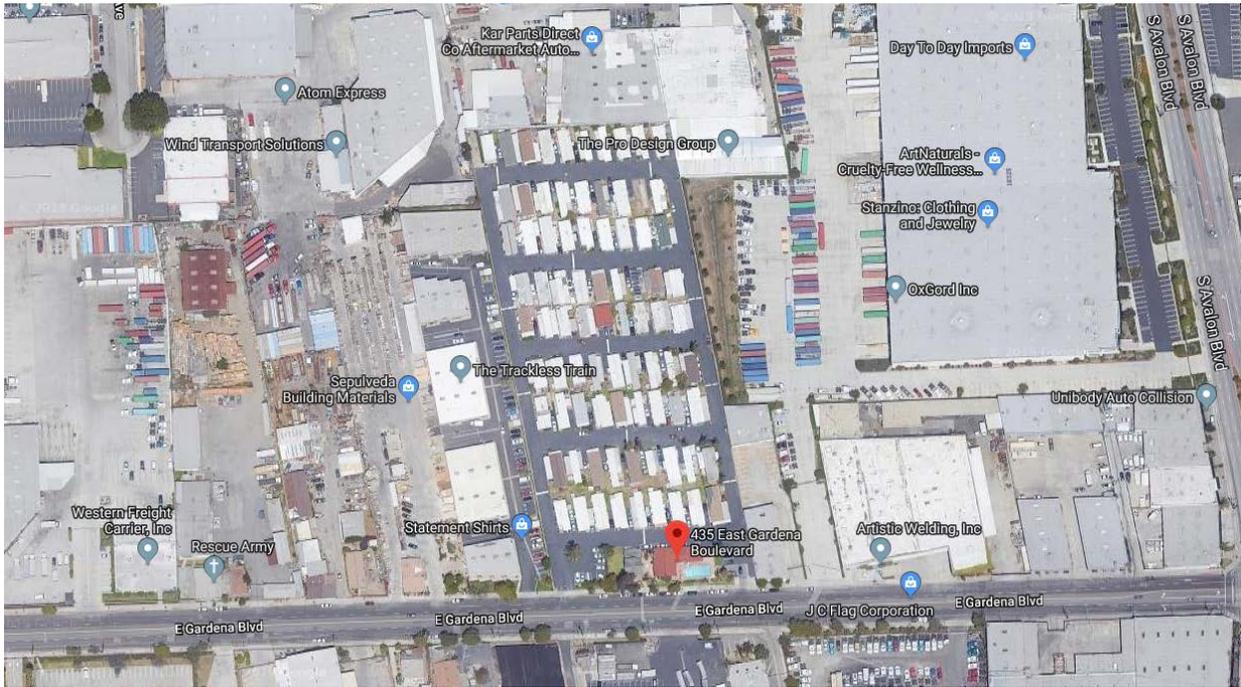


Figure 2: Mobile Home Site Location

C. Mobile Home Park Description

The Park is an 81-space, all age community located in an industrial area of Carson, California. There are two additional structures on the site: a stick-built single-family residence at the park entry and a community recreation building with laundry room. A map of the Park is presented in **Exhibit B** of this report.

The average age of the homes in the Park is 47 years old. All of the units (based on data provided by 41 respondent Park households and the Park Owner) are at least 20 years old. Many of the homes have one or more types of improvements such as porches, patios, sheds, hardscape, landscape and carports.

The Park has a pool, recreation room, laundry facilities and a play area.

The Park residents pay for gas, water and electric services. The Park Owner pays for trash service.

The current Park Owner's family has owned the property since the 1930's. The Park Owner's family built Rancho Dominguez Mobile Estates in 1962 and has operated it continuously since.

However, the Park is legally required to close as a result of the expiration of its legal, nonconforming use. When the Park was first developed prior to the City of Carson's incorporation, mobilehome parks could be located in light manufacturing zones (formerly known as M-1 zones, now re-designated as ML zones) when issued a "use variance." However, after the City was incorporated, it adopted Ordinance No. 77-413 (the "Ordinance") in 1977. The Ordinance provided that mobilehome parks were no longer permitted uses in manufacturing-zoned districts. (Carson Muni. Code § 9141.1) Mobilehome park usage in these zones therefore became "legal, nonconforming." The Ordinance granted a period of thirty-five (35) years, from October 1977, after which time the nonconforming use must terminate or be made conforming. This period expired in November 2012.

On or about April 20, 2000, the City informed the Park's owner that the Park's legal conforming use would no longer be legal as of November 2, 2012. The Park informed its residents and all future residents that the Park would have to close at that time. In April 2011, the Park Owner met with the City's Planning Director and City Attorney to seek an extension of the use. The City officials opposed any formal extension and stated that the Park would have to be closed. In a letter dated July 10, 2012, the Park Owner's representative wrote to City officials and informed them that pursuant to Government Code section 65863.7(g), the City is the entity proposing the change in use and is responsible for the preparation of the relocation impact report and any mitigation measures. The Park Owner also objected that it was unable to amortize its investment during the 35-year period because of the imposition of strict rent controls and vacancy control.

The City officials and the Park Owner traded various proposals and potential solutions in the following years. In 2015, the City enacted a moratorium on mobilehome park closures. The moratorium expired in December 2017. In 2019, Park Owner filed an application with the City to close the Park. The application stated that the City was the entity responsible for preparation of the Impact Report and is required to take steps to

mitigate any adverse impact on the Park's residents to find housing in mobilehome parks. However, City failed to do so, requiring Park Owner to prepare this Impact Report.

The Park Owner anticipates developing the property into denser workforce housing and possible mixed-use appropriate to the industrial location, where the Park remains an underdeveloped parcel. Attached as Exhibit "I" is a site/yield study commissioned by Park Owner and produced by Withee Malcolm Architects, LLP, demonstrating potential redevelopment of the Property from 81 mobilehome spaces into 174 1-, 2-, and 3-bedroom apartments, thereby more than doubling the current housing provided by the Property. Accordingly, the anticipated future use of the Property would include and contribute to housing opportunities for low- and moderate-income households within the City of Carson and would not materially contribute to a shortage of housing opportunities for low- and moderate-income households.

There is no intent to sell the Park, so Residents have not been offered the option of a long-term lease of the land and purchase of the improvements.

The proposed RIR does not involve any change to the existing zoning designations or General Plan land use designations. The City's consideration of the proposed RIR is not subject to review under the California Environmental Quality Act (CEQA), because it does not constitute a "project" within the meaning of CEQA. (Pub. Res. Code §21065; 14 CCR §15378). Approval of the RIR does not constitute "approval" of any "project" for purposes of CEQA, because the RIR is not a project, and because approval of the RIR does not commit the City to a definite course of action or foreclose options or alternatives in regard to any project (14 CCR §15352).

Mobile Home Park Resident Profile

This Report is being prepared based on the known occupants of the Park as of January 2020. As of the date of this Report, there are 57 owner-occupied spaces and 24 tenant-occupied spaces (Park-owned units).

Three resident meetings were held on October 21, 2019 and October 23, 2019 to inform the Park residents of the Park Owner's intention to close the Park. Information was provided at the meetings regarding the residents' rights, the park closure process, and the estimated Park closure timeframe, including the requirement to survey the Park

residents and prepare the Report. The residents were provided with written information about the Park closure as well (Exhibit C).

In October 2019, resident questionnaires, approved by the City of Carson (“City Questionnaires”), were mailed to all Park households. A letter requesting and encouraging residents to complete and return the questionnaires, in order to be represented in the RIR, and to assist the Park Owner with fully understanding the impacts a Park closure would have on residents, were also mailed at that time (**Exhibit C**).

Reminder letters regarding the importance of completing and returning the questionnaires were mailed to all households who had not yet returned a completed questionnaire as of late November 2019 (**Exhibit C**). The questionnaire forms have been available to residents since mid-October 2019.

A third letter was delivered to the residents in August 2020 regarding the appraisal process and site inspections by the appraiser (**Exhibit C**). The letter explained the importance of providing the appraiser with information and encouraged residents to submit photos or other evidence of any home improvements. The residents were also provided with a Homeowner Disclosure form (in English and Spanish) at that time as another opportunity to provide additional information about their homes to the appraiser (Exhibit C). All letters were provided in English and Spanish.

Completed, or partially completed, questionnaires were returned by 41 of the 81 Park households as of October 2020.

Mobile homes in the Park are either owned by the occupant/resident or owned by the Park and rented to the occupant/renter. Based upon the information provided by the residents and the Park Owner, 57 of the homes are owner-occupied, and there are 24 Park-owned units occupied by tenants. Non-owner occupants are not mobile home residents under the MRL or Ordinance and are not entitled to relocation mitigation assistance under the MRL or Ordinance. Verification of ownership will be required as part of the relocation process.

A summary of available Park resident City Questionnaire responses is provided in **Exhibit D**. (Completed questionnaires with additional personal information regarding the household, i.e. income level, disabilities, etc., was provided to the City of Carson under separate and private cover per the requirements of the Ordinance, together with a

Confidential Resident Information spreadsheet.) The resident-reported information has not been confirmed.

There is incomplete household data in some instances due to the lack of response to multiple survey requests, and/or although a household may have completed and returned a questionnaire, some residents declined to provide information about specific aspects of their household. The following data was reported but has not been verified. The residents will be required to provide written documentation of ownership, income, age, occupancy, special needs, loans balances, etc. at the time of relocations.

The 41 respondent households are comprised of a total of 94 adults and 21 children (17 years or younger) for a total of 115 residents. Sixteen households reported having at least one senior member (62 years of age or older), and eight households reported at least one member with a disability. (In California, disability is defined by the Fair Employment and Housing Act (FEHA) as an actual or perceived physical or mental disability or medical condition that is disabling, potentially disabling or perceived to be disabling or potentially disabling, which limits a major life activity). The total numbers of reported senior and disabled individuals are also depicted in **Table 1** below:

TABLE 1: Tenant Occupancy Data			
Adults	Children	Senior	Disabled
94	21	22	8

Of the 41 households who responded, 35 households provided unsubstantiated information regarding gross household income. According to income standards for Los Angeles County (**Exhibit E**) adjusted for family size as published by the United States Department of Housing and Urban Development (HUD), the households, as self-reported, would qualify as follows in **Table 2**:

TABLE 2: Park Household Incomes	
Income Level	# of Households
Extremely Low Income (30% or less of area median income)	11
Very Low Income (31% - 50% of area median income)	10
Low Income (51% - 80% of area median income)	11
Above Low Income (> 80% of area median income)	3
Unknown Income	6

None of the respondent households reported existing loans on their homes.

The mobile homes within the Park were reported to be one-bedroom, two-bedroom and three-bedroom units, although due to COVID 19 restrictions, bedroom counts are not verified at this time. Bedroom count and size of units is reported in **Exhibit D**.

Replacement Housing Resources

One of the impacts of the proposed closure may be the Park residents' need to identify the availability of replacement sites to which a mobile home could be moved or other replacement housing options. Per the Ordinance, available spaces in comparable mobile home parks within a 50-mile radius have been identified within the RIR. Initially, a search was conducted of all mobile home parks within a 30-mile radius, regardless of actual comparability to the Park.

For parks within 31-50 miles of the Park, the following comparability criterion was applied: size of the park (number of spaces), restrictions (senior versus family), space rent, and amenities. When interviewed, the current Park residents consistently stated they wanted to remain in the Carson community or as close as possible. Therefore, all parks, regardless of comparability, were included in the search up to 30 miles to present more options to the Park residents. Following is information on the availability of replacement sites in mobile home parks; mobile homes for sale and rent; and availability of all types of rental housing.

A. Mobile Home Park Space

A search was conducted to determine the availability of vacant mobile home spaces or pads in parks as described above. A complete list of the parks with the number of available spaces and conditions, and the reported type of mobile homes and residents accepted, is presented in **Exhibit F**.

Based on the survey of mobile home parks and of those parks where a representative was available to answer questions, 37 available vacant spaces were identified. Space rents for these parks range from \$790 to \$2,100 per month, depending on the size and location.

Although some of the mobile homes within the Park are in fair to good condition, there are other limitations to moving them to another park. Generally accepted standards and practices among mobile home park operators allow homes to be moved into the park if they are less than five years old and deny homes that are more than ten years old.

While some park operators may allow homes in excess of 10 years, they are generally not accepted and would have to be approved on an individual basis. None of the existing homes within the Park meet the ten-year age standard based on information provided and may be considered for acceptance by another park in the immediate vicinity.

Therefore, under the above generally accepted standards and practices, it is a reasonable assumption that none of the Park mobile homes may be relocated to a comparable mobile home park within the vicinity of the Park.

No written commitments from mobile home park owners willing to accept displaced residents were sought or obtained. It is the relocation specialist’s universal experience that park owners will not provide written commitments to accept relocated homes without knowing information about the home, when the homeowner seeks to relocate to their park, or whether the park owner will have a vacant space at that unknown future time.

B. Mobile Homes For Sale

A survey of for-sale mobile homes currently on the market identified 230 mobile homes for sale within comparable parks in a 50-mile radius, with prices ranging from \$12,500 to \$299,900, although the majority of dwellings were listed between \$50,000 - \$150,000. Mobile homes with higher sale prices may include the land, making it very much like single family residences or condominium units with common area maintenance monthly dues instead of space rents. Higher prices also indicate more park amenities and newer manufactured homes or mobile homes than exist at the Park.

An additional reason homes in those parks are priced higher is if they are in a rent-controlled City, because lower rents create high home prices. The available mobile homes for sale that were surveyed can also be found in **Exhibit F**. The results are as of October 2020, although it is an ever-changing market, and the results are a snapshot in time.

New mobile homes for sale were also researched with the following results shown in **Table 3** below:

TABLE 3: New Mobile Homes for Sale				
Company	1 BR	2 BR	3 BR	Installation & Shipping

Factory Expo	\$26,900 - \$30,400	\$36,444 – 60,389	\$81,295 - \$92,217	\$10,000- 15,000
The Homes Direct	\$42,961 – 49,900	\$50,900 - \$85,900	\$65,637 - \$119,900	\$20,000- 26,000
Home Nation	\$39,946 - \$47,280	\$46,130 - \$51,375	\$86,106 - \$98,293	\$5,000-8,000

As an alternative to purchasing a mobile home, a Park resident may consider purchasing a condominium. A survey for available condos for sale within the vicinity was conducted and the results are shown in **Exhibit G**. Ninety-seven condos for sale were identified with list prices ranging from \$230,000 - \$460,000. A summary per bedroom number is listed in **Table 4** below.

TABLE 4: Availability and Cost of Rental Housing			
Bedroom Size	One	Two	Three
No. Found	37	35	25
Rent Range	\$230,000 - \$399,000	\$250,000 - \$377,000	\$335,000 – 460,000

C. Rental Housing

A mobile home within another park would be considered the most comparable dwelling to what the residents currently occupy. A rental survey was also performed to identify the availability of mobile homes for rent within the Parks identified in **Exhibit F**. One mobile home was available for rent at a total monthly rental rate of \$2,241 for home and space rent.

Due to the limited availability of mobile homes for rent in the area, a search of other types of available low-density rental units (SFR, duplex, tri-plex, quad-plex), townhomes/condos and apartment rental units was conducted. Additional rental housing was identified and is shown in **Table 5** below as a summary of the availability of these types of rental units within a 15-mile radius of the Park.

TABLE 5: Availability and Cost of Rental Housing				
Bedroom Size	Studio	One	Two	Three
No. Found	9	25	62	42
Rent Range	\$950 - \$1,795	\$1,329 - \$2,200	\$1,695 - \$3,950	\$2,095 - \$3,700

Specific listings for rental units can be found in **Exhibit H**.

Moving Costs

Assuming a mobile home could be moved and there was an available location, the Owner will pay for all reasonable costs associated for moving a Park resident's dwelling to another location. These costs may include, but are not limited to, the cost to disassemble an existing mobile home and all appurtenances in the Park, to transport the dwelling, and to reassemble the mobile home and all appurtenances in another mobile home park or location.

General moving estimates were secured by two professional movers – both reviewed and approved by the City of Carson. Their estimated ranges of cost are as follows:

Mover 1: Terra Firma

Estimate:

Single wide \$9,000 - \$12,000

Doublewide \$14,000-\$16,000

(ranges are based on appurtenances and the extent of exterior improvements that can be relocated)

Prices include tear down, transportation, setup, and permits.

The price range includes transportation within 50 miles of subject dwelling.

Mover 2: Hemet Valley

Estimate:

Single wide \$7,000 - \$10,000

Doublewide \$12,000-\$15,000

(ranges are based on appurtenances and the extent of exterior improvements that can be relocated)

Prices include tear down, transportation, setup, and permits. The price range includes transportation within 50 miles of subject dwelling; estimates may vary depending on exact height/width of the unit, specifics of route, the condition of axles, number of awnings, and other factors.

Estimated costs to relocate the personal property within the mobile home to a replacement dwelling are based on the federal fixed move schedule for the state of California and include utility transfer fees. Payment amount examples include \$1,165 for a one-bedroom unit, \$1,375 for a two-bedroom unit and \$1,665 for a three-bedroom unit.

Mobile Home On-Site and Off-Site Values

Appraisals were completed in September 2020 by MAI-certified appraiser James Brabant and his firm, Brabant & Anderson, Inc. Mr. Brabant is qualified to appraise mobile homes, accessory structures and appurtenances and was chosen and hired by

the City Attorney's firm, Aleshire & Wynder. Mr. Brabant was instructed to value each dwelling as required by Section C (6) of the Ordinance. His firm conducted exterior inspections of the individual resident-owned coaches on August 18, 2020, August 19, 2020, and Sept. 10, 2020. Mr. Brabant also reviewed and considered coach owners' responses to the City-approved Resident Questionnaire, and the "Homeowner Disclosure Forms" that were completed by coach owners and compared it to his exterior inspection of each coach. Mr. Brabant prepared an Appraisal Report dated October 9, 2020 that provided his opinions of "on-site" and "off-site" values of the 57 homes owned by Park residents. Mr. Brabant's full report and individual appraised values will be provided with the RIR for each coach owner's review.

The appraised off-site values of the Park units ranged from \$5,300 to 40,000. The appraised on-site values of the Park units ranged from \$8,000 to \$45,000.

Impacts and Proposed Mitigation Measures

The relevant statutory law for the closure of a mobile home park and specific requirements for mitigation are California Government Code Section 65863.7, Civil Code Section 798.56(g), and City of Carson Municipal Code 9128.21, which indicates the City prior to closure will review the steps to be taken by the person proposing the closure to mitigate adverse impacts of the closure on the ability of the displaced mobile home owners to find adequate housing in a mobile home park.

Here, City is the "person proposing the change of use" of Rancho Dominguez Mobile Estates pursuant to Government Code section 65863.7(i) because the closure is the result of a "zoning or planning decision, action or inaction" by the City, and City is the person required to take steps to mitigate the adverse impact of the closure on Park residents.

Given the linkage between mitigation and reasonable relocation costs, the person proposing the closure should determine what elements should be considered in determining "*reasonable costs of relocation*." The scarcity of available mobile home park space and the difficulty or impossibility anticipated in the actual moving and set-up of the majority of the existing mobile homes in the Park allows for the opportunity to provide alternative assistance to secure replacement housing.

A. Impacts to Mobile Home Owners and Park Residents

All residents face the issue of the disposition of their mobile home and relocation to a replacement dwelling. Physical relocation of the existing dwelling to another mobile home park is likely not an option for the majority of the mobile home owners desiring to stay in the immediate vicinity. Finding available alternative space, particularly for older mobile homes, will be a challenge.

The main concern of the Park residents is with the potential financial impact resulting from the loss of affordable pad rent, and where they can afford to relocate. Some of the residents report to be elderly and on fixed incomes, and half of the households reported they are Extremely Low and Very Low Income.

Parents of minor children within the Park expressed the desire to remain within the geographic boundaries of their current schools. Many families have indicated they need to remain in the Carson or nearby area close to employment, current doctors, medical facilities, caregivers, family and other service providers. Nearby access to public transportation is a necessity for some of the households.

Some households reported they have invested money to remodel or improve their Park dwellings and are concerned with recouping their investments. As of the date of this Report, actual improvements and costs have not been verified.

And finally, resident owners with disabilities, including mobility challenges, were reported, which may create a need for these owners to secure replacement housing capable of accommodating the physical disabilities comparable to accommodations in their current dwelling.

B. Relocation Mitigation Measures

Section 65863.7 of the Government Code does not require a local government to impose any mitigation measures, and clearly limits imposition of any measures to mitigate any adverse impact of the closure on the ability of displaced Park resident to find adequate housing in a mobilehome park to the reasonable cost of relocation.

The City faced identical issues as are present here with the closure of Bel Abbey Mobilehome Park. Like Rancho Dominguez, Bel Abbey was located in an area zoned for light manufacturing (ML), and the extension of its “legal nonconforming” status had

expired. In approving relocation mitigation measures for Bel Abbey's closure, the City found the following:

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.

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 unattainable.

Accordingly, the City determined that for "mobilehomes that cannot be moved, all mobilehome owner/occupants who have resided in their mobilehome in the Park continually since the date the RIR was filed with the City, shall be provided compensation equal to the appraised off-site value" plus a lump sum payment of between \$1,800 and \$2,600, depending upon the number of bedrooms of the Mobilehome, plus a maximum of \$1,500 for moving personal belongings, and an extra \$1,000 for households that are elderly (62 years of age) and/or disabled.

As discussed above, the City is the "person proposing the change of use" of Rancho Dominguez Mobile Estates because its closure is the result of a "zoning or planning

decision, action or inaction” and it is required to take steps to mitigate the adverse impact of the closure on Park residents, pursuant to Government Code section 65863.7(i).

However, if this Impact Report receives final approval by the City without imposition of further mitigation conditions, the Park Owner agrees to provide the following relocation costs, relocation assistance, and additional benefits to the mobile home resident-owners without reimbursement from the City. These benefits are intended to follow those approved for the closure of Bel Abbey.

- A. In situations where it is feasible to relocate a mobile home, payment will be provided as set forth below to Eligible Resident Owners. Eligible Resident Owners are registered owner(s) of their mobilehome with clear title, or trustors or beneficiaries of living trusts holding clear title to the mobilehome or hold a life estate in the mobilehome, whose mobilehome was located in the park and who have resided in that mobilehome continually since prior to the date this Impact Report is filed with the City. In the event there may be more than one Eligible Resident Owner of any mobilehome, Park Owner may provide the payments set forth below to any one of them at Park Owner’s election. In no event shall Park Owner be liable to pay more than a single payment of each amount set forth below as relocation mitigation for all residents residing in a rental space.
1. Reimburse the actual cost to relocate the mobile home, including without limitation, to disassemble, transport, reassemble and level the mobile home and all permitted moveable accessory structures (awnings, skirting, porches, carports, storage structures, skirting, etc.) to another mobile home park within 50 miles of the Park. Transportation of the mobilehome will be arranged by the relocation specialist and provided by a licensed, bonded and insured mover, who will disconnect and reconnect all utilities and obtain all required permits;
 2. Payment of moving costs associated with moving all personal property, allowance to be determined based on the most current federal fixed move schedule for the State of California and the size of the displacement dwelling and/or professional mover bids;

3. Payment up to \$1,500 for necessary modifications to the mobile home to accommodate a handicapped or disabled person within the replacement park, if the current mobile home has already been modified;
 4. Services of a relocation specialist to assist owners through aspects of the relocation to include, but not be limited to, explaining options and relocation assistance program details, identifying replacement units, coordinate moving arrangements and payment of benefits, not to exceed eight hours of assistance from the specialist; and
- B. In situations where it is not feasible to relocate the mobile home, and the Eligible Resident Owner rents or buys a replacement dwelling, payment will be provided to an Eligible Resident Owner as follows:
1. Lump sum payment equal to the off-site value of the home as determined by Mr. Brabant using the NADA guide, plus additional moving and relocation assistance provided below, with any outstanding liens, unpaid property taxes HCD registration fees, or any other outstanding or required payments first deducted;
 2. An additional lump sum of \$3,200 for a one-bedroom mobilehome, \$3,800 for a two-bedroom, and \$4,800 for a three-bedroom as rental assistance in the form of first and last month's rent for subsequent housing;
 3. An extra \$1,000 will be provided to Eligible Resident Owners who are 62 years of age or older and/or disabled.
 4. Payment of moving costs associated with moving all personal property, allowance to be determined based on the most current federal fixed move schedule for the State of California and the size of the displacement dwelling and/or professional mover bids;
 5. Services of a relocation specialist to assist Eligible Resident Owners through aspects of the relocation to include, but not be limited to, explaining options and relocation assistance program details, identifying replacement units, coordinate moving arrangements and payment of benefits, not to exceed eight hours of assistance from the specialist;

6. If the Eligible Resident Owner chooses to transfer the mobilehome to the Park Owner, the Park Owner will be physically and financially responsible for any disposal or disposition of the dwelling;
7. Upon the issuance of the six-month Notice of Termination by the Park Owner, Eligible Resident Owners may submit written requests to the Park Owner and/or relocation specialist to receive appropriate relocation benefits and will be immediately entitled to the services of the relocation specialist. All or some portion of the monetary benefits may be paid prior to the resident's actual vacation of the Park provided that the resident provides assurances to the satisfaction of Park Owner that adequate arrangements have been made to vacate the Park and that advance funding is needed to pay the relocation expense. Otherwise, monetary benefits will be paid in full within three (3) days of vacation of the Park by the Eligible Resident Owner.

C. Eligible Home Renter Assistance

1. While the Park Owner has no obligation under law to mitigate relocation costs for households occupied by tenants in Park-owned mobilehomes, the Park Owner will provide a fixed payment based on the federal fixed move schedule for the State of California to Eligible Home Renters (those who occupy a Park-owned mobilehome and are named on its lease agreement with Park Owner at the time of filing the Impact Report) to assist with moving their personal property to a replacement dwelling provided the renter and all other occupants permanently vacate the Park;
2. In consideration of Park Rules which prohibit home owners from subleasing to non-owner residents, and because Park Owner has no obligation under law to mitigate relocation costs for households occupied by non-owner subtenants, no relocation assistance will be provided to subleasing tenants or non-residents. State law does not permit requiring mitigation measures to non-resident mobilehome owners. Any issues or conflicting information concerning home ownership, violation of any Park rules, and verification of residence in the park must be resolved with Park Owner prior to any mitigations being provided.

Relocation Plan / Explanation of Services

It is not known at the time of this Report, how long the actual physical moves of mobile homes would take, nor how many homes will be able to be moved at all. It is the opinion of the author that no mobile home manufactured in 2010 or older will be able to be accepted at any of the mobile home parks within the County of Los Angeles.

There is ample available housing in Carson and other nearby communities for the residents of the Park. While no two communities are alike, the residents undoubtedly have other quality, well-maintained mobile home park communities and other comparable alternatives available for their consideration as housing options. If the objective of Park residents were to continue owning a mobile home, resident owners could be assisted to move their mobile home or provide compensation to assist in the purchase of a replacement mobile home and the other compensation as listed on Pages 14 – 17. We have concluded that it will be challenging to move the majority of the existing mobile homes to another park in the immediate vicinity. If purchasing a replacement mobile home is considered an option, buyers will find an adequate inventory of for-sale mobile homes in good parks throughout Los Angeles County and surrounding counties.

In the event it is unfeasible to move the mobile home, the condo sale and rental housing market in Carson and Los Angeles County offers another option to residents. An adequate supply of available housing options exists in the market for the existing residents to consider.

Any relocation assistance payments will be conditioned on the completion of actual arrangements to move a mobile home and improvements, or the rental/purchase of replacement housing, and upon the resident permanently vacating the Park on a date certain. The residents must also enter into a relocation agreement, which specifies the resident-selected relocation benefits in accordance with this report or as mutually agreed upon.

Current Park residents will have to select in writing their choice of a relocation assistance option after the date the Planning Commission, or if on appeal thereto, the City Council, adopts a resolution or takes other affirmative action that finds under applicable law that this Report is adequate and sufficient and the resident receives a minimum of a 180-day notice to vacate. Notwithstanding that a resident does not timely or otherwise select a relocation assistance option, the resident will still be required to

vacate the Park no sooner than six (6) months following proper notice pursuant to Civil Code section 798.56(g)(2).

Mobile home owners will be offered the assistance of a relocation counselor to assist in identifying replacement dwellings and to coordinate moving arrangements and the payment of relocation assistance. Requests for funds will be timely processed in a reasonable manner and signed acknowledgments of receipt of payments will be maintained in individual relocation files.

It is not within the scope of this Report to address any disputed issues that may have been raised in the process of exploring the Park's closure. The recommendations which have been made however do provide an equitable basis for determining relocation assistance under current regulatory standards. Under the level of proposed assistance, it is anticipated there is the opportunity for all residents to maintain a residence within or in proximity to Carson and the surrounding communities.

Claim forms or agreements will be provided and payments made based on the option selected within the timeframe specified above. The relocation assistance payments will be based on the mitigation measure option chosen by the Park resident. Upon proof of need, adequate advance payments may be made to assist residents with securing replacement housing and final payments will be made after the resident has vacated the Park.

In situations where it is not feasible to move the mobile home, any mobile home owner that is eligible to receive a relocation payment as the owner of the dwelling will need to provide a valid Department of Motor Vehicles or Department of Housing and Community Development title to confirm ownership. **Any title issues will need to be resolved by the unit owner prior to release of funds.**

The procedures for claiming benefits are to be as follows:

1. Claimants will provide all reasonable and necessary documentation to substantiate eligibility for assistance, including income, ownership status, occupancy, etc.;
2. Assistance amounts will be determined;
3. Required claim forms will be prepared by relocation personnel and relocation agreements will be prepared by an attorney. Signed claims,

cooperation agreements, and supporting documentation will be submitted by relocation personnel to the Owner;

4. The Owner will review and if in conformance with the selected relocation program, will reply with concurrence and approval for processing the payment, or request additional information;
5. The relocation specialist will issue benefit checks, which will be available at their offices for pick-up, delivered personally or mailed, depending on circumstances;
6. A final payment will be issued after confirmation the resident has completely vacated the Park;
7. Receipts of payment will be obtained and maintained in the relocation case file.

Throughout the relocation process, a relocation specialist will be available to assist owners with their relocation assistance needs (limited to eight hours per household) including the following:

1. Be available to provide an explanation of benefits, so residents have a full understanding of the issues related to the closure of the mobile home park.
2. Providing assistance as needed and requested to lessen hardships by working with real estate agents, property managers, lenders, health care providers and others.
3. Search for available replacement dwellings within and outside of Carson or in the area desired by the resident.
4. Provide assistance in claiming relocation assistance funds from the Owner.
5. Other individual assistance that may be required on a case by case basis.

Proposed Timetable for Park Closure

The termination of tenancies (closure) will not occur earlier than six (6) months following proper notice pursuant to Civil Code section 798.56(g)(2). The Owner will adhere to all

noticing requirements as outlined in the Ordinance, Government Code and MRL. Upon all required approvals, residents will receive a minimum of six months' notice to vacate.

Conclusion

It is the Owner's intent to adhere to all state law and local regulations in consideration of the Park closure. Additionally, as discussed in this Report, in its entirety, the assistance the Owner is offering is beyond its obligations under the law to lessen the impact of closing the Park, as follows:

- Payment of a lump sum to acquire the dwelling for any eligible resident homeowner's whose home cannot be moved.
- Payment of the actual cost to relocate any mobile home that can be moved.
- Payment of a lump sum to compensate for first and last month's rent at a new dwelling.
- Payment of up to \$1,500 for necessary modifications to the relocated mobile home to accommodate a handicapped or disabled Park resident, if the Park resident currently has a modified unit.
- Payment of moving costs associated with moving all personal property.
- Relocation assistance services of a relocation professional to assist all Park residents;
- Absorbing the cost of removing and disposing of the mobile homes left in the Park for unit owners that elect to sell their mobile home to the Owner.

List of Exhibits:

Exhibit A – Legal Description of the Park
Exhibit B – Park Map
Exhibit C – Resident Correspondence
Exhibit D – Park Resident Questionnaire Responses
Exhibit E – HUD Income Limits
Exhibit F – Available Mobile Home Spaces and Units for Rent/Purchase
Exhibit G – Available Condos for Sale
Exhibit H – Available Rental Housing
Exhibit I – Site / Yield Study

Exhibit A – Legal Description of the Park

PARCEL 1:

THAT PORTION OF LOT 14 OF THE BASSETT TRACT, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, IN BOOK 2, PAGE 44 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEAST CORNER OF SAID LOT; THENCE NORTHWESTERLY ALONG THE EAST LINE 369.80 FEET TO THE NORTH LINE, THENCE WESTERLY ALONG THE NORTH LINE 330.71 FEET TO A POINT, THENCE SOUTHWESTERLY 367.17 FEET MORE OR LESS, TO A POINT IN THE SOUTH LINE OF SAID LOT, DISTANT WESTERLY 331.10 FEET, FROM THE SOUTHEAST CORNER; THENCE EASTERLY ALONG THE SOUTH LINE 331.10 FEET TO THE POINT OF BEGINNING.

EXCEPT THEREFROM THE NORTH 233.05 FEET OF SAID PORTION.

PARCEL 2:

THE EASTERLY 5 ACRES OF LOT 15, (ACREAGE ESTIMATED TO THE CENTER OF PALM AVENUE, NOW 165TH STREET, AND THE WESTERLY LINE OF SAID 5 ACRES BEING PARALLEL WITH THE EASTERLY LINE OF SAID LOT) OF THE BASSETT TRACT, AS PER MAP RECORDED IN BOOK 2 PAGE 44 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

Exhibit B –Park Map

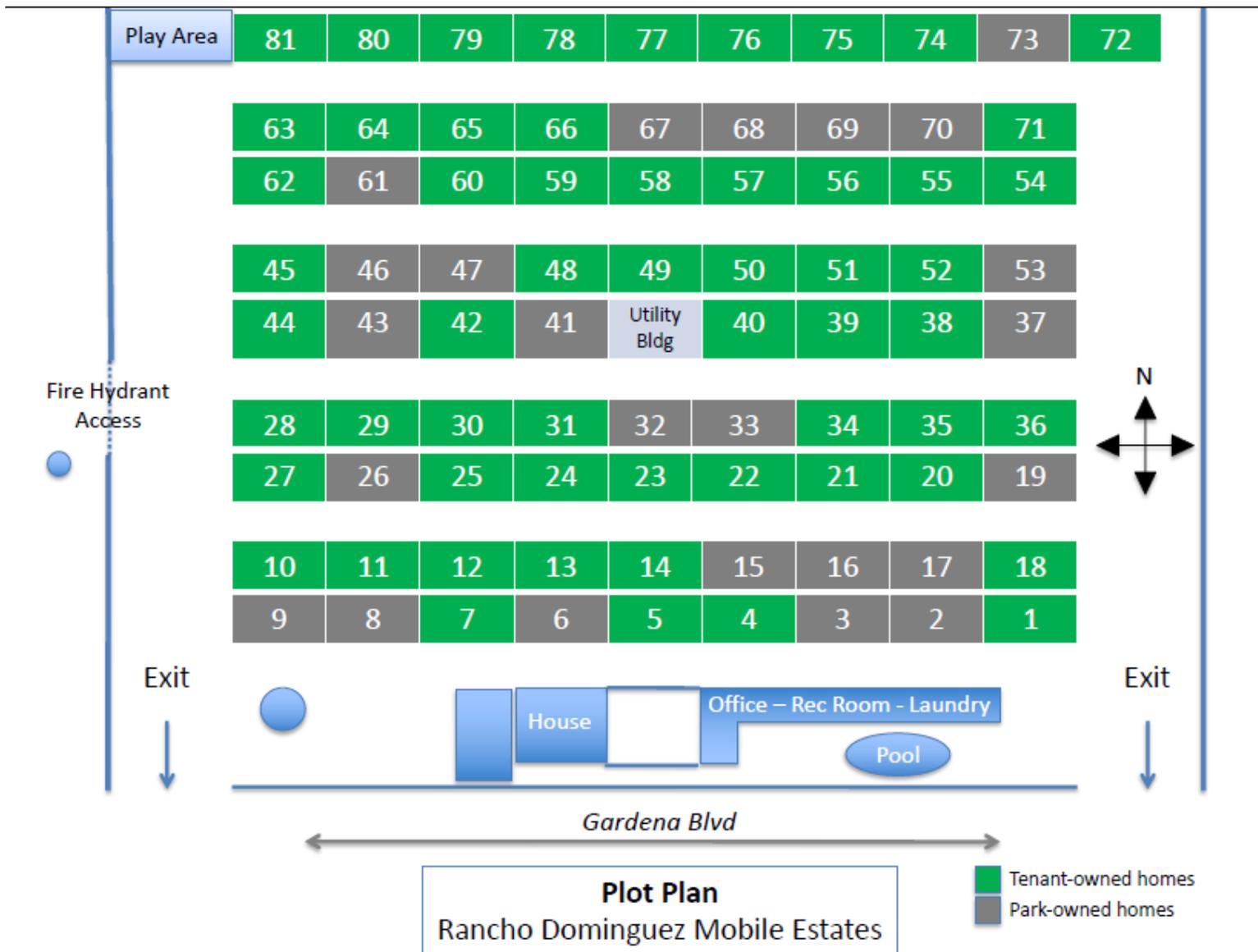


Exhibit C – Resident Correspondence

NOTICE OF INFORMATIONAL MEETING AND NOTICE OF SUBMISSION OF APPLICATION FOR CLOSURE

October 4, 2019

Dear Resident at Rancho Dominguez Mobile Estates:

As you are aware, the City of Carson made clear in written correspondence that, based on the Carson Zoning Ordinance, our mobile home park would have an expiration of its legal non-conforming use effective November 2012. As a consequence, we must comply with this mandate and therefore have filed an Application to the City of Carson for a change of use of the property which will result in the closure of the mobile home park's rental spaces.

Please plan to attend an upcoming informational meeting for mobile homeowners where you will learn more about the closure process and what it will mean for you. There will be a presentation by a relocation consultant and a representative from our legal advisors.

In order to accommodate as many residents and family schedules as possible, we will be holding the informational meeting at two different times:

DATE: October 21, 2019

DATE: October 23, 2019

TIME: 4:30 – 5:30 p.m.

TIME: 6:30-7:30 p.m.

**PLACE: Carson Community Center
801 E. Carson Street / Adult Activity Room**

Parking will be available in the East Parking Lot of the Carson Center located across from the Double Tree Hotel.

IMPORTANT: There will be a sign-up sheet in the RDME Manager's Office. Please select the day that works best for your schedule and reserve your place at that meeting by signing up soon, as seating will be limited. Refreshments will be provided.

NOTE: If you require Spanish translation at the meeting, please call: Norma Jacquez at (800) 400-7346 to confirm a translator will be available.

Rancho Dominguez Mobile Estates
Administration Office

NOTICE OF INFORMATIONAL MEETING
AND
NOTICE OF SUBMISSION OF APPLICATION FOR CLOSURE

October 4, 2019

Dear Resident at Rancho Dominguez Mobile Estates:

As you are aware, the City of Carson made clear in written correspondence that, based on the Carson Zoning Ordinance, our mobile home park would have an expiration of its legal non-conforming use effective November 2012. As a consequence, we must comply with this mandate and therefore have filed an Application to the City of Carson for a change of use of the property which will result in closure of the mobile home park's rental spaces.

Please plan to attend an upcoming informational meeting for tenants of the park where you will learn more about the closure process and what it will mean for you.

PLEASE NOTE: This will be a special meeting for HOME RENTERS ONLY (those residents who do NOT own their mobile homes) held on:

DATE: October 21, 2019

TIME: 6:00 – 7:00 p.m.

**PLACE: Carson Community Center
801 E. Carson Street / Adult Activity Room**

Parking will be available in the East Parking Lot of the Carson Center located across from the Double Tree Hotel.

IMPORTANT: There will be a sign-up sheet in the RDME Manager's Office. Please reserve your place at this meeting by signing up soon. Refreshments will be provided.

NOTE: If you require Spanish translation at the meeting, please call: Norma Jacquez at (800) 400-7346 to confirm a translator will be available.

Rancho Dominguez Mobile Estates
Administration Office

RANCHO DOMINGUEZ

Frequently Asked Questions About Closure

1. **What is the process for closing the park?** The property owner must submit an application to the City of Carson (City) for a conversion permit to allow them to close the park. The property owner must prepare a Relocation Impact Report (RIR) to describe the impacts a park closure would have on the residents of the park and to propose relocation assistance that will be offered to residents of the park. The property owner must submit the RIR to the City for approval by the City Council at a public hearing.

For the closure of Rancho Dominguez, the property owner has engaged a law firm, Cozen O'Connor, to assist them with the legal requirements of the closure process. They have also engaged a relocation company, Overland, Pacific & Cutler, LLC (OPC) to prepare the RIR. The preparation of the RIR will require OPC to collect information from all resident households regarding the impacts a park closure may have on them. OPC has mailed questionnaires to all park households which you should have received. The information you provide will be included in the RIR, together with information on available replacement housing options for park residents.

2. **Will I have to move out?** Yes, once the park closure is approved by the City, you will be provided with written notice at least six months prior to the date on which everyone will need to permanently relocate.
3. **As an owner of a dwelling within the park, do I have any rights related to the park closure?** Yes, the property owner must follow all requirements of California Mobile Home Residency Law and the City of Carson's Municipal Code Chapter 8 – 9128.21 in order to close the park. This includes providing to all park residents a copy of the RIR, and advance written notice of the public hearing by the Carson City Council to consider approval of the RIR and the park closure. It also includes to financial assistance to mitigate any adverse impact of the closure on the ability of displaced mobilehome park residents to find adequate housing in a mobilehome park.
4. **Where will I go?** You may choose to relocate your mobile home to another park or property of your choice and the property owner will pay the cost to relocate the dwelling and your personal property, or you may sell your mobile home and move to another dwelling at a location of your choice. The RIR will list available mobile homes for sale and for rent, as well as available condos for sale and apartments for rent, and you will receive assistance in identifying replacement housing.
5. **What if my household has special needs or circumstances that would make it difficult for us to move from the park?** OPC relocation specialists will be available to you. You may give them the details of your circumstances and how a park closure may impact your household. The property owner will then propose mitigation measures within the RIR to address the impacts. To schedule a phone

interview, please call **(800) 400-7356** and ask for **Norma Jacquez** or **Liset Corona** for an appointment convenient for you.



**RANCHO DOMINGUEZ MOBILE ESTATES
435 E. GARDENA BLVD. GARDENA, CA 90248-2918**

October 30, 2019

Dear Residents:

As you may be aware, the owner of the property known as Rancho Dominguez Mobile Estates (“Mobilehome Park”) located at 435 E. Gardena Boulevard, Gardena, CA 90248 has filed an application to the City of Carson for a change of use of the Mobilehome Park, which will result in closure of the Mobilehome Park rental spaces.

The property owner must complete a Relocation Impact Report (Report) as a requirement of the park closure approval process. The Report will describe the impacts to the Mobilehome Park residents and assistance that will be provided to residents when the park is approved for closure and park residents must permanently relocate.

It is very important that you are represented in the Report. We have included a City-approved questionnaire for you to complete by **Monday, December 02, 2019. Please mail your completed questionnaire to Norma Jacquez, OPC, 3750 Schaufele Avenue, Suite 150, Long Beach, CA 90808.**

If you have questions about how to complete the questionnaire, relocation specialists are available to conduct a phone interview with you, or come to your home, to further clarify your answers on the questionnaire. Please contact Maritza Guevara (Spanish speaker) or Kelly Dewitt (English) at **(800) 400-7356**, if you would like to speak to a relocation specialist regarding the questionnaire.

Again, it is in your best interest to participate and return a completed questionnaire so that your family is represented in the Report before it is submitted to the City for approval.

Thank you,

Norma Jacquez
Project Manager
Overland, Pacific & Cutler, LLC (OPC)

MOBILEHOME OWNER QUESTIONNAIRE

This questionnaire is required pursuant to Carson Ordinance 9128.21 and the information may be used to determine relocation benefits.

Fill out and return by **December 02, 2019** to:

Norma Jacquez at Overland Pacific & Cutler, 3750 Schaufele Ave., Suite 150 Long Beach, CA 90808.

You may use the self-addressed, stamped envelope provided.

PLEASE PRINT

Property: Rancho Dominguez Mobile Estates	Date: ___/___/___
HOUSEHOLD ADDRESS	
425-435 E. Gardena Blvd., Space # _____ Gardena, CA 90248	If you RENT your mobilehome do not complete this form. Please contact the park manager to obtain the correct questionnaire form.
HOUSEHOLD OCCUPANTS (use additional pages as needed)	
Total # of occupants: _____	
HEAD OF HOUSEHOLD (HOH) Do you own <input type="checkbox"/> or rent <input type="checkbox"/> the mobilehome? Move in Date: _____ (month and year)	
1) Name: _____ Gender: F M Primary Language: _____ Interpreter Needed? Y N	
Date of Birth: ___/___/___ Employer/School: _____	
Phone: _____	Monthly Gross Income: \$ _____ Transportation Used: _____
Email: _____	Distance from employment: _____ miles
Disabilities/Special Needs: _____	
2) Name: _____ Gender: F M Language: _____	
Relationship to HOH: _____ Date of Birth: ___/___/___ Employer/School: _____	
Monthly Gross Income: \$ _____ Transportation Used: _____	
Phone/Email: _____	Move In Date: _____ Distance from employment: _____ miles
Disabilities/Special Needs: _____	
3) Name: _____ Gender: F M Language: _____	
Relationship to HOH: _____ Date of Birth: ___/___/___ Employer/School: _____	
Monthly Gross Income: \$ _____ Transportation Used: _____	
Phone/Email: _____	Move In Date: _____ Distance from employment: _____ miles
Disabilities/Special Needs: _____	
4) Name: _____ Gender: F M Language: _____	
Relationship to HOH: _____ Date of Birth: ___/___/___ Employer/School: _____	
Monthly Gross Income: \$ _____ Transportation Used: _____	
Phone/Email: _____	Move In Date: _____ Distance from employment: _____ miles
Disabilities/Special Needs: _____	
5) Name: _____ Gender: F M Language: _____	
Relationship to HOH: _____ Date of Birth: ___/___/___ Employer/School: _____	
Monthly Gross Income: \$ _____ Transportation Used: _____	
Phone/Email: _____	Move In Date: _____ Distance from employment: _____ miles
Disabilities/Special Needs: _____	

MOBILEHOME RENTER QUESTIONNAIRE

Fill out and return by **December 02, 2019** to:
 Overland Pacific & Cutler, 3750 Schaufele Ave., Suite 150 Long Beach, CA 90808.
 You may use the self-addressed, stamped envelope provided.

PLEASE PRINT

Property: Rancho Dominguez Mobile Estates	Date: ___/___/___
HOUSEHOLD ADDRESS	
425-435 E. Gardena Blvd., Space # _____ Gardena, CA 90248	If you OWN your mobilehome do not complete this form. Please contact the park manager to obtain the correct questionnaire form.
HOUSEHOLD OCCUPANTS (use additional pages as needed)	
Total # of occupants: _____	
HEAD OF HOUSEHOLD (HOH) Move in Date: _____ (month and year)	
1) Name: _____ Gender: F M Primary Language: _____ Interpreter Needed? Y N	
Date of Birth: ___/___/___ Employer/School: _____	
Phone: _____	Monthly Gross Income: \$ _____ Transportation Used: _____
Email: _____	Distance from employment: _____ miles
Disabilities/Special Needs: _____	
2) Name: _____ Gender: F M Language: _____	
Relationship to HOH: _____ Date of Birth: ___/___/___ Employer/School: _____	
Monthly Gross Income: \$ _____ Transportation Used: _____	
Phone/Email: _____	Move In Date: _____ Distance from employment: _____ miles
Disabilities/Special Needs: _____	
3) Name: _____ Gender: F M Language: _____	
Relationship to HOH: _____ Date of Birth: ___/___/___ Employer/School: _____	
Monthly Gross Income: \$ _____ Transportation Used: _____	
Phone/Email: _____	Move In Date: _____ Distance from employment: _____ miles
Disabilities/Special Needs: _____	
4) Name: _____ Gender: F M Language: _____	
Relationship to HOH: _____ Date of Birth: ___/___/___ Employer/School: _____	
Monthly Gross Income: \$ _____ Transportation Used: _____	
Phone/Email: _____	Move In Date: _____ Distance from employment: _____ miles
Disabilities/Special Needs: _____	
5) Name: _____ Gender: F M Language: _____	
Relationship to HOH: _____ Date of Birth: ___/___/___ Employer/School: _____	
Monthly Gross Income: \$ _____ Transportation Used: _____	
Phone/Email: _____	Move In Date: _____ Distance from employment: _____ miles
Disabilities/Special Needs: _____	

Current Dwelling:	
Are you renting your mobilehome? Y <input type="checkbox"/> N <input type="checkbox"/>	
If yes, please state here the name of the mobilehome owner: _____	
Monthly home/space rent \$ _____	# of BRs: ____ # of BAs: ____ Total # Rooms: ____
Replacement Dwelling/Site Needs	
<input type="checkbox"/> Public Transportation	<input type="checkbox"/> School
<input type="checkbox"/> Medical Facilities	<input type="checkbox"/> Private Medical Transportation
<input type="checkbox"/> Service Providers (List Below)	<input type="checkbox"/> Religious Facility
<input type="checkbox"/> Other	<input type="checkbox"/> Family/Friends
Preferred area to relocate: _____	
Type of Dwelling: _____	
Size of dwelling (# BRs): _____	
Describe any additional circumstances which would limit where the resident is able to relocate (for example, job location):	



**RANCHO DOMINGUEZ MOBILE ESTATES
435 E. GARDENA BLVD. GARDENA, CA 90248-2918**

November 25, 2019

RE: Rancho Dominguez Mobile Estates – Resident Questionnaire

Dear Residents:

As you are aware, the owner of the property known as Rancho Dominguez Mobile Estates (“Mobilehome Park”) located at 435 E. Gardena Boulevard, Gardena, CA 90248 has filed an application to the City of Carson for a change of use of the Mobilehome Park, which will result in closure of the Mobilehome Park rental spaces.

The City of Carson (City) is requiring the Park owner to provide Park households with a questionnaire per Carson Ordinance 9128.21 (Ordinance) for each Park resident to complete, so that information about the Park households and their potential relocation needs can be incorporated into the RIR.

You were previously provided with the questionnaire which we need for you to complete and return by **Monday, December 02, 2019**. It is very important that you are represented in the Report. **Please mail your completed questionnaire to Norma Jacquez, OPC, 3750 Schaufele Avenue, Suite 150, Long Beach, CA 90808.**

If you prefer to schedule an appointment to answer the questions over the phone, or if you have any questions about what is being asked on the questionnaire, please contact **Maritza Guevara (Spanish-speaking) or Kelly Dewitt (English) at (800) 400-7356**. The relocation specialists can conduct an interview via the telephone or in person at your convenience and are available to answer any questions you may have.

Again, it is in your best interest to participate and return a completed questionnaire so that your family is represented in the Report before it is submitted to the City for approval. Therefore, we encourage you to return the completed questionnaire as soon as possible.

Thank you,

Norma Jacquez
Project Manager
Overland, Pacific & Cutler, LLC



August 12, 2020

Dear RDME Residents:

The closure of Rancho Dominguez is progressing. We are continuing to prepare the Closure Impact Report. The next step in the process will be inspections of the mobilehomes by an appraisal team.

An appraiser selected by the City, will need to visit each home site. The appraisal company selected by the City is Anderson & Brabant, Inc. The appraisers that will be conducting the inspections are James Brabant, MAI and Patricia Haskins.

Typically, the appraisers would inspect both the exterior and interior of each home, but due to COVID-19 precautions, only the exteriors of the homes will be viewed. However, in an attempt to obtain as much information about your homes as possible, enclosed is a Homeowner Form for you to provide important information to the appraiser. You will also have the opportunity to send interior photos to the appraiser. This information will help him to determine the value of your home. If you have made any recent upgrades to your home which you want him to include in his valuation, you will be required to send photos of the upgrades. You will also have the opportunity to speak with the appraiser or his representative by phone.

There is a section on the Form for Homeowner Disclosures. Under state law, before selling your home, you are required to disclose to the potential buyer any features of your home that are in need of repair or replacement.

The dates for inspections will be August 18th and 19th. You may notice the appraisers walking around your home taking measurements and exterior photos. They will keep socially distanced from your property.

For the information on your Homeowner Form to be considered by the appraiser, please return the Form to the Park Manager's office by no later than August 17, 2020. If you do not have access to email or have technical issues with providing photos or paper documentation electronically, the Park Manager can assist you with scanning and/or emailing documentation of your home interiors and upgrades to the appraiser.

Sincerely,

Norma Jacquez
Project Manager
OPC

**RANCHO DOMINGUEZ
HOMEOWNER FORM**

Please fill out form with as much detail as possible. This form will be used to assist the appraiser in valuing your home.

HOMEOWNER NAME: _____ DATE: _____

PHONE NUMBER: _____ SPACE NO: _____

Please check this box if you do not want the appraiser to call you to discuss your home.

SPEAK AND UNDERSTAND ENGLISH? YES _____ NO _____ #BEDROOMS _____ #BATHS _____

GENERAL DESCRIPTION OF INTERIOR:

INSTRUCTIONS: In the following sections, circle all that apply and write additional information and comments in space provided.

FLOOR TYPE: Example: Vinyl Kitchen and bathrooms
 (List rooms for Vinyl _____
 each floor type) Carpet _____
 Tile _____
 Laminate/Wood _____

INTERIOR WALLS: Drywall _____ Paneling _____ Other _____

HEATING: Central (Forced Air) _____ Wall Heat _____ None _____

AIR CONDITIONING: Central (Forced Air) _____ Wall or Window AC _____ Swamp (Evaporative) _____ None _____

ROOM DETAIL:

KITCHEN: Appliances: Range/Oven _____ Garbage Disposal _____ Dish Washer _____
 Refrigerator _____ Built-in Microwave _____
 Countertops: Formica _____ Ceramic _____ Granite _____ Other _____
 (Plastic Laminate) _____ Tile _____
 Describe Any Upgrades: _____

BATHROOM 1: Fixtures: Tub Only _____ Oval Tub _____ Shower Only _____ Combination Tub/Shower _____
 Surround: (Walls of Tub/Shower) Fiberglass _____ Tile _____
 Shower Enclosure (Door): Yes _____ No _____
 Countertops: Formica _____ Ceramic _____ Granite _____ Other _____
 (Plastic Laminate) _____ Tile _____
 Describe Any Upgrades: _____

BATHROOM 2: Fixtures: Tub Only _____ Oval Tub _____ Shower Only _____ Combination Tub/Shower _____
 Surround: (Walls of Tub/Shower) Fiberglass _____ Tile _____
 Shower Enclosure (Door): Yes _____ No _____
 Countertops: Formica _____ Ceramic _____ Granite _____ Other _____
 (Plastic Laminate) _____ Tile _____
 Describe Any Upgrades: _____

RANCHO DOMINGUEZ - HOMEOWNER FORM

(CONTINUED)

OTHER FEATURES:	Laundry:	Washer	Dryer	None		
		If there is a separate laundry room, are there cabinets?			Yes	No
	Fireplace (gas or woodburning)	Yes	No			
	Wet Bar	Built-in Buffet/Hutch		Vaulted Ceilings		
	Skylight(s) #	Ceiling Fan(s)	#			
	Mirrored Wardrobe(s) #	Earthquake Bracing	Yes	No		
	Other					

PERMITTED ADDITIONS TO MAIN HOME:

Note: This section applies to pop-outs, additions built in place, sunrooms, and enclosed porches

FINISH DETAILS:	Interior Walls:	Drywall	Paneling	Other	_____	
	Ceiling:	Panels	Unfinished	Other	_____	
	Floors:	Vinyl	Carpet	Tile	Laminate/Wood	Other
	Electrical:	Outlets	Wall/Ceiling Lights	Other	_____	
	Access:	Outside Only	Accessed from Inside Home	Open to Home		
	Utility (Used as):	Additional Living Space	Laundry	Enc Porch		
Is there any heat in the addition?	No	Yes	Type	_____		
Is there air conditioning in the addition?	No	Yes	Type	_____		

ADDITIONAL COMMENTS: _____

CONDITION OF INTERIOR OF HOME:

Only Circle One:	Excellent	Well maintained and updated home. May have recent remodeling.
	Good	Well maintained with few or minimal repairs needed.
	Average	Maintained with typical wear and tear. Repairs mostly inexpensive & cosmetic.
	Fair	Lacks Maintenance and/or minor repairs needed to bring to average condition.
	Poor	Lacks Maintenance and major repairs are needed (more than just cosmetic).

LIST ANY ITEMS THAT HAVE BEEN REPLACED OR ADDED TO YOUR HOME IN THE LAST 5 YEARS:

ITEM REPLACED/ADDED	DATE
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

**RANCHO DOMINGUEZ - HOMEOWNER FORM
(CONTINUED)**

The following is a typical disclosure form. Please fill out where applicable.

Are you aware of any significant defects/malfunctions in any of the following in connection with the mobilehome?

- Yes No If yes, check appropriate space(s) below.
- | | | |
|---|---|---|
| <input type="checkbox"/> Interior walls | <input type="checkbox"/> Ceilings | <input type="checkbox"/> Floors |
| <input type="checkbox"/> Exterior Siding | <input type="checkbox"/> Insulation | <input type="checkbox"/> Roof(s) |
| <input type="checkbox"/> Windows | <input type="checkbox"/> Doors | <input type="checkbox"/> Plumbing |
| <input type="checkbox"/> Porch or Deck | <input type="checkbox"/> Steps & Railing | <input type="checkbox"/> Other Steps & Railings |
| <input type="checkbox"/> Porch Awning | <input type="checkbox"/> Carport Awning | <input type="checkbox"/> Skirting |
| <input type="checkbox"/> Stove | <input type="checkbox"/> Oven | <input type="checkbox"/> Microwave |
| <input type="checkbox"/> Dishwasher | <input type="checkbox"/> Refrigerator/Freezer | <input type="checkbox"/> Washer/Dryer |
| <input type="checkbox"/> Gas/Electric Heating | <input type="checkbox"/> Porch Decking | <input type="checkbox"/> Porch Awning |
| <input type="checkbox"/> Evaporative Cooler(s) | <input type="checkbox"/> Air Conditioning | <input type="checkbox"/> Window Screens |
| <input type="checkbox"/> Home foundation or
Support/Bracing System | <input type="checkbox"/> Water Heater | <input type="checkbox"/> Rain Gutters |
| | <input type="checkbox"/> Bedroom Window Quick Release Mechanism | |

If any of the above is checked, explain. (Attach additional sheets if necessary):

Are you aware of any of the following:

1. Substances, materials, or products which may be an environmental hazard, such as, but not limited to asbestos, formaldehyde, radon gas, lead-based paint, or chemical storage tanks on the subject home interior or exterior? Yes No
2. Room additions, structural modifications, or other alterations or repairs made without necessary permits? Yes No
3. Room additions, structural modifications, or other alterations or repairs not in compliance with applicable codes? Yes No
4. Any notices of abatement or citations against the home or accessory structures being sold with the home? Yes No
5. Any lawsuits by or against the seller threatening to or affecting the home or the accessory structures being sold with the home, including any lawsuits alleging any defect or deficiency in the home or accessories sold with the home? Yes No
6. Neighborhood noise problems or other nuisances? Yes No

If you have photos of the interior of your home that you would like to share,
please e-mail them to phaskins@ymail.com along with your Space No. and Name.
***If you have a permitted addition or significant upgrades, photos are required. ***

Exhibit D – Park Resident Questionnaire Responses

Space	Move In Date	Owner /Tenant	Principal or Secondary Home	Total # Occupants	Lease Rate	Date of Manuf	Make/Model	Length / Width	Double wide/ Single wide	Age in Yrs	# BRs	# BAs	Total # Rooms	Square Footage
1		O			\$424.56	1977	Celtic	20x56		43	2	2		1120
2	9/1/18	T	P	2	\$1,430.00	1963	Rollway	8x10		57	2	2	5	800
3	11/1/12	T	P	5	\$1,800.00	1975	Kaufman	48x20		45	2	2		960
4		O			\$424.56	1981	Golden West	20x60		39	2	2		1,200
5		O			\$411.86	1963		12x60		57	1	1		720
6		T			\$1,235.00	1963	National	12x60		57	1	1		720
7		O			\$424.56	1980	Skyline	20x56		30	2	2		1120
8		T			\$1,485.00	1972	Skyline	20x48		48	2	2		960
9		T	P	4	\$1,850.00	1971	Kaufman	45x12		49	3	1.5		540
10		O			\$424.56	1978	Skyline	20x52		33	2	2		1040
11		O	P	1	\$411.86	1976	Skyline	52x12	Single	44	1	1	4	624
12		O			\$424.56	1982	Kaufman	20x52		28	2	2		1040
13	6/5/15	O	P	6	\$402.56	1974	Fleetwood	60x12	Single	46	2	2		720
14		O	P	1	\$402.56	1989	Golden West	48x20	Single	31	2	2		960
15		T			\$1,040.00	1968	Star	12x37		42	1	1		444
16	9/1/16	T	P	3	\$1,800.00	1970	Cameron	54x20		50	2	2		1080
17	7/1/16	T	P	4	\$1,340.00	1968	Bitmore	56x12		52	2	1		672
18	1/1/05	O	P	2	\$400.57	1988	Hallmark	52x20	Single	32	3	2	6	1040
19		T			\$1,520.00	1963	Parklane	12x56		57	2	1		672
20		O			\$408.41	1971	Silvercrests	20x44		49	2	2		880
21	1/1/91	O	P	3	\$424.56	1978	Skyline	48x20	Single	42	2	2		960
22		O			\$411.86	1976	Skyline	12x52		44	2	1		624
23	5/1/00	O	P	3	\$424.56	1981	Kaufman	54x20		39	2	2		1080
24	6/1/05	O	P	1	\$411.86	1976	Skyline	56x12		44	1	1		672
25		O			\$424.56	1976	Meteor	20x48		44	2	2		960
26	12/1/17	T	P	1	\$1,530.00	1976	Moduline	60x14		44	2	1	4	840
27		O			\$411.86	1965	National	20x50		55	2	2		1000
28	6/20/92	O	P	2	\$411.86	1977	Prestige	50x20		43	2	1		1000
29	1/1/85	O	P	2	\$409.31	1977	Jefferson	48x20	Double	43	2	2		960
30		O			\$418.44	1971	Great Lakes	20x44		49	2	2		880
31		O			\$424.56	1968	Champion	12x56		52	2	1		672
32	8/28/18	T	P	5	\$2,040.00	1972	Redman	56x12		48	3	2		672
33	1/1/11	T	P	2	\$1,370.00	1974	Champion	56x12		46	2	2		672
34	9/1/07	O	P	2	\$393.78	1963	Redman	60x12	Single	57	2	1		720
35		O			\$411.86	1962	Rolloway	12x60		58	2	1		720
36		O			\$424.56	1973	Skyline	20x48		47	2	2		960
37	9/1/15	T	P	3	\$1,425.00	1972	Skyline	40x20		48	2	2		800
38		O			\$424.56	1976	Celtic	20x44		44	2	2		880
39		O			\$424.56	1965	Broadmore	20x52		55	3	2		1040
40		O			\$400.57	1972	Fleetwood	12x54		48	1	1		648
41	12/1/17	T	P	2	\$1,470.00	1999	Champion	48x14		21	2	1.5		672
42	7/1/05	O	P	3	\$402.56	1964	Lakeview	50x12	Double	56	2	1		600
43		T			\$1,235.00	1969	Skyline	14x48		51	2	1		672

44		O			\$400.57	2000	Cavco	20x40		20	2	j2		800
45	6/13/05	O	p	4	\$411.86	1972	Viceroy	52x10	Double	48	3	2		520
46		T			\$1,325.00	1965	Universal	20x52		55	2	1		1040
47	4/1/12	O	P	5	\$1,850.00	1963	Universal	52x20	Single	57	3	2	6	1040
48		O	P	2	\$418.44	1978	Skyline Homette	55x20		42	2	2		1100
49	2/14/81	O	P	1	\$424.56	1980	Kaufman /Broad	44x20	Single	40	2	2	4	880
50		O	P	1	\$400.57	1963	Universal	46x12	Single	57	2	1		552
51		O			\$400.57	1972	Biltmore	12x52		48	2	2		624
52		O			\$397.05	1967	Fleetwood	12x43		53	2	1		516
53	12/1/19	T	P	5	\$1,490.00	1971	Star	57x20		49	2	1	4	1140
54		O			\$418.44	1971	Silvercrest	20x50		49	2	2		1000
55	9/22/88	O	P	1	\$418.44	1972	Skyline	40x20	Single	48	3	1	7	800
56		O			\$424.56	1982	Skyline	20x48		38	2	2		960
57		O			\$418.44	1977	Bendix	20x48		43	2	1		960
58	5/1/06	O	P	3	\$411.86	1969	Fleetwood	52x12	Single	51	2	1		624
59		O			\$424.56	1971		20x48		49	2	2		960
60	3/1/90	O	P	2	\$402.55	1989	Hallmark	57x24	Double	31	3	2	5	1,368
61	10/1/11	T	P	5	\$1,480.00	1965	Universal	52x20		55	2	2		1,040
62		O			\$418.44	1964	Puritan	20x48		56				
63	1/1/07	O	P	4	\$416.00	1979	Kaufman	50x20	Single	41	2	2		1,000
64	4/1/07	O	P	4	\$424.56	1986	Hallmark	48x20	Double	34	2	2	3	960
65	1/1/00	O	P	1	\$424.56	1974	Skyline	48x20	Double	46	2	2	7	
66		O			\$424.56	1968	Fleetwood	12x60		52	2	2		720
67		T			\$1,900.00	1972	Skyline	20x48		48	2	2		960
68		T			\$1,750.00	1971	Golden West	12x60		49	2	2		720
69		T	P	5	\$1,625.00	1971	Silvercrest	52x20		49	3	2		1,040
70		T			\$1,900.00	2019	Fleetwood	14x58		1	2	1		812
71		O			\$424.56	1964	Skyline	12x50		56	2	1		600
72		O			\$411.44	1972	Skyline	20x48		48	2	1		960
73	7/1/18	T	P	3	\$1,665.00	1965	Universal	58x12		54	2	1		
74		O			\$424.56	1971	Skyline	20x48		49	2	1		
75		O			\$411.86	1971	Fleetwood	12x56		49	2	1		
76		O	P	4	\$402.56	1972	Wick	50x12	Single	48	2	1	5	600
77	3/1/06	O	P	4	\$424.56	1975	Skyline	56x20	Single	45	3	2	7	1,120
78	10/20/05	O	P	5	\$408.41	1977	Winston Manor	48x20		43	2	2		960
79		O			\$424.56	1986	Hallmark	20x48		34	2	2		960
80	5/1/98	O	P	2	\$418.44	1978	Lancer	52x20		42	3	2		1,040
81	12/12/06	O	P	2	\$418.44	1976	Celtic	40x20	Double	44	2	1		800

Did not return survey

Exhibit E – HUD Income Limits

The following figures are approved by the U. S. Department of Housing and Urban Development (HUD) for use in the **County of Los Angeles** to define and determine housing eligibility by income level.

Area Median Income: \$97,900			
Family Size	Extremely Low	Very Low	Lower
1 Person	23,700	39,450	63,100
2 Person	27,050	45,050	72,100
3 Person	30,450	50,700	81,100
4 Person	33,800	56,300	90,100
5 Person	36,550	60,850	97,350
6 Person	39,250	65,350	104,550
7 Person	41,950	69,850	111,750
8 Person	44,650	74,350	118,950

Figures are per the Department of Housing and Urban Development (California), **updated in April 2020.**

Exhibit F – Available Mobile Home Spaces/Units for Rent/Purchase Within a 50 Mile Radius of Rancho Dominguez Mobile Estates

Mobile Home Parks Within a 30-Mile Radius of 435 E. Gardena Boulevard, Gardena, CA 90248

PARK NAME	ADDRESS	DISTANCE IN MILES FROM PARK	MHs AVAIL FOR RENT	RENT	MHs AVAIL FOR PURCH	PURCH PRICE	AVAIL PADS	SPACE RENT	CONTACT PHONE	TOTAL UNITS ON PROP	AGE OF PARK	TYPE	AMENITIES
Garden Terrace Mobile Park	7887 Lampson Ave, Garden Grove, CA 92841	18	NA	NA	3	\$27,900; \$59,800; \$79,900	NA	\$1,485	(714) 899-6043	103	59	Family	Clubhouse, Rec Facility, Pool
Royal Western Mobile Home Park	17705 South Western Ave, Gardena, CA 90248	5	NA	NA	2	\$20,000; \$28,000	NA	\$1,700	(714) 963-4123	120	54	Family	Rec Facility, Pool
Lincoln Center MHP	9080 Bloomfield St Cypress CA 90630	13	NA	NA	12	\$16,500 - \$59,900	NA	\$1,700	(714) 826-6211	305	52	Family	Rec Facility, Pool
Knolls Manor	24200 Walnut St, Torrance, CA 90501	5	NA	NA	2	\$15,250; \$78,000	NA	\$1,600	(714) 963-4123	73	51	Family	Rec Facility, Pool
Surf City Beach Cottages	80 Huntington St, Huntington Beach, CA 92648	25	NA	NA	7	\$24,900 - \$119,900	4	\$1,670	(714) 536-3832	252	77	Family	Rec Facilities, Pool
Rancho Huntington Mobile Park	19361 Brookhurst St, Huntington Beach, CA 92646	11	NA	NA	15	\$29,900 - \$124,900	NA	\$1,800	(714) 962-7311	194	51	Family	Rec-Facilities, Pool
Friendly Village MHP	5450 North Paramount Blvd, Long Beach, CA 90805	10	NA	NA	NA	NA	NA	1500	(562) 531-3002	181	NA	Family	Pool
Cinderella Mobile Home Park	8600 Contreras St, Paramount, CA 90723	11	NA	NA	1	\$105,000	NA	\$858	(562) 602-0696	81	59	Senior	Planned activities, Gated, On-site Staff, Fitness Center, Library, Clubhouse, Whirlpool, Spa, Rec-facilities, Pool, Sidewalks
Huntington Shorecliffs	20701 Beach Blvd, Huntington Beach, CA 92648	24	1	\$2,152	6	\$44,444 - \$350,000	NA	\$2,100 - \$4,495	(714) 536-4417	308	46	Family	Rec Facilities, Pool
Magic Lamp Mobile Home Park	7700 Lampson Ave, Garden Grove, CA 92841	18	NA	NA	5	\$51,995 - \$184,995	NA	\$1,146	(714) 894-3381	132	56	Senior	Rec Facility, Pool
Cypress Mobile Home Park	4861 Lincoln Ave, Cypress, CA 90630	16	NA	NA	3	\$54,995 - \$84,995	3	\$999	(714) 527-3362	65	59	Family	NA
Ocean Breeze	525 Fairfax Dr, Costa Mesa, CA 92627	28	NA	NA	NA	NA	1	NA	(714) 829-8280	43	54	Family	Off-Street Parking
Montebello Mobile Home Park	525 S Greenwood Ave, Montebello, CA 90640	21	NA	NA	NA	NA	NA	NA	(562) 412-9333	NA	NA	Family	NA
Plantation Mobile Estates	1835 South Manchester Ave, Anaheim, CA 92802	26	NA	NA	NA	NA	NA	NA	(714) 750-2711	NA	NA	Family	NA
Costa Mesa Mobile Home Estates	327 W Wilson St, Costa Mesa, CA 92627	27	NA	NA	2	\$75,000 - \$119,900	NA	\$1,000	(949) 548-1201	111	39	Family	NA

Whittier East Community	16540 Whittier Blvd, Whittier, CA 90603	23	NA	NA	1	\$109,900	NA	\$790	(562) 943-1010	77	NA	Family	Clubhouse
Plaza Village	3101 South Fairview Ave, Santa Ana, CA 92704	25	NA	NA	6	\$65,900-\$118,999	NA	NA	(714) 545-4205	237	60	Family	Rec Facility, Pool
Crestview Lodge for Mobile Homes	2350 250th St, Lomita, CA 90717	6	NA	NA	3	\$87,500 - \$93,000	NA	\$625	(310) 621-0646	58	NA	Senior	NA
Continental Mobile Manor	2804 West 1st St, Santa Ana, CA 92703	24	NA	NA	2	\$26,999; \$31,000	NA	\$1,650	(909) 494-2280	257	62	Family	Rec Facility, Pool, Off-Street Parking
Beach View Community	17261 Gothard St, Huntington Beach, CA 92647	22	NA	NA	5	\$62,000 - \$139,000	NA	\$1,175	(949) 633-8887	81	49	Senior	Rec Facility, Pool
Driftwood Mobile Park	15621 Beach Blvd, Westminster, CA 92683	19	NA	NA	5	\$58,500 - \$189,900	NA	\$1,300	(714) 893-1166	178	56	Senior	Rec Facility, Pool
Del Mar Mobile Estates	19251 Brookhurst St, Huntington Beach, CA 92646	23	NA	NA	12	\$77,500 - \$299,900	NA	\$1,350	(714) 968-0484	142	48	Senior	Rec Facility, Pool, Off-Street Parking
Thunderbird Mobile Lodge	13102 Partridge St, Garden Grove, CA 92643	23	NA	NA	2	\$21,000; \$30,000	NA	\$1,500	(714) 534-3478	103	57	Family	Rec Facility, Pool, Off-Street Parking
Gardena Villas	16949 S Western Ave Gardena CA 90247	7	NA	NA	1	\$109,000	NA	\$865.16-\$975	(310) 329-7001	194	67	Family	Rec Facility, Pool
Arbor Mobile Village	300 East Arbor St, Long Beach, CA 90805	7	NA	NA	NA	NA	NA	NA	(562) 422-3666	61	NA	Senior	Rec Facility, Off-Street Parking
Royal Garden Estates	10200 Bolsa Ave, Westminster, CA 92683	21	NA	NA	4	\$59,000 - \$65,000	NA	\$1,361	(714) 531-0500	152	47	Senior	Staff, Clubhouse, Pool, Billiards, Laundry, Playground, Library
Brookside Country Club	12700 Elliott Ave, El Monte, CA 91732	25	NA	NA	21	\$96,100 - \$124,900	NA	\$ 1,400	(626) 448-6727	421	69	Family	On-Site Staff, Boat/RV Storage, Laundry, Library, Clubhouse, Billiards, Playground, Rec Facility, Pool, Parking
Plaza Pines Estates	11250 Beach Blvd, Stanton, CA 90680	18	NA	NA	2	\$89,000; \$93,000	NA	\$1,015	(714) 897-4900	144	48	Senior	Pool
Rancho La Paz	501 E Orangethorpe, Anaheim, CA 92801	25	NA	NA	21	\$39,900 - \$229,900	NA	\$1,160	(714) 525-1381	387	64	Senior	Rec Facility, Pool
Bel Aire Park	21425 Avalon Blvd, Carson, CA 90745	1	NA	NA	NA	NA	NA	NA	(213) 570-4892	80	49	Senior	Pool
Stoneridge	12300 Lilac Ave, Santa Ana, CA 92704	23	NA	NA	1	\$149,900	NA	\$1,615	(714) 839-8699	136	54	Family	Rec Facility, Pool, Off-Street Parking
Regal Estates	1845 Monrovia Ave, Costa Mesa, CA 9267	27	NA	NA	1	\$84,500	NA	\$1,075	(949) 548-8703	94	49	Senior	Planned activities, On-site Staff, Library, Clubhouse, Billiards, Spa, Rec Facilities, Pool

Bellwood MHP	15717 Woodruff Ave, Bellflower, CA 90706	13	NA	NA	1	\$139,995	NA	NA	(714) 423-9507	47	57	Senior	Off-Street Parking
Kona Kai	4117 West McFadden Ave, Santa Ana, CA 92704	24	NA	NA	2	\$89,500 - \$129,900	NA	\$1,125	(714) 775-6030	208	65	Senior	Rec Facility, Pool
Culver City Terrace	11250 Playa St, Culver City, CA 90230	16	NA	NA	NA	NA	NA	NA	(800) 494-1494	117	NA	Family	Resident Owned
Rancho Fullerton Mobile Estates	1201 W. Valencia Dr, Fullerton, CA 92833	20	NA	NA	11	\$79,000 - \$239,000	3	\$850	(714) 871-8701	229	50	Senior	Rec Facility, Pool, Sidewalks
Le Fontaine Estates	12062 Edinger Ave, Santa Ana, CA 92704	24	NA	NA	1	\$99,990	NA	\$1,200	(714) 423	63	49	Family	Off-Street Parking
Willowick Royal	14300 Clinton St, Garden Grove, CA 92843	23	NA	NA	2	\$134,900; \$189,900	NA	\$1,300	(714) 554-8680	191	46	Family	Rec Facility, Pool
Del Amo Mobile Home Park	4895 Oregon Ave, Long Beach, CA 90805	6	NA	NA	1	\$84,900	NA	\$750	(800) 494-1494	137	69	Senior	Rec Facility, Pool
Buena Villa Mobile Park	6741 Lincoln Ave, Buena Park, CA 90620	20	NA	NA	2	\$119,999; \$209,995	NA	\$1,295	(714) 478-1921	171	44	Senior	Rec Facility, Pool, Off-Street Parking
Summerset Mobile Estates	9200 Westminster Blvd, Westminster, CA 92683	20	NA	NA	NA	NA	NA	\$1,679	(714) 894-7766	116	45	Senior	Clubhouse, Rec Facility, Pool, On-Site Staff
Fountain Valley Mobile Estates	9320 Talbert Ave, Fountain Valley, CA 92708	11	NA	NA	2	\$99,000; \$99,500	NA	\$1,900	(714) 962-2112	192	54	Family	Rec Facility, Pool
Cresta Mobile Park	2345 190th St, Redondo Beach, CA 90278	6	NA	NA	1	\$132,500	NA	\$825	(714) 609-1725	98	69	Senior	Off-Street Parking
La Lampara Mobile Home Club	7271 Katella Ave, Stanton, CA 90680	17	NA	NA	2	\$51,900- \$99,900	NA	\$1,062	(714) 527-1205	102	51	Senior	Pool
Park Terrace	4080 W. First St, Santa Ana, CA 92703	25	NA	NA	2	\$115,900; \$119,900	NA	\$1,495	(714) 206-1176	191	48	Family	Rec Facility, Pool
Whittier Downs Mobile Home park	11730 Whittier Blvd, Whittier, CA 90601	21	NA	NA	2	\$87,000; \$139,000	NA	1299-1359	(562) 698-3333	75	41	Senior	Planned activities, Gated, On-site staff, Library, Clubhouse, Billiards, Spa, Rec Facilities, Pool
Casa Hermosa	525 N. Gilbert St, Anaheim, CA 92801	18	NA	NA	5	\$169,000- \$259,900	NA	\$898	(714) 828-1060	152	49	Senior	Rec Facility, Pool
Golden Skies Mobile Home Park	100 W Midway Dr, Anaheim, CA 92805	26	NA	NA	1	\$85,000	NA	\$1,350	(714) 778-3000	140	59	Family	Pool
Villa Capri Mobile Estates	8111 Stanford Ave, Garden Grove, CA 92841	18	NA	NA	1	\$129,000	NA	\$1,600	(714) 890-1883	176	39	Family	Rec Facility, Pool, Off-Street Parking
Robins Mobile Home Park	17820 Lakewood Blvd, Bellflower, CA 90706	11	NA	NA	3	\$74,900 - \$95,000	NA	\$995	(949) 248-0554	38	69	Family	None

Park La Habra	1731 West Lambert Rd, La Habra, CA 90631	24	NA	NA	1	\$154,900	NA	NA	(562) 326-0557	107	65	Family	Rec Facility, Pool, Off-Street Parking
Coach Royal	215 South Sullivan St, Santa Ana, CA 92704	25	NA	NA	3	\$99,900; \$107,000; \$125,000	NA	\$1,350	(909) 343-0609	228	56	Family	Rec Facility, Pool, Off-Street Parking
Coast Mobile Home Park	24815 Normandie Ave, Harbor City, CA 90710	5	NA	NA	NA	NA	NA	\$700 - \$800	(310) 308-7984	100	59	Senior	Pool, Off-Street Parking
Fairview Mobile Home Park	206 South Sullivan St, Santa Ana, CA 92704	25	NA	NA	NA	NA	NA	\$1,250	(714) 448-5968	118	50	Family	Rec Facility, Pool, Off-Street Parking
Fairlane Mobile Lodge	12560 Haster St, Garden Grove, CA 92840	23	NA	NA	1	\$70,000	NA	\$1,263	(714) 251-7932	248	59	Family	Rec Facility, Pool
Beach West Mobile Estates	8051 Acacia Ave, Garden Grove, CA 92841	18	NA	NA	2	\$199,900; \$209,900	NA	\$1,150	(714) 650-5833	90	NA	Family	Pool, Off-Street Parking
Parque Pacifico Mobile Home Club	12101 Dale Ave, Stanton, CA 90680	20	NA	NA	2	\$90,000- \$115,000	NA	\$975 - \$1,200	(714) 539-5018	110	49	Senior	Pool
Thunderbird Villa Mobile Home Park	10001 West Frontage Rd, South Gate, CA 90280	14	NA	NA	2	\$115,000; \$144,900	NA	\$994	(562) 928-4301	239	53	Senior	Rec Facility, Pool
Harbor Mobile Homes	1535 Superior Ave, Newport Beach, CA 92663	29	NA	NA	NA	NA	NA	\$900	(949) 378-3330	40	66	Family	NA

Huntington Mobile Estates	7652 Garfield Ave, Huntington Beach, CA 92648	22	NA	NA	3	\$147,000 - \$189,000	NA	\$1,315	(714) 847-3888	105	59	Family	Rec Facility, Pool
Las Brisas	400 E Arbor St, Long Beach, CA 90805	7	NA	NA	NA	NA	NA	\$950	(562) 423-5267	94	NA	Family	NA
Bloomfield Mobile Home Community	22221 South Bloomfield, Cypress, CA 90630	15	NA	NA	2	\$159,900; \$169,900	NA	\$1,150	(323) 385-5952	48	49	Senior	Pool
Americana Mobile Home Park	16600 Downey Ave, Paramount CA, 90723	17	NA	NA	3	\$89,000 - \$139,300	NA	\$1,050	(562) 634-7484	174	55	Family	Rec Facilities, Pool
Lakewood Mobile Estates	12550 Carson St, Hawaiian Gardens CA 90716	16	NA	NA	NA	NA	NA	\$700	(562) 421-4982	200	57	Senior	Rec Facilities, Pool
Hyde Park Mobile Estates	2934 W 1st St, Santa Ana, CA 92703	24	NA	NA	2	\$125,000; \$177,500	NA	\$1,150	(714) 541-0181	118	54	Senior	Rec Facility, Pool
Friendly Village of La Habra	1001 W Lambert Rd, La Habra, CA 90631	24	NA	NA	4	\$92,900 - \$239,995	NA	\$1,175	(866) 981-4146	329	48	Senior	Planned activities, On-site Staff, Fitness center, Clubhouse, Billiards, Golf course, Spa, Pool, sidewalks
Rancho La Siesta Mobile Home Park	18194 Bushard St, Fountain Valley, CA 92708	25	NA	NA	8	\$269,000 - \$109,000	NA	\$752- \$1275	(714) 962-3841	213	54	Senior	Rec Facility, Pool, Off-Street Parking

Westland Estates Mobile Home Park	4139 Paramount Blvd, Pico Rivera, CA 90660	21	NA	NA	NA	NA	NA	NA	NA	(562) 699-6525	67	40	Family	Pool
Katella Mobile Home Estates	8681 Katella Ave, Stanton, CA 90680	20	NA	NA	3	\$133,000 - \$249,000	NA	\$1,270	(714) 952-2971	279	55	Family	Rec Facility, Pool	
Rowland Heights Mobile Home Park	1441 Paso Real Ave, Rowland Heights, CA 91748	28	NA	NA	NA	NA	NA	NA	(562) 522-5239	327	47	Family	Rec Facility, Pool, Sidewalks	
Ponderosa	2300 South Lewis St, Anaheim, CA 92802	25	NA	NA	1	\$99,999	NA	1,574.00	(714) 947-3378	162	56	Family	Rec facility, Swimming Pool	
Carson Gardens	437 West Carson St, Carson, CA 90745	2	NA	NA	NA	NA	NA	NA	(714) 478-1921	97	85	Family	NA	
Villa Nova Mobile Home Park	8509 Beverly Blvd, Pico Rivera, CA 90660	26	NA	NA	NA	NA	NA	NA	(562) 639-9533	153	49	Senior	Rec Facility, Pool, Off-Street Parking	
Crestmont Estates	1051 Site Dr, Brea, CA 92821	27	NA	NA	8	\$80,000 - \$269,000	NA	\$1,500	(714) 529-4131	289	48	Family	Rec Facility, Pool, Off-Street Parking	
Gables Mobile Estates	4801 W 1st St, Santa Ana, CA 92703	23	NA	NA	3	\$240,000; \$249,900	NA	\$1,065	(714) 890-1883	125	49	Family	Rec Facility, Pool	
Prado Verde Mobile Estates	14081 Magnolia Street Westminster CA 92683	19	NA	NA	1	\$89,000	NA	\$1,650	(714) 893-6344	181	54	Family	Rec Facilities, Pool	
Park Royale Mobile Home Park	300 North Rampart St, Orange, CA 92868	25	NA	NA	3	\$59,900 - \$139,500	0	\$1,700	(760) 221-6881	203	48	Family	Rec Facility, Pool	
Gold Crest Mobile Home Park	10770 Katella Ave, Anaheim, CA 92804	22	NA	NA	NA	NA	NA	NA	(714) 697-5386	41	44	Family	Rec Facility, Pool, Off-Street Parking	
Western Skies Mobile Home Estates	2770 West Lincoln Ave, Anaheim, CA 92801	22	NA	NA	1	\$129,900	NA	\$1,350	(714) 421-0624	58	54	Family	Rec Facility, Pool, Off-Street Parking	
Del Prado Mobile Home Park	12861 West St, Garden Grove, CA 92840	22	NA	NA	7	\$70,000- \$135,900	NA	NA	(714) 583-4377	169	NA	Family	Rec Facility, Pool, Off-Street Parking	
Dominguez Hills Estates	19009 S Laurel Park Rd, Compton, CA 90220	4	NA	NA	8	\$145,000 - \$249,000	NA	\$1,022	(310) 638-0392	511	39	Family	Rec Facility, Pool, Off-Street Parking, Sidewalks	
Sea Aira Mobile Estates	6241 Warner Ave, Huntington Beach, CA 92647	16	NA	NA	7	\$91,500 - \$229,000	NA	\$1,292	(714) 847-1121	231	58	Family	Rec Facilities, Pool	
Sahara MHP	1517 North Newhope St, Santa Ana, Ca 92703	22	NA	NA	NA	NA	NA	\$1,099	(714) 245-9833	89	59	Family	Pool, Off-Street Parking	
Anaheim Mobile Estates	3050 West Ball Road, Anaheim, CA 92804	17	NA	NA	3	\$129,900- \$191,900	NA	\$1,350	(714) 828-6920	229	52	Family	Pool	
Californian Mobile Home Estates	7101 E Rosecrans Ave, Paramount, CA 90723	22	NA	NA	2	\$160,000; \$170,000	NA	\$1,250	(562) 630-1867	210	58	Family	Rec Facilities, Pool	

Casa De Jardin	10525 East Compton Blvd, Bellflower, CA 90706	8	NA	NA	2	\$99,900; \$114,995	NA	\$1,025	(562) 864-2731	50	59	Family	Pool, Off-Street Parking
Del Amo Mobile Home Estates	2601 East Victoria St, Rancho Dominguez, CA 90220	5	NA	NA	15	\$110,000-\$195,000	NA	\$1,000	(310) 537-5515	512	41	Family	Rec Facility, Pool
View Park Mobile Estates	1750 West Lambert Rd, La Habra, CA 90631	24	NA	NA	NA	NA	NA	\$925	(714) 742-4771	143	60	Family	Rec Facility, Pool, Off-Street Parking
Lake Park La Habra	500 South Palm St, La Habra, CA 90631	27	NA	NA	1	\$138,900	2	\$1,142	(714) 992-2770	169	44	Senior	Planned activities, On-site Staff, Waterfront, Library, Clubhouse, Billiards, Spa, Rec-Facilities, Pool, sidewalks
Lake Park La Mirada	13990 Imperial Highway, La Mirada, CA 90638	20	NA	NA	NA	NA	NA	NA	(562) 921-5700	150	43	Senior	Planned activities, Staff, Waterfront, Clubhouse, Library, Billiards, Spa, Pool
Lido Park	22404 Normandie Ave, Torrance, CA 90502	3	NA	NA	1	\$119,000	NA	\$950	(562) 206-6949	NA	NA	Family	NA
New Holiday ME	3224 W. Washington, Santa Ana, CA 92703	23	NA	NA	1	\$130,000	NA	\$1,375	(562) 639-9533	77	NA	Family	Pool
Harbor City MHP	760 Lomita Blvd, Harbor City, CA 90710	4	NA	NA	1	\$165,900	NA	\$1,150	(310) 539-8550	192	49	Family	Rec Facility, Pool, Off-Street Parking
Rancho Del Rey Mobile Homes	16222 Monterey Lane, Huntington Beach, CA 92649	19	NA	NA	10	\$148,900-\$299,000	NA	\$1,450	(714) 846-1429	379	54	Senior	Rec Facilities, Pool
Whittier Mobile Country Club	10550 Dunlap Crossing Rd, Whittier, CA 90606	20	NA	NA	4	\$65,500 - \$172,900	NA	\$820	(562) 692-2755	190	51	Senior	Rec Facility, Pool
Lake Park Brea	625 North Puente St, Brea, CA 92821	26	NA	NA	1	\$199,900	NA	\$1,000	(562) 694-6484	342	39	Senior	Rec Facility, Pool
Orchard Trailer Park	25344 Pennsylvania Ave, Lomita, CA 90717	7	NA	NA	1	\$164,000	NA	\$650	(310) 326-5304	54	74	Family	Off-Street Parking
Belmont Shores	6230 East Marina View Dr, Long Beach, CA 90803	13	NA	NA	NA	\$249,900-\$289,900	NA	\$1,300	(562) 754-5330	347	56	Senior	Rec Facility, Pool, Off-Street Parking
Friendly Village	5815 East La Palma Ave, Anaheim, CA 92807	28	NA	NA	5	\$128,000 - \$179,000	NA	\$1,375	(714) 970-7575	347	47	Family	Rec Facility, Pool, Off-Street Parking
Mariner's Pointe	19350 Ward St, Huntington Beach, CA 92646	13	NA	NA	5	\$129,900-\$248,900	NA	\$1,395	(714) 968-0820	98	48	Senior	Rec Facility, Pool
Grandview Mobile Home Park	24100 Pennsylvania Ave, Lomita, CA 90717	5	NA	NA	NA	NA	NA	NA	(310) 539-8550	NA	NA	Senior	NA
El Rancho Verde	1501 Palos Verdes Drive N, Harbor City, CA 90710	7	NA	NA	NA	NA	NA	950-1400	(310) 534-1443	131	53	Family	Clubhouse, Rec Facility, Pool

Newport Terrace Mobile Home Park	824 W 15th St, Newport Beach, CA 92663	29	NA	NA	NA	NA	NA	NA	(714) 916-0310	56	69	Family	Rec Facility, Pool, Off-Street Parking
Friendly Village of West Covina	3033 East Valley Blvd, West Covina, CA 91792	30	NA	NA	NA	NA	NA	\$950	(877) 257-5860	157	47	Family	On-Site Staff, Fitness center, Clubhouse, Billiards, Playground, Spa, Pool, Rec Facilities
Colony Cove	17700 South Avalon Blvd, Carson, CA 90746	22	NA	NA	7	\$179,000 - \$282,891	NA	\$680 - \$1200	(310) 538-3320	404	39	Senior	Pool
Carson Harbor Village	17701 South Avalon Blvd, Carson, CA 90746	3	NA	NA	5	\$209,000 - \$295,000	NA	\$715	(562) 981-6100	418	41	Family	Pool, Off-Street Parking

Comparable Mobile Home Parks Below within 31 to 50-Mile Radius of 750 E Carson St, Carson, CA 90745													
Copacabana MHP	2717 Arrow Hwy, La Verne, CA 91750	43	NA	NA	NA	NA	NA	NA	(818) 802-0209	173	49	Family	Rec Facility, Pool, Off-Street Parking
Crest Mobile Manor	3727 N Equation Rd, Pomona, CA 91767	45	NA	NA	NA	NA	NA	NA	(909) 392-3191	141	60	Family	Rec Facility, Pool, Off-Street Parking
Monterey Manor Mobile Home Park	11250 Ramona Ave, Montclair, CA 91763	46	NA	NA	NA	NA	NA	\$725	(909) 591-4700	138	48	Family	Pool
Upland View Terrace	1515 West Arrow Highway, Upland, CA 91786	47	NA	NA	3	\$169,000 - \$179,500	NA	\$710	(626) 428-9910	95	53	Family	Rec Facility, Pool, Off-Street Parking

Exhibit G – Available Condos for Sale

CONDOS FOR SALE WITHIN 20 MILES OF 435 East Gardena Blvd., Gardena, CA 90248						
ADDRESS	DISTANCE (IN MILES) FROM PARK	1BR LIST PRICE	2BR LIST PRICE	3BR LIST PRICE	4BR LIST PRICE	CONTACT NAME/PHONE
1501 Brea Blvd. Unit 221 Fullerton, CA 92835	19.8	\$230,000				Joanne Carmony (714) 906-4842
14819 Downey Ave. Unit 210 Paramount, CA 90723	6.7	\$239,000				Johnathan Cardwell (562) 221-9895
11827 Beverly Blvd. Unit 1 Whittier, CA 90601	14.6	\$240,000				Johanne Joly (562) 331-5701
320 South Ardmore Ave. Unit 228 Los Angeles, CA 90020	13	\$255,000				Chona Galvez (213) 706-1423
333 West 4th St. Unit 13 Long Beach, CA 90802	8.7	\$265,000				Will Puente (559) 549-9191
335 Cedar Ave. Unit 207 Long Beach, CA 90802	8.7	\$265,000				Bertha Jaramillo (562) 667-6372
15000 Downey Ave. Unit 141 Paramount, CA 90723	6.8	\$270,000				Bel Ceballos (562) 233-3197
15000 Downey Ave. Unit 236 Paramount, CA 90723	6.8	\$280,000				Carlene Zamora (562) 760-0107
335 Cedar Ave. Unit 405 Long Beach, CA 90802	8.7	\$285,000				Phillip Dominguez (562) 394-8385
930 East 1st St. Unit 20 Long Beach, CA 90802	9.4	\$287,000				Ada Greatrix (562) 493-3004
840 Cedar Ave. Unit 11 Long Beach, CA 90813	8.4	\$289,000				Gall Ben-Aharon (818) 590-7136
315 West 3rd St. Unit 410 Long Beach, CA 90802	8.8	\$290,000				Scott Chapman (562) 572-2275
525 South Ardmore Ave. Unit 124 Los Angeles, CA 90020	12.8	\$292,000				Jeong Oh (818) 515-8924
2925 East Spaulding St. Unit 301 Long Beach, CA 90804	9.2	\$293,000				Joyce Cheung (818) 335-6288
3565 Linden Ave. Unit 305 Long Beach, CA 90807	6.3	\$295,000				Tony Turek (562) 234-7101
100 Atlantic Ave. Unit 910 Long Beach, CA 90802	9.2	\$295,000				Nolan Same'-Weil (562) 505-1063
5585 East Pacific Coast Unit 208 Long Beach, CA 90804	11.1	\$299,000				Maryann Okorondwo (512) 577-3126
601 Olive Ave. Unit E Long Beach, CA 90802	8.9	\$309,000				D Joel Cruzado (562) 307-1986
350 Cedar Ave. Unit 308 Long Beach, CA 90802	8.7	\$309,900				Richard Carlos (562) 455-5488
100 Atlantic Ave. Unit 702 Long Beach, CA 90802	9.2	\$319,850				Jose Gutierrez (562) 212-4965
1237 East 6th St. Unit 203 Long Beach, CA 90802	9.2	\$319,900				Honghua Shang (626) 652-9666
3532 West Stonepine Ln. Unit C Anaheim, CA 92804	15.5	\$323,500				George Pancescu (714) 404-3308
330 Chestnut Ave. Unit 7 Long Beach, CA 90802	8.7	\$325,000				Maria Gonzalez (562) 708-2112
256 South La Fayette Pl. Unit 312 Los Angeles, CA 90057	12.8	\$325,000				Atsuko Kimoto (310) 990-9951
4049 Abourne Rd. Unit C Park Hills Heights, CA 90008	9.9	\$328,900				Khaled Saleh (310) 680-0890
10631 Lakeside Dr. Unit B Garden Grove, CA 92840	19.7	\$335,000				Jillian Annen (714) 642-9316
455 East Ocean Blvd. Unit 504 Long Beach, CA 90802	9.2	\$349,000				Tom Carrington (323) 308-8553
3312 Pasadena Ave. Unit 304 Long Beach, CA 90807	6.5	\$350,000				Lluvia Martinez (562) 650-6212
3424 Hathaway Ave. Unit 313 Long Beach, CA 90815	9.1	\$359,000				Gay-Lynn Barnes (562) 858-7065

ADDRESS	DISTANCE (IN MILES) FROM PARK	1BR LIST PRICE	2BR LIST PRICE	3BR LIST PRICE	4BR LIST PRICE	CONTACT NAME/PHONE
552 North Bellflower Blvd. Unit 206 Long Beach, CA 90814	11.4	\$359,950				Speedy Watson (310) 766-1412
2060 East 3rd St. Unit 2 Long Beach, CA 90814	9.8	\$364,900				Razvan Danciu (310) 402-3017
4125 South Figueroa Unit 416 Los Angeles, CA 90037	8.8	\$375,000				Venus Martinez (562) 201-3772
1517 East Garfield Ave. Unit 13 Glendale, CA 91205	17.8	\$379,800				Vartan Vasghanian (818) 625-2565
1406 Brett Pl. Unit 115 San Pedro, CA 90732	9	\$382,500				Leticia Rivera (310) 779-6892
444 Obispo Ave. Unit 107 Long Beach, CA 90814	10	\$390,000				Tiffany Saenger (562) 714-7159
312 West 5th St. Unit 411 Los Angeles, CA 90013	11.5	\$395,000				Peter Lorimer (310) 428-1094
1301 Cabrillo Ave. Unit 208 Torrance, CA 90501	4.2	\$399,000				Jennifer Orio (310) 951-6413
2222 South Mesa St. Unit 21 San Pedro, CA 90731	11		\$250,000			Melissa Urena (310) 780-5270
15338 Gundry Ave. Unit 215 Paramount, CA 90723	5.4		\$298,999			Marilyn Martinez (562) 686-9263
223 South Acacia Ave. Unit 214 Compton, CA 90220	2.5		\$299,900			Paola Melendez (562) 225-4802
3626 Baldwin Ave. unit 3 El Monte, CA 91731	18.1		\$308,000			Dantes Woo (626) 628-7141
1250 South Brookhurst St. Unit 1021 Anaheim, CA 92804	18.4		\$314,990			David Yoshida (714) 813-4734
1723 Cedar Ave. Unit 104 Long Beach, CA 90813	7.7		\$315,000			Caroline Witham (562) 307-5502
730 Frankel Ave. Unit B4 Montebello, CA 90640	11.5		\$319,900			Jose Nino (909) 342-3980
16551 Grunion Ln. Unit 202 Huntington Beach, CA 92649	17		\$329,000			Scott Sackin (714) 717-8911
2952 Belgrave Ave. Unit 205 Huntington Park, CA 90255	7.8		\$329,900			Maria Cibrian (562) 746-8832
9155 Pacific Ave. Unit 202 Anaheim, CA 92804	17.7		\$329,900			Jorge Neyra (714) 397-7101
3316 West 76th St. Unit 3/4 Los Angeles, CA 90043	6.9		\$335,000			Jeanine Liss (323) 842-6297
1725 Neil Armstrong St. Unit 105 Montebello, CA 90640	14.8		\$335,000			Shuyun Xu (626) 586-9919
7100 Cerritos Ave. Unit 58 Stanton, CA 90680	15.7		\$335,000			Holly Le (714) 325-0200
11131 Dodson St. Los Angeles, CA 91733	12.6		\$339,000			Yuan Chen (626) 888-9808
7100 Cerritos Ave. Unit 46 Stanton, CA 90680	15.7		\$339,999			Yvonne Alfaro (562) 706-7736
16322 Eucalyptus Ave. Unit 8 Bellflower, CA 90706	8.4		\$340,000			Yesenia Monroy (562) 484-8609
4051 Abourne Rd. Unit D Los Angeles, CA 90008	9.9		\$349,000			Kaela Whelan (310) 305-8333
15312 South Normandie Ave. Unit 206 Gardena, CA 90247	2		\$349,999			Pila Gray-Jessie (310) 242-5990
25602 Belle Porte Ave. Unit 204 Harbor City, CA 90710	6.6		\$350,000			Rene Magana (323) 573-1820
611 East Kelso St. Unit 10 Inglewood, CA 90301	6.9		\$350,000			Dorothy Manuel (310) 686 5215
5905 Rosemead Blvd. Unit 19 Pico Rivera, CA 90660	12.7		\$350,000			Juan Elias (310) 864-3093
1549 West 146th St. Unit 4 Gardena, CA 90247	2.4		\$359,900			Joy Houlihan (562) 595-3253
16551 Grunion Ln. Unit 303 Huntington Beach, CA 92649	17		\$359,900			James Melton (714) 318-4664
14405 Cerise Ave. Unit 11 Hawthorne, CA 90250	4		\$360,000			Dana Hughes (562) 544-0582

ADDRESS	DISTANCE (IN MILES) FROM PARK	1BR LIST PRICE	2BR LIST PRICE	3BR LIST PRICE	4BR LIST PRICE	CONTACT NAME/PHONE
23206 Sesame St. Unit D Torrance, CA 90502	4.8		\$360,000			Heather Barnard (310) 910-5324
805 Glenway Dr. Unit 104 Inglewood, CA 90302	8.3		\$364,000			Lori Penix (310) 939-9300
3516 East Ransom St. Unit 103 Long Beach, CA 90804	9.4		\$365,000			Gustavo Arias (323) 819-0035
16003 Pioneer Blvd. Unit 2B Norwalk, CA 90650	10.6		\$365,000			Walter Hearvey (562) 794-8679
4140 Workman Mill Rd. Unit 116 Whittier, CA 90601	15.8		\$365,000			Jennifer Johnson (626) 367-8443
601 South Euclid St. Unit 2A La Habra, CA 90631	18.7		\$365,000			Beth Sands (949) 385-2534
1781 Neil Armstrong St. Unit 205 Los Angeles, CA 90640	14.8		\$369,900			Josue Ramon (562) 544-2748
17628 Alburdis Ave. Unit 16 Artesia, CA 90701	10.6		\$374,900			John McGoff (562) 618-7801
4515 California Ave. Unit 205 Long Beach, CA 90807	5.7		\$375,000			Lynsee Russell (562) 841-6615
2504 East Willow St. Unit 202 Signal Hill, CA 90755	8.2		\$375,000			Brian Zinda (562) 706-0815
1334 West 137th St. Unit 131 Gardena, CA 90247	2.5		\$377,000			Michael Green (818) 642-5843
2222 South Mesa St. Unit 3 San Pedro, CA 90731	11			\$335,000		Martine Klein (310) 856-9153
5535 Ackerfield Ave. Unit 26 Long Beach, CA 90805	6.2			\$369,000		Michael Grosso (714) 376-1754
190 Racquet Club Dr. Compton, CA 90220	2.8			\$385,000		Brandy Adair (714) 852-9477
1901 W Greenleaf Ave. Unit B Anaheim, CA 92801	18.5			\$389,000		Harvey Vargas (714) 724-4444
5835 Gotham St. Unit B Bell Gardens, CA 90201	8.1			\$390,000		Raul Rodriguez (323) 816-8439
1900 West Glenoaks Ave. Unit D Anaheim, CA 92801	18.5			\$394,900		Ginger Douglass (714) 458-6234
16710 Orange Ave. Unit 74 Paramount, CA 90723	5.3			\$399,000		Andromeda Rangel (714) 865-5450
1630 Neil Armstrong St. Unit 204 Montebello, CA 90640	14.6			\$399,000		Wilfred Olguin (562) 714-2072
5951 Corona Ave. Unit B Huntington Park, CA 90255	8.3			\$405,000		Carlos Ramirez (909) 658-4181
1207 Obispo Ave. Unit 207 Long Beach, CA 90804	9.5			\$407,000		William Ward (949) 566-7517
729 South Knott Ave. Unit 208 Anaheim, CA 92804	15.3			\$409,500		Jae Young Kim (714) 948-0638
2011 West Katella Ave. Unit 13 Anaheim, CA 92804	18.9			\$410,000		Cherie Seiler (714) 200-8212
1509 Stanley Ave. Unit 304 Long Beach, CA 90804	8.9			\$416,800		Mirvat Khoury (909) 567-8400
1509 Stanley Ave. Unit 203 Long Beach, CA 90804	8.9			\$418,888		Alina Sachelarie (909) 262-8193
1765 Neil Armstrong St. Unit 101 Montebello, CA 90640	14.8			\$419,000		Javier Mendoza (818) 298-1576
20825 Norwalk Blvd. Unit 33 Lakewood, CA 90715	11.6			\$429,900		Bernard Moran (562) 208-5288
3725 Cogswell Rd. Unit D El Monte, CA 91732	19.5			\$438,888		Yu-Chin Han (626) 290-6501
1541 West 145th St. Unit 5 Gardena, CA 90247	2.4			\$448,999		Michael Hayes (951) 757-7025
1541 West 145th St. Unit 12 Gardena, CA 90247	2.4			\$449,000		Daniel Ahn (310) 972-0239
12020 Orange St. Unit A Norwalk, CA 90650	11			\$449,900		Vonn Vasquez (562) 889-0698
9909 Karmont Ave. South Gate, CA 90280	7.1			\$450,000		Robert McCullough (626) 650-7035

ADDRESS	DISTANCE (IN MILES) FROM PARK	1BR LIST PRICE	2BR LIST PRICE	3BR LIST PRICE	4BR LIST PRICE	CONTACT NAME/PHONE
1620 S. Pomona Ave. Unit C Fullerton, CA 92832	19.9			\$450,000		Karen Cobb (714) 287-2928
11855 Ramona Blvd. El Monte, CA 91732	19.7			\$458,000		Ying Xia (626) 818-38565
9640 Park St. Unit 4 Bellflower, CA 90706	8			\$459,000		Alex Palacios (562) 787-5243
6510 Walker Ave. Unit 6 Bell, CA 90201	8.4			\$460,000		Marcia Miranda (562) 500-2091
11032 Kibbins Circle Stanton, CA 90680	16.1				\$448,000	Rebecca Korss (949) 299-6324
737 North Chippewa Ave. Unit F Anaheim, CA 92801	18.6				\$450,000	Eric Guzik (714) 253-4446
1126 West Shorb St. Unit 4 Alhambra, CA 91803	15.6				\$540,000	Truc Truong (714) 717-3691
4816 Larwin Ave. Cypress, CA 90630	13.4				\$570,000	Myong Rose (714) 247-9100
330 Depot Ct. Fullerton, CA 92832	19.9				\$580,000	James Lee (909) 610-5470
2651 West Lincoln Ave. Anaheim, CA 92801	16.9				\$617,000	Richard Mohr (714) 296-7751,
4344 Muscatel Ave. Rosemead, CA 91770	17.7				\$668,000	Alexandra Yeung (626) 319-6216
9260 Elm Vista Dr. Unit 20A Downey, CA 90242	8.8				\$674,500	Jose Fregoso (310) 559-5570
9254 Elm Vista Dr. Unit 19A Downey, CA 90242	8.8				\$674,500	Jose Fregoso (310) 559-5570
9258 Elm Vista Dr. Unit 2A Downey, CA 90242	8.8				\$685,000	Jose Fregoso (310) 559-5570
345 Peach St. Unit D Monterey, CA 91755	14.9				\$699,888	Jenny Wu (909) 402-2645
20331 Anza Ave. Unit 11 Torrance, CA 90503	6				\$710,000	William H. Shin (213) 605-1119
68 East Bay State St. Unit 3E	16.7				\$718,000	Bao Liu (626) 347-8379
22330 Meyler St. Unit 3 Torrance, CA 90502	4.4				\$730,000	Alicia Nguyen (562) 673-8616

Exhibit H – Available Rental Housing Within 15 Miles of the Park

Rentals within 15 miles of 435 E. Gardena Blv. Gardena, CA 90248					
Address	Type of Unit	Studio	1 Bed	2 Bed	3 Bed
347 E. 56th St. Unit B Long Beach, CA 90805	Apt	\$950			
13108 S. Vermont Ave. Unit 8 Gardena, CA 90247	Apt	\$1,195			
3734 Cerritos Ave. Unit A Long Beach, CA 90807	Apt	\$1,250			
835 W. Rosecrans Ave. Unit 322 Gardena, CA 90277	Apt	\$1,275			
813 Amapola Ave. Unit C Torrance, CA 90501	Apt	\$1,275			
5731 California Blv. Unit B Long Beach, CA 90805	Apt	\$1,295			
1439 W. 179th St. Unit 18 Gardena, CA 90248	Apt	\$1,375			
17040 Yukon Ave. Unit 21 Torrance, CA 90504	Apt	\$1,400			
545 551st St. Ynit A-8A Redondo Beach, CA 90277	Apt	\$1,795			
14517 S. Vermont Ave. Unit 16 Gardena, CA 90247	Apt		\$1,329		
1218 W. 107th St. Unit 4 Los Angeles, CA 9044	Apt		\$1,395		
2110 W. El Segundo Blv. Unit 18 Gardena, CA 90249	Apt		\$1,395		
16024 S. Vermont Ave. Unit C Gardena, CA 90247	Apt		\$1,450		
102 E. Bennett St. Unit 6 Compton, CA 90220	Apt		\$1,450		
13921 S. Normandie Ave. Unit 81 Gardena, CA 90249	Apt		\$1,475		
835 Rosecrans Ave. Unit 210 Gardena, CA 90247	Apt		\$1,495		
835 Rosecrans Ave. Unit 202 Gardena, CA 90247	Apt		\$1,495		
2005 Cabrillo Ave. Unit B Torrane, CA 90501	Apt		\$1,495		
13520 Lemoli Ave. Unit 14 Hawthorne, CA 90250	Apt		\$1,495		
13700 Lemoli Ave. Unit 8 Hawthorne, CA 90250	Apt		\$1,495		
1727 W. 158th St. Unit 10 Gardena, CA 90247	Apt		\$1,550		
13630 Doty Ave. Unit 1 Hawthorne, CA 90250	Apt		\$1,550		
1520 W. Carson St. Unit 227 Torrance, CA 90501	Apt		\$1,575		
201 S. Willow Ave. Unit L Compton, CA 90221	Apt		\$1,575		
1830-34 El Segundo Blv. Unit 42 Gardena, CA 90249	Apt		\$1,575		
1412 W. 148th St. Unit 1 Gardena, CA 90247	Apt		\$1,595		
3900 Redondo Beach Blv. Unit 19 Torrance, CA 90504	Apt		\$1,595		

1520 W. Carson St. Unit 106 Torrance, CA 90501	Apt		\$1,600		
2515 Arlington Ave. Unit E Torrance, CA 90501	Apt		\$1,675		
1639 Cabrillo Ave. Unit 204 Torrance, CA 90501	Apt		\$1,675		
127 W. 112th St. Unit 1 Los Angeles, CA 90061	Apt		\$1,675		
2611 Voorhees Ave. Unit H Redondo Beach, CA 90278	Apt		\$1,700		
2616 Curtis Ave. Unit 2 Redondo Beach, CA 90278	Apt		\$1,750		
950 E. Del Amo Blv. Unit F63-19 Carson, CA 90746	Apt		\$1,795		
950 E. Del Amo Blv. Unit F63-24 Carson, CA 90746	Apt		\$1,795		
950 E. Del Amo Blv. Unit F63-17 Carson, CA 90746	Apt		\$1,795		
950 E. Del Amo Blv. Unit F63-18 Carson, CA 90746	Apt		\$1,795		
2706 Vanderbilt Ln. Unit H Redondo Beach, CA 90278	Apt		\$1,795		
21818 Figueroa St. Unit 9 Carson, CA 90745	Apt		\$1,800		
13621 Cerise Ave. Unit 1 Hawthorne, CA 90250	Apt		\$1,800		
4121 W. 162nd St. Lawndale, CA 90260	Duplex		\$1,995		
1905 Phelan Ln. Unit A Redondo Beach, CA 90278	Apt		\$1,995		
807 Amapola Ave. Unit B Torrance, CA 90501	Apt		\$2,195		
2704 Vanderbilt Ln. Unit 14 Redondo Beach, CA 90278	Apt		\$2,200		
1574 W. 207th St. Unit B Torrance, CA 90501	Apt			\$1,695	
1911 N. Santa Fe Ave. Unit 1 Compton, CA 90221	Apt			\$1,700	
8439 Adams St. Unit 6 Paramount, CA 90723	Apt			\$1,795	
2616 W. El Segundo Blv. Unit 4 Gardena, CA 90249	Apt			\$1,795	
1340 E. South Sr. Unit 1 Long Beach, CA 90805	Apt			\$1,800	
92 E. Market St. Unit 8 Long Beach, CA 90805	Apt			\$1,825	
1609 W. 227th St. Unit 5 Torrance, CA 90501	Apt			\$1,850	
1064 E. Market St. Unit 1 Long Beach, CA 90805	Apt			\$1,850	
1520 W. Carson St. Unit 244, Torrance, CA 90501	Apt			\$1,875	
1751 Cabrillo Ave. Unit 1 Torrance, CA 90501	Apt			\$1,875	
16919 Yukon Ave. Unit 15 Torrance, CA 90504	Apt			\$1,875	
1438 W. 145th St. Unit E Gardena, CA 90247	Apt			\$1,875	

1538 W. 206th St. Unit 1 Torrance, CA 90501	Apt			\$1,895	
49 W. Del Amo Blv. Unit 5 Long Beach, CA 90805	Apt			\$1,895	
6565 Cherry Ave. Unit 3 Long Beach, CA 90805	Apt			\$1,895	
3229 W 190th St. Unit A Torrance, CA 90504	Apt			\$1,900	
457 E. Louise St. Unit C Long Beach, CA 90805	Apt			\$1,900	
5465 Lime Ave. Unit 3 Long Beach, CA 90805	Apt			\$1,900	
3694 Redondo Beach Blv. Unit C Torrance, CA 90504	Apt			\$1,900	
4340 Manhattan Beach Blv. Unit 4 Lawndale, CA 90260	Apt			\$1,900	
50 E. Plymouth St. Unit 3 Long Beach, CA 90805	Apt			\$1,925	
3460 E. 67th St. Unit 4 Long Beach, CA 1925	Apt			\$1,925	
16724 Yukon Ave. Unit 2 Torrance, CA 90504	Apt			\$1,950	
1142 E. 120th St. Unit 2 Los Angeles, CA 90059	Apt			\$1,980	
13751 Lemoli Ave. Unit 2A Hawthorne, CA 90250	Apt			\$1,988	
1119 W. 158th St. Unit 4 Gardena, CA 90247	Apt			\$1,995	
4339 Elm Ave. Unit 3 Long Beach, CA 90807	Apt			\$1,995	
4457 Atlantic Ave. Unit 4 Long Beach, CA 90807	Apt			\$1,995	
2940 W. 235th St. Unit 14 Torrance, CA 90505	Apt			\$1,995	
15730 Larch Ave. Unit B Lawndale, CA 90260	Apt			\$1,995	
4379 W. 141st St. Unit F Hawthorne, CA 90250	Apt			\$1,995	
360 E. 55th St. Unit 4 Long Beach, CA 90805	Apt			\$2,000	
5409 Olive Ave. Int B Long Beach, CA 90805	Apt			\$2,000	
14427 S. Normandie Ave. Unit C Gardena , CA 90247	Apt			\$2,000	
1519 Del Amo Blv. Unit 4 Torrance, CA 90501	Apt			\$2,050	
3750 Atresia Blv. Unit 22 Torrance, CA 90504	Apt			\$2,055	
4049 139th St. Unit E Hawthorne, CA 90250	Apt			\$2,095	
950 E. Del Amo Blv. Unit F63-03 Carson, CA 90746	Apt			\$2,195	
20606 S. Vermont Ave. Unit 45 Torrance, CA 90502	Apt			\$2,195	
14523 S. Budlong Ave. Unit E Gardena, CA 90247	Apt			\$2,195	
1651 W. 147th St. unit 7 Gardena, CA 90247	Apt			\$2,195	

709 Pine Dr, Torrance, CA 90501	Duplex			\$2,200	
16417 S. Denker Ave. Unit E Gardena, CA 90247	Apt			\$2,200	
2513 190th St. Unit A Redondo Beach, CA 90278	Twn Hm			\$2,215	
20428 Osage Ave. Unit C Torrance, CA 90503	Apt			\$2,249	
909 Sarori Ave. Unit C Torrance, CA 90501	Apt			\$2,250	
16812 S. Yukon Ave. Unit E Torrance, CA 90504	Apt			\$2,300	
105 W. Spring St. Unit E Long Beach, CA 90806	Twn Hm			\$2,300	
4024 Emerald St. Unit 2 Torrance, CA 90503	Apt			\$2,345	
20617 Denker Ave. Unit B, Torrance, CA 90501	Twn Hm			\$2,350	
1639 Cabrillo Ave. Unit 307 Torrance, CA 90501	Apt			\$2,350	
16503 S. Dalton Ave. Gardena, CA 90247	Duplex			\$2,350	
1412 W. 148th St. Unit 4 Gardena, CA 90247	Apt			\$2,395	
22704 Maple Ave. Unit 2 Torrance, CA 90505	Apt			\$2,395	
3825 Artesia Blv. Unit A Torrance, CA 90504	Apt			\$2,495	
1270 Engracia Ave, Torrance, CA 90501	Twn Hm			\$2,599	
2513 Apple Ave. Unit D Torrance, CA 90501	Twn Hm			\$2,750	
2971 Plaza Del Amo Unit 205 Torrance, CA 90503	Twn Hm			\$2,950	
2577 Plaza Del Amo Unit 706 Torrance, CA 90503	Twn Hm			\$3,200	
4015 N. Virginia Rd. Unit 3 Long Beach, CA 90807	Twn Hm			\$3,500	
1800 Oak St. Unit 500 Torrance, CA 90501	Twn Hm			\$3,500	
3101 Plaza Del Amo Unit 91 Torrance, CA 90503	Twn Hm			\$3,950	
5580 Dairy Ave. Unit 4 Long Beach, CA 90805	Apt				\$2,095
4086 W. 139th St. Unit C Hawthorne, CA 90250	Apt				\$2,100
1040 W. 91st St. Unit 9 Los Angeles, CA 90044	Apt				\$2,200
1439 W. 179th St. Unit 14 Gardena, CA 90248	Apt				\$2,300
16118 S. Ainsworth St. Unit 4 Gardena, CA 90247	Apt				\$2,350
10604 Hickory St. Unit A Los Angeles, CA 90002	Apt				\$2,400
9427 S. Braodway Unit 5 Los Angeles, CA 90003	Apt				\$2,400
8970 Annetta Ave. South Gate, CA 90280	Duplex				\$2,450

1608 W. 226th St. Unit 4 Torrance, CA 90501	Apt				\$2,450
6645 Delta Ave. Unit B Long Beach, CA 90805	Apt				\$2,500
219 E. 49th St. Unit 2 Long Beach, CA 90805	Apt				\$2,500
360 E. Imperial Hwy. Unit A Los Angeles, CA 90061	Apt				\$2,500
2927 W. 141st Pl. Unit 1 Gardena, CA 90249	Apt				\$2,500
23312 Western Ave. Unit C Los Angeles, CA 90710	Apt				\$2,500
4315 W. 145th St. Unit 10 Lawndale, CA 90260	Apt				\$2,600
456 W. 89th St. Unit 456 Los Angeles, CA 90003	Apt				\$2,641
15549 S. Budlong Pl. Unit 25 Gardena, CA 90247	Apt				\$2,695
4049 139th St. Unit F Hawthorne, CA 90250	Apt				\$2,695
11812 Avalon Blv. Los Angeles, CA 90059	Apt				\$2,700
2919 W. 235th St. Unit 1 Torrance, CA 90505	Apt				\$2,700
309 W. 121st St. Los Angeles, CA 90061	Triplex				\$2,750
5431 Dairy Ave. Unit A Long Beach, CA 90805	Apt				\$2,795
3360 E. 67th St. Unit 1 Long Beach, CA 90805	Apt				\$2,796
2607 Curtis Ave. Unit A Redondo Beach, CA 90278	Apt				\$2,825
18030 Prairie Ave. Unit D Torrance, CA 90504	Apt				\$2,975
4315 W. 182nd St. Unit 105 Torrance, CA 90504	Apt				\$3,000
22533 S. Vermont Ave. Unit 31 Torrance, CA 90502	Twn Hm				\$3,000
2417 Mathews Ave. Unit D Redondo Beach, CA 90278	Apt				\$3,075
2686 Cabrillo Ave. Unit 23 Torrance, CA 90501	Apt				\$3,100
2600 Mathews Ave. Unit B Redondo Beach, CA 90278	Apt				\$3,195
15612 Van Ness Ave. Unit 6 Gardena, CA 90249	Apt				\$3,200
20707 Anza Ave. Unit 276 Torrance, CA 90503	Apt				\$3,200
3055 W. 104th St. Inglewood, CA 90303	Twn Hm				\$3,200
1512 W. Aresia Sq. Unit C Gardena, CA 90248	Twn Hm				\$3,295
2456 W. 238th St. Torrance, CA 90501	SFR				\$3,300
22634 Maple Ave. Unit 3 Torrance, CA 90505	Twn Hm				\$3,495
2801 Sepulveda Blv. Unit 86 Torrance, CA 90505	Twn Hm				\$3,500

2016 Nelson Ave. Unit D Redondo Beach, CA 90278	Apt				\$3,500
4339 W. 141st St. Unit 2 Hawthorne, CA 90205	Duplex				\$3,550
1500 W. Artesia Sq. Unit D Gardena, CA 90248	TwN Hm				\$3,600
2214 Manhattan Beach Blv. Unit A Redondo Beach, CA	Apt				\$3,600
2222 Curtis Ave. Unit B Redondo Beach, CA 90278	Apt				\$3,700

Exhibit I – Site/Yield Study for 435 E. Gardena Blvd., Carson, CA



PROJECT SUMMARY
 TOTAL SITE AREA: 5.81 AC.
RESIDENTIAL SUMMARY
 AMT. SYM. DESCRIPTION NET LEASABLE
 72 1 ONE BDRM/ONE BA 684 S.F.
 41 2 TWO BDRM/TWO BA 1025 S.F.
 41 3 THREE BDRM/TWO BA 1168 S.F.
 174 TOTAL O.U.
 DENSITY = 30 O.U./ACRE
 TOTAL PARKING = 348 SPACES = 2 SPACES/UNIT

COMMERCIAL SUMMARY
 2500 SF. RESTAURANT/CAFE
 PARKING REQ. = 1/100 SF = 25
 PARKING PROVIDED = 29



SITE / YIELD STUDY 4355 E. GARDENA BLVD., CARSON, CA.
 FOR CARTER-SPENCER ENTERPRISES, LLC 4.25.19 1" = 60'-0"

APPRAISAL REPORT

**57 MOBILE HOMES
RANCHO DOMINGUEZ MOBILE ESTATES
435 E. GARDENA BOULEVARD
CARSON, CALIFORNIA**

APPRAISED FOR

Aleshire & Wynder, LLP
18881 Von Karman Ave., Suite 1700
Irvine, CA 92612

DATE OF VALUATION

September 10, 2020

DATE OF REPORT

October 9, 2020

**APPRAISED BY
Anderson & Brabant, Inc.
353 West Ninth Avenue
Escondido, California 92025**

File No. 20-057

ANDERSON & BRABANT, INC.
REAL ESTATE APPRAISERS AND CONSULTANTS
353 W. NINTH AVENUE
ESCONDIDO, CALIFORNIA 92025-5032
TELEPHONE (760) 741-4146
FAX (760) 741-1049

October 9, 2020

Sunny K. Soltani, Esq.
Aleshire & Wynder, LLP
18881 Von Karman Ave., Suite 1700
Irvine, CA 92612

Dear Ms. Soltani:

As requested, we have appraised 57 mobile/manufactured homes in Rancho Dominguez Mobile Estates located at 435 E. Gardena Boulevard, Carson, California. The purpose of the appraisal has been to provide two opinions of value for each home, as of September 10, 2020. Per the City's Ordinance for park closures, the two opinions of value are the "on-site value" and the "off-site value." Definitions of the two values have been included in the appraisal.

Our analyses and final conclusions were developed, and this report has been prepared, in conformity with the requirements of the Code of Professional Ethics and Standards of Professional Practice of the Appraisal Institute, as well as the Uniform Standards of Professional Appraisal Practice (USPAP).

Immediately following this letter is a summary list of our opinions of the "on-site value" and "off-site value" of each home. The balance of the report includes a brief introduction followed by the individual home valuations. The appraisal is subject to certain assumptions and limiting conditions as set forth in the introductory section of the report.

Respectfully submitted,

ANDERSON & BRABANT, INC.



James Brabant, MAI
State Certification No. AG002100

RANCHO DOMINGUEZ MOBILE ESTATES

Space	On-Site Home Value	Off-Site Home Value
1	\$36,000	\$15,200
4	\$35,000	\$16,100
5	\$20,000	\$9,600
7	\$35,000	\$17,400
10	\$31,000	\$15,200
11	\$17,000	\$7,900
12	\$35,000	\$15,800
13	\$30,000	\$12,900
14	\$37,000	\$24,500
18	\$41,000	\$24,900
20	\$24,000	\$11,400
21	\$30,000	\$9,200
22	\$23,000	\$9,800
23	\$36,000	\$23,000
24	\$23,000	\$8,300
25	\$30,000	\$13,300
27	\$26,000	\$8,600
28	\$30,000	\$14,700
29	\$30,000	\$13,200
30	\$23,000	\$8,200
31	\$21,000	\$8,100
34	\$23,000	\$10,800
35	\$24,000	\$6,200
36	\$29,000	\$12,400
38	\$23,000	\$10,000
39	\$27,000	\$10,200
40	\$17,000	\$6,700
42	\$27,000	\$13,300
44	\$45,000	\$40,600

Space	On-Site Home Value	Off-Site Home Value
45	\$33,000	\$19,500
48	\$32,000	\$15,900
49	\$29,000	\$14,000
50	\$13,000	\$6,400
51	\$8,000	\$5,300
52	\$25,000	\$12,200
54	\$25,000	\$13,000
55	\$28,000	\$16,000
56	\$31,000	\$11,500
57	\$30,000	\$11,500
58	\$30,000	\$18,000
59	\$28,000	\$10,200
60	\$40,000	\$22,700
62	\$30,000	\$9,100
63	\$33,000	\$19,900
64	\$40,000	\$26,600
65	\$18,000	\$9,300
66	\$27,000	\$15,700
71	\$23,000	\$8,700
72	\$22,000	\$7,900
74	\$22,000	\$8,100
75	\$22,000	\$9,000
76	\$22,000	\$10,200
77	\$27,000	\$11,000
78	\$36,000	\$20,200
79	\$35,000	\$18,100
80	\$36,000	\$14,800
81	\$26,000	\$13,400

INTRODUCTION

APPRAISAL OF

57 MOBILE/MANUFACTURED HOMES

RANCHO DOMINGUEZ MOBILE ESTATES

435 E. GARDENA BOULEVARD

CARSON, CALIFORNIA

ASSUMPTIONS AND LIMITING CONDITIONS

This appraisal is subject to the following special assumptions and limiting conditions:

1. This is an Appraisal Report that is intended to comply with the reporting standards established by the Uniform Standards of Professional Appraisal Practice (USPAP Standards Rule 2-2(a). It presents summary discussions of the data, reasoning and analyses that were used in the appraisal process to develop the appraisers' opinion of value. In some instances, supporting documentation concerning data, reasoning, and analyses has been retained in the appraisers' file. The information contained in this report is specific to the needs of the client and for the intended use stated in this report. The appraisers are not responsible for the unauthorized use of this report.
2. It is understood that the park residents have been informed that the mobile home park has been located in a manufacturing-zoned district that does not permit that use since October 3, 1977. A 35-year amortization period was granted and the park became "legal nonconforming." That status expired on November 2, 2012, and the mobile home park was no longer a legal use. The illegal status, and eventual closure of the park, became a disclosure requirement for anyone attempting to sell their home and has had a negative impact on the value of homes in the park.
3. Information regarding the physical characteristics of the subject 57 homes was obtained from several physical inspections conducted during August and September of 2020, with the most recent inspection conducted on September 10, 2020. The inspections of the homes were conducted from the exterior only, with no interior inspections due to COVID-19 concerns. Information on the interior of the homes was obtained from summaries of homeowner questionnaires that were filled out and returned as well as telephone conversations with residents willing to provide their phone numbers. Many residents chose not to fill out and return the homeowner form and/or to provide a telephone number. Our rating of the overall condition of the homes was based on all of the above information we were able to obtain and is assumed to be reasonable. This is considered to be an extraordinary assumption that is necessary for the analysis.
4. For those homes where we did not receive a homeowner questionnaire and were unable to conduct a telephone interview, we have made certain assumptions about the physical characteristics of the home. We have assumed the following: interior walls are standard; appliances include a range/oven and refrigerator; the bathrooms feature a tub/shower; and the home has forced air heat. In addition, our analysis assumes that all appliances and utility systems in the home are in working condition and there are no significant repairs needed other than what may be visible and noted from our exterior inspection. These are considered to be extraordinary assumptions that are necessary for the analysis.
5. During the course of this appraisal we made numerous attempts to find ways to obtain information about the interiors of homes when we did not have a completed Homeowner Form and no way to contact the homeowner. We first suggested that residents who speak English could come outside, keeping socially distant, during our exterior inspections and we could interview them about their home. But, this idea was not approved by the park owner's

representative. We also requested phone numbers of all the resident owners so we could interview them; and the park owners cited privacy concerns and would not provide them. We also asked if we could knock on doors, keeping socially distant, and ask the resident if he (she) would be willing to talk with us about their home. We were strongly discouraged, by the park owner's representative, from doing that. It appears that many of the resident homeowners have chosen not to cooperate with efforts to obtain information about their homes. The end result is that we received and reviewed only 19 completed forms and we completed a number of telephone interviews, but there are a number of homes that required assumptions about the interior finishing and condition. We believe that the assumptions we have made are reasonable, especially in light of the fact that the park is subject to closure. The significance of the differences in interior finishing and condition is much less than it would be if the park was not going to close.

6. The date of value for these appraisals is September 10, 2020, which is the date of our most recent inspection of the park. We have assumed that the condition of each of the 57 homes on the date of value is similar to the condition we observed on the date of our exterior inspection of the home and the information obtained from various sources. This is considered to be an extraordinary assumption that is necessary for the analysis.
7. For the opinions of off-site value we have used the NADA Appraisal Guides and have assumed that the homes are not located in a rental mobile home park. This is a hypothetical condition that is necessary for the analysis.

This appraisal is subject to the following general assumptions and limiting conditions:

1. It is assumed that information furnished to us by our client, including maps, cost estimates, and legal descriptions, is substantially correct.
2. No responsibility is assumed for matters legal in character, nor do we render an opinion as to title, which is assumed to be held in fee simple interest as of the date of valuation unless otherwise specified.
3. It is assumed that the property is readily marketable, free of all liens and encumbrances except any specifically discussed herein, and under responsible ownership and management.
4. Photographs, plats, and maps furnished in this appraisal are to assist the reader in visualizing the property. No surveys of the property have been made and no responsibility has been assumed in this matter.
5. A title report has not been provided for this appraisal assignment. We have assumed that there are no undisclosed easements or restrictions affecting the property which would adversely impact its value.
6. It is assumed that there are no legitimate environmental or ecological reasons that would prevent orderly development of the land to its highest and best use under economically feasible conditions.
7. Soils engineering studies have not been provided to your appraisers. It is therefore assumed that there are no hidden or unapparent soil conditions that would render the appraised properties

more or less valuable. No responsibility is assumed for such conditions or for engineering that might be required to discover such factors.

8. No Phase I Environmental report was provided to us. The appraisers are not qualified to detect hazardous waste and/or toxic materials. Any comment by the appraisers that might suggest the possibility of the presence of such substances should not be taken as confirmation of the presence of hazardous waste and/or toxic materials. Such determination would require investigation by a qualified expert in the field of environmental assessment. The appraisers' value estimates are predicated on the assumption that there is no contamination in the soil that would adversely impact the value of the property. No responsibility is assumed for any environmental conditions, or for any expertise or engineering knowledge required to discover them. The appraisers' descriptions and resulting comments are the result of the routine observations made during the appraisal process.
9. Possession of this report, or a copy thereof, does not carry with it the right of publication. It may not be used for any purpose by any person other than the part to whom it is addressed without the written consent of Anderson & Brabant, Inc., and in any event, only with proper written qualification and only in its entirety.
10. Disclosure of the contents of this appraisal report is governed by the by-laws and regulations of the Appraisal Institute. Neither all nor any part of the contents of this report (especially reference to the Appraisal Institute or the MAI designation) shall be disseminated to the public through advertising media, public relations media, news media, sales media, or any other public means of communication without prior written consent and approval of Anderson & Brabant, Inc.
11. The submission of this report constitutes completion of the services authorized. It is submitted on the condition that the client will provide the appraiser customary compensation relating to any subsequent required work on this matter including, but not limited to, review and response to questions and comments about the report, as well as preparation for and attendance at any required meetings and/or hearings.
12. The valuation estimate is of surface rights only and the mineral rights, if any, have been disregarded.
13. No warranty is made as to the seismic stability of the subject property.
14. It is assumed that the utilization of the land or improvements is within the boundaries or property lines of the properties described and that there is no encroachment or trespass unless otherwise stated in this report.

APPRAISER'S SIGNED CERTIFICATION

I do hereby certify that, to the best of my knowledge and belief ...

1. The statements of fact contained in this report are true and correct.
2. The reported analyses, opinions, and conclusions are limited only by the reported assumptions and limiting conditions and are my personal, impartial, and unbiased professional analyses, opinions, and conclusions.
3. I have performed no services, as an appraiser or in any other capacity, regarding the properties that are the subject of this report within the three (3) year period immediately preceding acceptance of this assignment.
4. I have no bias with respect to the properties that are the subject of this report or to the parties involved with this assignment.
5. My engagement in this assignment was not contingent upon developing or reporting predetermined results.
6. My compensation for completing this assignment is not contingent upon the developing or reporting of a predetermined value or direction in value that favors the cause of the client, the amount of the value opinion, the attainment of a stipulated result, or the occurrence of a subsequent event directly related to the intended use of this appraisal.
7. My analyses, opinions, and conclusions were developed, and this report has been prepared, in conformity with the *Uniform Standards of Professional Appraisal Practice (USPAP)*.
8. I made an exterior inspection (from the street) of the homes that are the subject of this report. Interior inspections of the homes were not conducted due to COVID-19 concerns.
9. Patricia L. Brabant Haskins and Patricia Milich Cypher provided significant real property appraisal assistance to the person signing this appraisal report. Their assistance included exterior inspections of the subject properties, telephone interviews with homeowners, data research, valuation analyses and report preparation.
10. The reported analyses, opinions, and conclusions were developed, and this report has been prepared, in conformity with the Code of Professional Ethics and Standards of Professional Appraisal Practice of the Appraisal Institute.
11. The use of this report is subject to the requirements of the Appraisal Institute relating to review by its duly authorized representatives.
12. As of the date of this report, I have completed the continuing education program of the Appraisal Institute.
13. Our office has not previously appraised or performed any other service for the subject properties.



James Brabant, MAI
Certified General Real Estate Appraiser
State Certification No. AG002100

October 9, 2020
Date

INTRODUCTION

IDENTIFICATION OF THE PROPERTIES APPRAISED

The properties that are the subject of this appraisal are 57 resident owned mobile/manufactured homes in Rancho Dominguez Mobile Estates, located at 435 E. Gardena Boulevard, Carson, California. Rancho Dominguez consists of a total of 81 mobile/manufactured homes, but 24 park owned homes are not included in the valuation analyses.

PURPOSE/OBJECTIVE OF THE APPRAISAL ASSIGNMENT

The purpose of the assignment is to provide two opinions of current value for each of the 57 resident owned mobile/manufactured homes in Rancho Dominguez Mobile Estates. According to the City's Ordinance for park closures, the two values are "on-site value" and "off-site value." Neither term is defined in the Ordinance.

EFFECTIVE DATE OF VALUE OPINIONS

The effective date of the opinions of value expressed herein is September 10, 2020, the date of our most recent inspection of the park.

DATE OF REPORT

The date of the appraisal report is October 9, 2020.

INTENDED USE AND INTENDED USER

Our client for this assignment is Aleshire & Wynder, LLP, a law firm that represents the City of Carson. James Brabant of Anderson & Brabant, Inc. was selected by the City of Carson, per their Ordinance, to prepare the appraisal of mobile/manufactured homes at Rancho Dominguez Mobile Estates in connection with the closure of the park and the preparation of a required Relocation Impact Report. The intended user of this appraisal is considered to be the City of Carson and its representatives. It is understood that a copy of the appraisal report will also be made available to the park owner and its representatives and that the City will provide each homeowner with a copy of a summary of our appraisal of their home. It is also understood that information about our value conclusions may be included in a Relocation Impact Report.

EXTRAORDINARY ASSUMPTIONS

An extraordinary assumption is defined as an assignment-specific assumption as of the effective date regarding uncertain information used in an analysis which, if found to be false, could alter the appraiser's opinions or conclusions. It is something that is assumed to be true, but is not certain.

Information regarding the physical characteristics of the subject properties was obtained from several sources. The park owners representative provided some initial basic information about the homes. We then conducted physical inspections during August and September of 2020, with the most recent inspection conducted on September 10, 2020. Our home inspections

included only the exterior of each home, with no interior inspections because of COVID-19 concerns. We prepared home inspection forms that were distributed to the homeowners with a request that they be filled out and returned along with a phone number for follow-up questions. We have received and reviewed only 19 completed forms. We were also able to complete a number of telephone interviews to obtain basic information about the interior of homes. Our rating of the overall condition of each home was based on our exterior inspections and whatever additional information we were able to obtain and we have assumed our ratings are reasonable.

For those homes where we did not receive a homeowner questionnaire and were unable to conduct a telephone interview, we have made certain assumptions about the physical characteristics of the home. We have assumed the following: interior walls are standard; appliances include a range/oven and refrigerator; the bathrooms feature a tub/shower; and the home has forced air heat. In addition, our analysis assumes that all appliances and utility systems in the homes are in working condition and there are no significant repairs needed other than what was revealed on homeowner questionnaires, telephone interviews, or was visible and noted from our exterior inspections.

The date of value for these appraisals is September 10, 2020, and we have assumed that the condition of each of the 57 homes on the date of value is similar to the condition we observed on the date of our exterior inspection of the home and the other information obtained.

The above assumptions are considered to be extraordinary assumptions that are necessary for the analysis. This appraisal is also subject to certain special and general assumptions as outlined on pages 2, 3 and 4 of this report.

HYPOTHETICAL CONDITIONS

A hypothetical condition is defined as a condition, directly related to a specific assignment, which is contrary to what is known by the appraiser to exist on the effective date of the assignment results, but is used for the purpose of analysis. For the opinions of off-site value we have used the NADA Appraisal Guides and have assumed that the homes are not located in a rental mobile home park. This is a hypothetical condition that is necessary for the analysis.

SCOPE OF WORK

James Brabant, MAI was the lead appraiser for this assignment. Patricia L. Brabant Haskins and Patricia Milich Cypher provided significant professional assistance in the preparation of this appraisal. Their assistance included inspecting (exterior) the subject properties and conducting telephone interviews; researching, verifying and inspecting comparable market data; valuation analyses and report preparation. The scope of work for this assignment included the following:

- Review of the City's Ordinance for the closing of a mobile home park.
- Discussion of the scope of the assignment with representatives of the City of Carson.
- Requested, received and reviewed documents and information from representatives of the park owner.

- We completed exterior only inspections of all of the resident owned homes in Rancho Dominguez and telephone interviews with some of the homeowners. Interior inspections of the homes and personal interviews were not conducted due to COVID-19 concerns.
- Information about the interior of the homes was obtained from a review of 19 Homeowner Forms filled out by resident homeowners and telephone interviews with some of the homeowners. Spanish language translators were used for some resident interviews.
- Identify, verify and inspect comparable sales of mobile/manufactures homes in Rancho Dominguez. We were unable to verify with either the buyer or seller, the details of the 11 sales that were purchased by existing resident homeowners. Information about the resident purchases was obtained from HCD records.
- Research potential comparable sales from other parks that were subject to closure because the park is no longer a legal use.
- Valuation analysis of comparable sales data (onsite values).
- Prepare NADA Guide analysis for each home (offsite values).
- Prepare written appraisal report.

During the course of this appraisal we made numerous attempts to find ways to obtain information about the interiors of homes when we did not have a completed Homeowner Form and no way to contact the homeowner. We first suggested that residents who speak English could come outside, keeping socially distant, during our exterior inspections and we could interview them about their home. But, this idea was not approved by the park owner's representative. We also requested phone numbers of all the resident owners so we could interview them; and the park owners cited privacy concerns and would not provide them. We also asked if we could knock on doors, keeping socially distant, and ask the resident if he (she) would be willing to talk with us about their home. We were strongly discouraged, by the park owner's representative, from doing that. It appears that many of the resident homeowners have chosen not to cooperate with efforts to obtain information about their homes. The end result is that we received and reviewed only 19 completed forms and we completed a number of telephone interviews, but there are a number of homes that required assumptions about the interior finishing and condition. We believe that the assumptions we have made are reasonable, especially in light of the fact that the park is subject to closure. The significance of the differences in interior finishing and condition is much less than it would be if the park was not going to close.

REPORT OPTION

This is an Appraisal Report as defined by the Uniform Standards of Professional Appraisal Practice (USPAP). It presents summary discussions of the data, reasoning and analyses that were used in the appraisal process to develop the appraisers' opinion of value. Additional supporting documentation concerning the data, reasoning, and analyses is retained in the appraisers' files. The depth of discussions contained herein is specific to the needs of the clients and for the intended use as previously stated.

REPORT FORMAT

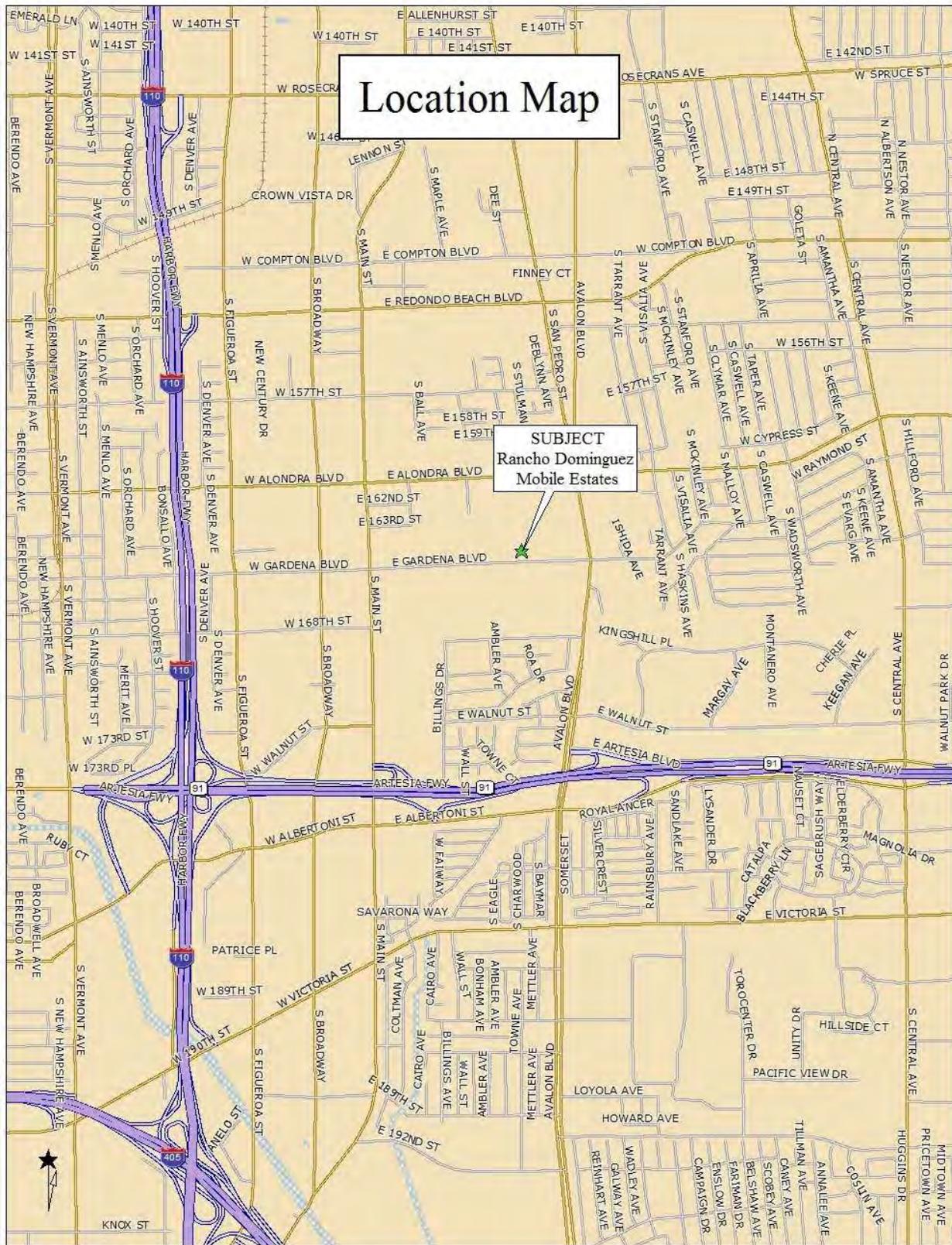
This appraisal report begins with an Introduction section that describes the purpose and scope of the assignment and an explanation of significant assumptions and limiting conditions. It also includes a brief description of Rancho Dominguez Mobile Estates and its location. The Valuation section includes our definitions of “on-site value” and “off-site value” and the approaches we took for the valuation analyses. This introductory section is followed by the 57 individual home valuations.

SALES HISTORY OF THE SUBJECT PROPERTIES

None of the homes appraised were acquired within the last five years.

PRIOR APPRAISAL SERVICES

Our office has not previously appraised the subject properties.



LOCATION DESCRIPTION

The subject property is located on the north side of East Gardena Boulevard, west of Avalon Boulevard in the northern portion of the City of Carson. It is in an industrial area and is surrounded by a variety of industrial uses. It has good freeway proximity to the 91, 110, 405 and 710 freeways.

MOBILE HOME MARKET

As of January 1, 2020, approximately 9.3 percent of the total housing units within the city of Carson were mobile homes. The California State Department of Finance reports that there are 2,456 mobile homes in the city. When considering all unincorporated areas within Los Angeles County, there are a total of 58,297 mobile homes, which is approximately 1.6 percent of the total housing units. As of the date of value, there were no physically vacant spaces in the subject park.

The number of mobile homes in the City of Carson has not significantly changed in recent years. This, of course, points to the fact there has been negligible new construction of mobile home parks throughout the state of California, for many years. Although there has not been any significant change, it is our understanding that there are a few parks that are currently contemplating or in the process of closure.

RENT CONTROL

The City of Carson's Mobile Home Rent Review Board (MRRB) was created in 1979. Over the years there have been a number of revisions and amendments to the ordinance. Currently, rent increases are allowed in the amount of 75% of the change in the CPI from the date of the parks last rent increase, with a maximum increase of 8%. No additional increase is allowed when a home is sold. Rancho Dominguez Mobile Estates is subject to the City of Carson's mobile home rent review ordinance and the rents range from \$397.05 to \$424.56 with an average of \$414.94 per month.

RECENT LEGISLATION

Recent legislation in California, in the form of AB 2782, was signed by the Governor on August 31, 2020. One of the provisions of this bill is that in the event of park closure, residents would be entitled to the in-place market value of their home if they are unable to obtain adequate housing in another mobilehome park. I have been informed that this legislation will become effective January 1, 2021. Thus, it is not effective as of the date of this appraisal. However, it could become effective prior to completion of all required processing and hearings. The implications of this legislation will be discussed in the section titled Approaches to Value on page 21.

AERIAL VIEW OF PARK AVALON MOBILE ESTATES



The approximate boundaries of the park are outlined in red

SUBJECT PROPERTY PHOTOGRAPHS



Westerly park entrance.



Easterly park entrance.

SUBJECT PROPERTY PHOTOGRAPHS



Recreation Building



Multi-purpose room.

SUBJECT PROPERTY PHOTOGRAPHS

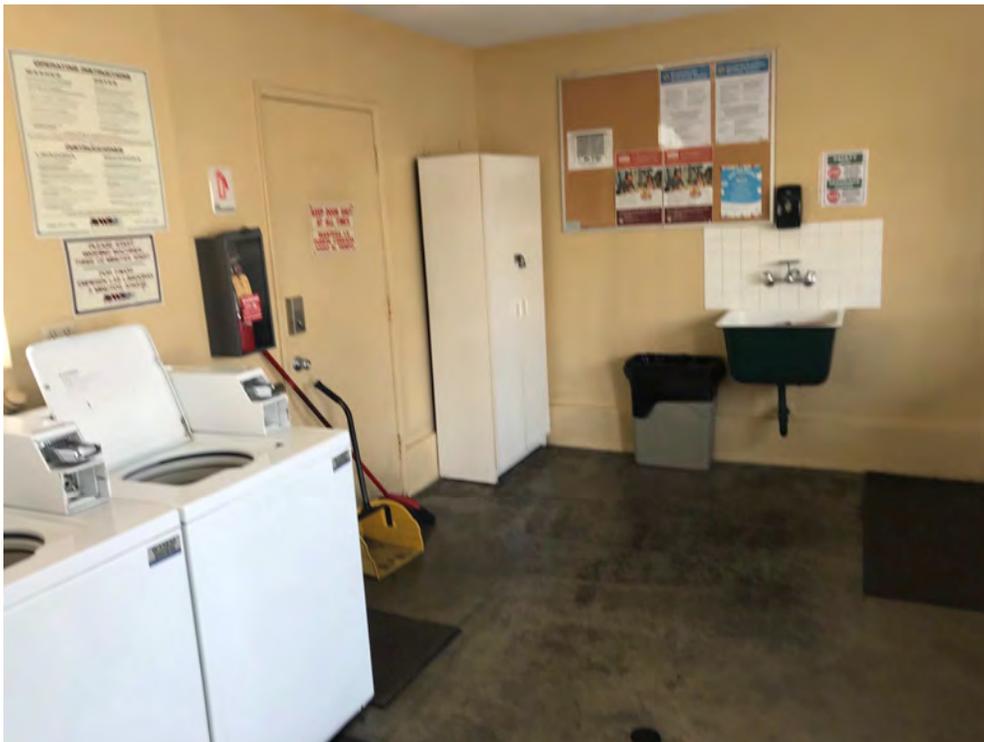


Kitchen.



Office.

SUBJECT PROPERTY PHOTOGRAPHS



Laundry room.



View of pool while looking toward recreation building.

SUBJECT PROPERTY PHOTOGRAPHS



Playground.

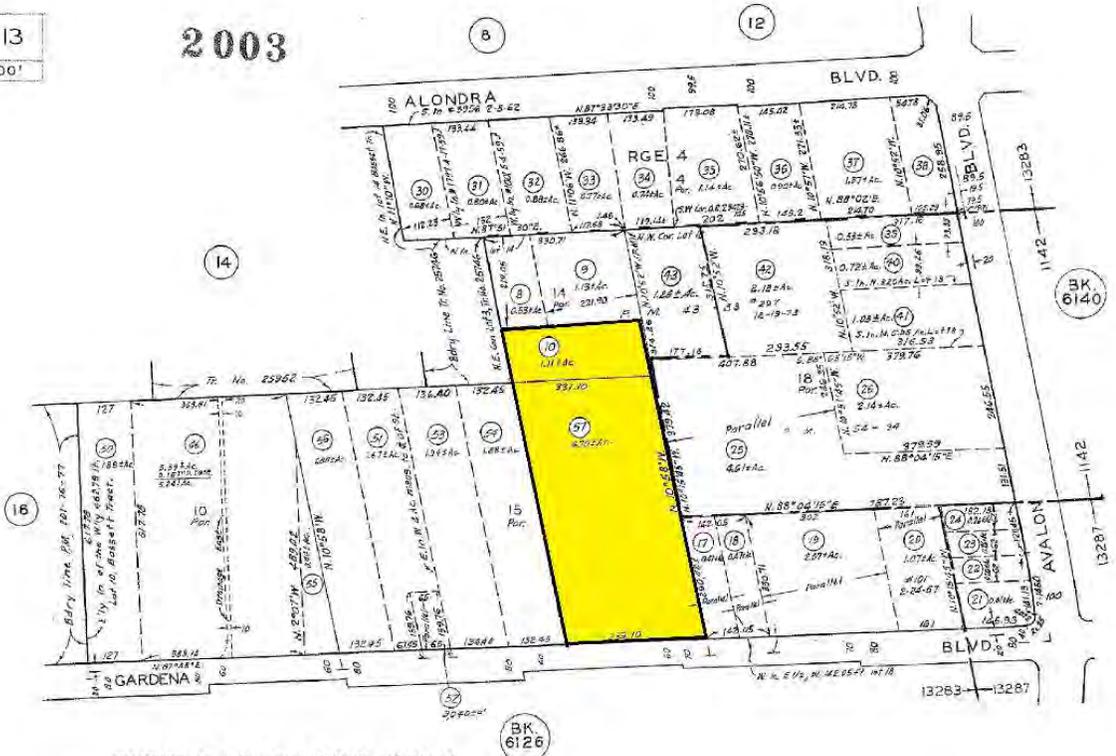


Interior street.

PLAT MAP

6125 13
SCALE 8" = 200'

2003



PORTION OF THE SAN PEDRO RANCHO
FORMERLY OWNED BY THE HEIRS
OF NASARIO DOMINGUES
M.R. 4-348

SUBJECT PARK DESCRIPTION

LAND DESCRIPTION

The subject property consists of two Assessor's Parcels with a combined land area of 5.74 acres. The two parcels are nearly rectangular in shape. A plat map delineating the property boundaries may be found on the previous page.

The topography of the improved mobile home park is essentially level and near street grade. Onsite drainage appears to be adequate.

All normal utilities are available and connected to the subject homes, including gas, electricity, sewer, water, telephone and cable TV. The subject park has frontage along E. Gardena Boulevard. Gardena Boulevard is a public thoroughfare that runs east to west and is asphalt paved to a width of two traffic lanes in each direction.

Access to the park is provided via two driveways at the front of the park, off E. Gardena Boulevard. The interior private streets are in a grid pattern and are asphalt paved.

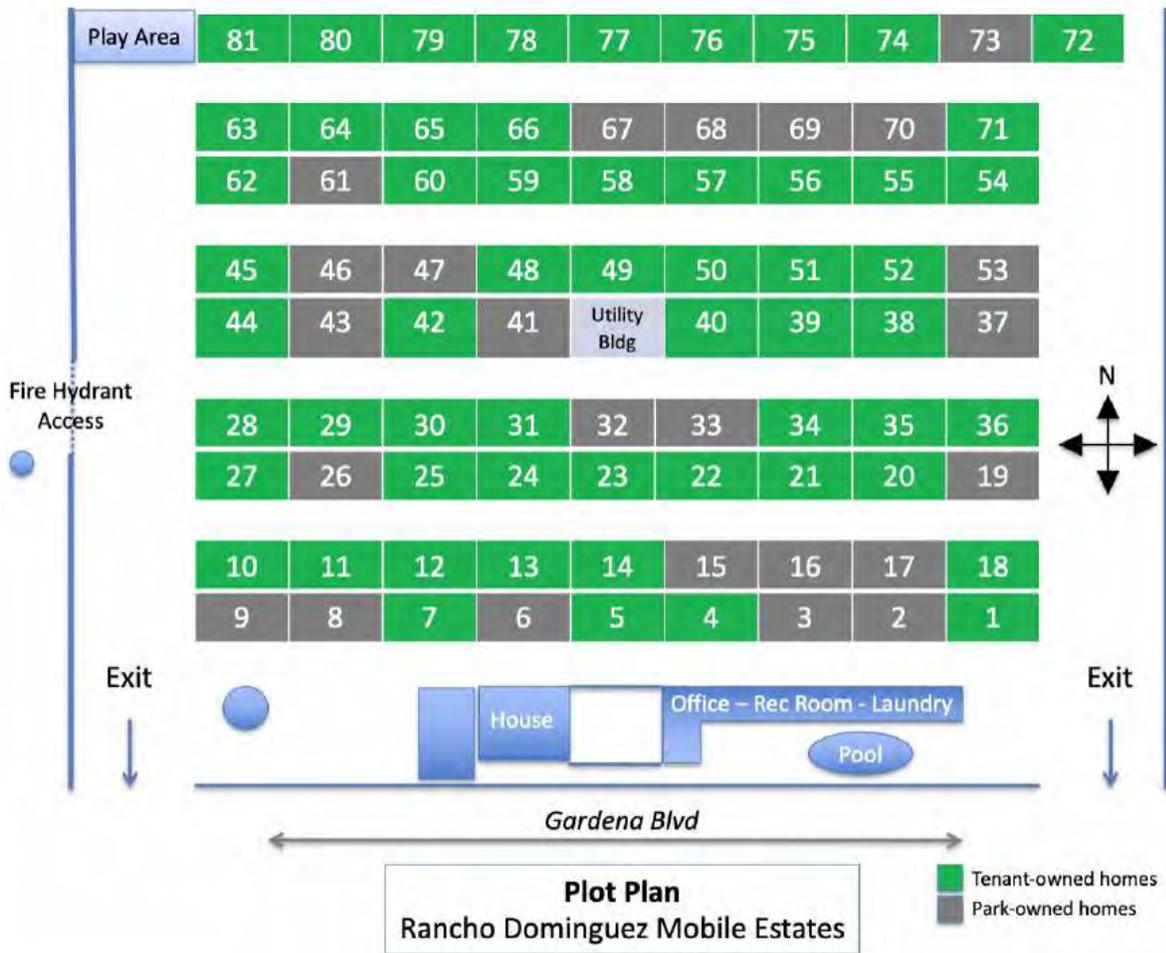
IMPROVEMENT DESCRIPTION

Rancho Dominguez Mobile Estates is an all-age (family) mobile home park that consists of 81 spaces and one single family residence. It was developed around 1962. The park map on the following page shows the layout of the park. The park is comprised of a mixture of double-wide and single-wide homes. There are no vacant spaces in the park.

Recreational amenities include a modest recreation building with a multi-purpose room, kitchen, park office, a second office, laundry room and two restrooms. The swimming pool is adjacent to the clubhouse. There is also a picnic area adjacent to the pool and recreation building. In addition, there is a children's playground at the rear of the park that was closed, as of the date of value, due to COVID-19.

This is an average quality park that was in overall average to above average condition at the dates of our inspections.

PARK MAP



Map is not to scale

VALUATION

DEFINITIONS OF VALUE

The City of Carson has an ordinance that relates to the closure of a mobile home park. In Section 9128.21 titled Relocation Impact Report (RIR), it states that the report shall contain “The appraised on-site value and off-site value of each of the mobile homes in the park.” For this assignment we have only appraised the 57 resident owned homes. It is noted that the terms “on-site value” and “off-site value” are not defined in the ordinance. It is my understanding that “on-site value” means the home is located within Rancho Dominguez Mobile Estates and subject to the City of Carson’s rent control ordinance. It also means we are estimating the current in-place market value of the home, with knowledge and disclosure that the mobile home park use is no longer a legal use and the park will eventually be closed.

My understanding of “off-site value” is the depreciated cost (replacement value) of the home. We have used NADA Appraisal Guides as the source for the off-site value estimates. Since the term is “off-site value,” we have assumed that the homes are not located in a rental mobile home park. This is a hypothetical condition that is necessary for the analysis. Improvements for this analysis include the home with additions as well as raised porches, awnings, steps, carports and sheds, but do not include hardscape or landscape.

APPROACHES TO VALUE

The primary approach to value for the estimates of in-place market value of the subject homes is considered to be a Sales Comparison Approach. The Sales Comparison Approach compares the subject homes to similar homes that have recently sold. This approach is based upon the principle of substitution and relies on the concept that a prudent purchaser would pay no more to buy a property than it would cost to acquire a comparable substitute property. Since the subject homes are “in-place” in a park that is subject to the City of Carson rent control ordinance, but also subject to closure, we have utilized comparable sales of mobile/manufactured homes within Rancho Dominguez, since those sales included the disclosure of the illegal use and eventual park closure. Sales of homes from other parks in the City of Carson, that are not subject to closure, are not considered to be comparable and have not been utilized.

It is our opinion that the recent legislation in California (AB 2782), discussed on page 11, would not alter our selection of comparable sales. There is no on-site highest and best use of the homes in the park because the mobile home park use is no longer legal. If the subject mobile home park was not an illegal use, the in-place market value could be based on a hypothetical condition that the park was not going to close and sales from parks that were not closing could be utilized. However, because the park is an illegal use and cannot continue, we are not able to utilize that hypothetical condition.

Furthermore nearly all of the resident owned homes in the park are more than 30 years old with all but one resident owned home ranging in age from 1962 to 1989. Thus, it is unlikely that these homes could be moved to another park.

A form of the Cost Approach has been utilized for the estimates of “off-site” value. We have utilized the NADA Appraisal Guides for the estimates of depreciated replacement cost for

the 57 homes. The Income Approach is not considered relevant and has not been utilized for this assignment.

ON-SITE VALUES

For the on-site values we have considered the fact that the mobile home park is now an illegal use and notice of the park closure has been given to the residents. There was a noteworthy example of a mobile home park in Southern California, El Morro Village in Laguna Beach, the use of which was declared illegal.

El Morro Village was a 294 space park that was bisected by Coast Highway. The main portion of the park was on the inland side of Coast Highway, while a smaller section was waterfront sites that were literally on the sand. The park was built in 1927 and the neighborhood became very popular in the 1950's and 1960's. After the State bought 3,000 acres of land from the Irvine Company in 1979, that included this property, it was decided the mobile home park was not an appropriate use of the land and the residents were given a 20 year lease, after which they had to leave. After many complaints and negotiations, a 5 year extension was given in 1999. The park was ultimately shut down on March 2, 2006. I interviewed a former owner of a waterfront home that he bought in 1990 for \$250,000. At that time, he knew he might only have 9 to 10 years, but they would be on the beach and he could afford it. He ended up getting about 15 years of use. However, the closer it came to the final closing, the lower the prices became. According to HCD records there were five sales in 2005, the year before the closing. Eliminating one sale of a new (2005) home, at a price of \$138,618 the other four sales ranged from \$3,000 to \$36,500 with three of them at \$10,000 or less. In the year 2004, there were eight sales that ranged from \$5,000 to \$132,500. While not directly comparable to the subject, these prices show the dramatic impact park closure can have on home value.

There have been 32 sales of homes in the subject park between January 2009 and April 2020, with disclosure of the illegal use and ultimate closure of the park. Eleven of the homes were purchased by residents and 21 were purchased by the park. There was a broad range of sale prices from \$1,500 to \$63,194. There were 15 single wide sales with prices ranging from a low of \$1,500 to a high of \$30,000 and an average price of \$15,453. There were 16 double wide sales with prices ranging from \$5,000 to \$63,194 and an average price of \$24,968. In addition, there was a sale of Space 70 where the home was pulled out of the park and we do not know if it was a single or double wide.

The differences in prices do not appear to reflect differences in the date of sale, and changes in market conditions. There also is a lack of consistency between the prices and the physical characteristics of the homes. This suggests that other factors, such as the circumstances and motivations of the sellers and buyers, have influenced the sale prices. This is not surprising in the case of homes being sold with full disclosure of negative factors, since the market for prospective purchasers is very limited.

An example of a buyer being influenced by motivating factors is the park purchase of the home on Space 70 in February 2017 at a purchase price of \$10,000. The home was reportedly uninhabitable and the park owner was willing to pay more than he typically would for a home in that condition due to "health/safety/hoarding issues". The home was subsequently pulled out of

the park. In addition, some of the sales in the park could reflect lower prices due to special circumstances and motivations of the sellers. However, we were unable to verify the details of these transactions with any of the sellers.

A park representative verified the price, physical characteristics and condition of the 21 homes they purchased. The remaining 11 sales were purchased by the current resident homeowners and we were unable to verify the details of the acquisitions including the condition of the homes at the time of purchase. We were provided with phone numbers for only two of the resident purchasers. Both of those individuals refused to speak with us; however, one of them did return a completed questionnaire. No phone numbers were provided for the other 9 resident purchases and we were strongly discouraged from knocking on their doors by the park owner's representative. Information about these resident purchases was obtained from HCD records. According to the park, all prospective tenants are notified of the park closure at the time of purchase; thus, all 32 of the sales were made with full disclosure.

The lack of consistency of the sale prices and physical characteristics of the homes results in the typical process of adjusting comparable sales not being applicable in this case. However, the park owner's representative shared with us some of the criteria used in their purchases. It was stated that the prices were based on the general condition of the home at the time of sale. If the price paid was below \$8,000 it was likely in poor condition; if the price was between \$9,000 and \$15,000 it was likely in below average condition; and if the price was greater than \$15,000 it was in average condition. The highest price for a home purchased by the park was \$30,000; however, that was for a home that was in average condition. But, they reportedly did not purchase any homes that were in better than average condition.

We have utilized a comparative analysis that involved the grouping of the sales and the subject homes in various ways to account for differences in the home characteristics. We identified reasonable ranges of values for the various groups and formed conclusions of values for each home within the group. We rated the condition of the 57 homes appraised from fair-poor to good condition and our values for the homes ranged from a low of \$8,000 to a high of \$45,000. A summary of the 32 sales in Rancho Dominguez has been included in each individual home appraisal summary and a list of the on-site values may be found after the letter of transmittal.

OFF-SITE VALUES

In estimating the off-site value of each home, we have used the NADA Guides program. This is an automated cost estimating program based upon information obtained from manufacturers, dealers, wholesales and auctions. Because the NADA program is an automated tool based on National standards, it has certain limitations. This includes the inability to enter some specific home dimensions and certain features and upgrades. The off-site values for the individual homes are based upon information obtained from resident questionnaire's and interviews, the park owner, public records, and our physical exterior inspections. The September-October 2020 edition has been used in valuing the subject homes. A copy of the NADA Guides analysis has been include in each individual home appraisal summary and a list of the off-site values may be found after the letter of transmittal.

Addenda

QUALIFICATIONS OF THE APPRAISER

James Brabant, MAI
Anderson & Brabant, Inc.
353 W. Ninth Avenue
Escondido, CA 92025
(760) 705-1592 (Direct)
Email: jlbrabant@aol.com

- I. Resident of San Diego County since 1977
- II. **Educational Background:**
 - A. University of Southern California, B.S. degree in Real Estate — 1960
 - B. School of Theology at Claremont, Master of Theology — 1966
 - C. Professional Education Completed:
 - 1. Appraisal Institute
 - a. "Basic Appraisal Principles, Methods and Techniques" — Course I-A
 - b. "Capitalization Theory and Techniques" — Course I-B
 - c. "Urban Properties" — Course II
 - d. "Investment Analysis" — Course IV
 - e. "Standards of Professional Practice"
 - f. "Litigation Valuation"
 - g. Special Applications of Appraisal Analysis Course 301
 - 2. Lincoln Graduate Center
 - a. Manufactured Housing Appraisal Course 669
 - 3. Continuing Education (Partial List):
 - USPAP Course and Updates (every two years)
 - Four Hour Federal and State Laws, 1/16
 - Fundamentals of Separating Real Property, Personal Property, and Intangible Business Assets 4/12
 - Eminent Domain Case Update, 10/95, 3/97, 10/07, 4/10
 - Business Practice and Ethics, 6/07, 7/12
 - San Diego Apartment & Housing Seminar, 10/98, 5/07, 9/11
 - Appraiser as Expert Witness, 12/06
 - Deal and Development Analysis – Downtown S.D., 9/05
 - Litigation Seminar, 11/04, 11/07, 11/10
 - Appraising Manufactured Housing, 1/04
 - Economic and Real Estate Forum, 09/02
 - Gramm-Leach-Bliley Act, 10/01
 - Condemnation on Trial (Participant), 5/00
 - Digging Into Ground Leases, 2/15
 - Unique Appraisal Assignments (Participant), 2/14
 - Appraisal of Partial Interests; 6/98
 - Vineyard Valuation, 11/12
 - Downtown San Diego Development, 9/15

Qualifications of the Appraiser — James Brabant, MAI

Page Two

III. **Professional Affiliations:**

- A. Member, Appraisal Institute, MAI (1985 President, San Diego Chapter)
- B. Realtor Member, North County Association of Realtors
- C. Member, International Right of Way Association
- D. Real Estate Brokers License, State of California
- E. Teaching Credential, State of California, Community College Level
- F. Certified General Real Estate Appraiser (AG002100)
Office of Real Estate Appraisers, State of California

IV. **Appraisal Experience:**

- Co-Owner — Anderson & Brabant, Inc., Since 1979
- Co-Owner — Robert M. Dodd & Associates, Inc., 1977 - 1979
- Appraisal Manager — California First Bank, Huntington Beach, California, 1974 - 1977
- Staff Appraiser — California First Bank, San Diego, California, 1972 - 1974
- Staff Appraiser — O. W. Cotton Co., San Diego, California, 1970 - 1972
- Staff Appraiser — Davis Brabant, MAI, Huntington Park, California, 1960 - 1962

V. **Teaching Experience:**

- Southwestern College, Chula Vista, California, "Real Estate Appraisal"

VI. **Expert Witness:**

- Superior Court, San Diego, Los Angeles, Riverside, and San Bernardino Counties
- Rent Control Hearings: Cities of Oceanside, Escondido, Ventura, Concord, Yucaipa, Carpinteria, Palmdale, San Marcos, Carson, Watsonville
- Various Arbitration Hearings
- Assessment Appeals Boards of Riverside County, San Diego County and Orange County
- Federal Bankruptcy Courts in San Diego County & Santa Barbara County
- United States District Court – Northern District of California

VII. **Types of Appraisals:**

- | | |
|-----------------------------|---|
| Residential Property: | Single-family residence, condominiums, apartments, subdivisions, existing and proposed |
| Commercial Property: | Office buildings, shopping centers, office condominiums, etc., existing and proposed |
| Industrial Property: | Single/multi-tenant, business parks, etc., existing and proposed |
| Vacant Land: | Industrial, commercial, residential, and rural |
| Agricultural: | Ranches, avocado and citrus groves, etc. |
| Special Purpose Appraisals: | Leasehold estates, possessory interest, historical appraisals, etc. |
| Mobile Home Parks: | For a variety of purposes including rent hearings, park closure, park conversions, failure to maintain litigation, eminent domain, etc. |

VIII. Partial List of Appraisal Clients:

Banks

Bank of America
Bank of New York
City National Bank
Downey Savings
Fidelity Federal Bank
First Interstate Bank
First Pacific National Bank
Flagship Federal Savings
Great Western Bank
Industrial Bank of Japan
Palomar Savings & Loan
Redlands Federal Bank
Union Bank of California
Wells Fargo Bank

Government Agencies and Municipalities

California Department of
Transportation/Caltrans
Carlsbad Municipal Water District
City of Carlsbad
City of Chula Vista
City of Colton
City of Concord
City of Escondido
City of Laguna Beach
City of La Mesa
City of Salinas
City of San Bernardino
City of San Diego
City of San Marcos
City of Vista
City of Yucaipa
County of San Diego
Fallbrook Public Utility District
Metropolitan Water District
Oceanside Unified School District
Pacific Telephone
Poway Municipal Water District
Ramona Unified School District
SANDAG (San Diego Assoc. of Govts.)
San Diego County Water Authority
San Diego Unified Port District
San Marcos Unified School District
U.S. Depart. of the Interior
 Bureau of Indian Affairs
U.S. Department of Justice

Law Firms

Aleshire & Wynder, LLP
Asaro, Keagy, Freeland. & McKinley
Best, Best & Krieger
Daley & Heft
Endeman, Lincoln, Turek & Heater
Foley & Lardner, LLP
Fulbright & Jaworski
Gray, Cary, Ware & Freidenrich
Higgs, Fletcher & Mack
Latham & Watkins
Lounsbery, Ferguson, Altona & Peak
Luce, Forward, Hamilton & Scripps
McDonald & Allen
McInnis, Fitzgerald, Rees, Sharkey & McIntyre
O'Melveny & Meyers
Procopio, Cory, Hargreaves & Savitch
Rutan & Tucker
Singer, Richard
Sullivan Wertz McDade & Wallace
Tatro & Zamoyski
Thorsnes Bartolotta & McGuire
Woodruff, Spradlin & Smart
Worden Williams, APC

Title Companies

Chicago Title
Fidelity National Title Insurance
First American Title
St. Paul Title
Title Insurance & Trust

Others

Avco Community Developers
Coldwell Banker
Dixieline Lumber
Golden Eagle Insurance
National Steel & Shipbuilding Co.
Northern San Diego County Hospital District
Prudential Insurance Corp.
Rosenow, Spevacek, Group
San Diego Gas & Electric Co.
San Luis Rey Downs (Vessels)
Steeffel, Levitt & Weiss
Tellwright-Campbell, Inc.
Transamerica Relocation Service
Vedder Park Management



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Date: April 22, 2021

To: John Raymond, Assistant City Manager
Sunny Soltani, City Attorney
Benjamin Jones, Assistant City Attorney
CITY OF CARSON

From: Tara Matthews, Principal
Lynn Kelly-Lehner, Director
Jake Nieto, Analyst

Subject: **Rancho Dominguez Mobile Home Park Closure and Conversion Low- and Moderate-Income Housing Impact Analysis**

Per the City of Carson’s (“City”) request, RSG, Inc. (“RSG”) prepared a Low- and Moderate-Income Housing Impact Analysis to assist the City to make findings in relation to Government Code Section 65863.7(e) and the closure of the Rancho Dominguez Mobile Home Park (“Park”). RSG understands that this is a requirement of Government Code Section 65863.7(e) that must be taken prior to a change in use of a mobile home park to determine if the closure of the Park and its conversion to a different use will materially result in or contribute to the shortage of housing options for low- and moderate-income households.

The legislative intent of Government Code Section 65863.7(e) is to examine if the closure of mobile home park will have a negative effect on a community’s supply of affordable housing and the availability of housing options for the displaced mobile home park residents. If it is determined that there are inadequate affordable housing options or adverse impacts on displaced residents, a legislative body may require, as a condition of the change in use, that mitigation measures be taken by the mobile home park owner.

RSG reviewed and analyzed the following to determine the impact of the Pak closure:

- The Relocation Impact Report (“RIR”) prepared by Park, Overland, Pacific & Cutler, LLC to understand the potential use of the site;
- The City’s Regional Housing Needs Assessment allocations and annual housing production progress to determine the jurisdiction’s overall housing needs;

- Both affordable and market rate housing projects recently completed and those currently in the development pipeline; and
- Mitigation measures for the Park Owner and for the City to consider as a way to offset any adverse impacts of the Park closure and conversion.

MOBILE HOME PARK BACKGROUND

Rancho Dominguez is a 5.74-acre, 81 space, all-age community mobile home park located in an industrial area of the City of Carson. The Park is currently owned and operated by Carter-Spencer Enterprises, LLC (“Owner”), who recently submitted an application to the City to permanently close the Park.

The mobile homes are a mix of singlewide and doublewide coaches, ranging from one to three bedrooms. The coaches range in size from 540 square feet to 1,368 square feet. Based on a survey of the residents of the Park, all of the units are at least 20 years old, with the average age of the homes being 47 years. Many of the homes have improvements such as porches, patios, sheds, hardscape, landscape and carports.

When the Park was first developed in 1962 prior to the City’s incorporation, mobile home parks were allowed in light manufacturing zones (formerly known as M-1 zones, now re-designated as ML zones) when issued a variance. However, after the City was incorporated, City Council adopted Ordinance No. 77-413 (the “Ordinance”) that stated mobile home parks were no longer permitted uses in manufacturing-zoned districts. Mobile home park usage in these zones therefore became legal, nonconforming uses.¹ The Ordinance granted a period of the legal non-conforming use for up to 35 years, from October 1977, after which time the non-conforming use must terminate or be made conforming. This period expired in November 2012.

It is worth noting that according to the California Office of Environmental Health Hazard Assessment, the Census Tract that Rancho Dominguez is located in is in the top 10% of the state for the levels of diesel emissions and toxic substance pollution (meaning the census tract is one of top tracts for this type of pollution). In addition, other sites in the near vicinity of the Park have tested positive for soils contamination. While the Park property has not been tested for ground contamination itself, there is a probability that it is also contaminated. This is likely related to the Park’s location in an industrial area and proximity to a former landfill site.

According to the RIR, in 2000, the City informed the Park’s owner that the Park’s legal conforming use would no longer be legal as of November 2012. At the time, the Park informed its residents and all future residents that the Park would have to close. In April

¹ The current zoning of the property is Manufacturing Light – Design Overlay (MS-D) zone, which does not permit residential development.

2011, the Park Owner met with the City staff to seek an extension of the legal non-conforming use. Although the City and the Park Owner did not reach an agreement in that case, the City enacted a moratorium on mobile home park closures in 2015. The moratorium expired in December 2017. In 2019, Park Owner filed an application with the City to close the Park.

RELOCATION IMPACT REPORT

In 1978, the California Legislature enacted the Mobile Home Residency Law (Civil Code Section 798 et seq.) which regulates the use and closure of mobile home parks.² Overland, Pacific & Cutler, LLC (“OPC”) prepared a Relocation Impact Report (“RIR”) for the Park Owner in accordance with Government Code 65863.7. The purpose of the RIR is to report on the impact of the proposed Park closure upon the residents of the Park. The RIR is required to include a replacement and relocation plan that adequately mitigates the impact upon the ability of the displaced residents of the mobile home park to be converted or closed to find adequate housing in a mobile home park.

RSG reviewed the RIR to better understand the implications of the Park closure and conversion on the supply of affordable housing options in the community and to determine if there are any adverse impacts to the Park residents. The following subsections outline the major findings from the RIR.

Proposed Conversion

The RIR states that the Park Owner anticipates developing the property into denser workforce housing and possible mixed uses. The Owner proposes the potential redevelopment of the Property from 81 mobile home spaces into 174 one-, two-, and three-bedroom apartments. If the site is developed as described, the RIR states that the anticipated future use of the Property would include and contribute to housing opportunities for low- and moderate-income households within the City.

However, because the current zoning designation (Manufacturing Light) does not allow residential development on that site, the Owner would need to secure discretionary approval from the City to move forward with the anticipated use. The Community Development Director of the City stated there are multiple ways to achieve this including a Specific Plan (and corresponding General Plan Amendment) or a General Plan Amendment and Design Review to change the site to Urban Residential. This process may include, but is not limited to, environmental review, a public hearing by the Planning Commission, and a public hearing by the City Council. The Community Development Director confirmed that

² Civil Code sections 798 et seq. and Government Code sections 65863.7-65863.8.

at the time of the writing of this report, the Park Owner had not submitted an application for the potential development.

The entitlement process for the anticipated use may result in a more adverse impact on the supply of affordable housing than the RIR acknowledges. Between the six-month notice that the Owner must provide to the residents before the ultimate closure of the Park and the completion of construction for the future anticipated use, it could take several years to replace the lost units.

Resident Makeup

Of the 81 mobile homes in Rancho Dominguez, 58 are owner occupied and the remaining 23 are occupied by tenants in coaches that are owned and leased by the Park Owner. All of the residents consider Rancho Dominguez as their primary residence. For owner occupied coaches, rents range between \$393 and \$424 per month. For tenant occupied coaches, rents between \$1,370 – \$2,040 per month.

The Park Owner distributed a survey to all residents within the Park. Out of 81 residences, 41 responded to the survey. Some of the Park residents reported to be elderly and on fixed incomes, and half of the households reported they are Extremely Low and Very Low Income. Of the 41 respondents, 32 are at the low-income level or below. Based on the number of responses, it is safe to assume that a large majority of park resident are low-income residents.

Income Level	# of Households
Extremely Low Income (30% or less of AMI)	11
Very Low Income (31%-50% of AMI)	10
Low Income (51%-80% of AMI)	11
Above Low Income (>80% of AMI)	3
Unknown Income	6

1. Based on a survey of Park residents. Of 81 households, 41 responded.

Housing Options for Displaced Tenants

The RIR conducted a survey of available housing options in Carson for the displaced tenants. The data indicates that there are only five rental units available in the City of Carson.³ Because of the low number of available units, the RIR expanded its search to a 15-mile radius of the park and found that there are 138 market rate units available for rent.

³ RSG conducted an updated search in April 2021 and found approximately 10 market rate units available for rent in Carson.

The RIR included a survey of all 21 mobile home parks in the City and found that there are currently no vacant pads for displaced residents to relocate to. The RIR expanded its scope to mobile home parks within a thirty-mile radius of Rancho Dominguez. Of the 108 mobile home parks in the vicinity, there were 13 open pads available for lease.⁴ However, it should be noted that it is extremely unlikely that many of the coaches, due to their age, will be able to be transported.

The RIR survey reported 111 condominiums available for sale within a twenty-mile radius of the Park, however none of the condos are located within Carson. The condos ranged from a median price of a one-bedroom condo at \$309,000 to the median price of a four-bedroom condo at \$674,500. Based on RSG's calculations, an affordable sales price for an ownership unit for a moderate income, four-person family is \$376,000. While there are a fair number of market rate condos for sale within a twenty-mile radius, the majority of the condos would not be considered an affordable housing price for ownership units.

The RIR demonstrates that there is an adequate number of market rate housing units available in the surrounding communities for the displaced residents; however, RSG finds that there is not an adequate supply of affordable units for displaced tenants.

Park Owner Mitigation Options

The Park Owner provided several relocation benefit payment options to the displaced residents of the Park. They include relocation costs, relocation assistance, and additional benefits to the mobile home resident-owners without reimbursement from the City.

Where it is feasible to relocate a mobile home, payment will be provided as set forth below to eligible resident owners.⁵

- Reimburse the actual cost to relocate the mobile home to another mobile home park within 50 miles of the Park.
- Payment of moving costs associated with moving all personal property.⁶
- Payment up to \$1,500 for necessary modifications to the mobile home to accommodate a handicapped or disabled person within the replacement park.
- Services of a relocation specialist to assist owners through aspects of the relocation.

The RIR states that generally accepted practices among mobile home park operators allow

⁴ The RIR referenced 37 open pads, but after review of the RIR data, RSG could only calculate 13 open spaces.

⁵ Eligible Resident Owners are registered owner(s) of their mobile home with clear title, or trustors or beneficiaries of living trusts holding clear title to the mobile home or hold a life estate in the mobile home, whose mobile home was located in the park and who have resided in that mobile home continually since prior to the date this Impact Report is filed with the City.

⁶ Allowance to be determined based on the most current federal fixed move schedule for the State of California and the size of the displacement dwelling and/or professional mover bids;

homes to be moved into a mobile home park if they are less than five years old and typically deny homes that are more than ten years old. All of the mobile homes within the Park are older than ten years old. Unfortunately, because of the age of the coaches, it is unlikely that any resident can take advantage of this option.

In situations where it is not feasible to relocate the mobile home, and the eligible resident owner rents or buys a replacement dwelling, the Park Owner payment offered the following payment:

- Lump sum payment equal to the off-site value of the home, plus additional moving and relocation assistance.⁷
- Rental assistance in the form of an additional lump sum of \$3,200 for a one-bedroom mobile home, \$3,800 for a two-bedroom, and \$4,800 for a three-bedroom mobile home
- An additional \$1,000 will be provided to Eligible Resident Owners who are 62 years of age or older and/or disabled.
- Payment of moving costs associated with moving all personal property.
- Services of a relocation specialist to assist Eligible Resident Owners through aspects of the relocation.
- If the eligible resident owner chooses to transfer the mobile home to the Park Owner, the Park Owner will be responsible for its disposal or disposition.

While the Park Owner has no obligation to mitigate relocation costs for households occupied by tenants in Park-owned mobile homes, the Park Owner has offered to provide a fixed lump sum payment to eligible home renters to assist with moving their property to a replacement dwelling.⁸

SUPPLY OF AFFORDABLE HOUSING IN THE CITY OF CARSON

Like the rest of California, the City of Carson is experiencing a shortage of affordable housing. The City is proactive in building affordable housing and is continually partnering with the private sector for the provision of additional affordable housing units to meet the community's needs. In addition, the City of Carson is seeking to augment its affordable housing options by leveraging the City's funds by securing various grants. RSG examined the supply of affordable housing and housing development activity in the City to assess the various options available to residents.

According to the 2010 Census, there were 26,226 housing units, of which 19,529 (76.8%) were owner-occupied, and 5,903 (23.2%) were occupied by renters. Over 75% of the population, 68,924 people, lived in owner-occupied housing units, and 21,487 people

⁷ With any outstanding liens, unpaid property taxes HCD registration fees, or any other outstanding or required payments first deducted

⁸ Those residents who occupy a Park-owned mobile home and are named on its lease agreement with Park Owner at the time of filing the RIR.

(23.4%) lived in rental housing. The homeowner vacancy rate was 1.3%; the rental vacancy rate was 3.7%. Anecdotal evidence collected from various affordable housing developments in the City indicates that the vacancy rates for affordable units is lower than the City market rate average.

Of the 26,226 housing units, 685 are designated as affordable units. Since 2013, 1,157 housing units, including 268 affordable units, have been constructed within the City at various income levels.

In addition to the data provided in the RIR, RSG analyzed the City’s Regional Housing Needs Assessment allocations, evaluated existing affordable housing options in the City, and analyzed housing projects in the development pipeline in Carson. This analysis provides data on relocation options for the displaced residents of the Park. The following subsections summarize RSG’s analysis.

Regional Housing Needs Assessment

The City of Carson has made significant progress towards its fifth cycle Regional Housing Needs Allocation (“RHNA”) through 2019. Since 2013, the City of Carson has partnered with multiple developers for the development of 1,157 residential units, which included 96 very low-income units, 82 low-income units, and 90 moderate-income units. The City must produce 722 housing units to meet its current RHNA allocations. At the time of writing of this report, the City is in negotiation with two private developers for over 200 additional affordable units.

Table 2 demonstrates the progress that local communities in the vicinity of Carson have made toward their RHNA allocations. While the City still has some progress to make, Carson is faring better than many of its neighbors on meeting its RHNA allocations, especially in the very low- and low-income allocations.

Table 2 - 5th Cycle RHNA Progress ¹					
City ²	Very Low Progress %	Low Progress %	Moderate Progress %	Above Moderate Progress %	% COMPLETED TOTAL
Hawaiian Gardens	0%	0%	0%	2%	1%
Torrance	0%	0%	2%	19%	8%
Redondo Beach	0%	6%	0%	42%	18%
Long Beach	17%	6%	0%	51%	27%
Lakewood	10%	0%	1%	72%	33%
Artesia	0%	0%	0%	122%	52%
Carson	21%	31%	32%	91%	54%
Norwalk	2%	10%	55%	101%	54%
Signal Hill	100%	100%	68%	40%	70%
Gardena	0%	0%	82%	176%	90%
Average	15%	15%	24%	72%	41%

1. Data captures RHNA progress from 2014 to 2018. The City of Carson's RHNA progress is based on the City's 2018 Housing Element Annual Progress Report. All other RHNA progress figures are based on data from HCD.
 2. Comparison group of cities are located in South LA County and have RHNA allocations of 100 units or more.

Existing Affordable Housing Options

There are nine affordable housing complexes in the City that provide a total of 685 affordable housing units. As mentioned above, the affordable housing complexes have a very low vacancy rate and often have lengthy waiting lists. Table 3 provides a breakdown of the affordable units throughout the City.

	Type	Total Units ²	Extremely Low (30% AMI)	Very Low (40% - 60% AMI)	Low (60% AMI)	Moderate (80% - 90% AMI)
Carson City Center	Senior	85	0	42	0	43
Villagio	Family	147	0	30	117	0
Carson Terrace	Senior	61	0	15	0	46
Avalon Courtyard	Senior (62+)	91	0	46	0	45
Via 425	Family	103	11	48	44	0
Arbor Green	Family	39	4	22	13	0
Bella Vita/Sepulveda Senior Housing	Senior	64	7	37	20	0
Veterans Village	Family	50	5	28	17	0
Carson Arts Colony	Family	45	9	15	0	21
Total		685	36	283	211	155

1. Affordability levels are based on HCD income limits.
2. Excludes manager and staff units.

In addition to the affordable housing units listed above with covenants restricting their rents, there are 272 public housing choice vouchers (Section 8) utilized within the City as of February 2020.⁹ The Housing Authority of Los Angeles administers the Section 8 program; however, the waiting list is currently closed to new applicants.

There are 2,324 mobile home spaces within 21 mobile home parks the City, including Rancho Dominguez. While mobile home park spaces are not always technically deemed as affordable, mobile home parks contribute to the functionally affordable housing supply within the City because their rents are subject to the City of Carson’s Mobile Home Rent Control Ordinance. At this time, however, there are no available pads for lease within the City of Carson for displaced residents to relocate to.

As demonstrated with the above data, there are few existing affordable housing options within the City of Carson for the displaced residents.

New Housing Units in the Pipeline

Developers in the City are in various phases of the development process for over 1,800 market rate housing units throughout the community. As mentioned above, the City is working with two private developers for the provision of over 200 additional affordable housing units. Imperial Avalon is currently in the entitlement phase, with construction expected to be completed in early 2026. When completed, it will have approximately 83

⁹ According to the City’s Community Development Block Grant (“CDBG”) Analysis of Impediments.

affordable units and 1130 market rate units. Because the other project is still under negotiation, further details cannot be provided.

The breakdown of these units can be found in Table 5.

Table 5 - Housing Units in Development Pipeline					
Project Name	Status	Location	Type	Number of Units	Affordability
Rand	Under Review	225 W. Torrance Blvd.	MFR	356	Market Rate
Carson Loft Apartments	Under Review	21240 S. Main St.	MFR	19	Market Rate
Imperial Avalon	Under Review	S. Avalon Blvd.	MFR	1130	Market Rate
Imperial Avalon	Under Review	S. Avalon Blvd.	MFR	83	Affordable
N/A	Under Review	140 W. 223rd St.	SFR	2	Market Rate
N/A	Under Review	243 W. 233rd St.	ADU	1	N/A
N/A	Under Review	366 E. 228th St.	ADU	1	N/A
N/A	Under Review	2874 E. Tyler St.	ADU / JADU	2	N/A
N/A	Under Review	22107 Newkirk Ave.	ADU	1	N/A
Carson Upton Condos	Approved	1007 E. Victoria St.	SFR	36	Market Rate
Carson Landing Condos	Approved	1301 E. Victoria St.	SFR	95	Market Rate
Carson Landing Condos	Approved	1301 E. Victoria St.	MFR	80	Market Rate
Moshar 223rd Condos	Approved	123 E. 223rd St.	SFR	9	Market Rate
Cambria Court Condos	Approved	345E. 220th St.	SFR	35	Market Rate
Dolores Condos	Approved	21915 S. Dolores St.	SFR	5	Market Rate
Birch Condos	Approved	21809 S. Figueiroa	SFR	32	Market Rate
Union South Bay Apartments	Under Construction	21521 S. Avalon Blvd.	MFR	357	Market Rate
Evolve South Bay Apartments	Under Construction	20330 South Main St.	MFR	300	Market Rate
<i>Subtotal - Market Rate Units in Pipeline</i>				1804	
<i>Subtotal - Affordable Units in Pipeline</i>				83	
Total Number of Residential Units in Pipeline				1887	

IMPACT OF THE CLOSURE ON LOW- AND MODERATE-INCOME HOUSING OPTIONS

The closure of Rancho Dominguez Mobile Home Park will result in the loss of 81 functionally affordable units, with a total of 165 bedrooms within the community. Because of its illegal zoning and possible contamination, it is arguable that the loss of these units shall not count towards the loss of affordable housing units. However, the closure will result in the displacement of approximately 81 low-income families, with minimal affordable housing options.

Mobile homeowners are a uniquely vulnerable group of tenants due to the investment made in purchasing and maintaining their homes and the high cost and difficulty involved in attempting to move a home. Additionally, many of the owners are seniors on fixed incomes and many have low or moderate incomes. Unlike apartment tenants, mobile homeowners cannot just pack their personal belongings and move if rents increase to a level they cannot afford.

The potential closure of the Rancho Dominguez creates a challenging and unique situation for the Park Owner, the Park residents, and the City of Carson as it relates to the availability of low- and moderate- income housing options. The Park is currently a legal, non-conforming use located in an industrial area within the City. The Park's legal conforming

use expired in November 2012, requiring the Park to close, but due to several circumstances, the Park Owner could not consider closing the Park until now. Due to environmental health concerns and usage issues, it may be in the best interest of all parties to close the Park and relocate the residents to safer locations.

Findings

After reviewing the RIR, analyzing the supply of affordable housing in the community, and evaluating the Owner's proposed mitigation measures for displaced residents, RSG has made the following findings:

- The closure of the Park will materially contribute to the shortage of affordable housing for several reasons:
 - The timeline for the potential future of the use of the site is uncertain and may take several years to develop due to discretionary approvals needed by the City.
 - There are no available mobile home spaces for lease within the City.
 - While there is a supply of market rate units, the existing marketplace cannot accommodate the displaced residents at their income levels.
 - The City is in early stages of negotiation for additional affordable housing units however, at this time, there are no additional affordable housing units currently under construction.
- The RIR does not adequately mitigate the effect of the closure of the Park on the displaced residents.

MITIGATION MEASURES

Section 65863.7 of the Government Code states that the City may require, as a condition of the closure and conversion of the Park, steps to mitigate any adverse impact of the conversion, closure, or cessation of use on the ability of displaced mobile home park residents to find adequate housing in a mobile home park.

The scarcity of available mobile home park spaces and other affordable housing, coupled with the difficulty or impossibility in the actual moving of the existing mobile homes in the Park dictates the necessity to provide alternative assistance to displaced residents to secure replacement housing. With this understanding, the Owner has proposed several mitigation measures, as previously discussed. However, because the closure of the Park contributes to the shortage of affordable housing options, RSG recommends implementing additional mitigation measures to offset the adverse effects of the closure of the Park.

Like the rest of California, Carson has an affordable housing shortage. Although it appears challenging, there are several mitigating measures that can assist the Owner in offsetting the contribution to the affordable housing shortage. The following possible mitigation

measures, implemented separately, or as a combination thereof, would provide an additional safety net to residents, allowing the displaced occupants the ability to stay in their community, and offset the contribution towards the shortage of affordable housing from the closure of the mobile home park.

Mitigation Measure Option 1: On-Site Construction of New Affordable Housing Units

The Park Owner anticipates developing the property into denser workforce housing and possible mixed-use. The Owner proposes the potential redevelopment of the property from 81 mobile home spaces into 174 one-, two-, and three-bedroom apartments. If the site is developed as described, the RIR states that the anticipated future use of the property would include and contribute to housing opportunities for low- and moderate-income households within the City. However, because the current zoning designation (Manufacturing Light) does not allow residential development on that site, the Owner would need to secure discretionary approval from the City to move forward with the anticipated use. This results in an uncertain timeline regarding the replacement of the lost units.

If the Owner and future developer of the property secure entitlements to construct 174 apartments, the tenants of Rancho Dominguez may be offered first right of re-entry to live at the property. In this case, it would be best if Owner and future developer of the property set aside 81 of the units as affordable units to accommodate the displaced residents.

As mentioned earlier, the California Office of Environmental Health Hazard Assessment, determined that Rancho Dominguez is located in a Census Tract that is rated in the top 10% of the state for the levels of diesel emissions and toxic substance pollution. Other sites nearby have tested positively for soils contamination due to the previous landfill in the nearby vicinity. While the site itself has not been tested for ground contamination, there is a likely possibility of soil contamination. The future developer of the site should fully mitigate these risks to future tenants with the remediation of any contamination. Mitigation measures under this option could include conditions of approval on the future project related to air quality control and other environmental remediation.

Because of the uncertain timeline associated with the future development of this property, under this mitigation option, displaced residents would need additional assistance from the Owner until the housing units are built.

Mitigation Measure Option 2: Create an Affordable Housing In-Lieu Fee or Housing Impact Fee

The City of Carson may create an inclusionary affordable housing requirement with an

in-lieu fee option that applies to future developments and the closure of mobile home parks. In the case of the potential future development of this property, the developer would be requesting a Specific Plan and General Plan Amendment. As such, the City may request an additional community benefit tied to the development. The development of the in-lieu or impact fee would be tied to the cost of constructing an affordable unit, and in line of the requirements of Proposition 218. RSG recommends that legal counsel vet the requirements and considerations of such a program.

A maximum affordable housing in-lieu fee reflects the full financial equivalent needed to develop housing units affordable to very low-, low-, and moderate-income households. It reflects the in-lieu fee amounts necessary to fund 100% of the estimated cost or assistance needed to develop the affordable units at an off-site location; that is, the full production cost of the affordable unit.

The City may consider that if a fee is too high, it may deter residential development, thereby raising housing costs and negating its purpose. To avoid this unintended consequence, the City may choose to implement a reduced fee to mitigate the cost impacts to future residential development in the City. Should the City choose to implement a reduced fee, additional funding sources would not necessarily be required to create affordable units. The City could maintain in-lieu fees in a special fund until enough in-lieu fees are collected to develop the units, or it could create income-restricted units without construction, for example by buying income-restricting covenants or purchasing units and selling them to low-income residents for less than market value.

Mitigation Measure Option 3: Increase Relocation Rental Assistance

The Park Owner may offer additional relocation benefits for all residents of the mobile home park, including both owners and tenants.

- Pursuant to Government Code Section 7264(b), displaced households may be entitled to a replacement housing payment in the form of rental assistance, not-to-exceed \$5,250.
- Housing of Last Resort is a program that allows for comparable replacement housing that is within the financial means of the displaced person. Displaced residents may be provided rental assistance for up to 42 months.

It is likely that rental assistance or down payment assistance for the displaced residents would be less than the cost of constructing a new affordable unit.

Mitigation Measure Option 4: Payment of Differential Rental Assistance in Local Market Rate Developments in the Pipeline

The Park Owner may partner with the City and private housing developers to secure housing in some of the 1,804 market rate apartment units currently in the development pipeline.

The City may wish to enter into agreements with the market rate housing developers to set aside a portion of the units for the displaced residents. While the residents would be charged market rent, the City may create a rental assistance subsidy fund for the displaced residents. The Park Owner will contribute to the fund to provide additional rental assistance to the displaced residents to cover the gap between the market rate rent and affordable rent, or a portion thereof. The displaced residents will be offered first right of tenancy in the newly constructed apartments located in the City of Carson.

Mitigation Measure Option 5: Waiting List Priority on City's Affordable Housing Projects

There are 685 affordable housing units in nine developments in the City of Carson. The Park Owner would partner with the City and the property managers for each of these developments so that the displaced residents would receive priority preference for available units on the existing waiting lists. This option would also apply to those affordable units currently in the development pipeline.

Through a multi-pronged set of mitigation measures, the Owner and the City of Carson can mitigate the contribution to the shortage of affordable housing with the closure of Rancho Dominguez Mobile Home Park. The Park Owner and the City should be cognizant of the environmental concerns and high pollution levels on the site and how they may affect current and future residents. RSG recommends exercising extreme caution when evaluating future mobile home park closures, particularly those closures that do not mitigate the contribution affordable housing shortage by its future use.



April 5, 2019

VIA EMAIL AND FEDERAL EXPRESS

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**Re: Relocation Impact Report (RIR) No. 4-19
Closure Request for Rancho Dominguez Mobile Estates
425-435 East Gardena Boulevard**

Dear Ms. Alexander:

We have received your letter to Richard H. Close, Esq. dated March 26, 2019 (your “Letter”), which responds to the Development Application form submitted by this firm on behalf of the owner of Rancho Dominguez Mobile Estates (the “Park”) for the park’s closure/change of use/conversion. In short, your Letter purports to require the Park owner to submit items, including a filing fee and a Relocation Impact Report, that are required under Carson’s Municipal Code of an applicant proposing such a closure. However, as was clearly set forth by the Park owner in its submission of the City’s Development Application form, the City, not the Park owner, is the applicant proposing the closure under state and local law.

The Development Application form stated, “Pursuant to Government Code section 65863.7, the City of Carson is the entity proposing the change in use for the purpose of preparing the required impact report and is required to take steps to mitigate the adverse impact of the change on the ability of displaced mobilehome park residents to find adequate housing in a mobilehome park, if any are required.” Your Letter did not respond to or otherwise address this fact and the underlying legal authority.

As you are likely aware, prior to the City of Carson’s incorporation, mobilehome parks in what is now the City of Carson could be located in light manufacturing zones (formerly known as M-1 zones, now re-designated as ML zones) so long as they were issued a “use variance.” These use variances did not have an expiration date. The Park has such a use variance.

However, after the City was incorporated, the City adopted Ordinance No. 77-413 (the “Ordinance”) in 1977. The Ordinance held that mobilehome parks were no longer permitted in manufacturing-zoned districts. (Carson Municipal Code § 9141.1) Mobilehome park usage in

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these zones therefore became “legal, nonconforming.”¹ The Ordinance granted a period of thirty-five (35) years, from October 1977, for the amortization of the legal, nonconforming use, after which time the nonconforming use would be terminated or made conforming. The thirty-five (35) year period for the Park expired in November 2012. Prior to that date of expiration, the owners of Rancho Dominguez requested that the City extend the Park’s legal, non-conforming use for a period not to exceed twenty (20) additional years. However, the City failed to grant any extension or to otherwise make the use conforming. Accordingly, the Park’s closure is the result of the City’s zoning or planning decision, action and/or inaction.

The City’s relevant Municipal Code provision states, “Prior to the conversion of a mobile home park [including the closure thereof]...**the person or entity (hereinafter “the applicant”) proposing such conversion** shall file an application with the City and obtain approval from the City of a relocation impact report (RIR) in accordance with the provisions contained in this Section.” (Carson Municipal Code § 9128.21 [emphasis added]).

The Municipal Code further states that, “In approving an RIR, the Commission may impose reasonable measures not exceeding the reasonable costs of relocation to mitigate adverse impacts created by the conversion...” (Carson Municipal Code § 9128.21(E).) The Municipal Code concludes that “[t]he total of the mitigation measures required shall be subject to and shall not exceed the limitation in Government Code Section 65863.7 which provides: the steps required to be taken to mitigate shall not exceed the reasonable costs of relocation.” (*Id.*)

Notably, the statutory provision cited in the City’s Municipal Code, Government Code section 65863.7, subd. (i), provides as follows:

This section is applicable when the closure, cessation, or change of use is the result of a decision by a local governmental entity or planning agency not to renew a conditional use permit or zoning variance under which the mobilehome park has operated, or as a result of any other zoning or planning decision, action, or inaction. **In this case, the local governmental agency is the person proposing the change in use for the purposes of preparing the impact report required by this section and is required to take steps to mitigate the adverse impact of the change as may be required in subdivision (e).** (Emphasis added.)

Pursuant to Section 65863.7(i) of the Government Code, the City – not the Park owner – is the “person proposing the change in use” and is therefore responsible for preparing the impact report and taking the steps necessary to mitigate the adverse impact of the change. Indeed, the City’s own Municipal Code provides that “the person or entity (hereinafter “the applicant”) proposing such conversion” is responsible for preparing the RIR and taking mitigation measures. Accordingly, under both state law and the City’s own Municipal Code, the City, and not the Park owner, is required to prepare any necessary impact reports and to mitigate any adverse impact of the Park’s closure. Items 1-6 in your Letter, therefore, are the responsibility of the City. Please note, however, that the Park’s owner has offered to cooperate fully and lend assistance to the City where appropriate.

¹ A legal, nonconforming use is “one that existed lawfully before a zoning restriction became effective and that is not in conformity with the ordinance when it continues thereafter.” (*Bauer v. City of San Diego*, 75 Cal. App. 4th 1281, 1285 fn. 1 (1999).)

McKina Alexander
April 5, 2019
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Finally, in response to Item 7, at this time the Park owner seeks only to have the park closed so that it is no longer operating out of compliance with CMC § 9141.1. We would welcome discussions with the City regarding other uses the Property may be put to.

Accordingly, please fulfill the requirements of CMC § 9128.21 without further delay. All rights of the Park owners are expressly reserved.

Sincerely,

COZEN O'CONNOR



Thomas W. Casparian, Esq.

cc: Richard H. Close, Esq.
Jeff Malawy, Esq., Ass't City Attorney



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April 30, 2019

VIA E-MAIL AND U.S. MAIL

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Re: **Relocation Impact Report No. 4-19
Closure Request for Rancho Dominguez Mobile Estates
425-435 East Gardena Boulevard**

Dear Messrs. Close & Casparian:

The City of Carson ("City") is in receipt of your letter dated April 5, 2019 ("Letter") regarding the above-referenced closure application for Rancho Dominguez Mobile Estates ("Rancho Dominguez" or the "Park"). The purpose of this letter is to: (1) respond to your Letter, specifically in regards to your contention that the City is the "person proposing the change in use" for purposes of Government Code Section 65863.7(i), and is therefore responsible for preparing the required relocation impact report ("RIR") and taking the steps necessary to mitigate the relocation impacts of the closure (collectively sometimes referred to as the "relocation obligations"); and (2) notify your client, the owner of Rancho Dominguez ("Owner"), that its closure application remains incomplete.

The Letter states that City Ordinance No. 77-413 granted a period of thirty-five (35) years, from October 1977, for the amortization of Rancho Dominguez as a legal nonconforming use, that the 35-year period expired in November 2012, and that despite the Owner's requests, the City failed to grant any extension or to otherwise make the Park's use conforming. The Letter further states that accordingly, Rancho Dominguez' closure is the result of the City's zoning or planning decision, action or inaction, meaning the City is the "person proposing the change in use" responsible for the relocation obligations in connection with the proposed closure pursuant to Government Code Section 65863.7(i).

Taking the factual assertions in the Letter as true, the Letter fails to address the missing link in the causal chain that is necessary to support your client's position that the closure is the "result" of the City's planning or zoning actions or decisions: *enforcement action*. That is, the City has

Richard H. Close
Thomas W. Casparian
April 30, 2019
Page 2

not ordered, requested, or pressured the Owner to close the Park in any way or at any time since expiration of the 35-year period specified in the City's zoning ordinance.¹ Indeed, the application comes as a surprise to the City, as it was not preceded by any communications on the issue between the City and the Owner.

To be clear, the City is not ordering or requesting the Owner to close the Park at this time. Accordingly, the Owner is free to withdraw its application and abandon the proposed closure if it wishes to do so.

Because the Owner is not being compelled to close the Park, the proposed closure is the result of the Owner's own choice, not any decision, action or inaction of the City. The voluntary nature of the Owner's decision is highlighted by the fact that the Park became an illegal land use in 2012, and yet the Owner did not propose closure until February 2019, over six years later. If the Park's closure were a necessary "result" of illegal land use status unaccompanied by any enforcement action, the Owner would have been obligated to submit its closure application when that illegal status attached, not 6+ years later. Therefore, the Owner's decision to do so now is clearly the result of its own free will, likely based on a desire to convert the land use to one that is more profitable for the Owner without having to bear responsibility for the consequences. Accordingly, the Owner, not the City, is the "person proposing the change in use" responsible for all relocation obligations in connection with the proposed closure under Government Code Section 65863.7(i).

If and only if the City ever commences formal proceedings to enforce its zoning ordinance to terminate the Park's illegal land use, the City will then be amenable to engaging the Owner in further discussions on the topic of responsibility for relocation obligations in connection with closure of the Park.

Based on the foregoing, the Owner must submit an RIR pursuant to Government Code Section 65863.7(a) and containing all required information and materials set forth in Carson Municipal Code Section 9128.21. The Owner has yet to submit any RIR, and therefore the application remains incomplete. In order to complete the application, the Owner must submit the information/documentation specified in the City's letter to you dated March 26, 2019, as follows:

- RIR

¹ The amortization period, as applied to the Park, remains ongoing, and will remain ongoing until the City compels the Owner to close the Park. *People v. Tolman*, 110 Cal.App.3d Supp. 6, 11 (1980). The 35-year period specified in the City's ordinance (Carson Municipal Code §9182.22(A)) is merely a minimum safe harbor period during which the City Council has formally indicated it will not pursue action to eliminate a nonconforming mobilehome park use.

- Submit a Relocation Impact Report consisting of all required information and materials (CMC Section 9128.21(C)).
- RIR Application Fee
- Questionnaire
 - Completed mobile home owner questionnaires using a questionnaire form approved by the City (CMC 9128.21(B));
 - Submit a proposed questionnaire form.
- Relocation Specialist
 - Indicate a relocation specialist for consideration;
 - The City is requiring the use of a relocation specialist, per CMC 9128.21(C)(12).
- Appraiser
 - Indicate two appraisers for consideration;
 - Note that the City may choose the appraiser and contract appraisal services, with payment made from the applicant's application deposit.
- Moving companies
 - Indicate two moving companies for consideration.
- CEQA Information
 - The project description in the application states "mobilehome park closure for potential redevelopment of site." What type of potential redevelopment does the applicant propose for the site? Please be as specific as possible, but we understand details may not be known at this time. It may be that only "commercial" or "residential" or "mixed use" development is known or contemplated at this early stage.

However, as noted above, the Owner need not proceed with Park closure at this time. As such, it may withdraw its application if it does not wish to take the steps necessary to complete it.

Lastly, the City is currently in the process of updating its General Plan. The General Plan update and related processes may or may not result in modifications to the City's current zoning standards regarding mobilehome park uses. The City has not yet determined what, if any, action it will take in regards to mobilehome park land use and zoning in connection with or related to the General Plan update, but the Owner is always welcome to participate in the City's public processes as it considers these issues moving forward.

Richard H. Close
Thomas W. Casparian
April 30, 2019
Page 4

Thank you for your attention to this important matter. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

ALESHIRE & WYNDER, LLP

A handwritten signature in black ink, appearing to read "BRJ", with a stylized flourish at the end.

Benjamin R. Jones, Esq.
Assistant City Attorney

JMM:BRJ

CC: Sunny Soltani, City Attorney
Jeff Malawy, Deputy City Attorney
McKina Alexander, Senior Planner



June 3, 2019

VIA EMAIL AND U.S. MAIL

Thomas W. Casparian, Esq.

Direct Phone 310-393-4000
Direct Fax 310-594-3082
tcasparian@cozen.com

Benjamin R. Jones, Esq.
Assistant City Attorney
18881 Von Karman Avenue, Suite 1700
Irvine, CA 92612
E-Mail: bjones@awattorneys.com

**Re: Relocation Impact Report (RIR) No. 4-19
Closure Request for Rancho Dominguez Mobile Estates
425-435 East Gardena Boulevard**

Dear Mr. Jones:

We are in receipt of your April 20, 2019 letter regarding the above-referenced matter, which itself responded to our letter dated April 5, 2019.

We first note that your letter avoids confirming or denying the truth of the factual statements made in our letter regarding the City's historical actions in this matter. The history of the City's zoning and other decisions related to this matter are matters of public record, contained in the City's own files. Your letter's refusal to confirm the truth of the factual statements is a troubling indication of the City's good faith approach to this matter.

More importantly, your contention that the City must order or "request" the Owner to close the Park, or take some other "enforcement action" which you do not define, in order for the City to be the responsible party under Government Code section 65863.7 is clearly wrong under the plain language of the statute.

We note that you provide no legal authority whatsoever for your contention, only argument. Yet, your argument is directly refuted by the plain language of the statute. No action by the City is necessary for the City to be an agency proposing a change in use pursuant to Section 65863.7. To the contrary, the statute explicitly states that if the closure is the result of a decision, action, or *inaction* by the City, the City is responsible for mitigation. Your argument cannot be reconciled with this language.

Furthermore, your argument also improperly reads the statute as stating that it is applicable only when the "closure ... is the *necessary* result of" agency action. Yet, the statute does not indicate the closure must be the necessary result of the agency's action, but only that it is "a result" of any zoning or planning decision, action or inaction. Your argument, unsupported by any legal authority, is directly contradicted by the plain language of the state statute.

LEGAL\41296183\1

The current situation, caused entirely by the City's own actions and inaction, is untenable for the Park Owner and for the Park's residents. The City's neglect to enforce its own laws does not shield it from responsibility under the statute. The Owner is not required to wait until it has been subjected to fines or other penalties before the City is obligated to perform its duty under the law. Your letter's reference to the fact that the City is not ordering or requesting the Owner to close the park "at this time" is not a shield to the Owner's potential liability, and the Owner cannot be expected to bear the risk.

Furthermore, the City's decision to terminate the prior legal non-conforming use and its refusal to grant an extension of the temporary exemption has substantially damaged the property's value and the Owner's ability to sell it. It further prevents the Owner from being able to obtain financing for the Park necessary for infrastructure improvement and repairs. Without resolution, the Owner continues to suffer damages. In addition, the Park's residents cannot obtain financing for their homes, and the non-conforming use makes it impossible or extremely difficult for them to sell their homes or for potential new residents to finance a purchase.

Finally, your letter makes material mis-statements of fact, which appear to be the result of the City's failure to make even a good-faith analysis of its own file in this matter. Your letter states that "the City has not ordered, requested, or pressured the Owner to close the park in any way or at any time since the expiration of the 35-year period specified in the City's zoning ordinance." This is also plainly untrue. Then-City Attorney William Wynder and then-Director of Planning Sherri Repp-Loadsmann met with the Owner upon expiration of the legal, non-conforming use, indicated to the Owner that a zoning exemption extension would not be approved and the park would need to close, and alleged, among other things, that the Park's no-longer legal use constituted a "public nuisance" in addition to violating zoning law.¹ Again, just because the City has not yet taken official enforcement action, the Owner's decision to comply with the law and not to subject itself to the risk of liability, especially after the direct threats made by City officials, is certainly not "clearly the result of its own free will," as your letter unreasonably avers.

Accordingly, as stated earlier, pursuant to Section 65863.7(i) of the Government Code, the City – not the Park owner – is the "person proposing the change in use" and is therefore responsible for preparing the impact report and paying any required amounts to the tenants pursuant to the City's Ordinance. Please inform us immediately that the City will perform its legal duty pursuant to state law, as the Park's Owner has offered to cooperate fully and lend assistance to the City where appropriate.

¹ We also note that the City sent the Owner a letter in April 2000 that stated, "[U]nless a time extension is requested by the park owner(s) and granted by the City, the park must cease existence by November, 2012." (Emphasis added.) Furthermore, there is no legal support for your letter's assertion that the 35-year expiration period for the legal, non-conforming use "is merely a minimum safe harbor period during which the City Council has formally indicated it will not pursue action to eliminate a nonconforming mobilehome park use." To the contrary, that contention is plainly wrong and is directly refuted by the ordinance, which states that such use was legal for the 35-year period, not that the City would not take action (no action could be taken to eliminate a legal use), and explicitly contains an expiration of that legal use, not a "minimum" period. The City's subsequent statements regarding Rancho Dominguez have also made clear the City does not recognize any current "safe harbor."

Benjamin R. Jones, Esq.
June 3, 2019
Page 3

Sincerely,

COZEN O'CONNOR



Thomas W. Casparian, Esq.

cc: Richard H. Close, Esq.
Jeff Malawy, Esq., Ass't City Attorney
McKina Alexander, Senior Planner

McKina Alexander

From: Benjamin R. Jones
Sent: Friday, October 09, 2020 2:47 PM
To: tCasparian@cozen.com
Cc: Sunny Soltani; MAlexander@carson.ca.us; SForbath@cozen.com; rclose@cozen.com
Subject: RE: Rancho Dominguez Home Appraisals

Large File Send Sent Files



You shared files with tCasparian@cozen.com ssoltani@awattorneys.com MAlexander@carson.ca.us SForbath@cozen.com rclose@cozen.com.

File(s):

20-057 Rancho Dominguez Report Introduction.pdf

20-057 Rancho Dominguez - Individual Home Appraisal Summaries.pdf

20-057 Invoice #9975 + Stmt.pdf

Hi Tom,

Thank you for providing this additional information and documentation. At least now we know that the residents were informed, both in English and Spanish, that Brabant is the City's appraiser, and were given a meaningful opportunity to provide relevant information regarding their homes' interiors to Brabant to be included in the appraisal while knowing the purpose for which the information would be used.

Brabant confirmed he can complete his appraisal in accordance with the Uniform Standards of Professional Appraisal Practice (USPAP), as well as the Code of Ethics and Standards of Professional Practice of the Appraisal Institute, provided certain disclosures are made in the report. Attached is the completed report.

Your email below purports to characterize the City's efforts to ensure its residents were properly notified of the appraisal process and given a meaningful opportunity to have relevant information regarding their homes' interiors included in the appraisal as "bad faith tactics to delay and undermine the process" and a "scheme to delay [your] application until AB 2782 was enacted." It should go without saying that these claims are completely false and are unequivocally denied by the City.

It is disappointing that you could level such accusations against the City, Brabant and our office for merely attempting to ensure that the appraisal process was completed properly and fairly. My hope is that in the future, you will bestow more trust in us and ensure that you fully understand all relevant considerations before resorting to such measures. This will help ensure that the Park Owner and the City are able to maintain an open, trusting and positive working relationship moving forward throughout what will inevitably be a very difficult park closure process for all involved.

Also attached is Brabant's invoice. The Park Owner will need to pay Brabant the remaining \$30K for the appraisal; as specified in Section 3 of the parties' reimbursement agreement, the payment can be made directly to Brabant, provided City is immediately notified for purposes of ensuring proper accounting and compliance under the reimbursement agreement.

Thanks and please do not hesitate to contact me if you have any questions.

Benjamin R. Jones | Associate, Assistant City Attorney of Carson
Aleshire & Wynder, LLP | 18881 Von Karman Ave., Suite 1700, Irvine, CA 92612
Tel: (949) 223-1170 | Dir: (949) 250-5430 | Fax: (949) 223-1180 | bjones@awattorneys.com | awattorneys.com

This email and any files transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient, or believe that you may have received this communication in error, please advise the sender via email and delete the email you received.

From: Casparian, Thomas <tCasparian@cozen.com>
Sent: Monday, October 5, 2020 12:53 PM
To: Benjamin R. Jones <bjones@awattorneys.com>
Cc: Sunny Soltani <ssoltani@awattorneys.com>; McKina Alexander <MAlexander@carson.ca.us>; Close, Richard <Rclose@cozen.com>; Forbath, Susy <SForbath@cozen.com>
Subject: RE: Rancho Dominguez Home Appraisals

**** EXTERNAL SENDER ****

Ben,

After being led to believe by you and Sunny that the City and we were working together cooperatively to close and redevelop Rancho Dominguez, it is with great disappointment that we are forced to call out City's bad faith tactics to delay and undermine the process.

Your denial that Brabant's report was due by September 14 is false. Brabant's agreement stated without reservation, "Our fee for the appraisal will be \$40,000 and it can be completed within about 60 days." Brabant's agreement did not ever state that was an "estimate," and his contract certainly was a "binding promise." But moreover, your response below avoids addressing the fact that you waited until we inquired about the already late report, more than a week after it was due, to even alert us to any issue.

In fact, you waited over two weeks before you would even authorize Brabant to proceed, despite our having paid \$40,000 (an extortionate amount, as any other appraiser will attest to) and executed the City's Reimbursement Agreement on July 1. At this point it now appears that you and Sunny advised us to delay our client's application until after Imperial Avalon's was approved, even though Rancho Dominguez's application was submitted much earlier, as part of a scheme to delay our application until AB 2782 was enacted, and to favor Imperial Avalon's application over Rancho Dominguez's.

Brabant did not condition timely completion of his appraisal report upon receiving responses to his form. Furthermore, any appraiser will attest that Brabant can complete his appraisals without more detailed information on the interiors of the homes, and he should make reasonable assumptions based upon the exterior of the home, and other known and observable conditions. Any MAI appraiser will attest that Brabant does not need to inspect the interior of each home or interview the homeowner to appraise it.

The cover letter to Brabant's form explained to residents that they should provide the information to Brabant if they wanted it considered in their appraisal. Brabant's form also requested that residents provide their phone numbers *if* they wanted to be contacted. The residents who chose not to have every right to retain their privacy, and many of them did provide detailed information.

The Park Owner applicant is not responsible for Brabant receiving responses to his form, nor can it force its residents to provide them or their phone numbers to him. And, to the extent residents may be withholding information from Brabant or otherwise refusing to cooperate in an effort to sabotage the park's closure (if they are "confused, angry, frustrated" and scared about how much longer they will be able to remain in their homes, as you state), that must be to their own detriment and not to Applicant's. Applicant has cooperated, and assisted, throughout the process, and has no reason to obstruct it.

In answer to your inquiry below, yes, the cover letter was also provided in Spanish. Enclosed is the cover letter from the city-approved relocation specialist OPC in Spanish that was sent when it distributed Brabant's form, and translated his form into Spanish for him, and informed residents of the dates of Brabant's visits, all of which were done in order to assist, not block, his efforts. It was Brabant's responsibility to obtain any information regarding the homes he wanted, not Park Owner's or OPC's. As stated earlier, the Spanish translation was performed by a certified Legal Translation Service.

We would be more than happy to work together with the City to host further meetings with the park's residents to explain the status of the closure and to again to explain the process once the application is deemed complete and set for hearing. There is not much purpose to such a meeting until the City allows, as it must, the application to be heard by the Planning Commission.

Your email ignores the fact that the Park Owner held three (3) meetings (two for home owners, one for tenants) with the residents when the application was first submitted to inform residents about the closure process and to urge them to return the City Questionnaire. A total of 52 homeowner households (out of 57) attended the homeowners meetings. All three meetings were conducted in English and Spanish (as were the meeting notices) at the City Community Center. At both homeowner meetings, the importance of completing the questionnaires was emphasized. Additionally, the cover letter to the City Questionnaire informed homeowners that that it is in their best interest to provide requested information. We note that City held its own resident meeting for Park Avalon to discuss that Park's closure, but City never did so for Rancho Dominguez.

Your statement that that Park Owner's efforts to promote completion of Brabant's form "clearly was not enough" misconstrues who is in charge of the appraisal. The appraisal is being performed by an appraiser, Brabant, who was imposed on Park Owner. The appraiser was engaged by and is under the control of the City. Your attempts to impose on Park Owner responsibility for the appraiser's conduct of his appraisal is intentionally misdirected. Additionally, you and Sunny were cc'd on the emails with Brabant regarding his conduct of his appraisals and inspection process, and you never provided further instructions or guidance to the parties. You further ignore the residents' own likely reasons for refusing to do cooperate and/or retain their privacy.

Again, Brabant's contract gave no indication of any intent to knock on residents' doors (let alone during a pandemic). As you note, it said, "Details about the interior of the homes and their overall condition will be based on the combination of our exterior inspections, information provided by representatives of the park owner, and interviews with homeowners." As one of three sources of information on the interior of the homes, even Brabant made clear that that interviews were unnecessary. The contract gave no indication that speaking to the residents was "very important," as only you now claim.

Your claim the Park Owner "put up numerous roadblocks in connection with the inspection process" is false. You fail to identify a single "roadblock", and ignore the assistance, cooperation and offers that Park Owner gave. The Park Owner's and Park residents' objection to Brabant knocking on doors is not a "roadblock" but an obviously and eminently understandable concern during the pandemic. Brabant's request to do so was irresponsible and dangerous, and your deeming that a "roadblock" put up by the Park owner, indeed the only one you have identified, demonstrates City's bad faith intent to use Brabant to block the applicant's ability to complete its application.

As you note, Susy even clarified to Brabant that we were not prohibiting him from knocking on doors, but asked that if he insisted on doing so to please have residents sign a waiver. Exactly such a C.A.R. form is provided on the M.L.S. and the C.A.R. websites, so your claim that Brabant did not have such a form readily available to him is false. More to the point, Brabant responded to Susy that he did not require conducting in-person interviews and, "We can do the appraisal without conducting in-person interviews." We never heard anything further on the issue until we wrote to you six weeks later to inquire about the late appraisal. Ben, you and Sunny were both cc'd on these emails with Brabant, and at no point did you provide direction to Park

Owner or offer assistance. Why on earth would park owner want to put up “roadblocks” to Brabant completing his appraisal? It is obviously City that intends to place roadblocks in Park Owner’s way of completing its application because the park closure is politically unpopular, and because City is hoping to delay application completeness until the new law allowing City greater freedom to place *more* roadblocks comes into effect on January 1. City’s intent will be transparent to any court upon its review of City’s conduct.

Furthermore, Brabant has phone numbers for more than half of the homes to be appraised. By his own count, 19 of Brabant’s forms were returned to him. You state that he contacted an additional 4 homes by phone. In addition to those 23 homes, we have supplied Brabant with the phone numbers for 12 more residents who agreed to give their numbers. Out of 57 homes to be appraised, Brabant has been able to interview the owners of 35. As for the remaining homeowners, they have been asked, in writing, twice, to provide their phone numbers to the City and the appraiser, once on the City Questionnaire and once on Brabant’s form. If the City has the authority to require the residents to divulge their phone numbers, (or information about the interior of their homes) to it, then City may do so, but it was wrong for Brabant to ask Park Owner to violate the residents’ privacy after they had twice refused.

Park Owner also provided Brabant with information on every home for appraisal that included: (1) the dimensions and square footage of the home, (2) the number of bedrooms and bathrooms, (3) the year the home was built, (4) the manufacturer, and (5) the home’s decal number for Brabant’s use in obtaining title and transfer information from HCD (see attached).

The idea that Brabant cannot complete his appraisal because mobilehomes might contain unknown wet bars, fireplaces or vaulted ceilings is preposterous for so many reasons. If residents did not understand everything on Brabant’s form, and there is no indication they did not despite your speculation, it is Brabant’s form, not Park Owners’. Again, the Spanish translation was performed by a certified Legal Translation Service, and your email fails to demonstrate anything incorrect. Besides, Brabant can see from an exterior inspection that there is no chimney for a fireplace, and that the mobilehomes’ flat roofs makes vaulted ceilings impossible. It is plain City is inventing a pretext to delay completion of the application.

There is apparently no issue regarding Brabant’s completion of 35 of the appraisals. As to the remaining 22 homes, any appraiser will attest that Brabant is able to complete their appraisals without interviewing the owners. Appraisers use their experience and judgment to make reasonable assumptions based on the information they have, and Brabant has been able to inspect the exterior of the homes, knows their square footage, bed and bath counts, age, and manufacturer. He also knows the details of the interiors of the other 35 extremely similar homes.

The fact that these 23 homeowners did not choose to provide further details about their homes’ interior, despite being informed, in writing, twice, that it was in their interest to do so (in addition to orally at the well-attended homeowner meetings) is also strong evidence that these homes do not contain significant upgrades or other details that would increase their otherwise-observable value. In addition, the fact that the residents were informed over ten years ago that the Park would be closing makes it further unlikely these residents performed expensive upgrades inside their mobilehomes, especially if there is no indication that the exterior of the home has been improved.

It is impossible not to conclude that City is attempting to delay completion of the closure application, for which the City requires the appraisals, for which City imposed Brabant as the appraiser, and Brabant is under City’s control and direction. Your email’s reliance on plainly false statements, preposterous scenarios of undisclosed fireplaces and wetbars, and unjust attempts to blame park owner for residents’ refusal to provide information, whether in their attempt to block the closure or for personal reasons, makes City’s bad faith and bad intent here inescapable. City is clearly attempting to delay completion of the closure application until it can impose new, very different substantive requirements under recently-passed AB 2782.

Rancho Dominguez demands that City instruct Brabant to complete his appraisals immediately. Any additional costs or losses to the park owner as a result of application of AB 2782 to this closure will constitute damages against the City for its bad faith obstruction, as well as damages against Brabant for failing to timely and competently fulfill the terms of his agreement, under which Park Owner is clearly the intended beneficiary and for which it already paid \$40,000.



Thomas W. Casparian
Member | Cozen O'Connor
1299 Ocean Ave, #900 | Santa Monica, CA 90401
P: 310-460-4471 F: 310-594-3082
[Email](#) | [Map](#) | [cozen.com](#)

From: Benjamin R. Jones <bjones@awattorneys.com>
Sent: Monday, September 28, 2020 11:06 AM
To: Casparian, Thomas <tCasparian@cozen.com>
Cc: Sunny Soltani <ssoltani@awattorneys.com>; McKina Alexander <MAlexander@carson.ca.us>; Close, Richard <Rclose@cozen.com>; Forbath, Susy <SForbath@cozen.com>
Subject: RE: Rancho Dominguez Home Appraisals

****EXTERNAL SENDER****

Hi Tom,

Thank you for your email and for the documentation you provided.

Firstly, I don't agree with your assertion that the appraisal report was "due at latest by September 14." Brabant estimated it would take him 60 days to complete the report from the date of our notice to proceed, but that 60-day estimate was just that – an estimate. It was not a binding promise or agreement to have the report completed by a date certain irrespective of any and all other relevant considerations or circumstances.

You are correct that Brabant never proposed or attempted to conduct interior inspections of the homes, due to COVID concerns. However, that makes it all the more important that he be able to obtain relevant information on the interiors of the homes by other means, including by obtaining completed questionnaires from each of the homeowners and conducting interviews with residents (either in person or over the phone). It recently became clear to us that despite Brabant's best efforts, he has been unable to gather any information regarding the interiors of most of the homes that are the subject of the appraisal. Also, please note that the completed questionnaires and the information gathered therefrom may well be necessary for the Park Owner to be able to submit a complete RIR, so obtaining the completed questionnaires is in the Park Owner's interest as well.

I mentioned in my last email that Brabant has only received completed questionnaires from about 20 residents. The specifics on that are that he has obtained 19 questionnaire forms returned by residents, and in four other cases, his firm was able to speak with a resident on the phone and fill out a questionnaire during the conversation.

Thank you for providing the cover letter that was sent to the residents, and I note that it states Anderson & Brabant is the appraiser selected by the City. However, the letter is in English, and you did not provide me with a Spanish version. As you know, the park is predominately Spanish speaking. Was the cover letter provided to the residents in Spanish? If so, please send me a copy.

As far as ways to promote completion of the questionnaires, certainly an updated Spanish version of the cover letter from the Park Owner would be in order, but if it was sent in Spanish originally, that clearly was not enough. The City may

need to send out a notice to the residents (and possibly host a meeting with the residents) to explain what is going on and to encourage participation. It is clear from questions received by Brabant and the City that the residents are scared, confused, angry, frustrated, and very much in the dark as to the status of park closure, what is happening/going to happen, and how much longer they will be able to remain in their homes. Would the Park Owner be willing to help distribute a notice letter from the City to the residents to help address these issues?

In addition to obtaining completed questionnaires, it is very important for Brabant to be able to speak to the residents about their homes. Brabant's contract did not exclude intent to knock on doors; conversely, it expressly states that "[d]etails about the interior of the homes and their overall condition will be based on the combination of our exterior inspections, information provided by representatives of the park owner, and *interviews with homeowners.*" (emphasis added).

Brabant originally contemplated these interviews occurring by way of *either*: (1) knocking on doors; (2) residents coming out of their houses on their own during exterior inspections without any knock; or (3) telephone conversations. Later, in response to request from the Park Owner, Brabant agreed not to knock on doors during the two days of initial inspections, but he still sought to obtain the Park Owner's permission to speak with residents who came out of their homes during the inspections, provided masks and social distancing measures were observed. However, Brabant feels that the Park Owner (communicating via Susy) put up numerous roadblocks in connection with the inspection process that prevented or discouraged him from conducting in-person interviews in this manner. By way of example:

- On July 23, 2020, Susy sent Jim an email stating, "I thought we had agreed that you would not be speaking with the residents in person."
- After some back and forth, Susy sent Jim another email on August 4, 2020, stating, "I think we can all agree that while Covid 19 continues to be rampant in LA, conducting in person interviews is not ok. The park does not want to be responsible for anyone's health being risked in this process. Phone interviews must suffice."
- Then on August 5, 2020, after a response from Jim, Susy modified this position in an email stating, "[t]he park is not prohibiting you from conducting in-person interviews, if you insist. If any residents come out of their homes to speak with you, please just have them sign a waiver indemnifying the park owner from any liability for health risks."

In regards to the last bullet point above, Jim did not have a waiver form readily available to him, and it occurred to him that even if he did, attempting to have residents sign them would require him to walk up closer than six feet to hand the form to them, discuss it with/explain it to them, and then have them hand it back to him, and that residents may not even understand the "legalize" of the documents and might refuse to sign it (not to mention possible English-Spanish translation issues). Thus, Brabant concluded this was intended merely as a roadblock to keep him from conducting in-person interviews.

Moreover, Jim has not been able to obtain phone numbers for many of the residents because: (1) many of the questionnaires were not completed/returned by the residents; and (2) the Park Owner has not provided resident phone numbers to Brabant despite the fact that Brabant requested them early on in the inspection/appraisal process.

Brabant's inability to speak with residents has hampered not only his ability to obtain information on the interiors of most of the mobilomes that he is valuing, but also his ability to obtain necessary information regarding prior sales of mobilehomes from residents to residents (as opposed to sales from residents to the Park Owner) that have occurred in the Park since 2009, which are being used for sales comparison purposes in the appraisal.

Lastly, in regards to the Spanish translation of the questionnaire that the Park Owner had prepared, I am certainly no fluent Spanish speaker, but I have received the following information from Anderson & Brabant in regards to potential errors/inaccuracies in the translation:

- Fireplace - Anderson & Brabant believes a word was used that typically means "home" instead of "fireplace";
- Wet Bar – although the correct Spanish word for this was used, Anderson & Brabant has doubts that residents understood what it meant or what a wet bar is, so some explanation may be necessary;

- Vaulted Ceilings – same as for wet bar - residents apparently did not know what this meant or what vaulted ceilings are, so this may need further explanation as well;
- Many residents were confused about the section titled "Permitted Additions to Main Home." Susy asked Anderson & Brabant to add the word "Permitted." Anderson & Brabant recommends adding a note saying to skip this section if there are no additions to the home.

Thanks and I look forward to working with you to resolve these issues as soon as possible.

Benjamin R. Jones | Associate, Assistant City Attorney of Carson
Aleshire & Wynder, LLP | 18881 Von Karman Ave., Suite 1700, Irvine, CA 92612
Tel: (949) 223-1170 | Dir: (949) 250-5430 | Fax: (949) 223-1180 | bjones@awattorneys.com | awattorneys.com

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From: Casparian, Thomas <tCasparian@cozen.com>
Sent: Thursday, September 24, 2020 11:49 AM
To: Benjamin R. Jones <bjones@awattorneys.com>
Cc: McKina Alexander <MAlexander@carson.ca.us>; Sunny Soltani <ssoltani@awattorneys.com>; Close, Richard <Rclose@cozen.com>; Forbath, Susy <SForbath@cozen.com>
Subject: Rancho Dominguez Home Appraisals

***** EXTERNAL SENDER *****

Ben,

Brabant's appraisal report was due at the latest by September 14. Any concerns about his ability to complete his report should have been raised long ago, not more than a week after the deadline and only upon our inquiry regarding the overdue report.

Under his own contract proposal with the City, Brabant's appraisal was never to include the ability to conduct interior inspections of residents' homes. ("We will conduct an on-site inspection of the park, and an exterior inspection of each home. We will not be inspecting the interior of the homes because of Covid-19 concerns.")

Brabant's contract also excluded any intent to knock on residents' doors. Rather, he stated he would conduct his appraisal using "a form that requests information about each home The form will include a space for the phone number of each homeowner in case we have any follow-up questions." Brabant was not prohibited from knocking on residents doors, and told Susy in an email that he could conduct the appraisal without in-person interviews.

As requested, attached here is the cover letter sent by OPC encouraging residents to complete Brabant's Homeowner Form, together with the Homeowner Forms themselves, in English and Spanish. The Spanish translation was performed by a certified Legal Translation Service.

The cover letter encouraged homeowners to complete the form and provide photos of their interiors and any other relevant documentation to assist with the appraisal of their home. The letter also let them know that if they needed technical assistance providing photos or documentation electronically, the Park Manager was available to assist them with scanning and/or emailing.

Brabant was also provided with the Resident Questionnaire response data obtained by OPC on the City-mandated form which included the resident's descriptions of any home improvements. Brabant was also provided with a Home Data chart prepared by park owner which included the number of bedrooms/baths and square footage of every home in the park.

Ben, I hope this resolves any concerns you may have. The fact remains that Brabant, who is under City's control, is causing undue delay in a matter in which time is of the essence. Please ensure the appraisal is completed and delivered to us immediately.



Thomas W. Casparian
Member | Cozen O'Connor
1299 Ocean Ave, #900 | Santa Monica, CA 90401
P: 310-460-4471 F: 310-594-3082
Email | Map | cozen.com

From: Benjamin R. Jones <bjones@awattorneys.com>
Sent: Tuesday, September 22, 2020 5:02 PM
To: Forbath, Susy <SForbath@cozen.com>
Cc: McKina Alexander <MAlexander@carson.ca.us>; Sunny Soltani <ssoltani@awattorneys.com>
Subject: RE: Rancho Dominguez Executed Reimbursement Agreement

****EXTERNAL SENDER****

Hi Susy,

We have some concerns about the limited information that Anderson & Brabant has been able to obtain from the residents regarding the interiors of their homes. For example, only about 20 residents have responded to their questionnaires, and as you know, Anderson & Brabant was not permitted to conduct interior inspections or knock on doors to speak with residents about their homes when Anderson & Brabant was at the park to conduct the exterior inspections. We also have some related concerns regarding what has been communicated by the park owner to the residents about who Anderson & Brabant is, who they work for, and how providing information to Anderson & Brabant is in the residents' best interest. We want to understand what the park owner has communicated to the residents on these topics. My understanding is the park owner has sent two letters to the residents in this regard – can you please provide me with copies of these letters? Also, we have heard that the Spanish translation of the resident questionnaire contained some inaccuracies – can you please send me a copy of that as well? Thank you.

Benjamin R. Jones | Associate, Assistant City Attorney of Carson
Aleshire & Wynder, LLP | 18881 Von Karman Ave., Suite 1700, Irvine, CA 92612
Tel: (949) 223-1170 | Dir: (949) 250-5430 | Fax: (949) 223-1180 | bjones@awattorneys.com | awattorneys.com

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From: Forbath, Susy <SForbath@cozen.com>
Sent: Tuesday, September 22, 2020 11:27 AM
To: Benjamin R. Jones <bjones@awattorneys.com>
Cc: McKina Alexander <MAlexander@carson.ca.us>
Subject: RE: Rancho Dominguez Executed Reimbursement Agreement

***** EXTERNAL SENDER *****

Hi Ben –

We are past the 60 days in which Brabant had agreed (in his contract) to provide the appraisal report. We would like to get our RIR filed. When do you anticipate we will receive his appraisal?

Susy



Susy Forbath
Regulatory and Government Relations Professional | Cozen O'Connor
1299 Ocean Ave, #900 | Santa Monica, CA 90401
P: 310-309-4500 F: 310-594-7308
[Email](#) | [Bio](#) | [Map](#) | [cozen.com](#)

From: Benjamin R. Jones <bjones@awattorneys.com>
Sent: Thursday, July 16, 2020 9:46 AM
To: Forbath, Susy <SForbath@cozen.com>
Cc: McKina Alexander <MAlexander@carson.ca.us>
Subject: RE: Rancho Dominguez Executed Reimbursement Agreement

****EXTERNAL SENDER****

Hi Susy,

Yes, Jim is now authorized to proceed for Rancho Dominguez.

For Park Avalon, I believe his engagement letter is being executed today.

Benjamin R. Jones | Associate, Assistant City Attorney of Carson
Aleshire & Wynder, LLP | 18881 Von Karman Ave., Suite 1700, Irvine, CA 92612
Tel: (949) 223-1170 | Dir: (949) 250-5430 | Fax: (949) 223-1180 | bjones@awattorneys.com | [awattorneys.com](#)

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From: Forbath, Susy <SForbath@cozen.com>
Sent: Wednesday, July 15, 2020 6:09 PM
To: McKina Alexander <MAlexander@carson.ca.us>
Cc: Benjamin R. Jones <bjones@awattorneys.com>
Subject: RE: Rancho Dominguez Executed Reimbursement Agreement

***** EXTERNAL SENDER *****

Thanks McKina! Ben – have you now authorized Brabant to proceed in Rancho Dominguez? And what about Park Avalon?



Susy Forbath
Regulatory and Government Relations Professional | Cozen O'Connor
1299 Ocean Ave, #900 | Santa Monica, CA 90401
P: 310-309-4500 F: 310-594-7308
[Email](#) | [Bio](#) | [Map](#) | [cozen.com](#)

From: McKina Alexander <MAlexander@carson.ca.us>
Sent: Wednesday, July 15, 2020 5:52 PM
To: Forbath, Susy <SForbath@cozen.com>
Cc: Benjamin R. Jones <bjones@awattorneys.com>
Subject: Rancho Dominguez Executed Reimbursement Agreement

****EXTERNAL SENDER****

Hello Susy,

Attached is a copy of the executed Rancho Dominguez reimbursement agreement.

Best Regards,

McKina Alexander | Associate Planner

City of Carson | [Planning Division](#)

701 East Carson Street, Carson, CA 90745

Office: 310-952-1700 ext. 1326

[City of Carson Website](#)

Until further notice, the Planning Division will be managed via email, phone or Zoom. In person appointments will be considered on a case by case basis and scheduled as a matter of last resort. We appreciate your patience as we strive to ensure the safety and well-being of the public and city staff.

For the most up to date COVID-19 information, please visit ci.carson.ca.us.



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the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

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CITY OF CARSON

November 24, 2020

Richard H. Close, Esq.
Cozen O'Connor
1299 Ocean Avenue, Suite 900
Santa Monica, CA 90401
Rclose@cozen.com

Via U.S. Mail and Email

**SUBJECT: Relocation Impact Report (RIR) No. 4-19
Closure Request for Rancho Dominguez Mobile Estates
425-435 E. Gardena Boulevard**

Dear Mr. Close,

On October 26, 2020, City staff received the relocation impact report (RIR) for the closure of Park Avalon Mobile Estates located at 425-435 E. Gardena Blvd.

After review of the RIR and associated application documentation, as it relates to completeness pursuant to Carson Municipal Code (CMC) Section 9128.21, the application is **deemed incomplete** at this time.

Table 1 (Section 9128.21 – RIR Application Completeness analysis) and the subsequent discussion below specify the incomplete items and the information/documentation needed to complete them.

1. RIR APPLICATION COMPLETENESS ANALYSIS (CMC 9128.21) - TABLE 1

Relevant Provision of CMC 9128.21:	Complete/Incomplete	Location	Staff Comments
A. RIR	Incomplete		See comments below re: §9128.21(C)
B. Resident Questionnaire	Incomplete*	39 completed or partially completed questionnaires submitted concurrently with RIR	*RIR (p.6) states that completed or partially completed questionnaires were returned by 41 of the 81 Park households. City received 39 questionnaires. Per the

		<p>RIR, there are 57 resident-owned spaces in the Park, and the remainder are Park-owned.</p> <p>Space No's. 64, 65, & 80 are listed as resident-owned spaces that completed questionnaires, but no questionnaires for these spaces were submitted to the City. Please submit these questionnaires.</p> <p>Additionally, Space No. 6 was included among the 39 submitted questionnaires, but the questionnaire states that the mobilehome is Park-owned, so the City has received completed or partially completed questionnaires for 38 of the 57 resident-owned spaces. Please provide confirmation that questionnaires were given to each resident in accordance with §9128.21(B) and that all completed or partially completed questionnaires have been submitted to the City. To the extent questionnaires were not given to residents in accordance with §9128.21(B), and to the extent completed or</p>
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			partially completed questionnaires were not submitted, please do so.
C. RIR Content:			
C.1. Description of Proposed New Use	Complete**	RIR, Pg. 5	Please submit additional detail as discussed below**
C.2. Timetable for park conversion	Complete	RIR, Pg. 5, 20	
C.3. Legal Description of the Park	Complete	RIR, Exhibit A	
C.4. No. of spaces, length of occupancy, current rental rates	Incomplete	RIR, Exhibit D; Confidential Tenant Spreadsheet	Confidential tenant spreadsheet is inconsistent with other application materials (e.g., RIR, Exh. D) and has 132 spaces listed instead of 81 spaces. Please submit a corrected confidential tenant spreadsheet.
C.5. Date of manufacture and size of each mobilehome	Complete	RIR, Exhibit D; Appraisal reports submitted concurrently with RIR	
C.6. Appraised on-site value and off-site value of each of the mobile homes in the park	Complete	Appraisal Report submitted concurrently with RIR	James Brabant appraisal report submitted
C.7. Total number of residents, broken down space by space, to identify owner or renter occupancy, principal or second home occupancy, resident under sixteen (16) years of age, residents sixty-two (62) years of age or over, and	Incomplete	RIR Pg. 7, Table 1; Confidential Tenant Spreadsheet	Confidential tenant spreadsheet is inconsistent with other application materials (e.g., RIR, Exh. D) and has 132 spaces listed instead of 81 spaces. Please submit a corrected confidential

the number of residents who are handicapped and/or disabled.			tenant spreadsheet.
C.8. The name and mailing address of each mobile home resident and each nonresident mobile home owner	Complete	Tenancy Mailing List submitted concurrently with RIR	
C.9. A list of known available spaces in the South Bay-Long Beach area of Los Angeles County, the Orange County area and other areas of Los Angeles County within a fifty (50) mile radius from the park, including any written commitments from mobile home parks and trailer park owners willing to accept displaced residents, the comparability of such parks and the rental rates for such spaces	Complete	RIR pgs. 8-11 Exhibits F-H	
C.10. Estimates from two (2) moving companies as to the minimum and per mile cost of moving, tear-down and set-up; and moving improvements installed by residents.	Complete	RIR, pgs. 10-11	
C.11. Proposed measures to mitigate the adverse impacts upon the park residents	Incomplete***	RIR pgs. 13-17	See discussion below***
C.12. Relocation Specialist	Complete	RIR pgs. 15-16, 18-21	
C.13. Information whether residents have been offered the option of a long-term	Complete	RIR pg. 5	

lease of the land and purchase of the improvements if the park is to be sold			
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Please submit all information required per Table 1 above at your earliest convenience.

******You have indicated to the City that you are aware of Governor Newsom’s August 31, 2020, approval of Assembly Bill 2782 (AB 2782), and indeed, that you have been following the bill since prior to its passage. AB 2782 will take effect as law on January 1, 2021, and as such will apply to any final administrative decision on your application that is rendered effective on or after said date. Due to the passage and impending effectiveness of AB 2782, you are required to submit the following information (in addition to the other information/items specified in this letter) in order to complete your RIR application: (1) information as to whether or not the intended or anticipated future use of the subject property would include or contribute to housing opportunities or choices for low- and/or moderate-income households within the City. Submittal of this information is necessary to enable the City to fully evaluate your RIR application.

*******The RIR improperly purports to condition the proposed “relocation mitigation measures” upon City approval of the RIR by December 31, 2020, stating that if City does not do so, applicant will seek to hold City responsible for any required relocation impact mitigation measures.

Specifically, the RIR, on page 14, provides, “the City is the ‘person proposing the change of use’ of Rancho Dominguez Mobile Estates because its closure is the result of a ‘zoning or planning decision, action or inaction’ and it is required to take steps to mitigate the adverse impact of the closure on Park residents, pursuant to Government Code section 65863.7(i). *However, if this Impact Report is finally approved by the City no later than December 31, 2020, the Park Owner agrees to provide the following relocation costs, relocation assistance, and additional benefits to the mobile home resident-owners without reimbursement from the City....*” (emphasis added).

This tactic renders the proposed mitigation measures illusory, used as a means of seeking to coerce or induce the City into eschewing proper exercise of its police power. The City is legally prohibited from contracting or otherwise bargaining away its away its municipal or governmental functions or its right to exercise its police power, and any action which amounts to an abdication of the police power or an agreement to surrender, abnegate, divest, abridge, impair, or bargain away control of its police power or municipal or governmental function would be invalid. The proposed “relocation mitigation measures” represent nothing more than a bad faith attempt to leverage the park owner’s perceived potential legal claims against the City related to Gov’t Code §65863.7(i) to induce the City to summarily approve the RIR on the park owner’s desired timeline rather than properly considering, evaluating and acting upon the RIR in accordance with its authority and timelines under applicable law.

The City cannot agree to applicant’s proposed terms without illegally compromising the City’s police power at the expense of the welfare of its residents. Additionally, such an action would

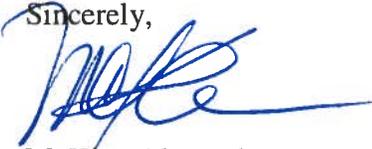
November 24, 2020
Rancho Dominguez Mobile Estates
RIR No. 4-19

contravene the legislative intent of AB 2782. Any action taken by City will and must be pursuant to the full and free exercise of its police power and in accordance with applicable law. The City cannot do, or promise or agree to do, anything to the contrary. Moreover, the City has already made its position clear that it is not the “person proposing the change of use” for purposes of Section 65863.7(i), and that the land use or zoning status of the park may soon be changed as part of the City’s general plan update process or otherwise.

Based on the foregoing, the RIR is incomplete as to CMC §9128.21(C)(11). Please submit proposed measures to mitigate the adverse impacts of the conversion upon the park residents (in addition to the information and documentation necessary to complete the other outstanding application items as detailed in this letter) at your earliest convenience.

You may contact me at (310) 952-1700 extension 1326 or malexand@carson.ca.us if you need further assistance.

Sincerely,



McKina Alexander
Associate Planner



December 30, 2020

VIA EMAIL AND FEDERAL EXPRESS

Thomas W. Casparian, Esq.

Direct Phone 310-460-4471
Direct Fax 310-594-3082
tcasparian@cozen.com

McKina Alexander
Associate Planner
City of Carson – City Hall
701 E. Carson Street
P.O. Box 6234
Carson, CA 90749
E-Mail: malexand@carson.ca.us

**Re: Relocation Impact Report (RIR) No. 4-19
Closure Request for Rancho Dominguez Mobile Estates
425-435 East Gardena Boulevard**

Dear Ms. Alexander:

We received your letter to Richard H. Close, Esq. dated November 24, 2020 (your “Incompleteness Letter”), which purports to deem as incomplete RIR No. 4-19 (the “RIR”) and fails to set a timely hearing by the City’s Planning Commission for the RIR’s approval. We have also recently received your December 23, 2020 letter to the same effect.

Together with this letter, we are filing a revised RIR that provides the information your letter contends is omitted. Additionally, as your December 23rd letter recognizes, other items requested in your November 24th letter were previously provided. Please deem the RIR complete immediately and set this matter for hearing before the Planning Commission.

The RIR “incompleteness” items are addressed below:

1.B: *“Please provide confirmation that questionnaires were given to each resident in accordance with §9128.21(B) and that all completed or partially completed questionnaires have been submitted to the City.”*

The questionnaires for space nos. 56, 64, 65, and 80, together with a revised questionnaire data chart, were provided to Staff on 12/01/20 as acknowledged by Staff’s response letter dated 12/23/20.

1.C.4: *“Please submit a corrected confidential tenant spreadsheet.”*

A revised Confidential Tenant Spreadsheet was provided to Staff on 12/01/20 as acknowledged by your letter dated December 23, 2020.

1.C.7: *“Please submit a corrected confidential tenant spreadsheet.”*

LEGAL\50235979\1

A revised Confidential Tenant Spreadsheet was provided to Staff on 12/01/20 as acknowledged by your letter dated December 23, 2020.

1.C.1: Due to the passage and impending effectiveness of AB 2782, you are required to submit the following information (in addition to the other information/items specified in this letter) in order to complete your RIR application: (1) information as to whether or not the intended or anticipated future use of the subject property would include or contribute to housing opportunities or choices for low- and/or moderate-income households within the City. Submittal of this information is necessary to enable the City to fully evaluate your RIR application.

This information is not required under current law. As even your letter notes, at 1.C.1: "Description of Proposed New Use", this item is "Complete." Denial of a completeness determination and refusal to set the RIR for Hearing approval under the time limits required by law until information that is *not* required under current law is provided is unjustified and wrongful.

Irrespective, an amended RIR containing the information requested is included herewith. The following language has been added:

The Park Owner anticipates developing the property into denser workforce housing and possible mixed-use appropriate to the industrial location, where the Park remains an underdeveloped parcel. Attached as Exhibit "I" is a site/yield study commissioned by Park Owner and produced by Withee Malcolm Architects, LLP, demonstrating potential redevelopment of the Property from 81 mobilehome spaces into 174 1-, 2-, and 3-bedroom apartments, thereby more than doubling the current housing provided by the Property. Accordingly, the anticipated future use of the Property would include and contribute to housing opportunities for low- and moderate-income households within the City of Carson and would not materially contribute to a shortage of housing opportunities for low- and moderate-income households.

1.C.11: The RIR improperly purports to condition the proposed "relocation mitigation measures" upon City approval of the RIR by December 31, 2020, stating that if City does not do so, applicant will seek to hold City responsible for any required relocation impact mitigation measures. [¶] Specifically, the RIR, on page 14, provides, "the City is the 'person proposing the change of use' of Rancho Dominguez Mobile Estates because its closure is the result of a 'zoning or planning decision, action or inaction' and it is required to take steps to mitigate the adverse impact of the closure on Park residents, pursuant to Government Code section 65863.7(i). However, if this Impact Report is finally approved by the City no later than December 31, 2020, the Park Owner agrees to provide the following relocation costs, relocation assistance, and additional benefits to the mobile home resident-owners without reimbursement from the City..." (emphasis added). [¶] This tactic renders the proposed mitigation measures illusory, used as a means of seeking to coerce or induce the City into eschewing proper exercise of its police power. The City is legally prohibited from contracting or otherwise bargaining away its away its municipal or governmental functions or its right to exercise its police power, and any action which amounts to an abdication of the police power or an agreement to surrender, abnegate, divest, abridge, impair, or bargain away control of its police power or municipal or governmental function would be invalid. The proposed "relocation mitigation measures" represent nothing more than a bad faith attempt to leverage the park owner's perceived potential legal claims against the City related to Gov't Code §65863.7(i) to

induce the City to summarily approve the RIR on the park owner's desired timeline rather than properly considering, evaluating and acting upon the RIR in accordance with its authority and timelines under applicable law. [¶] The City cannot agree to applicant's proposed terms without illegally compromising the City's police power at the expense of the welfare of its residents. Additionally, such an action would contravene the legislative intent of AB 2782. Any action taken by City will and must be pursuant to the full and free exercise of its police power and in accordance with applicable law. The City cannot do, or promise or agree to do, anything to the contrary. Moreover, the City has already made its position clear that it is not the "person proposing the change of use" for purposes of Section 65863.7(i), and that the land use or zoning status of the park may soon be changed as part of the City's general plan update process or otherwise.

We disagree. The law is clear that under the circumstances, "the local governmental agency is the person proposing the change in use for the purposes of preparing the impact report required by [Government Code section 65863.7] and is required to take steps to mitigate the adverse impact of the change as may be required in subdivision (e)." (Gov't Code, § 65863.7(i), as current and as effective after Jan. 1, 2021.)

City has repeatedly failed and refused to comply with its obligations to provide an impact report and mitigation measures to the Park's residents pursuant to Government Code section 65863.7(i) despite its clear obligation to do so and repeated demands from the Park Owner. City has failed and refused to conform the zoning status of the Park or to grant a use permit, and has itself asserted to the Park Owner and the Park residents that the Park must be closed. City's vague claim, after 18 years, that "the land use or zoning status of the park *may* soon be changed as part of the City's general plan update process or otherwise" is meaningless. Indeed, it has been 22 months since Rancho Dominguez filed an Application for closure, re-asserting that City is responsible for preparation of the impact report and to provide mitigation measures because the "closure, cessation, or change of use is the result of a decision by a local governmental entity or planning agency not to renew a conditional use permit or zoning variance under which the mobilehome park has operated, or as a result of any other zoning or planning decision, action, or inaction" (Gov't Code, § 65863.7(i)). Since then, City has taken no action, and still cannot say it will.

Park Owner has no legal obligation to provide any mitigation measures under these circumstances, but has agreed to do so, up to a reasonable point. Indeed, the mitigation benefits Park Owner has agreed to provide, without seeking reimbursement from the City, are those same measures the City required of the last mobilehome park closure that resulted from expiration of its legal use, at Bel Abbey. If City, in a proper (as limited under law) exercise of its police power determines that further mitigation or other measures are warranted, it remains free to provide them, as it is obligated to do pursuant to Government Code section 65863.7(i). Irrespective, Park Owner agrees to remove any condition for a certain timeline for approval (other than that which it asserts is required by law), and has amended the RIR accordingly.

Perhaps most important, City's purported disagreement with Park Owner regarding City's legal obligation does not render the RIR "incomplete." Park Owner cannot be forced to withdraw its legal contentions or absolve the City of its legal obligations in order to have its Application deemed complete and obtain a timely hearing thereon. Accordingly, Park Owner renews and restates its demand that a hearing before the Planning Commission be set at its next scheduled meeting.

As the record already clearly shows, City is engaging in a scheme and course of conduct to delay, obstruct and unreasonably burden the park closure because it is politically unpopular and to avoid its own obligations under state law, and to delay the Application indefinitely, or at least until new law comes into effect on January 1, 2021. All rights of the Park Owner are expressly reserved.

Sincerely,

COZEN O'CONNOR



Thomas W. Casparian, Esq.

cc: Richard H. Close, Esq.
Benjamin R. Jones, Esq., Ass't City Attorney



CITY OF CARSON

January 25, 2021

Richard H. Close, Esq.
Thomas W. Casparian
Cozen O'Connor
1299 Ocean Avenue, Suite 900
Santa Monica, CA 90401
Rclose@cozen.com

Via U.S. Mail and Email

**SUBJECT: Relocation Impact Report (RIR) No. 4-19
Closure Request for Rancho Dominguez Mobile Estates
425-435 E. Gardena Boulevard**

Dear Messrs. Close and Casparian,

Thank you for your December 30, 2020 submittal of a revised version of Relocation Impact Report No. 04-19 (“revised RIR”) for Rancho Dominguez Mobile Estates (the “Park”) together with a cover letter from Mr. Casparian (“Letter”).

In regards to RIR incompleteness item 1.C.1, based on the additional language you provided in the revised RIR and the new Exhibit “T” you provided in the revised RIR, this item is now deemed complete.

In regards to RIR incompleteness item 1.C.11, you agreed “to remove any condition for a certain timeline for [RIR] approval (other than that which is required by law),” and you made the corresponding change in the revised RIR. However, the revised RIR still asserts that “the City is the ‘person proposing the change of use’ of [the Park] because its closure is the result of a ‘zoning or planning decision, action or inaction’ and it is required to take steps to mitigate the adverse impact of the closure on Park residents, pursuant to Government Code section 65863.7(i).”

The Letter states that “the mitigation benefits Park Owner has agreed to provide, without seeking reimbursement from the City, are the same measures the City required of . . . Bel Abbey. If City, in a proper (as limited under law) exercise of its police power determines that further mitigation or other measures are warranted, it remains free to provide them, as it is obligated to do pursuant to Government Code section 65863.7(i).”

Richard H. Close, Esq.
Thomas W. Casparian
Cozen O'Connor
January 25, 2021

First, please be advised that AB 2782 is now in effect as law and applicable to any City decision on the RIR. As you know, AB 2782 entitles displaced Park residents who cannot relocate their coaches to adequate housing in other mobilehome parks to receive payment of, without limitation, the “in-place market value” of their homes (likely represented by the “on-site values” as appraised by Mr. Brabant) in connection with any RIR approval. Therefore, payment of only “off-site values” to such residents, as proposed in the revised RIR, would violate AB 2782. Of course, AB 2782 did not apply to the City’s decision on the closure of Bel Abbey many years ago, so your comparison of the benefits proposed in the revised RIR to the benefits that were required for the closure of Bel Abbey is irrelevant insofar as it disregards the change in law.

Second, as the City has asserted in prior letters, including my November 24, 2020 letter and a letter from the City Attorney’s office dated April 30, 2019, the City is not the “person proposing the change of use” for purposes of Government Code section 65863.7(i). The City has not initiated or taken any code enforcement action or administrative or legal process or proceeding to actually compel the termination of the nonconforming use by requiring Park Owner to close the Park, and therefore the Park continues to operate in its nonconforming status until City does so. Conversely, the City informed the Park Owner on April 30, 2019, that the City is not ordering or requesting the Park Owner to close the Park at this time, and that the Park Owner is free to withdraw its RIR application and abandon the proposed closure if it sees fit to do so. That remains the case today.

The unmistakable reality is that the proposed closure of the Park is purely the result of the Park Owner’s desire to close the Park in favor of a more profitable future use. This is apparent not only from the Park Owner’s aggressive pursuit of RIR approval from City as soon as possible despite the lack of any current City order or request for Park Owner to proceed with same, but also from documentation Park Owner has provided to the City. For example, as stated in a letter from Ms. Forbath to Planning Manager Betancourt on May 29, 2019, the Park Owner’s “goal is to receive a zoning designation that would support a mixed-use residential development, at a minimum density of 30 units per acre.” As indicated in that letter, the Park Owner has engaged the City regarding input into the General Plan update process, not to achieve zoning that would facilitate continued operation of the Park as offered by City in the above-referenced letters, but rather to achieve zoning that would facilitate Park Owner’s desired future development.

Indeed, the Park Owner has ostensibly taken no interest in City’s overtures, articulated in the above-referenced letters from the City Attorney’s office and from me, regarding potential changes to the Park’s zoning to remove the nonconforming status. If the Park Owner wished to continue operating the Park, the Park Owner would be actively seeking such a change from the City, rather than ignoring these possibilities. The City has refrained from pursuing any zoning change for the Park because Park Owner has neither applied for nor shown any interest in same, and because City is and has been under the impression that the Park Owner’s true desire is to close the Park.

However, Mr. Casparian’s persistence on the nonsensical position that City is responsible for the proposed Park closure is creating confusion that now needs to be resolved. The time has come

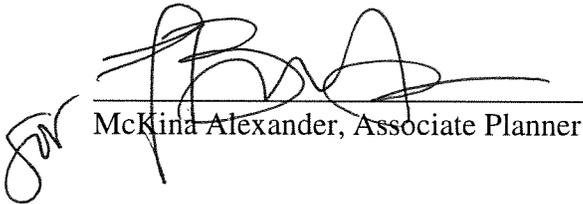
Richard H. Close, Esq.
Thomas W. Casparian
Cozen O'Connor
January 25, 2021

for the Park Owner to make its true intentions clear to the City. Park Owner cannot have it both ways.

If the Park Owner truly wishes to continue operating the Park but is perturbed by the lack of certainty associated with the Park's current zoning status, please notify me within the next three (3) business days, and I will be happy to work with you toward Park Owner's submittal and processing of a zone change application pursuant to Carson Municipal Code Section 9172.13. However, in that case, the RIR application should be withdrawn, or applicable processing timelines tolled.

If you do not so notify me, Planning staff will conclude that Park Owner wishes to close the Park voluntarily and irrespective of its zoning status, in which case the revised RIR will be accepted as complete and set for Planning Commission hearing. Please understand that in this event, City staff's recommendation to the Planning Commission at hearing would include requiring Park Owner to pay residents the appraised "in-place market value" on their mobilehomes as required by AB 2782.

Sincerely,


McKina Alexander, Associate Planner

McKina Alexander

From: McKina Alexander <MAlexander@carsonca.gov>
Sent: Wednesday, January 27, 2021 12:53 PM
To: Close, Richard
Cc: Benjamin R. Jones
Subject: RE: Rancho Dominguez Mobile Estates

*** EXTERNAL SENDER ***

Hello Richard,

Thank you for the update. Ben Jones is copied to keep him informed of the project's status.

Kind Regards, M

McKina Alexander | Associate Planner

Pronoun: she/her

City of Carson | [Planning Division](#)

701 East Carson Street, Carson, CA 90745

Office: 310-952-1700 ext. 1326

[City of Carson Website](#)

Until further notice, the Planning Division will be managed via email, phone or Zoom. In person appointments will be considered on a case by case basis and scheduled as a matter of last resort. We appreciate your patience as we strive to ensure the safety and well-being of the public and city staff.

For the most up to date COVID-19 information, please visit ci.carson.ca.us.



From: Close, Richard [<mailto:Rclose@cozen.com>]
Sent: Wednesday, January 27, 2021 12:30 PM
To: McKina Alexander
Subject: Rancho Dominguez Mobile Estates

Ms. Alexander,

I am in receipt of your email pertaining to possible rezoning of the property. As soon as our client has determined action that they are interested in pursuing, I will respond to the suggestion of rezoning.

Richard



January 29, 2021

VIA EMAIL AND FEDERAL EXPRESS

Thomas W. Casparian, Esq.

Direct Phone 310-460-4471
Direct Fax 310-594-3082
tcasparian@cozen.com

McKina Alexander
Associate Planner
City of Carson – City Hall
701 E. Carson Street
P.O. Box 6234
Carson, CA 90749
E-Mail: malexand@carson.ca.us

**Re: Relocation Impact Report (RIR) No. 4-19
Closure Request for Rancho Dominguez Mobile Estates
425-435 East Gardena Boulevard**

Dear Ms. Alexander:

We received your letter to Richard H. Close, Esq. dated January 25, 2021 (your “Completeness Determination”), which deems complete RIR No. 4-19 (the “RIR”). We agree with your conclusion that the Application is now complete and request that a hearing before the Planning Commission be scheduled within the time period required by the City’s municipal code.

As to the remainder of your letter, we disagree with both your factual contentions and legal conclusions. We have already addressed those contentions and conclusions in prior letters and need not repeat those points here.

Please inform us of the date of the Planning Commission hearing in sufficient time to give notice to the Park’s residents.

Sincerely,

COZEN O'CONNOR

Thomas W. Casparian, Esq.

cc: Richard H. Close, Esq.
Benjamin R. Jones, Esq., Ass't City Attorney

LEGAL\50741188\1

McKina Alexander

From: Noelia Texta
Sent: Monday, March 15, 2021 4:44 PM
To: McKina Alexander
Subject: The impact closed the park

Categories: Rancho Dominguez

Sent from my iPhone

Begin forwarded message:

From: Samuel Figueroa
Date: March 15, 2021 at 3:46:06 PM PDT
To: Noelia Texta

The Impact That the Park Closure Will Have on My Family

My name is Nestor Figueroa living in Rancho Dominguez mobile home spc # 4 since 2009 I have lived here with my wife and 2 children, 12-year-old Samuel and 8-year-old Melanie. very happy here.

The closure of the park is something that has stolen our peace of mind, all this added to the bad economy in which this pandemic has left us.

All of us at home

we got sick from covid, my wife lost her job and so far she is still at home helping children with their classes by zoom.

The information that was sent to us by the owner Mr. Spencer is all in English.

Most of the people who live here speak Spanish and in my case I don't understand all of it. the information. I would like to receive the information in Spanish. My income after taxes are \$ 2,080 dollars a month and think about having to pay a rent of more than \$ 1,800 dollars is something you could not afford, mobile homes around the area are valued at \$ 100,000 to \$ 200,000 in addition to the rent of the apartment.

We are also concerned about

uncertain future of our children when it comes to their education, they are very good students and we believe that moving to another school can affect them emotionally.

The

Mr. Spencer has let us know that because the city has put many obstacles to extend the permission so you prefer to close.

We don't want to leave, could the city

Please extend your permission from Carson so that we can continue living here.

We need your help.

Also Mr. Spencer has like 20 houses that he has bought for some years, because he did not allow anyone to sell his house to someone else, there were neighbors who already

bought houses and were forced to sell them very cheaply.

He rents them from \$ 1,500 to \$ 1950.

Because of that we think that he wants to evict us and keep the properties to rent them and get more income since we pay very little rent for the apartment, in our case we paid approximately \$ 510 with everything and utilities.

We don't really want to leave here, but if we have no other option for Could you please help us so that you can extend us enough time to get out of the havoc that the pandemic has brought. since we consider unfair a closure in these circumstances.

Right now they offer me \$ 35,000 if we leave now or \$ 16,100 if we wait Until the end, I find it unfair when we pay more than \$ 63,000.

We evaluate the houses as they are in the area, that we are paid just enough for the houses. I have a lot of stress just thinking about where I am going to go with my family, I can't sleep. Do not

I speak or understand the English language a lot, so I ask you to please have a Spanish translator for the April 27 meeting, please consider that most of the people speak spanish.

Thanks a lot.

Madam: Mckina Alexander for reading my letter

Att

Nestor Figueroa

My name is Daniel Herrera,

Through this letter I wish to express our difficult housing situation in which we find ourselves. We ask for your help as an authority of the city of Carson. My family and I live in Rancho Dominguez Mobile Estates, located at 435 E Gardena Blvd Space # 5, the owner of the mobile home park has sent us a letter stating that he wants to vacate us from our mobile home, because his desire as owners is to make more money and since we own our mobile home he cannot make more money from us since we only pay rent for the space. They have only offered us \$10,000 dollars for our mobile home which is a big injustice, our mobile home is worth way more than that amount. Also, with that money it will not be enough to get a new place, we have researched and all prices for mobile homes are very high and out of our reach as a family. That is why we are reaching out to you as authority to please help us and we trust that you will not allow for this injustice to happen. Ever since they warned us that they want to remove us from our home, our family has been affected emotionally and mentally. My wife has really bad anxiety due to this situation since economically we are not well. I have hardly had a job since the covid 19 pandemic began. We wish as a family that you can do something about it to help us not become homeless. Thank you for all your hard work and help you provide to our community.

Sincerely,

Daniel Herrera & family

March 22, 2021 at 9:48 AM

To whom it may concern :

First of all we would like to thank you for your time to read this letter.

We come to you because we have full confidence in your good judgment that you exercise in your work and we are sure that you will help us to avoid doing an injustice to our situation.

We are facing something unfair, the closure of the Rancho Domínguez park and this would make us lose our home, which through years of effort and hard work we have managed to have, a decent place to live. And due to the situation that we are all living with this pandemic, economically we would not have the resources to be able to go to another place, practically with what they offer us to leave our house they are throwing us to live on the street, because the cost of housing is really high . At the moment we have not been able to have stable work, due to the pandemic.

Therefore, we do not agree that the park is closed, as this would affect not only us but also our family who live in the park and all our neighbors, including the elderly who would also be left on the street.

We ask you to review our case and consider the possibility of renewing the contract so that we can continue living here.

Thank you in advance for your good work for the Carson community.

Sincerely : Juan Herrera & Rubi Herrera
Spc 10

03-19-21

To Whom It May Concern:

As a long-term resident and mobile estate owner, I am not satisfied with the initial appraisal amount. Plainly, the current offer is well below the market cost and does not reflect the rental rates of the area. The entire mobile estate would need additional time, and especially more monetary support, to fully comply with the dissolution of the mobile estate closure.

I understand the park closure is inevitable, however, the current relocation benefit package and appraisal estimate do not take into account the extraordinary situation of the COVID-19 pandemic, which will make it extremely difficult to find suitable housing amongst the recent financial limitations. Many residents have seen a decline in job opportunities, and some have even lost their jobs, making this transition much more difficult. The relocation benefit package should reflect additional COVID-19 reparations to ensure that all the residents have suitable housing in nearby areas.

To summarize, I would like to request a new appraisal that accurately reflects the market cost and rental rates of the area and/or more time before the closure to consider all available options.

Thank you,
Space # 22 Resident

March 19, 2021

To Whom It may concern:

As a long-term resident and mobile estate owner, I am not satisfied with the initial appraisal amount.

Plainly, the current offer is well below the market cost and does not reflect the rental rates of the area. The entire mobile estate would need additional time, and especially more monetary support, to fully comply with the dissolution of the mobile estate closure.

I understand the park closure is inevitable, however the current relocation benefit package and appraisal estimate do not take into account the extraordinary situation of the covid-19 pandemic which will make it extremely difficult. to find suitable housing amongst the recent financial limitations. Many residents have seen a decline in job opportunities and some have even lost their jobs. making this transition much more difficult. The relocation benefit package should reflect additional covid-19 reparation to ensure that all the residents have suitable housing in nearby areas.

To summarize. I would like to request a new appraisal that accurately reflects the market cost and rental rates. of the area and/or more time before the closure to consider all available option.

Thank you

Space # 23 Resident.

Resident Survey
Rancho Dominguez Estates
425-435 E. Gardena Blvd

Dear Alexander,

I am the owner of mobile home 30 and I do not approve of the selling of the land. During this time the closure of the park will make it difficult to move to somewhere we can afford to live comfortably as a family of four. In this pandemic work has been slower that moving would just add to the stressfulness of the past year/ current year. Currently the housing and renters' market has gone up and also makes it difficult to leave.

Thank you,

Jaybee Mujica

3-21-21

TO Whom It may Concern
I Am A Tenat. at
Rancho Dominguez.

I have lived in my home
since 1996

I Love living here. it where I
I Planned to live out the
rest of my life.

We are close knit community
and we all think of each
other as more of a family
then. neighbors.

In a world where everything
is being turned up side down
this is my safe place and
many of the residents

I've spoken with feel the
same. I work close by. and
all my friends and family
are near by.

We do not know what were
are going to do or go if
you close this place down
our families and our lives
are going to be displaced.

please Reconsider your
choice to close down this
Park along with the lives
of the people who live here

Sincerely Patty Torres
#Owner SP 35

To whomever this may concern,

My name is Leopoldo Guzman and my wife and I live in the mobile estates of Rancho Dominguez which we are now receiving notice that you plan to get rid of. We are two elder people who are close to retiring and with covid affecting us as well, this just puts more stress for us and I wish to still live here. We have been living here for the past 24 years and very much love my house, rent everywhere else is very expensive and can't find anything reasonable. Covid really affected my family and this just makes it a little harder for us during these troubled times. So we please ask you kindly that you think about not getting rid of the mobile estates where we currently live and wish to keep living in.

Sincerely,
Mr. & Mrs. Leopoldo Guzman

Sp. # 36

To whom it may concern,

My name is Rosalva Estrada Hernandez and I live in Rancho Dominguez Mobile Estates, mobile home #38 of which I own. I wish to express my feelings as a human being as how badly I have been affected by the news of the eviction of my property. I have been affected tremendously emotionally, mentally and psychologically, since I found out when this whole process began, I have had a lot of anxiety, depression and at night I cannot sleep. I do not know what it will be of me in the future as I am a 63-year-old woman who depends on herself with very low resources to cope with my needs. I beg you to please, please not agree with this injustice or crime, we cannot call it otherwise. People like me will have no shelter, we will have no choice but to live on the streets, I will become homeless as I cannot afford to pay rent higher than what I pay now. I put all my trust and hope in God and in you as an authority of our city since you are always advocating for the people of the city of Carson. Thank you for everything you do for all the residents of Carson.

Sincerely,

Rosalva Estrada Hernandez

3/19/21

To whom it may concern,

My name is Josefina Herrera and I live in Rancho Dominguez Mobile Estates space # 39, the place I thought would be my forever home. I want to express before you, my concerns about the closure of the mobile home park, I'm an elderly person of 67 years, I'm a widow and I suffer from many health issues. I lost my job because the Company I worked for 15 years went out of business on March of 2020 and due to my age it's not easy to find a new job.

My pension is not enough for me to pay rent at another place. I hope that as authorities of the city of Carson you are able to help me so that I don't lose my home.

The rent for this home is within my possibilities I used all my savings to buy this mobile home and the owners of the mobile home park only want to pay me for my home \$10,000 with that small amount I will not be able to purchase another home for me I would only be able to pay rent for a few months and then I will have to live on the streets, I will become homeless.

Please I hope it is in your heart to help me, I'm recurring to you as authorities for the City of Carson.

Thank you for all the service you provide for our city.

Sincerely,
Josefina Herrera

To my Concern:

I Jose A. Padilla

I been living in Rancho Domingu
mobile home For 15 years and
I don't support the closure
of the park... Under the
circumstances the we are
right now is very difficult
for me and my Family to
move out... Please be consi-
dered and understanding.

Thank you.

José A. Padilla

SPACE #42

City Of Carson

March 19,2021

To Whom It May Concern:

As a long-Term resident and mobile estate owner, I am not satisfied with the initial appraisal amount plainly. The current offer is well below the market cost and does not reflect the rental rates of the area. The entire mobile estate would need additional time, and especially more monetary support, to fully comply with the dissolution of the mobile estate closure. I understand the park closure is inevitable, however, the current relocation benefit package and appraisal estimate do not take into account the extraordinary situation of the covid-19 pandemic, which will make it extremely difficult to find suitable housing among the recent financial limitations. Many residents have seen a deadline in job opportunities, and some have even lost their jobs, making this transition much more difficult. The relocation benefit package should reflect additional covid-19 reparations to ensure that all the residents have suitable housing in nearby areas. to summarize, i would like to request a new appraisal that accurately reflects the market costs and rental rates of the are and/or more time before the closure to consider all available options.

Thank You,
Space# 48 Resident

Address: 435 E. Gardena Blvd.
Gardena,CA 90248

McKina Alexander

From: Maria Gonzalez
Sent: Monday, March 22, 2021 8:23 AM
To: McKina Alexander
Subject: RE: La manera en que me afectaría el cierre del parque Rancho Domínguez...

Categories: Rancho Dominguez

The way that the closure of the Rancho Dominguez Mobile Estates Park will affect me.

My name is Ana Rojas and I live in space #52, my financial situation has been affected by the pandemic, my work has been affected by a fracture in my right hand and shoulder. I do not receive any income from Social Security, I'm 64 years old and I suffer from high blood pressure and depression and to think that the park will be closing has robbed my peace and has affected my sleep. I currently pay approximately \$490 with everything including utilities, in my situation I would not be able to pay a high rent such as the ones in this area.

Due to my financial situation I would not like to see the park closed, but if we are forced to leave, please have the City of Carson help us by giving us a good amount of time to continue living here. Also that we are paid what's fair for our houses, because buying a house like this one are very expensive especially in parks where space is cheap.

One favor. I would like there to be a translator for the April meeting.

Thanks for your attention
Ms. McKina Alexander

Sincerely,
Ana Rojas

-----Original Message-----

From: McKina Alexander
Sent: Monday, March 22, 2021 7:41 AM
To: Maria Gonzalez
Subject: FW: La manera en que me afectaría el cierre del parque Rancho Domínguez...

Hi Maria, Please translate.

Thanks,
McKina

-----Original Message-----

From: Ana Rojas
Sent: Friday, March 19, 2021 2:33 PM
To: McKina Alexander
Subject: La manera en que me afectaría el cierre del parque Rancho Domínguez...

La manera en que me afectaría el cierre del parque Rancho Domínguez Mobile Estates.

Mi nombre es Ana Rojas vivo en el espacio #52 ,mi situación económica se ha visto afectada por la pandemia,me he visto afectada para trabajar debido a una fractura en mi mano derecha y en mi hombro.

No recibo ninguna ayuda del Seguro,tengo 64 años y padezco de alta presión y depresión y el pensar en un posible cierre del parque me ha robado la calma y me ha afectado mi sueño.

Actualmente pagó aproximadamente 490 dólares con todo y utilidades, en mi situación no podría pagar una renta tan cara como las que hay en el área.

Debido a mi situación económica no me gustaría que cerraran el parque, pero si nos viéramos obligados a salirnos, por favor que la Ciudad de Carson nos ayude a que nos den un buen tiempo para continuar aquí.

También que se nos pague lo justo por nuestras casas, porque la compra de una casa como estas, están muy caras especialmente en los parques donde el espacio es barato.

Un favor me gustaría que hubiera un traductor para la reunión de abril.

Gracias por su atención.

Señora Mckina Alexander.

Atentamente: Ana Rojas.

Enviado desde mi iPad

McKina Alexander

From: Debora Fore
Sent: Tuesday, March 2, 2021 6:26 PM
To: McKina Alexander
Subject: Error in Mobile Home Appraisal

Categories: Rancho Dominguez

Debora Fore
435 East Gardena Boulevard, Space 55
Gardena, California 90248

I received my packet from the City of Carson. I noticed some errors in my home description.

The manufacturer of my home is Cameron, not Skyline. I own a double wide, not a single wide. My home is a three bedroom. The third bedroom is addition, eight feet by twenty. So that would make the home 20' x 40' +8' x 20'. That will change the value of my home.

If you any additional information please contact me at If you cannot reach me at home please call my cell at

Debora N. Fore
Owner

Sent with care from Debora Fore's iPhone

City Of Carson

March 19, 2021

To Whom It May Concern:

As a long-Term resident and mobile estate owner, I am not satisfied with the initial appraisal amount plainly. The current offer is well below the market cost and does not reflect the rental rates of the area. The entire mobile estate would need additional time, and especially more monetary support, to fully comply with the dissolution of the mobile estate closure. I understand the park closure is inevitable, however, the current relocation benefit package and appraisal estimate do not take into account the extraordinary situation of the covid-19 pandemic, which will make it extremely difficult to find suitable housing among the recent financial limitations. Many residents have seen a deadline in job opportunities, and some have even lost their jobs, making this transition much more difficult. The relocation benefit package should reflect additional covid-19 reparations to ensure that all the residents have suitable housing in nearby areas. to summarize, i would like to request a new appraisal that accurately reflects the market costs and rental rates of the are and/or more time before the closure to consider all available options.

Thank You,
Space# 56 Resident

Address: 435 E. Gardena Blvd.
Gardena, CA 90248

March 14, 2021

To Whom It May Concern:

As a long-term resident and mobile estate owner, I am not satisfied with the initial appraisal amount. Plainly, the current offer is well below the market cost and does not reflect the rental rates of the area. The entire mobile estate would need additional time, and especially more monetary support, to fully comply with the dissolution of the mobile estate closure.

I understand the park closure is inevitable, however, the current relocation benefit package and appraisal estimate do not take into account the extraordinary situation of the COVID-19 pandemic, which will make it extremely difficult to find suitable housing amongst the recent financial limitations. Many residents have seen a decline in job opportunities, and some have even lost their jobs, making this transition much more difficult. The relocation benefit package should reflect additional COVID-19 reparations to ensure that all the residents have suitable housing in nearby areas.

To summarize, I would like to request a new appraisal that accurately reflects the market cost and rental rates of the area and/or more time before the closure to consider all available options.

Thank you,

Space #63 Resident

March 20, 2021

To Whom It May Concern:

I am writing to communicate that as a long-term resident and mobile estate owner, I am not satisfied with the initial appraisal amount or timeline. The current offer is well below the market value and does not reflect the rental rates in the area. The monetary support or the time provided is not sufficient to address what it is required to uproot and rehouse entire families in order to comply with the dissolution of the mobile estate closure.

The current relocation benefit package and appraisal estimate do not take into account the extraordinary circumstances faced by families during the current COVID-19 pandemic. At this time, and within the timeline provided, it is extremely difficult to find suitable housing options and this burden is compounded by the impact on families' financial limitations given the pandemic. Many residents are experiencing financial hardships due to decline in job opportunities, unemployment, health issues and death of loved ones, thus making any major housing transition extraordinarily burdensome at this time.

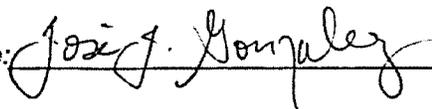
Additionally, our family includes two children, who are currently attending performing schools in the area, and removing them from this community will greatly affect their academic potential and further exacerbate the trauma experienced during this pandemic. My children have already been affected by the shelter in place conditions and another transition at this time will further disrupt their learning and negatively impact their social and emotional wellbeing. Furthermore, our family includes two elderly members who are currently facing major medical issues and are being treated and cared for by a local program at AltaMedPace. Removing them from their support system and local practitioners, is certain to disturb their health conditions.

Lastly, the session on April 27th, excludes the majority of the property owners, for they do not have access to computers nor speak English rendering these methods of communication inequitable. The relocation benefit package should reflect additional COVID-19 reparations to ensure that all the residents have suitable housing accommodations in nearby areas and have adequate time to navigate such a traumatic displacement.

To summarize, I am requesting a new appraisal that accurately reflects the market value and rental rates and additional time to consider all options and decrease the burden posed to my family.

Sincerely,

Jose Juan Gonzalez

Signature:  _____

Spce 64 Resident

March 18, 2021

Miguel A. Delgado
Space#72

I am writing this letter to let you know my disagreement in the closure of the Rancho Dominguez. I have been living here for a long time and to move would be very difficult for me because the rents are very high/expensive and at this time I cannot buy because I don't have credit. I have 3 kids in school and it's close by and to move to another place would be difficult right now.

I know that the closure is inevitable but give us what's fair for our trailers/coach and give us more time to look for a more accessible place according to our financial situation. I hope you consider seeing the situation of the Covid 19 pandemic and give us more time.

Thank you very much.

City Of Carson

March 19, 2021

To Whom It May Concern:

As a long-Term resident and mobile estate owner, I am not satisfied with the initial appraisal amount plainly. The current offer is well below the market cost and does not reflect the rental rates of the area. The entire mobile estate would need additional time, and especially more monetary support, to fully comply with the dissolution of the mobile estate closure. I understand the park closure is inevitable, however, the current relocation benefit package and appraisal estimate do not take into account the extraordinary situation of the covid-19 pandemic, which will make it extremely difficult to find suitable housing among the recent financial limitations. Many residents have seen a decline in job opportunities, and some have even lost their jobs, making this transition much more difficult. The relocation benefit package should reflect additional covid-19 reparations to ensure that all the residents have suitable housing in nearby areas. to summarize, i would like to request a new appraisal that accurately reflects the market costs and rental rates of the area and/or more time before the closure to consider all available options.

Thank You,
Space# 74 Resident

Address: 435 E. Gardena Blvd.
Gardena, CA 90248

Marzo 22-2021

Mi nombre es: Maria Orozco

A quien corresponda: Por medio de la presente les informo que ni mi familia ni yo estamos de acuerdo que quieran cerrar el parque Rancho Dominguez nosotros hemos vivido muy agusto y estamos acostumbrados a vivir aqui la escuela de mi niña Ariana esta cercas el trabajo de mi esposo Andres el no maneja yo estoy enferma muy enferma y tengo muchas citas en diferentes clinicas todas estan cercas de esta direccion y me van a operar de un tumor en la garganta estoy muy preocupada y extresada.

Yo no estoy de acuerdo con la valuacion que hicieron de mi casa mobile yo no mande el papel primero porque se me perdio y no la valoraron bien la casa tiene 2 baños y le pusieron hadamás 1 tiene shawer nuevo le cambie las tazas de baño le puse laminado de madera en la sala y cuartos le agregue un cuarto más los 2 closets les cambie as puertas de espejo hasta arriba y le puse 8 ventanas dobles nuevas.

Maria Orozco.

City Of Carson

March 19, 2021

To Whom It May Concern:

As a long-Term resident and mobile estate owner, I am not satisfied with the initial appraisal amount plainly. The current offer is well below the market cost and does not reflect the rental rates of the area. The entire mobile estate would need additional time, and especially more monetary support, to fully comply with the dissolution of the mobile estate closure. I understand the park closure is inevitable, however, the current relocation benefit package and appraisal estimate do not take into account the extraordinary situation of the covid-19 pandemic, which will make it extremely difficult to find suitable housing among the recent financial limitations. Many residents have seen a deadline in job opportunities, and some have even lost their jobs, making this transition much more difficult. The relocation benefit package should reflect additional covid-19 reparations to ensure that all the residents have suitable housing in nearby areas. to summarize, i would like to request a new appraisal that accurately reflects the market costs and rental rates of the are and/or more time before the closure to consider all available options.

Thank You,
Space# 78 Resident
CARLOS H. RAMIREZ.
JESSIE RAMIREZ.

Address: 435 E. Gardena Blvd.
Gardena, CA 90248

Eduardo Almeida
435 E Gardena Blvd #79
Gardena, California 90248

18, March 2021

To Whom It May Concern:

I am writing you concerning our property here at Rancho Dominguez Mobile Estates; we have been made aware this year that we are being asked to vacate and move from the property. I have been offered a sum of money to do so but unfortunately I find that sum is not an appropriate amount for our family to uproot and leave. We have been residents here at the estates since 2005 this is our community and we are established. Also our home is almost done being paid off in full. We would like to continue being here seeing as we are rooted here.

I am the care taker for my mother here Maria Olga Almeida she is elderly and her health, safety and well being is of the utmost importance and priority to me. Moving my mother and forcing her to leave her home and care would be detrimental to her health. All of my mother's doctor, physicians and care are based close to our home it is of great importance that she is able to maintain that care and moving would affect that greatly.

If there are any questions you may have and would like to speak please contact me as soon as possible. Thank you for your time it is greatly appreciated.

-Kindly

Eduardo Almeida

March 19, 2021

To Whom It May Concern:

As a long-term resident and a mobile estate owner, am not satisfied with the initial appraisal amount. Plainly the current offer is well below the market cost and does not reflect the rental rate in the area. The entire mobile estate would need additional time especially more monetary support to fully comply with the dissolution of the mobile estate closure.

I understand the park closure is inevitable however the current relocation benefit package and the appraisal estimate does not take in account the current COVID-19 pandemic. Which would make it extremely difficult to find suitable homes. Amongst the recent financial limitations many residents have seen a decline in job opportunities, and some have even lost their jobs making this transition much more difficult. The relocation benefit package should reflect addition COVID-19 reparations to ensure that all the residents have suitable housing in nearby areas.

For those of us that are retired or on a limited income it would be impossible to afford relocation, landlords would require three times the rent amount as qualifying income. For us that would leave us disqualified. To obtain a mortgage lender would be hesitant to approve of because of our age let alone the income.

To summarize I would like to request a new appraisal that accurately reflects the market cost and rental rates of the area and more time before the closure to consider all available options.

Thank you, *Benjamin Mendez Maria Mendez*

Space 80 Owners

03/18/2021

Attention: McKina

Rancho Dominguez Mobile Estates

Space#81

Raul & Gabriela Guerrero

In 2006 we bought the house for \$65,000 with Century 21 for 15 years. This December 2021 we were going to finish paying and they are only offering \$26,000 and this is very little. When we made our contract in 2006, they provided the park's contract and it said it will expire in 2012. Mrs. Dona Spencer said that there was no problem that the contract would be renewed with the city. Something that did not happen. We spent money renovating and improving the house as it would be our home forever and now without money, without a house and 15 years later. We will be a family living on the street.

In advance, thank you very much for reading our feelings.

In time of Covid-19 and without a home, in addition elderly and retired. What will become of us.

Survey – Question 1 (Spanish response)- The price they pay for the house is very low, where would we go without money.

ATTN: McKina

03-18-202

Rancho Dominguez Mobile Estates

space # 21

Raul y Gabriela Cuervo

En 2006 compramos la casa en \$65000.00
con Century 21 a 15 años.
Este Diciembre del 2021 terminamos de
pagar.

y solo nos ofrecen \$26000.00 lo cual
es demasiado poco.

Cuando hicimos contrato en el 2006 nos dieron
el contrato del parque y decía que vencía 2012
la Sra. Dona Spencer dijo que no había
problema ya que el contrato lo renovarían
con la Ciudad. Cosa que no pasó.
Gastamos dinero en renovar y mejorar la casa
ya que sería nuestro hogar por siempre.
y ahora sin dinero sin casa y 15 años,
después.

Seremos una familia más viviendo en la calle

De antemano muchas gracias por leer
nuestro sentir.

En tiempo de covid-19 y sin casa además
las personas ancianas y retiradas. Que será de
nosotros.