



Neighborhood Legal Services
of Los Angeles County



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CITY CLERK

Glendale Office
Direct Dial (818) 291-1786

2021 MAY 12 PM 3:04

CITY OF CARSON

FAX TRANSMITTAL

Date: May 12, 2021

To: Joy Siramago, City Clerk

Fax Number: (310) 513-6243

From: Ana A. Zuniga

Subject: **Appeal of Resolution No. 21-2708, with amendments approved by the Planning Commission on April 27, 2021 re: Relocation Impact Report No. 04-19 related to the Closure of Rancho Dominguez Mobile Estates Mobile Home Park: 435 E. Gardena Blvd, Gardena, CA 90248**

Total Number of Pages Transmitted (including this cover): 14

IF YOU HAVE ANY PROBLEMS RECEIVING THIS TRANSMITTAL, PLEASE CALL ME AT (818) 492-5254

Dear Clerk,

Please see attached appeal letter. You will also receive a physical copy of our letter. If there are any questions or issues, please let me know.

Sincerely,

Ana A. Zuniga
anazuniga@nlsla.org
(818) 492-5254

RECEIVED
CITY CLERK

Appeal Application

City Clerk's Office
701 E. Carson St.
Carson, CA 90745
310-952-1720

2021 MAY 12 PM 3:04
CITY OF CARSON
Clerk's Date & Time Stamp

Appeals are time sensitive and must be received by the City Clerk in the specified time period pursuant to the Carson Municipal Code or applicable authority. It is advisable to consult with the Department managing the issue if there is question with regards to appealing an action. All fees associated with appeals can be located in the City's Master Fee Schedule and/or Carson Municipal Code. This is an appeal of the:

- ☐ Director decision to the Planning Commission – shall be filed in writing within 15 days of the date of the Director action.
- ☒ Planning Commission decision to the City Council – shall be filed in writing within 15 days of the date of the Commission action.
- ☐ Other - Specify decision-maker, appellate body, Municipal Code authority: _____

Appellant Information:

Name(s): Ana A. Zuniga for Leopoldo Guzman

Address: 1104 E. Chevy Chase Drive

City/State/Zip: Glendale, CA 91205

Phone: (818) 492-5254

Email: anazuniga@nlsia.org

Appealing Application Regarding:

**If appeal is made by any member of the City Council or the City Manager, the sections identified with an asterisk (*) are not required; the Statement of Grounds for Appeal need only provide, in substance and effect, a request that a specific decision, administrative case number, or resolution number, as the case may be, be reviewed by the Planning Commission or City Council, as the case may be. CMC §9173.4.*

Name of Applicant(s): Ana A. Zuniga Date of Final Decision: April 27, 2021

*Administrative File No. /Case No.: Relocation Impact Report No. 04-19

*Street Address (otherwise, the legal description and location of the premises included in the action) _____

435 E. Gardena Blvd, Gardena, CA 90248

*Specific Matter Being Appealed: Resolution No. 21-2708, with amendments

Statement of the Grounds for Appeal (attach separate sheet if necessary): See attached letter

Signature of Appellant: _____

Date: 05/11/2021

FOR OFFICE USE ONLY:

Date Appeal received: May 12, 2021

Appeal Fee received: \$ _____

Joy Simarago
Joy Simarago, Deputy City Clerk

cc: Department Director, File



Neighborhood Legal Services
of Los Angeles County

Ana A. Zuniga
Senior Staff Attorney

anazuniga@nlsla.org
(818) 492-5254

May 11, 2021

Joy Siramago
City Clerk
701 E. Carson Street
Carson, CA 90745
Fax: (310) 952-1720
Email: cityclerk@carsonca.gov

Re: Appeal of Resolution No. 21-2708, with amendments approved by the Planning Commission on April 27, 2021 re: Relocation Impact Report No. 04-19 related to the Closure of Rancho Dominguez Mobile Estates Mobile Home Park: 435 E. Gardena Blvd, Gardena, CA 90248

We are writing on behalf of our client Leopoldo Guzman, a mobile homeowner at Rancho Dominguez Mobile Estate Mobile Home Park. We are writing to appeal Resolution No. 21-2708, with any amendments, approved by the Planning Commission on April 27, 2021 regarding the Relocation Impact Report (RIR) No. 04-19 in relation to the closing of the Rancho Dominguez Mobile Estates Mobile Home Park. Our request for appeal is based on the following reasons: Resolution No. 21-02708 does not conform to state law, the improper assumptions and determination by Mr. Brabant's RIR and the lack of fair access to the Planning Commission's April 27, 2021 hearing.

I. Resolution No. 21-02708 does not conform to AB 2782

First, we are appealing on the basis that Resolution No. 21-02708 does not conform to state law AB 2782. As you may know, AB 2782 requires that a park owner mitigate the impact of a park conversion/closure by purchasing the resident's home through a fair market buyout when the resident cannot be relocated to another park. Hence, AB 2782 requires mobile home appraisals to be based on the current in-place location of the mobile home and shall assume the continuation of the mobile home park. The law is clear and unambiguous.

The Brabant appraisal report incorrectly values the mobile homes by assuming "there is no on-site highest and best use of the homes in the park" and that that park is an illegal use and cannot continue. The appraisal report concluded, contrary to state law, that because of the illegal use of the park the hypothetical condition of its continuation could not be used in the appraisal of each individual mobile home. The City should have directed its appraiser to comply with AB 2782 and submit a valuation that assumed the continuation of the park.

It is also important to note, that Brabant's presumption also contradicts the City's own position that it was possible for the park to continue and to conform into a legal use. The City informed the applicant that the "owner could work with the City toward effectuating land use or

2, Appeal of Resolution No. 21-12708

zoning changes that would allow continuation of the park moving forward if it wished to do so." See the Planning's Commission Staff Report Exhibit. 3B. The City also encouraged applicant to submit processing of a zone change application if it wished to continue operating the Park. See also Planning's Commission Staff Report Exhibit. 3G.

Importantly, Resolution No. 21-02708 does not adequately mitigate the impact upon the ability of the residents of the mobile home park to find adequate housing as required by AB 2782. The commission mistakes compliance with Gov Code 65863.7(a)(2) (payment of in-place market value of displaced resident's mobile home) for compliance with Gov Code 65863.7(a)(1) (adequate mitigation of the impact of park closure on resident's ability to find adequate housing in a mobile home park). Requiring payment of the in-place market value of the mobile home is intended as a mitigation measure that would allow purchase of another mobile home where relocation of an existing mobile home is not possible. Clearly this step taken alone would not adequately mitigate the impact of park closure on residents' ability to find adequate housing because it does not account for the increase in cost of space rent.

The average space rent at Rancho Dominguez is \$414.94 per month which is considerably lower than the average rent of \$1224 at mobile home parks within a 30-mile radius. Half of the residents of the park are extremely low or very low-income. Therefore, even if given in-place market value so as to be able to purchase a mobile home these residents would still not be able to afford space rent. Likewise, the one year's rental assistance and other mitigation measures adopted by the commission would only delay homelessness for these residents. Additionally, the RIR nor the Commission's measures account for the difficulty of very low and extremely low-income residents to pass credit checks and be approved to rent.

The Planning Commission Staff Report concluded that the closure of the park would result in the displacement of approximately 81 low-income families, with minimal affordable housing options. It further concluded that the RIR did not adequately mitigate the effect of the closure of the park on the displaced residents. And that the closure of the park, as proposed, will materially contribute to a shortage of housing opportunities and choices for low-and moderate-income households within the City.

The City of Carson is facing an affordable housing shortage. By approving the closure of this park, the City of Carson is removing some of the most affordable housing in Carson and in the County of Los Angeles. The City is reneging on its responsibilities to "conserve and improve the condition of the existing affordable housing stock, which may include addressing ways to mitigate the loss of dwelling units demolished by public or private action, in order to make adequate provision for the housing needs of all economic segments of the community." Government Code Section 65583(c)(4).

II. There are improper assumptions in the Brabant's RIR

There are also serious concerns whether James Brabant has the appropriate experience to appropriately appraise mobile homes. Mr. Brabant is a certified CA *real estate* appraiser and a licensed *real estate* broker. Mr. Brabant does not possess the occupational licenses issued by the California Department of Housing and Community Development (HCD) required to sell or to engage in any of the restricted activities involving mobile homes. It appears that Mr. Brabant lacks the experience in the pricing, sale or determining the value of individual mobile homes. Without personal experience in the sale of mobile homes, Mr. Brabant might not be qualified to appraise the market value of mobile homes. Thus, it is problematic that during the Planning

3, Appeal of Resolution No. 21-12708

Commission's April 27, 2021 hearing, there were no opportunities to ask Mr. Brabant about his professional background, experience, findings and methodology to confirm his expertise in this highly specialized field.

Additionally, there were improper assumptions in Mr. Brabant "Sales Comparison" approach. The appraisal was conducted using a "Sales Comparison Approach" that incorrectly concluded that sales from mobile home parks that are not conforming uses cannot be utilized. As explained above such a conclusion is incorrect and does not comply with AB 2782.

During the Planning Commission April 27, 2021 hearing there was credible and corroborating testimony from multiple park tenants that from 2013 to present tenants were prohibited by the park owner from selling their mobile homes to anyone other than the park owner. The testimony is supported by the fact that sales within the park since 2013 have only occurred between the mobile homeowners and park owner. Considering these mobile home sales, in Brabant's sales appraisal method is questionable at best and any conclusion based on such data is unreliable and improper.

An investigation into the owner's purchasing practices is warranted and/or Brabant should have expanded his geographical search to find other mobile homes/parks acceptable for comparison; to ensure that the mobile homeowners are given a fair and accurate appraisal as required by the City's ordinances and state law.

It is also general practice that an appraisal consists of both exterior and interior inspections. For example, an interior and exterior inspection was conducted for the appraisal done for Park Avalon's RIR and application for closure. While the RIR mentions COVID-19 as the reason interior inspections were not conducted it does not negate the fact that interior inspections are necessary for a fair and accurate appraisal.

III. Lack of Fair Access to All Interested Parties

Finally, the Planning Commission April 27, 2021 hearing did not represent a fair and full opportunity for park residents to be heard. In addition to technical issues there were more serious problems: the lack of agenda priority of the hearing and the limited language access.

The hearing was scheduled to start at 6:30 pm and many residents logged in and showed up on time. The Planning Commission started the hearing by going into closed session, making residents wait for over an hour for the hearing to actually start and be heard. Many of the residents that attended physically, despite COVID-19 safety concerns, the hearing lasted over five hours and finishing a little short of midnight. Such actions discourage participation in the hearing process. The Planning Commission should have prioritized this hearing. It should have started earlier to engage participants and give more time for comments and/or more thoughtful consideration.

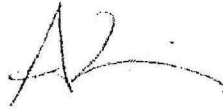
The Planning Commission's Staff Report and Brabant's RIR were not provided in Spanish. Although, there is a substantial amount of monolingual Spanish speakers and mobile home owners in the park. At the April 27, 2021 hearing, Spanish translation was only provided to participants who attended in person and those connecting via Zoom. However, Zoom access was only available to participants who signed up earlier to make comments. For those viewing the hearing via cable or the online broadcast Spanish/English simultaneous translation was not available.

Due to all the reasons stated above, we respectfully submit this appeal to the Planning Commission's Resolution 21-02708. We ask that the City Council reverse Resolution 21-02708

4, Appeal of Resolution No. 21-12708

and refer the matter back to the Planning Commission to be re-considered in compliance with state law.

Sincerely,



Ana A. Zuniga
Senior Staff Attorney

Enclosures.

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.



**ALESHIRE &
WYNDER LLP**
ATTORNEYS AT LAW

ORANGE COUNTY | LOS ANGELES | RIVERSIDE | CENTRAL VALLEY

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Irvine, CA 92612
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F (949) 223-1180

AWATTORNEYS.COM

April 30, 2019

VIA E-MAIL AND U.S. MAIL

Richard H. Close
Thomas W. Casparian
Cozen O'Connor
1299 Ocean Avenue, Suite 900
Santa Monica, CA 90401
E-Mail: rclose@cozen.com;
tcasparian@cozen.com

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.

Richard H. Close
Thomas W. Casparian
April 30, 2019
Page 3

- 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 'B. Jones', 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



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 "I" 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

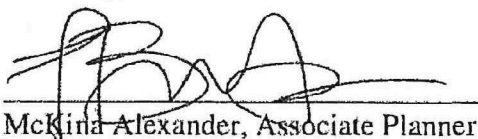
Richard H. Close, Esq.
Thomas W. Casparian
Cozen O'Connor
January 25, 2021

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