

Regional Planning Commission Transmittal Checklist

Hearing Date September 2, 2009
Agenda Item Number 7/

Project Number: 87091-(5)
Case(s): NON-CONFORMING REVIEW 200700005
Contact Person: Dean Edwards

Included	NA/None	Document
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Factual
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Property Location Map
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Staff Report
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Draft Findings
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Draft Conditions
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Approved Conditions of NCR87091
<input type="checkbox"/>	<input checked="" type="checkbox"/>	DPW Letter
<input checked="" type="checkbox"/>	<input type="checkbox"/>	FD Letter
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Other Department's Letter(s)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Burden Of Proof Statement(s)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Environmental Documentation (IS, MMP, EIR)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Opponent And Proponent Letters
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Photographs
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Resolution (ZC Or PA)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Ordinance with 8.5 X 11 Map (ZC Or PA)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Aerial (Ortho/Oblique) Image(s)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Land Use Radius Map
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Site Plan And Elevations

Reviewed By: Mark Chup



Los Angeles County Department of Regional Planning
 320 West Temple Street
 Los Angeles, California 90012
 Telephone (213) 974-6443
PROJECT NUMBER 87091-(5)
NON-CONFORMING REVIEW 200700005

PUBLIC HEARING DATE September 2, 2009	AGENDA ITEM 7
RPC CONSENT DATE	CONTINUE TO

APPLICANT MHC, LLC	OWNER 23500 Old Road LTD	REPRESENTATIVE Sunray Environmental Group
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ENTITLEMENT REQUEST
 Non-conforming review to allow an existing 85 unit mobile-home park that exceeds the current density maximum, has less than required parking and has a non-conforming driveway in terms of access points and width. Existing signage also exceeds the current allowed area.

PROJECT DESCRIPTION
 The proposed project consists of the continued use and operation of an existing 85 unit mobile-home park. 85 resident parking spaces, 24 guest parking spaces and eight recreational vehicle parking spaces are provided.

LOCATION/ADDRESS
 23500 The Old Road

ACCESS The Old road	ZONED DISTRICT Newhall
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ASSESSORS PARCEL NUMBER 2827-028-010	COMMUNITY Santa Clarita Valley
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SIZE 14.17 Acres	COMMUNITY STANDARDS DISTRICT NA
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	EXISTING LAND USE	EXISTING ZONING
Project Site	Mobilehome Park	A-2-1 (Heavy Agriculture)
North	Vacant	A-2-1 (Heavy Agriculture)
East	Vacant	A-2-1 (Heavy Agriculture)
South	Vacant	A-2-1 (Heavy Agriculture)
West	Vacant	A-2-1 (Heavy Agriculture)

GENERAL PLAN Santa Clarita Valley Area Plan	DESIGNATION U3 (Urban 3) W (Floodway/Floodplain) HM (Hillside Management)	MAXIMUM DENSITY 6.7 to 15.0 du/ac NA NA
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ENVIRONMENTAL DETERMINATION
 Class 1 Categorical Exemption – Existing Facilities

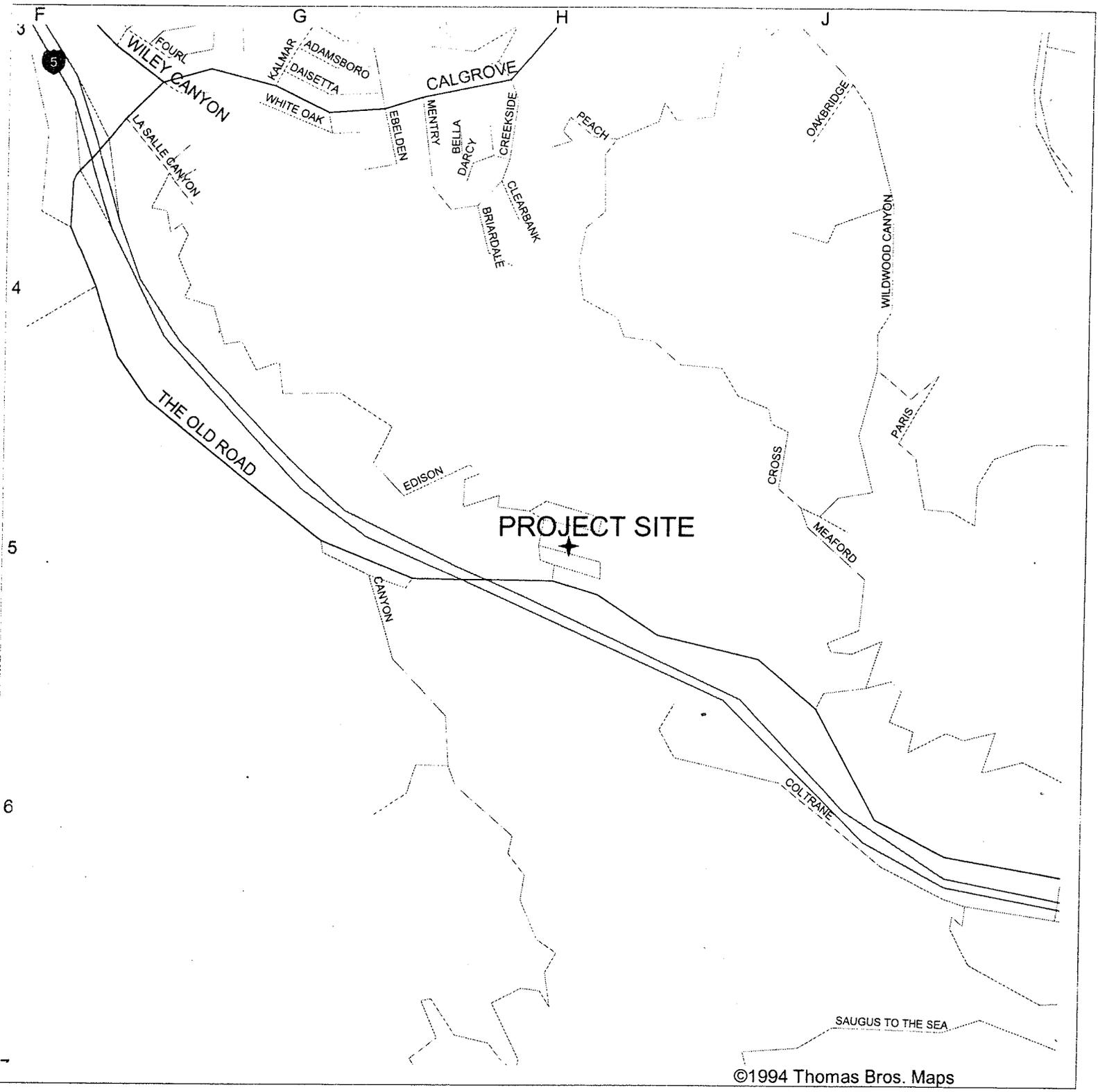
RPC LAST MEETING ACTION SUMMARY

LAST RPC MEETING DATE	RPC ACTION	NEEDED FOR NEXT MEETING
MEMBERS VOTING AYE	MEMBERS VOTING NO	MEMBERS ABSTAINING/ABSENT

TO BE COMPLETED ONLY ON CASES TO BE HEARD BY THE BOARD OF SUPERVISORS

STAFF CONTACT PERSON:		
RPC HEARING DATE(S)	RPC ACTION DATE	RPC RECOMMENDATION
MEMBERS VOTING AYE	MEMBERS VOTING NO	MEMBERS ABSTAINING
STAFF RECOMMENDATION (PRIOR TO HEARING):		
SPEAKERS* (O) (F)	PETITIONS (O) (F)	LETTERS (O) (F)

*(O) = Opponents (F) = In Favor



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VICINITY MAP

SITE : 23500 THE OLD RD.

STAFF ANALYSIS
PROJECT NUMBER 87091-(5)
NONCONFORMING REVIEW PERMIT 200700005

ENTITLEMENT REQUEST

Non-conforming review to allow an existing 85 unit mobile-home park that exceeds the current density maximum, has less than required parking and has a non-conforming driveway in terms of access points and width. Existing signage also exceeds the current allowed area.

PROJECT DESCRIPTION

The proposed project consists of the continued use and operation of an existing 85 unit mobile-home park. There are 85 resident parking spaces, 24 guest parking spaces and eight recreational vehicle parking spaces provided.

LOCATION

The subject property is located at 23500 The Old Road in the Newhall Zoned District and unincorporated area of Santa Clarita Valley.

SITE DESCRIPTION

The 14.17 acre project site is developed with an 85 unit mobile home park that includes a 3,445 square foot single-story club house and pool. A fifty foot wide public utility easement runs east to west across the site and there are two utility towers located on the property. An 8 space recreational vehicle storage lot is located on the east side of the property. The property is landscaped with ornamental and native vegetation including 82 oak trees.

ENVIRONMENTAL DETERMINATION

The Department of Regional Planning has determined that a Categorical Exemption, Class 1 – Existing Facilities, is the appropriate environmental documentation under California Environmental Quality Act (CEQA) reporting requirements. The project consists of the authorization of an existing mobilehome park. No new construction is proposed.

LEGAL NOTIFICATION AND PUBLIC OUTREACH

Pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the County Code, the community was appropriately notified of the public hearing by mail, newspaper, property posting, library posting and DRP website posting.

PREVIOUS CASES/ZONING HISTORY

- Zoning Exception Case 8251 for a mobile-home trailer park was approved by the Regional Planning Commission on December 6, 1966.
- Non-conforming Review 87091 for an 88 space mobile-home park was approved by the Regional Planning Commission on July 15, 1987. The grant expired July 15, 2007. The case's Findings and Conditions (attached) do not identify the number of RV parking spaces that are allowed.

Three mobile-home spaces (15, 17 and 29) have been eliminated since the approval. A 10 space recreational vehicle storage area is currently located where unit 15 was sited. The RV storage area is not depicted on the Exhibit A of NCR87091. Condition 9.b of NCR87091 required the permittee to submit revised site plans that depict RV storage areas to Director of Planning for review and approval. The NCR8709 case file does not include a Director approved revised site plan that depicts RV storage areas. Two of the 10 RV parking spaces are partially located outside the southerly property boundary. Condition 20 requires that the applicant submit revised site plans that depict the removal of the two spaces. Condition 21.i prohibits the parking or storage of vehicles outside the development's property boundaries.

STAFF EVALUATION

General Plan Consistency

Santa Clarita Valley Area Plan land use designations for the project site are Urban 3, Floodway/Floodplain and Hillside Management.

The Urban 3 land use designation is for residential development with a density of 6.7 to 15 units per acre. Source: Santa Clarita Valley Area Plan – page 32. The density of the development is 5.85 units per acre. The development is consistent with the Urban 3 land use designation. However, for hillside properties more restrictive density regulations apply under the Santa Clarita Valley Area Plan. The slope of the property is approximately 20 percent. The maximum allowable density for the subject property is one dwelling unit per two acres. The density of the development is 11.7 units per two acres which is greater than allowed by Santa Clarita Valley Area Plan.

Residential uses are allowed in the Floodway/Floodplain areas if Department of Public Works flood protective measures are “exercised.” Source: Santa Clarita Valley Area Plan – page 40.

Zoning Ordinance and Development Standards Compliance

The subject property is located in the A-2-1 (Heavy Agricultural – 1 Acre Lot Minimum) zone. Mobile-home Park is a use subject to permit in the A-2 zone. Pursuant to Section 22.52.1150, two parking spaces are required for every mobile-home and one guest parking space is required for every four mobile-homes. Condition 3.B of NCR87091 requires 1.25 parking spaces per coach site. A total of 109 spaces are provided (85 resident parking spaces and 24 guest space), which is less than required by the Zoning Ordinance but more than required by NCR87091. See table below. Condition 21.c requires that 1.25 parking spaces per unit be maintained.

	Parking Requirement	Total
22.52.1150	2.25 * 85	192
NCR8709	1.25 * 85	107
Provided		85 + 24 = 109

Pursuant to section 22.56.1500.A, a nonconforming use, building or structure may be continuously maintained provided there is no alteration, enlargement or addition to any building or structure. No alteration, enlargement or addition to any building or structure is proposed.

Pursuant to Section 21.24.200, driveways shall have a minimum width of 30 feet. The width of the development's driveway is 25 feet, five feet less than required. The Exhibit A of NCR87091 depicts a 25 foot wide driveway.

Pursuant to Section 22.52.500.C.2.b at least two access points to a public street or highway, which can be used by emergency vehicles, shall be provided. Only one access point is provided for the development. The Exhibit A of NCR87091 depicts only one access point. This is therefore a legal non-conforming situation that can be continued through approval of the subject NCR permit.

Pursuant to Section 22.24.170 and 22.20.120 the yard requirements are as follows:

Front: Not less than 20 feet.

Interior Side: Not less than 5 feet.

Rear: Not less than 15 feet.

The development complies with all yard/setback requirements.

The development is identified by an existing small (approximately one foot by three feet) pole mounted sign located on the east side of the entrance. The sign would be considered a building identification sign by the Zoning Ordinance which allows one, one square foot wall mounted per use (Section 22.52.930). The sign is not mentioned in the approved Conditions and Findings of 87091. The sign is non-conforming because it is not mounted on wall and is larger than allowed.

Zoning Enforcement staff inspected the site on May 7, 2009 and found no open zoning violations on the property.

Neighborhood Impact/Land Use Compatibility

The subject property is surrounded by vacant land.

The use has existed on the property since 1966. There are no unresolved zoning violations the property. With the proposed conditions, the development should not have a negative impact on the surrounding area.

Burden of Proof

The applicant is required to substantiate all facts identified by Section 22.56.1550 of the Los Angeles County Code. The Burden of Proof with applicant's responses is attached. The burden of proof has been met for all items except adequacy in site size and shape to accommodated parking.

COUNTY DEPARTMENT COMMENTS AND RECOMMENDATIONS

The Fire Department submitted a letter (attached) dated January 15, 2009 clearing the project for hearing.

PUBLIC COMMENTS

No comments from the public have been received.

FEES/DEPOSITS

If approved, fees identified in the attached project conditions will apply unless modified by the Regional Planning Commission.

STAFF RECOMMENDATION

Staff recommends that the RV parking be limited to eight spaces, located within the property boundaries and in the area marked on the Exhibit A. This is consistent with what was described in the findings for the previous NCR permit.

The following recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing:

Staff recommends **approval** of Project Number 87091 and Nonconforming Review 200700005, subject to the attached conditions.

Prepared by Dean Edwards, Senior Regional Planning Assistant
Reviewed by Mark Child, Supervising Regional Planner, Zoning Permits 1 Section

Attachments:

Draft Conditions of Approval
Applicant's Burden of Proof statement
Environmental Document
Site Photographs
Site Plan
Land Use Map

DRAFT FINDINGS AND ORDER OF THE REGIONAL PLANNING COMMISSION COUNTY OF LOS ANGELES

**PROJECT NUMBER 87091-(5)
NON-CONFORMING REVIEW 200700005**

REQUEST: Non-conforming review to allow an existing 85 unit mobile-home park that exceeds the current density maximum, has less than required parking and has a non-conforming driveway in terms of access points and width. Existing signage also exceeds the current allowed area.

REGIONAL PLANNING COMMISSION HEARING DATE: September 2, 2009

PROCEEDINGS BEFORE THE REGIONAL PLANNING COMMISSION:

Findings

1. The subject property is located at 23500 The Old Road in the Newhall Zoned District and unincorporated area of Santa Clarita Valley.
2. The project consists of the continued use and operation of an existing 85 unit mobile-home park. There are 85 resident parking spaces, 24 guest parking spaces and eight recreational vehicle parking spaces provided.
3. Santa Clarita Valley Area Plan land use designations for the project site are Urban 3, Floodway/Floodplain and Hillside Management.
4. The maximum allowable density for the subject property is one dwelling unit per two acres. The density of the development is 11.7 units per two acres, which is greater than allowed by Santa Clarita Valley Area Plan.
5. The subject property is located in the A-2-1 (Heavy Agricultural – 1 Acre Lot Minimum) zone. Mobile-home Park is a use subject to permit in the A-2 zone.
6. Condition 3.B of NCR87091 requires 1.25 parking spaces per mobile-home site. 85 resident parking spaces and 24 guest spaces, a total of 109 spaces are provided. Condition 21.c requires that 1.25 parking spaces per unit be maintained.
7. Pursuant to section 22.56.1500.A, a nonconforming use, building or structure may be continuously maintained provided there is no alteration, enlargement or addition to any building or structure. No alteration, enlargement or addition to any building or structure is proposed.

8. Present code requirement is that driveways have a minimum width of 30 feet. The width of the driveway of the subject property is 25 feet, five feet less than required, as authorized by NCR8709.
9. Present code requirement is that at least two access points to a public street or highway, which can be used by emergency vehicles, be provided. Only one access point is provided for the development as authorized by NCR8709.
10. Pursuant to Section 22.24.170 and 22.20.120 the yard requirements are as follows:
Front: Not less than 20 feet.
Interior Side: Not less than 5 feet.
Rear: Not less than 15 feet.
The development complies with all yard/setback requirements
11. The development is identified by an existing small (approximately one foot by three feet) pole mounted sign located on the east side of the entrance. The is considered a building identification sign by the Zoning Ordinance which allows one, one square foot wall mounted per use (Section 22.52.930). The sign is not mentioned in the approved Conditions and Findings of NCR87091. The sign is non-conforming because it is not mounted on wall and is larger than allowed.
12. A 10 space recreational vehicle storage lot is provided. Two RV parking spaces are partially located outside the southerly property boundary. Condition 20 requires that the applicant submit revised site plans that depict the removal of the two spaces. Condition 21.i prohibits the parking or storage of vehicles outside the development's property boundaries.
13. The subject property is surrounded by vacant land. The use has existed on the property since 1966. There are no unresolved zoning violations on the property. The continued use of a mobile-home park would not have a negative impact on the surrounding area and it is compatible with adjacent land uses.
14. Pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the County Code, the community was appropriately notified of the public hearing by mail, newspaper and property posting.
15. To assure continued compatibility between the use of the subject property allowed by this grant and surrounding land uses, the Regional Planning Commission determines that it is necessary to limit the term of the grant to 20 years.
16. The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at the Los Angeles County Department of Regional Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, CA 90012. The custodian of such documents and materials shall be the Section Head of the Zoning Permits 1 Section, Los Angeles County Department of Regional Planning.

BASED ON THE FOREGOING, THE REGIONAL PLANNING COMMISSION CONCLUDES:

1. The requested use at the proposed location will not:
 - a. Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, or
 - b. Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, or
 - c. Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
2. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in the Zoning Ordinance, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
3. The proposed site is adequately served:
 - a. By highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and
 - b. By other public or private service facilities as are required.
4. The nature of the improvement is such that to require cessation of use would impair the property rights of any person to such an extent as to be an unconstitutional taking of the property.
5. Such adjustment will not be materially detrimental to the public health, safety or general welfare, or to the use, enjoyment or valuation of property of other persons located in the vicinity.

REGIONAL PLANNING COMMISSION ACTION:

1. The Commission has considered the Categorical Exemption for this project and certify that it is consistent with the finding by the State Secretary for Resources or by local guidelines that this class of projects does not have a significant effect on the environment.
 2. In view of the findings of fact and conclusions presented above, Non-conforming Review 200700005 is APPROVED subject to the attached conditions.
- c: Each Commissioner, Zoning Enforcement, Building and Safety

This grant authorizes the continued use of an 85 unit mobile-home park with appurtenant structures subject to the following conditions of approval:

1. Unless otherwise apparent from the context, the term "permittee" shall include the applicant and any other person, corporation or other entity making use of this grant.
2. This grant shall not be effective for any purpose until the permittee, and the owner of the subject property if other than the permittee, have filed at the office of the Department of Regional Planning their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and that the conditions of the grant have been recorded as required by Condition Number 6 and until all required monies have been paid pursuant to Condition Number 8.
3. The permittee shall defend, indemnify and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void or annul this permit approval, which action is brought within the applicable time period of Government Code Section 65009. The County shall promptly notify the permittee of any claim, action, or proceeding and the County shall cooperate reasonably in the defense. If the County fails to promptly notify the permittee of any claim action or proceeding, or if the County fails to cooperate fully in the defense, the permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.
4. In the event that any claim, action, or proceeding as described above is filed against the County, the permittee shall within ten days of the filing pay the Department of Regional Planning an initial deposit of \$5,000, from which actual costs shall be billed and deducted for the purpose of defraying the expenses involved in the department's cooperation in the defense, including but not limited to, depositions, testimony, and other assistance to permittee or permittee's counsel. The permittee shall also pay the following supplemental deposits, from which actual costs shall be billed and deducted:
 - a. If during the litigation process, actual costs incurred reach 80 percent of the amount on deposit, the permittee shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.
 - b. At the sole discretion of the permittee, the amount of an initial or supplemental deposit may exceed the minimum amounts defined herein.

The cost for collection and duplication of records and other related documents will be paid by the permittee according to Los Angeles County Code Section 2.170.010.

5. If any provision of this grant is held or declared to be invalid, the permit shall be void and the privileges granted hereunder shall lapse.
6. Prior to the use of this grant, the property owner or permittee shall **record the terms and conditions** of the grant in the office of the County Recorder. In addition, upon any transfer or lease of the property during the term of this grant, the property owner or permittee shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.
7. **This grant will terminate on August 19, 2029.** Entitlement to use of the property thereafter shall be subject to the regulations then in effect. At least six (6) months prior to the expiration of this permit and in the event that the permittee intends to continue operations after such date, a new Non-conforming Review Permit application shall be filed with the Department of Regional Planning. The application shall be a request for continuance of the use permitted under this grant, whether including or not including modification to the use at that time.
8. The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the permittee to cease any development or activity not in full compliance shall be a violation of these conditions. The permittee shall deposit with the County of Los Angeles the sum of **\$1,500.00**. The deposit shall be placed in a performance fund, which shall be used exclusively to compensate the Department of Regional Planning for all expenses incurred while inspecting the premises to determine the permittee's compliance with the conditions of approval. The deposit provides for **ten (10) biennial (one every other year)** inspections. Inspections shall be unannounced.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the permittee shall be financially responsible and shall reimburse the Department of Regional Planning for all additional enforcement efforts necessary to bring the subject property into compliance. Inspections shall be made to ensure compliance with the conditions of this grant as well as adherence to development in accordance with the approved site plan on file. The amount charged for additional inspections shall be \$150.00 per inspection, or the current recovery cost, whichever is greater.

9. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission or a hearing officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or hearing officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance.

10. Upon receipt of this letter, the permittee shall contact the Fire Prevention Bureau of the Los Angeles County Fire Department to determine what facilities may be necessary to protect the property from fire hazard. Any necessary facilities shall be provided as may be required by said Department.
11. All requirements of the Zoning Ordinance and of the specific zoning of the subject property must be complied with unless otherwise set forth in these conditions or shown on the approved plans.
12. All structures shall conform to the requirements of the Division of Building and Safety of the Department of Public Works.
13. All structures, walls and fences open to public view shall remain free of extraneous markings, drawings or signage that was not approved by the Department of Regional Planning. These shall include any of the above that do not directly relate to the business being operated on the premises or that do not provide pertinent information about said premises.
14. In the event of graffiti or other extraneous markings occurring, the permittee shall remove or cover said markings, drawings, or signage within 24 hours of such occurrence, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces. The only exceptions shall be seasonal decorations or signage provided under the auspices of a civic or non-profit organization.
15. The subject property shall be developed and maintained in substantial compliance with the plans marked Exhibit "A." If changes to the site plan are required as a result of instruction given at the public hearing, a Revised Exhibit "A" shall be submitted to the Department of Regional Planning within sixty (60) days of the date of approval for the Conditional Use Permit.
16. Subsequent to the hearing, the permittee shall submit three sets of revised site plans corrected to remove the two recreational vehicle parking spaces that are partially located outside the southern property boundary and depicted on the Exhibit A. The Director will review the submitted plans for adequacy.
17. This grant allows the continued use and operation of a mobile-home park subject to the following restrictions:
 - a. The maximum number of mobile-home spaces is limited to 85.
 - b. No mobile-homes shall be located within the open space areas of the park.
 - c. Parking shall be maintained at a ratio of 1.25 spaces per mobile-home site, with a minimum of one space to be located adjacent to each mobile-home site.

- d. All units within the park shall be mobile-homes and, with the exception of the manager's unit, shall be owned by the occupants.
- e. The park shall be licensed and operated in accordance with the requirements of the California State Department of Housing and Community Development.
- f. The use of park facilities is limited to tenants and their guests.
- g. All exterior lights shall be shielded away adjacent property.
- h. A five foot high chain link fence shall be maintained along the developed north, east and west perimeters of the mobile-home park.
- i. Parking or storage of vehicles outside the development's property boundaries is prohibited.
- j. The recreational vehicle storage area shall be limited to eight parking spaces.



**COUNTY OF LOS ANGELES
FIRE DEPARTMENT**

5823 Rickenbacker Road
Commerce, California 90040-3027

DATE: January 15, 2009

TO: Department of Regional Planning
Permits and Variances

PROJECT #: 87091

LOCATION: 23500 The Old Road, Santa Clarita Valley

- The Fire Department Land Development Unit has no additional requirements for this permit.
- The required fire flow for this development is ____ gallons per minute for _ hours. The water mains in the street fronting this property must be capable of delivering this flow at 20 psi residual pressure. __ Hydrant(s) flowing simultaneously may be used to achieve the required fire flow.
- Verify __ 6" X 4" X 2 1/2" fire hydrants, conforming to AWWA C503-75 or approved equal. All installations must meet Fire Department specifications. Fire hydrant systems must be installed in accordance with the Utility Manual of Ordinance 7834 and all installations must be inspected and flow tested prior to final approval.
- This property is located within the area described by the Fire Department as the Very High Fire Hazard Severity Zone (VHFHSZ). A Preliminary Fuel Modification Plan shall be submitted and approved prior to the Public Hearing. For details contact the Fuel Modification Unit, Fire Station 32, 605 North Angeleno Avenue, Azusa, CA 91702-2904. They may be reached at (626) 969-5205.
- Comments:** THIS PROJECT IS CLEARED BY THE FIRE DEPARTMENT FOR PUBLIC HEARING.
- Location:** Fire Flow performed by Newhall County Water District on 10-01-08 is adequate.
- Access:** Access is adequate as depicted on the revised Site Plan dated 10-22-08.

Fire Protection facilities; including access must be provided prior to and during construction. Should any questions arise regarding this matter, please feel free to call our office at (323) 890-4243.

Inspector: **SCOTT JAEGGI** 

Land Development Unit – Fire Prevention Division – Office (323) 890-4243 Fax (323) 890-9783



NONCONFORMING REVIEW BURDEN OF PROOF

Pursuant to Zoning Code Section 22.56.1550, the applicant shall substantiate the following facts:

(Do not repeat the statement or provide Yes/No responses. If necessary, attach additional pages.)

<p>A. That the requested use at the location proposed will not:</p> <ol style="list-style-type: none"> 1. Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, or 2. Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, or 3. Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
(ATTACHED)
<p>B. That the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking, and loading facilities, landscaping and other development features prescribed in this Ordinance, or as is otherwise required in order to integrate said use with the uses in surrounding area.</p>
(ATTACHED)
<p>C. That the proposed site is adequately served:</p> <ol style="list-style-type: none"> 1. By highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and 2. By other public or private service facilities as are required.
(ATTACHED)
<p>D. That the nature of the improvement is such that to require cessation of use would impair the property rights of any person to such an extent as to be an unconstitutional taking of property.</p>
(ATTACHED)
<p>E. That such adjustment will not be materially detrimental to the public health, safety or general welfare, or to the use, enjoyment or valuation of property of other persons located in the vicinity.</p>
(ATTACHED)

CRESCENT VALLEY MHC, LLC

23500 THE OLD ROAD
NEWHALL, CALIFORNIA

[APN: 2827-28-10]

MARCH 27, 2009
NONCONFORMING REVIEW

BURDEN OF PROOF: PER SECTIONS 22.56.040 AND 22.56.1550 OF THE
LA COUNTY ZONING CODE

RESPONSE:

- A. That the requested use at the location proposed will not:
1. Adversely affect the health, peace, comfort of welfare of persons residing or working in the surrounding area, or
 2. Be materially detrimental to the use, enjoyment or valuation of property of persons located in the vicinity of the site, or
 3. Jeopardize, endanger, or otherwise constitute a menace to the public health, safety or general welfare.

The park has been in existence for over 40 years now. During this time, issues concerning neighbors were resolved, including access and encroachment on neighboring properties to the north and west. The park is self-contained and separated from other urban uses by topography. This isolation has minimized the impacts of the site from surrounding areas. The low intensity use of mobile homes is compatible to the rural character of the area. As the vegetation in the park has matured, surrounding areas are almost unaware of the 86 units and its visual and physical presence. Property owners in the area own hillside land. The park has not resulted in hillside grading, hillside view shed penetration along the ridge line, nor has it created growth-inducing impacts which would possibly have been materially detrimental to the rural, open-space character of the area.

The general welfare of the public has not been affected by the development because of the low impact nature of the mobile home park. Low intensity, with compact facilities and housing that is non-intrusive in character, is the hallmark of this 14-acre site.

Similarly, the health and safety of the residents and the general public is protected through the design mandated by two separate entitlements over a 40-year timeframe.

Lastly, to protect citizens, the park has been inspected regularly by local LEA (Los Angeles County) at the direction and oversight by the State Offices of Housing and Community Development (HCD) through the California Health and Safety Code Chapter 520: Sections 18400.1 through 18502, the enforcement section of the State's mobile Home Parks Act.

- B. That the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features described in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.**

This site is 14.1732 acres pursuant to the ALTA Survey of September 30, 2005. Through two previous entitlements, in 1966 and 1987, elements of the site have been formalized. The following elements are included into the design to protect residents and to integrate the park into the surrounding area:

1. All private driveways are blacktop.
2. Unit pad sizes average 2,200 square feet with units respecting 10 feet of separation between structures.
3. Adequate setbacks, front, rear and side yards for the total site are shown on the Site Plan and conform to the requirements of the Zone A-2-1.
4. Interior lighting is shielded to lessen impacts to surrounding areas.
5. All utilities are underground to lessen visual impact to surrounding areas.
6. Perimeter fencing and frontage landscaping were installed to ensure compatibility to surrounding areas.
7. Fire flow/hydrants and water capacity were assured to prevent fire impact to the site and surrounding areas.
8. Natural drainage was defined in the original approval to lessen impacts to surrounding areas and to comply with the rural character of the area.
9. Property taxes have been paid for over 40 years to offset impacts to the surrounding area. The 2006 taxes were in excess of \$40,000--exclusive of individual mobile home license fees.

- C. That the proposed site is adequately served:**

1. **By highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and**
2. **By other public or private service facilities as are required.**

The park is located on The Old Road, which provides public highway access to the park. Traffic is facilitated by the I-5 Freeway with access on/off ramps at Calgrove on The Old Road and south to Sierra Highway on/off ramps to Interstate Highway 15 at the I-5 Freeway. Traffic within the park is facilitated with an internal system of black-topped roads.

The park is provided with a multi-phased septic system that is well maintained.

Water is provided to the park by a 126,000-gallon tank and lines that include fire flow and domestic services maintained by the park site and the Newhall County Water District (NCWD).

Electricity is provided to the park by underground distribution and major service lines by Southern California Edison.

Trash collection is provided to the park by a local purveyor with established service.

Police and Fire services are provided by the LA County Sheriff's Department and the LA County Fire Department, Stevenson Ranch.

Other services are available in both the City of Santa Clarita and the City of Los Angeles, which are in close proximity to the site.

D. That the nature of the improvement is such that to require cessation of use would impair the property rights of any person to such an extent as to be an unconstitutional taking of property.

The takings clause comes under the Fifth Amendment of the Bill of Rights and involves a basic requirement that a governmental entity shall not allow for the taking of a property without just compensation, and that this just compensation is a result of a significant diminution of the property values. Relevant factors regarding taking include: economic impact, impact on investment expectations and, the character of the government action.

In the subject case, the cessation of previously approved (ZEC #8251 of 1966) and nonconforming review approval (NCR 87-091) of 1987 would, in effect, be a regulatory taking of my applicant's property. The following specific takings topics justify the fact that the government action would result in this taking:

1. Private property includes land, but also may include vehicles. In this case, there is a 14-acre piece of property that has been prior approved by the County for a mobile park. Secondly, private property, under the taking statute of the Fifth Amendment, can also include vehicles. In this case, there are 86 such vehicles that

are owned by individual mobile home owners in the park. Therefore, the taking could involve the 86 vehicles as companion to the mobile home park cessation that would affect the property owner, (Crescent Valley MHC, LLC).

2. There are two previous actions on the property--one in 1966, and the other in 1987, which both allowed for 20-year extensions on this property. There is a policy of the LA County Planning Commission which endorses the nonconforming trailer parks as a viable affordable housing component in the County's General Plan. There are two area plans that endorse this property as a mobile home park. The Santa Clarita Area Plan Land Use Policy has designated the property a U3, or an urban combination, of 6.7 to 15.0 dwelling units per acre. Most recently, the proposed One Valley-One Vision Community Plan also endorses this area as a mobile home park-type density for the property.

Previous actions on the property support the fact that there is no need to deny or cease operations of the mobile home park request. Such taking would necessitate compensation for value of the uses and the value of the physical structures. Following cessation, the property would have infrastructure that would be compatible only with another mobile home park--essentially leaving the property idle.

3. There are sufficient regulations that effectively control the use of this property. The State of California Business and Transportation and Housing Agency through the Department of Housing and Community Development has adopted the Mobile Home Park Act. The California Health and Safety Code Division 13, Part 2, Mobile home parks, are regulated through the State and the LEA, the delegated enforcement agency of the State, and call for a frequency of enforcement of the agency's inspections by requiring mobile home parks to perform maintenance and provision of reports regarding that maintenance. The existing mobile home park has an approximately 40-year track record and has shown a good faith effort in the maintenance of the property according to State and local regulations. In summary, restrictions are, and have been, in place to properly regulate this use.

4. The US Supreme Court, in cases relative to taking, have ruled that permanent physical occupation of the land is one of the grounds for a taking action. This property has been consistently occupied by residents of 86 mobile home units since its first approval in 1966, showing a permanent physical occupation of the land.

5. Site-specific facts: The following facts that are specific to this mobile home park show that cessation would impair the property rights of the tenants and of the property owner:

A. This mobile home park includes 86 families who each own their own unit and pay rental fees for their space to the mobile home park owner--Crescent Valley MHC, LLC.

B. Property rights within the park extend beyond the park owner to include the rights of the residents within the park who are long-term occupants of their various spaces and are owners of their vehicles (homes).

C. To move the units to another location following cessation would constitute a severe hardship to the residents and to the park owner--leaving the property idle for want of another specific use similar to a mobile home park.

D. The hardship of cessation would extend to not only the occupants and the property owner, but also to Los Angeles County, who would be required to assist 86 displaced residents and their families. LA County Regional Planning Commission Policy #3 (revised in 1984), which discusses nonconforming trailer parks, stipulates that the Community Development Commission/Housing Authority would provide assistance to the displaced residents to secure compatible affordable replacement housing. We submit that this hardship would extend not only to the residents, but to the County of Los Angeles--since adequate affordable residential replacement is probably not available in this vicinity, owing to the increased values of property and the increased gentrification of the Santa Clarita area.

For all the reasons stated above, we believe that the cessation of the existing nonconforming use at the site would be contrary to the opinions of the US Supreme Court regarding the unconstitutional taking of property. Cases cited most recently include Penn Central vs. New York City (1978), Dolan vs. City of Tigurd (1994), Lucas vs. South Carolina Coastal Commission (1992), Tahoe Preservation Council vs. Tahoe Regional Planning Agency (2002), and Kelo vs. City of New London (2005). Several of these cases involved regulatory takings by various public agencies, which caused significant diminution of the properties--and thus, taking.

E. That such adjustment will not be materially detrimental to the public health, safety or general welfare, or to the use, enjoyment or valuation of property of other persons located in the vicinity.

The Los Angeles Department of Regional Planning requires, through its Planning Commission directives in Policy #3 adopted as revised in 1984, that nonconforming trailer parks are a benefit to the community as a source of affordable housing, if maintained in a safe and sanitary manner.

Section 2 of this Policy #3, lists standards to protect public health and safety and general welfare, or to achieve enjoyment or valuation of property of persons residing within or located in the vicinity of the site.

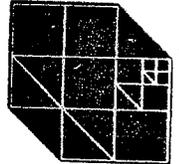
The Crescent Valley MHC, LLC Park meets the following Commission mandated standards:

- a). The trailer is buffered from Old Road with a large open space frontage that includes oak trees and a floodway area of dense vegetation. In conjunction with this floodway area, which is heavily landscaped and screened, are small concrete retaining walls and fences (where necessary) in order to define the mobile home park space from the open space within the floodway.
- b). The Crescent Valley Trailer Park is serviced by septic tanks, which are regularly pumped by a reputable contractor within the Santa Clarita Valley. The maintenance of the septic facilities is an on-going regular procedure of the mobile home park and its designee, the mobile home park manager.
- c). All mobile homes within the trailer park are self-contained with toilets, bath, and showers.
- d). The health, safety, and environmental conditions within the trailer park are not negatively affected by adjacent industrial uses. All of the uses within the vicinity are A-2-1-type uses and primarily open space with dense vegetation and/or ridge lines as shown in the aerial photographs. No industrial uses are contemplated or are within the vicinity of this mobile home park.
- e). The interior vehicular access to the mobile home park is paved with a minimum of 20 feet of paving to provide safe and efficient circulation. The LA County Fire Department in its review of the property toured the property and found the all-weather access to be sufficient of clearance for the standard fire vehicle. The access road also included sufficient turning radiuses for emergency vehicles and/or large trucks.
- f). There is at least one paved parking space for each trailer. Previously approved was 1 1/4 parking spaces per coach site. These quarter spaces represent the minimum 22 guest spaces within the mobile home park. A total of 24 guest spaces are currently shown.
- g). There is adequate paved access to each residential unit within the mobile home trailer park for use by emergency vehicles. The LA County Fire Department has verified that the width and the overhanging branches of the trees has been trimmed at sufficient height and width to allow emergency vehicles to include a large fire truck to have easy access to every one of the units in the mobile home park. The

LA County Fire Department verified that the seven on-site fire hydrants are advantageously located and of sufficient fire flow to satisfy LA County Fire Department's requirements for re-approval of this nonconforming review case.

h). The mobile home park and all individual trailers and structures comply with the regulations of the LA County Fire Code. As part of the Fire Department clearance, the applicant performed flow tests on two fire hydrants--one at the entrance to the mobile home park, and one at the top of the mobile home park. The flow tests showed a fire flow rating of sufficient volume and pressure to satisfy the LA County Fire Department. Secondly, access and placement of hydrants has been verified by the LA County Fire Department to their satisfaction. Brush control is also an on-going maintenance function of the mobile home park. The applicant's landscape contractor performs regular maintenance to observe brush clearance within 100 feet of adjacent structures. This on-going brush maintenance has been monitored by the local LA County Fire Department Brush Control Unit who monitor brush control for the Newhall/Santa Clarita area.

i). The trailer park and all individual trailers comply with the requirements of the State Department of Housing and Community Development in accordance with determinations made during periodic inspections. Over the last 40 years, numerous inspections have occurred at this mobile home park to satisfy the intent of the Mobile Park Act adopted by the State of California and regulated by the Department of Housing and Community Development through its local enforcement agency, the County of Los Angeles Department of Health Services. Inspection records are maintained for this mobile home park, along with individual reports of the on-going maintenance and operation of this mobile home park facility. This maintenance and reporting, as required in Chapter 520 Statutes of 1999 Applicable to Mobile Park Maintenance Inspection Program, has kept this facility in compliance with both local and state regulation regarding the health and safety of residents within the facility and in the vicinity.



July 28, 1987

**CERTIFIED-RECEIPT
REQUESTED**

El Cap XII - Crescent Valley
3060 Valencia Avenue, #3
Aptos, California 95003

7-15-2009

Dear Sirs:

**RE: NONCONFORMING USE AND
STRUCTURE REVIEW CASE NO. 87091-(5)** #13
To continue the operation of an 88-space
mobilehome park.
23500 The Old Road
Newhall Zoned District, Zone A-2-1

The Regional Planning Commission, by its action of July 15,
1987, GRANTED the above described permit. Documents pertaining
to this grant are enclosed.

Your attention is called to the following:

1. Condition No. 2, that this grant shall not be effective for any purpose until the applicant and the owner of the property involved, or his duly authorized representative, have filed at the office of the Department of Regional Planning the enclosed affidavit stating that they are aware of, and accept all the conditions of this permit;
2. The Commission's decision may be appealed to the Board of Supervisors at the office of Mr. Larry J. Monteilh, Executive Officer, Room 383, Hall of Administration, 500 West Temple Street, Los Angeles, CA 90012, telephone (213) 974-1442. The appeal must be postmarked or delivered in person within 15 days after this notice is received by the applicant. This grant will not become effective until and unless this period has passed without an appeal;
3. The Commission's grant affects the following described property:

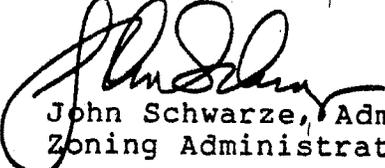
(See attached sheet.)

Ell Cap XII - Crescent Valley
July 28, 1987
Page 2

If you have any questions regarding this matter, please contact the Variances and Permits Section at (213) 974-6446.

Very truly yours,

DEPARTMENT OF REGIONAL PLANNING
Norman Murdoch, Director of Planning



John Schwarze, Administrator
Zoning Administration Branch

JS:RF:meg

Enclosures: Affidavit; Findings and Conditions

cc: Building and Safety, Board of Supervisors, Zoning Enforcement,
Nieves & Associates, 2453 Via Campesina, Palos Verdes Estates,
CA 90274
Fred J. Bergin, Inc., 5216 Corteen Pl.-17, N. Hollywood,
CA 91607
Michael J. Garfinkel, Attorney at Law, c/o Karno, Schwartz
& Friedman, 16255 Ventura Blvd., Penthouse Suite, Encino,
CA 91436

LEGAL DESCRIPTION

Lot commencing at the Northeasterly corner of Section 15, T3N, R15W; thence Westerly on the Northerly line of said section to a point East 440 feet from the Northwesterly corner of the East 1/2 of the Northeast 1/4 of said Section; thence South to the Northeasterly line of the Golden State Freeway; thence Southeast on said Northeast line to the Easterly line of said Section; thence north to the beginning part of the East 1/2 of the Northeast quarter of Section 15, T3N, R16W.

**NONCONFORMING USE AND
STRUCTURE REVIEW CASE NO. 87091-(5)**

REGIONAL PLANNING COMMISSION HEARING DATE: June 24, 1987

PROCEDURE BEFORE THE COMMISSION:

The Commission opened the hearing on a request to continue the use and operation of a mobilehome park located at 23500 The Old Road, Newhall. There being no one present to testify, the hearing was closed and the Commission considered the case on the basis of the submitted record.

No opposition statements were submitted into the record, but one letter was received that described a boundary dispute with 2 neighboring property owners and the mobilehome park.

FINDINGS:

1. The request is to extend the use and operation of an 88 space mobilehome park for 20 years.
2. The park is located on an irregular shaped parcel, 14 acres in size, which varies from level to sloping topography.
3. Access to the park's internal driveway system is via a single entrance to The Old Road. The Old Road is a secondary highway.
4. The park is surrounded by vacant hilly land and by the Golden State Freeway to the south. The area is rural in character.
5. The site plan shows the park located along the frontage and terraced on successively higher levels up the hillside. Vehicular circulation is via a peripheral road 25 feet in width connected with 2 east/west lanes. Each coachsite has at least 1 parking space.

A recreational and laundry building is located near the center of the park. A total of 24 guest parking spaces are located at various locations throughout the park.

6. The park presents an attractive appearance and appears to be well maintained by the operator and his tenants. All of the mobilehome coaches are owner occupied and carry State license tags. Each is self contained.
7. The subject property is located within the A-2-1 Zone (Heavy Agriculture, 1 acre lots) of the Newhall Zoned District. The park was established following approval of Zone Exception Case 8251 on December 6, 1966. That case expired on December 6, 1986.

**NONCONFORMING USE AND
STRUCTURE REVIEW CASE NO. 87091-(5)**

- 8. Since the park would not meet current development standards of the zone, approval of a Nonconforming Use and Structure Review Case is required to extend its operation.
- 9. There is a boundary and easement dispute between the park owners and 2 neighboring property owners which is the subject of pending Superior Court litigation. The final decision in the matter may require some changes in the park's boundaries, including loss of area occupied by coachsites along the westerly and northerly sides of the park.

Upon conclusion of the litigation the permittee will be required to submit a revised site plan that would be necessitated by a reduction in available area.

The project is categorically exempt (Class 1) from environmental impact reporting requirements in that it is a continuation of an existing use.

BASED ON THE FOREGOING, THE COMMISSION CONCLUDES:

Continuation of the existing structures and uses on the subject property with the attached conditions and restrictions does not now and will not during the extension period requested recommended:

- 1. Adversely affect the health, peace, or welfare of persons residing and working in the surrounding area.
- 2. Be materially detrimental to the use, enjoyment or valuation of the property of other persons located in the vicinity of the subject property.
- 3. Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

And, therefore, the information submitted by the applicant and presented at the public hearing substantiates the required findings for an extension of time for the subject nonconforming use as set forth in Section 22.56.1550 of the Zoning Ordinance.

COMMISSION ACTION:

- 1. The Regional Planning Commission finds that the project is categorically exempt (Class 1) from the requirements of the California Environmental Quality Act and that the project will not have a significant effect on the environment.
- 2. In view of the findings of fact presented above, Nonconforming Use and Structure Review 87091-(5) is GRANTED with the attached conditions.

Vote: 5-0

Concurring: Commissioners Strong, Clark, Fisher, Robinson and Ternstrom

Dissenting: None

Absent: None

1. Unless otherwise apparent from the context, the term "permittee" shall include the applicant and any other person, corporation, or other entity making use of this grant.
2. This grant shall not be effective for any purpose until the permittee and the owner of the property involved (if other than the permittee) have filed at the office of the Department of Regional Planning their affidavit stating that they are aware of, and agree to accept, all of the conditions of this grant.
3. The permittee shall reimburse the County for any court and attorney's fees which the County may be required to pay as a result of any claim or action brought against the County because of this grant. Although the permittee is the real party in interest in an action, the County may, at its sole discretion, participate at its own expense in the defense of the action, but such participation shall not relieve the permittee of any obligation under this condition.
4. This grant will terminate 20 years from the date of approval.

Entitlement to use of the property thereafter shall be subject to the regulations then in effect.
5. If any provision of this grant is held or declared to be invalid, the permit shall be void and the privileges granted hereunder shall lapse.
6. The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance or other regulation applicable to any development or activity on the subject property. Failure of the permittee to cease any development or activity not in full compliance shall be a violation of these conditions.
7. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission may, after conducting a public hearing, revoke or modify this grant, if it finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public health or safety or so as to be a nuisance.
8. This grant allows the continued use and operation of a mobile-home park subject to the following restrictions as to use:
 - a. The maximum number of coach spaces is limited to 88.

The owner of the park shall notify the Director of Planning when a decision has been rendered on the pending litigation in the Superior Court on the matter of LASC Cases No. NVC 07302 AND NVC 07303. If the decision requires boundary adjustments which would delete coach sites, the maximum number of coaches in the park must be reduced accordingly.

No coaches shall be resited within the open space areas of the park.

- b. Parking shall be maintained at a ratio of 1 1/4 spaces per coach site, with a minimum of 1 space to be located adjacent each coach site.
 - c. All units within the park shall be mobilehomes and, with the exception of the manager's unit, shall be owned by the occupants.
 - d. The park shall be licensed and operated in accordance with the requirements of the California State Department of Housing and Community Development.
 - e. The use of park facilities is limited to tenants and their guests.
 - f. All exterior lights shall be shielded and directed away from adjacent property.
9. Upon completion of the pending litigation referred to in Condition 8a, above, three copies of a revised plot plan, similar to Exhibit "A" as presented at the public hearing and conforming to such of the following conditions as can be shown on a plan, shall be submitted for approval of the Director of Planning:
- a. Show any boundary changes to the site and any coach space revisions resulting from such changes pursuant to condition 8a, above.
 - b. Show any recreational vehicle storage areas within the park.
 - c. Show 5 foot chain link fencing (or a substitute form of fencing acceptable to the Director of Planning) along the developed north, east and west perimeters of the park.
10. All requirements of the Zoning Ordinance and of the specific zoning of the subject property must be complied with unless otherwise set forth in these conditions or shown on the approved plans.

WATER TANK

2. 4. 1. 3.

PROJECT SITE:

CS 9-2666

R 5 9 5 8 2

3
-4 CS B-5279-3 FM 12401-2
SHMB 8-30

THE OLD ROAD
VAC

AV - MCBEAN PARKWAY

(I-5) GOLDEN STATE FREEWAY
B&T DISTRICT LYONS AV - MCBEAN PARKWAY



1" = 200'

23500 THE OLD ROAD
NEW HALL, CA.

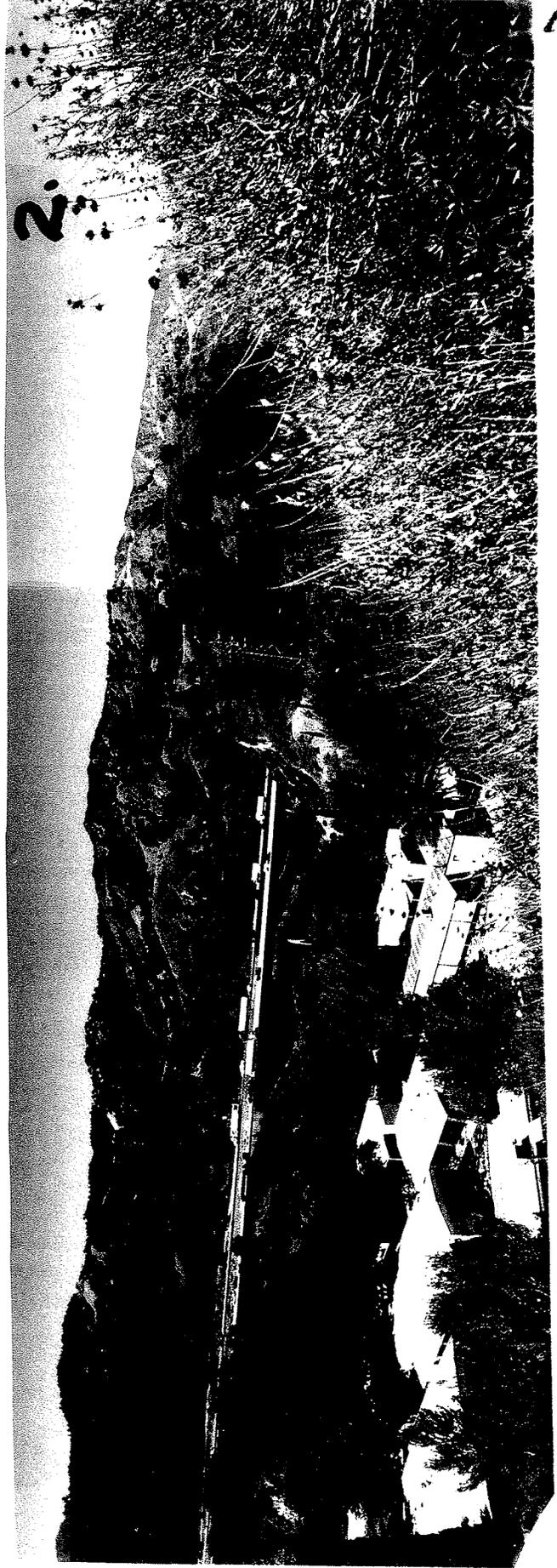
80 UNIT MOBILE HOME
PARK

5.

- PHOTO ESSAY -



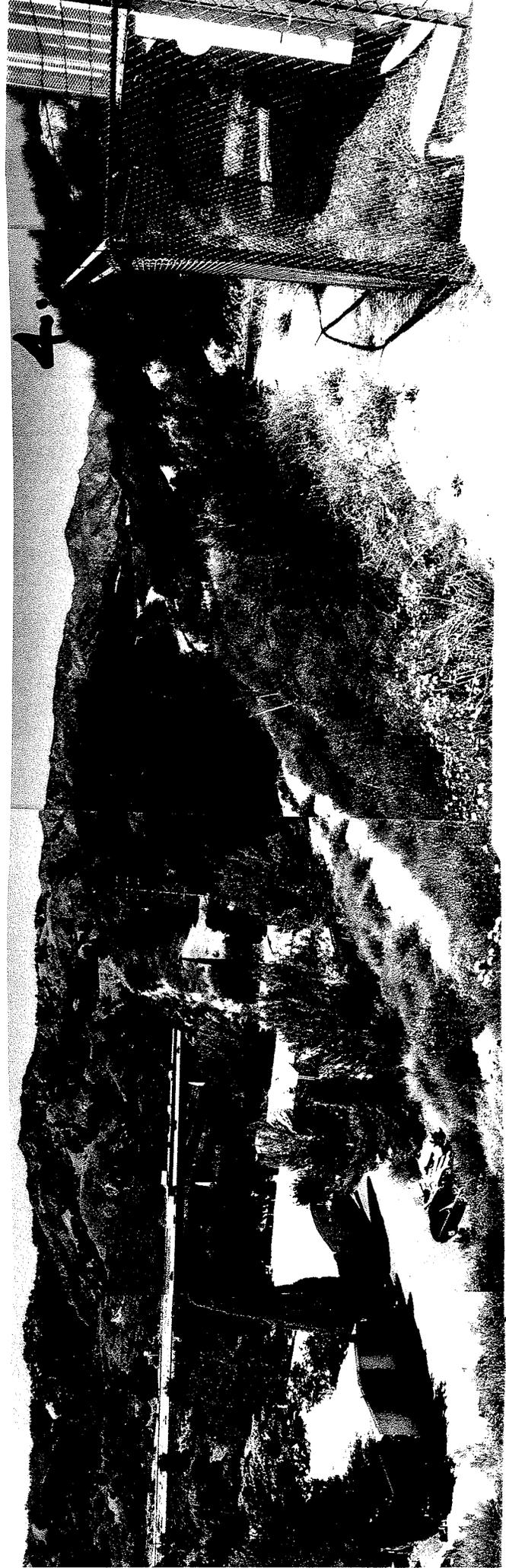
LOOKING SOUTHEAST FROM TANK SITE (I-5 BACKGROUND)



LOOKING SOUTHWEST FROM TANK SITE (I-5 BACKGROUND)

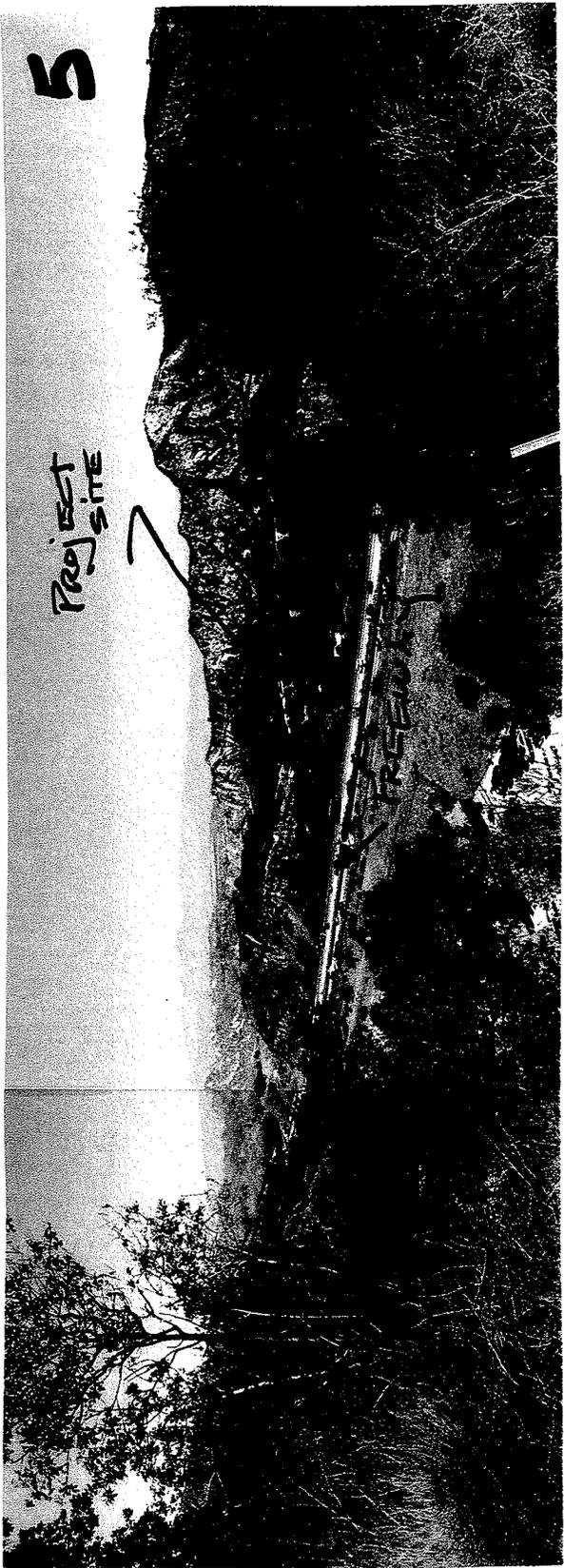


Looking Southeast From Tank Site



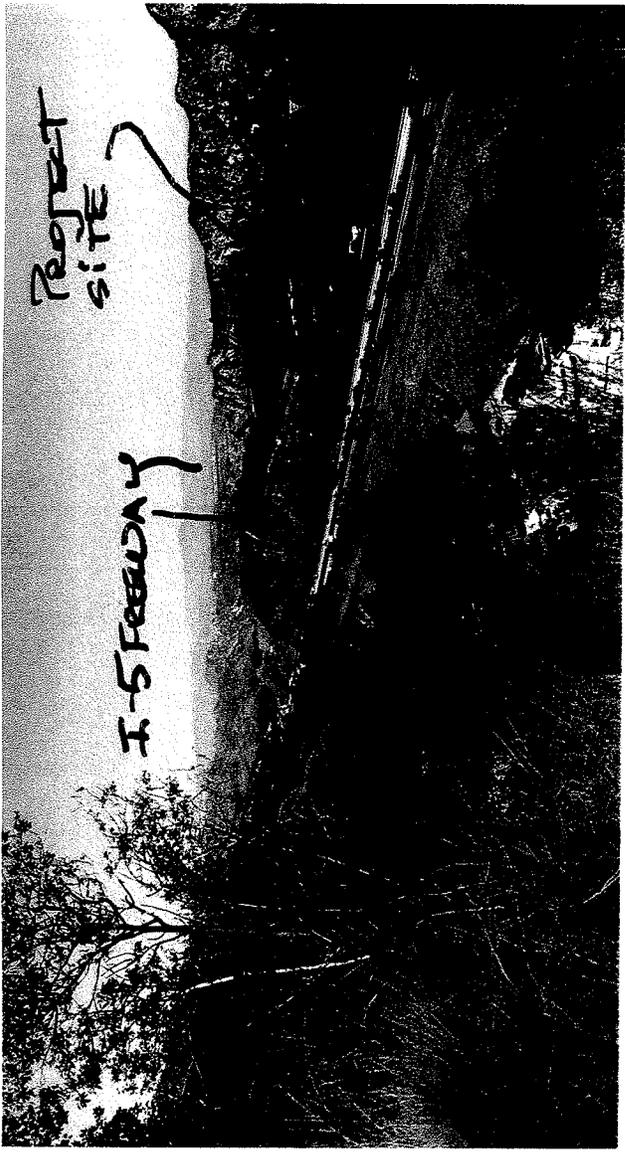
Looking Southwest From Tank Site (I-5 Background)

5.



LOOKING NORTH FROM THE EXTENSION OF COLTRANE AVE.

6.



I-5 FREEWAY