Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

July 16, 2015

TO: Hearing Officer

FROM: Steve Mar
Zoning Permits East Section

SUBJECT: Additional Materials
Project No. R2014-01923-(5)
Variance No. 201400008
HO Meeting: July 21, 2015
Agenda Item: 4

The above-mentioned item is a request for a Variance for the construction of a new single-family residence on a legal undersized lot.

The hearing for this item was continued by the Hearing Officer on July 7, 2015, to allow staff time to review and respond to the attached materials submitted by Mr. James A. Gorton in opposition to the proposed project.

In his letter dated July 16, 2015, Mr. Gorton addressed the legality of the subject lot stating his belief that the lot was not legally created. Staff research concluded that the subject lot is a legal lot and violated no subdivision laws at the time it was created.

The subject unimproved property is shown as Los Angeles County Assessor Parcel No. 5868-020-012, and is located between Canyonside Road, and Maurice Avenue, in La Crescenta, CA.

The subject property consists of two portions of land:

1) A portion of Lot 11, Tract 5784, Map Book 100, Pages 18-20, created as a remainder by Grant Deed No. 62, Recorded 12-30-1963.
2) A portion of Lot 10, Tract No. 5784, Map Book 100, Pages 18-20, created by Grant Deed No. 63, Recorded 12-30-1963.

The owner in 1963 created four parcels by the above-cited grant deeds. At that time a division of four or less parcels was exempt from the California Subdivision Map Act (Section 11535-11540 of The Business & Professions Code) and the Los Angeles

County Subdivision Ordinances (Ordinances 4478 & 5584). Therefore, there was no violation of subdivision laws in this respect.

A Conditional Certificate of Compliance was issued July 14, 2014 (Document No. 724087, Dated 7-09-2014, Recorded 7-14-2014) on the subject property due to the fact that the subject property (consisting of 4,670 square feet) was not in compliance with the minimum 5,000 square feet lot area zoning requirement (R-1-5000) when the lot was created in 1963. If an owner of real property requests a Certificate of Compliance, the local agency is required to issue either a Conditional or Unconditional Certificate of Compliance. (Section 66499.35 (a & b), Division 2, of Title 7, of the Government Code, California Subdivision Map Act). State law does not allow local jurisdictions to deny a Certificate of Compliance request outright.

The issuance of a Conditional Certificate of Compliance is not an implicit finding that the subject lot was not legally created.

Due to the fact that the lot did not meet the minimum required lot size at the time it was created, the condition in the Conditional Certificate of Compliance states: "Prior to any construction or grading on the subject property, the property owner shall acquire an approved Director's Review, Lot Line Adjustment, Variance, or other Zoning Permits deemed by the Land Division Coordinating Center of the Department of Regional Planning to adequately mitigate the negative effect of the undersized lot".

Mr. Gorton also states that the proposed project "frustrate[s] existing zoning requirements as to rear yards" and "frustrate[s] existing side yard setback requirements in having a garage built with no side yard setbacks..." The project provides a rear yard setback of approximately 42 feet between the proposed garage and the rear lot line along Canyonside Road and meets the minimum 15 feet rear yard setback as prescribed under the Los Angeles County Zoning Code. The garage is allowed to be placed within the required side yard setbacks because the garage meets lot placement (75 foot distance requirement from the front lot line) and rear yard coverage requirements as prescribed under County Code Section 22.48.140.B.

In a separate letter, Mr. Gorton expressed concern that the proposed project's house square footage to lot size ratio is not compatible with the surrounding neighborhood. The house will have 866 square feet for the first floor, 983.50 square feet for the second floor, 935.50 square feet for a roof deck, and a 480 square foot garage. The project's lot has an area of 4,670 square feet. Not including the roof deck and the garage, the project's ratio of improvements to lot area is 39.60%. According to statistics provided by Mr. Gorton, the average ratio of improvements to lot area in the Briggs Terrace neighborhood ranges from 22.68% to 23.08%, depending upon the inclusion or exclusion of certain streets in the lower, southern portion of the neighborhood. The statistics also show that a number of lots contain an improvements to lot area ratio larger than the average ratio in the neighborhood and 19 lots that have larger improvement to lot area ratios that the proposed project.

Mr. Gorton is also opposed to the siting of the garage along Canyonside Road because "virtually all other properties fronting on Canyonside use the Canyonside Road frontage as a front yard area" and suggests that "it would be far better if the garage were placed on the Maurice Ave. side of the property..." While most other properties along Canyonside use the Canyonside Road frontage as a front yard area, the property immediately adjacent to the north of the project site has a rear yard that faces Canyonside Road and the property immediately adjacent to the south of the project site is vacant. Properties located across the street from the project site to the east are actually located at a lower elevation of the project site on a secondary street also named "Canyonside Road." The homes located on this secondary street have front yards that face towards the west and are only partially visible from the project site due to the elevation difference and visual screening from existing trees.

If you need further information, please contact Steve Mar at (213) 974-6435 or smar@planning.lacounty.gov. Department office hours are Monday through Thursday from 7:00 a.m. to 6:00 p.m. The Department is closed on Fridays.

MM:SM

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July 6, 2015

Steve Mar
Department of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012

RE: Project No. R2014-01923-(5)
Variance No. 201400008
Planning Commission Hearing, July 7, 2015 – 9:00 a.m.

Dear Mr. Mar:

The purpose of this letter is to oppose the above-requested variance.

Summary. The variance is requested to allow construction on an illegally subdivided non-conforming lot of 4,670 sq. ft. in an R-1-7500 zone for which the Dept. of Regional Planning ("DRP") issued a Conditional Certificate of Compliance in July 2014. The requested variance is to allow development which would frustrate the existing plan of zoning in place since 1950 and introduce a density of development previously unknown in this neighborhood of a character which is completely unsuitable for it.

Burden of Proof. The applicant has failed to sustain his burden of proof as to the variance, in that the requested variance would:

1. Reward an attempt to illegally circumvent existing zoning. As discussed below, there is ample evidence that the applicant has had sophisticated, professional land use planning advice and must have been aware that at no time in the history of the subject lot was it ever legal in any manner, either in creation or conformance to the zone;

2. Frustrate existing zoning and the consistency of such zoning by allowing construction on a grossly undersized, non-conforming lot, one which is less than 63% of the minimum required lot size, thus substantially increasing the density of development in the zone and disrupting the pattern of development intended by such zoning;

3. Frustrate existing zoning requirements as to lot width, which is required to be 60' in the subject zone, whereas the lot is 20' wide at Canyonside Road and approximately 16' wide at Maurice Avenue;

4. Frustrate existing zoning requirements as to rear yards by designating the Canyonside Road frontage of the lot a rear yard, to the detriment of all existing properties fronting on this main street, while resulting in a bunching of the proposed improvements against neighboring structures with minimal clearance between the structures;

5. Frustrate existing side yard setback requirements in having a garage built with no side yard setbacks, again intruding a density more appropriate to a highly built up near-urban area, rather than the open, hillside community in which this is proposed;

6. Result in materially detrimental development of the subject lot at an unprecedentedly high level of density. If the variance is approved, it will usher in the very mansionization which the applicant claims to be avoiding; applicant's planned improvements of 2,785 square feet are equal to 59.64% of the area of the subject lot, resulting in a building density on the subject lot is two to three times that of most lots in the surrounding area;

7. Not result in the deprivation of a substantial property right of the applicant, in that the subject lot was illegally created and of a size far less than required by existing zoning at the time of its creation in 1963. There never being a time at which the lot was a legally created lot, it is not capable of development due to that fact and the applicant cannot complain of hardship as a result.

A Conditional Certificate of Compliance Does Not Legalize the Subject Lot. The subject application correctly describes the purpose of this variance application as being:

> "To legalize an existing undersized lot of 4,670 sq. ft...." [emphasis added]

DRP issued a Conditional Certificate of Compliance for the subject lot in July 2014.

> "When parcels are validated by certificates of compliance, they "may be sold, leased, or financed without further compliance with the Subdivision Map Act or any local ordinance enacted pursuant thereto." (§ 66499.35, subd. (f)(1)(E)). Conversely, if the property is found lacking in compliance, the local agency shall cause the filing of a conditional certificate of compliance, imposing conditions that the owner must fulfill. (*Id.*, subd. (b).)" *Gardner v. County of Sonoma*, 29 Cal.4th 990, 998 (2003). [emphasis added]

Per the California Supreme Court's *Gardner* decision, the DRP's issuance of a Conditional Certificate of Compliance is implicitly a finding that the subject lot was not legally created. The applicant, himself, per his variance application, has indicated his agreement with this conclusion.

Indeed, the circumstances of the subject lot's creation demonstrate that it was not legally created. The subject lot was created by a Grant Deed dated December 13, 1963, recorded

December 30, 1963. It is a remainder of Lot 11 of Tract No. 5784, the balance of which was deeded to the grantees under the foregoing deed. The subject lot appears to have been held back merely in order to provide a driveway from Maurice Avenue into Lot 12, the lot to the south of the subject lot. The subdivision of the subject lot did not comply with the then-existing zoning of R-1-7500 established in November 1950, which required a minimum lot size of 7,500 sq. ft. Further, though I have not located a citation, I believe that by 1963, the Zoning Ordinance of Los Angeles County required subdivisions of four lots or less, so-called minor land divisions, to be made through the filing of a tentative map.

Denial of the Application Would Not Constitute a Taking under the Fifth Amendment. The applicant maintains that if he is not allowed to build upon the subject lot that it will be a hardship, thus raising the specter of a taking under the Fifth Amendment of the U.S. Constitution. Central to Fifth Amendment takings cases, however, is that the party complaining of the deprivation of use must have a legally created parcel of real property, one which the party has the ability to use and develop but for government action. Thus in *Lucas v. S.C. Coastal Council*, 505 U.S. 1003 (1992), the petitioner, Lucas, owned two residential lots, the use of which was denied to him by an act forbidding construction within the zone in which the lots were located. Mr. Lucas would have had no claim of a governmental taking of his property had he not owned these single-family residential lots and had the lots not been legally created and capable of development but for the State of South Carolina having adopted legislation forbidding any construction on those lots.

In this case, however, as demonstrated above, the subject lot was created illegally and failed to conform then-existing zoning as to minimum lot sizes, not to mention required street frontage. Not being a legally created lot, the applicant and his predecessors in title have never at any time been in a position to build on the lot by virtue of the initial and continuing illegality of the lot. Thus, there can be no possibility of a 5th Amendment taking if this variance application is denied.

Further to the taking issue, it should be noted that the applicant has clearly had the benefit of sophisticated land use counselling through the assistance of Peter Gonzalez, the owner of SC Planners, Inc., a firm which bills itself as a Land Use Consulting Firm (www.scplanners.com). The sale of the subject lot closed on Friday March 28, 2014 and three days later, on Tuesday, April 1, 2014, the applicant was signing his Request for a Certificate of Compliance in which the name of SC Planners, Inc. appears as the address to which the certificate is to be mailed upon recording. It can be no stretch of the imagination to suppose that Mr. Gonzalez not only aided the applicant in drafting the Request for the Certificate of Compliance and the Variance Application, but that he was also working for the applicant long before the sale closed. Thus, applicant must have been just as much aware as Mr. Gonzalez of the illegality of the subject lot long before he bought it.

The Project Narrative attached to the Variance Application is also of interest in assessing the applicant's reasonable expectations in purchasing the subject lot. There, the applicant states that the lot size "allowed for a reduction in price..." yet it appears that he purchased it for a substantial premium compared with Lot 12, sold on the same day, March 28, 2014 to Robert Hall & Sons, Inc., a local builder/developer. From documentary transfer tax declarations on the deeds

for the two lots, the applicant paid $42.83 per sq. ft. for his property, while the buyer of Lot 12 paid $25.52 per sq. ft. for a lot improved with an existing home. Clearly, the applicant, far from obtaining a discount, elected to pay a steep premium for the subject lot in comparison with that of Lot 12. Perhaps, if we were allowed to examine the agreements and escrow documents for these sales we would find that the other buyer, Robert Hall & Sons, Inc., is merely holding title to Lot 12 for the applicant in nominee name and that the applicant has chosen to allocate a preponderance of the purchase price of the combined properties to the subject lot in order to maximize the tax basis of the subject lot. This would certainly be to his advantage if his object is to minimize capital gains tax in a quick sale of the subject lot once developed. And of course, if Robert Hall & Sons is merely holding title for the applicant, then the entire premise of the subject lot being separately owned would be a sham with implications not only for the variance application but also for the Conditional Certificate of Compliance.

Indeed, it may not be too much to say that the true subdivision of the subject lot occurred on March 28, 2014, when, for the first time, it was sold as a separate lot. The sellers of the subject lot would certainly have been required to merge the subject lot with Lot 12 had they applied for a Certificate of Compliance for the subject lot.

In fact, had the 1963 subdivision which created the subject lot been processed legally, there can be no doubt but that DRP would have required that the subject lot be merged with Lot 12 as a condition to the subdivision. The mere passage of time should not confer any semblance of legality to the subject lot's separate existence nor to the subsequent series of illegal sales which culminated in the purchase of the subject lot by the applicant.

Conclusion

The applicant wishes to treat his Conditional Certificate of Compliance as establishing a legal lot and thus a right to develop the subject lot. The Conditional Certificate of Compliance does not and cannot confer any such rights.

The true nature of this variance is an attempt to legalize a subdivision which at no time was legal. Granting the variance would be an assault on the character of the zone resulting in a level of density more suitable for an urban zone, rather than a suburban hillside zone.

The variance application should be denied.

Very truly yours,

Gorton, Janosik & Poxon, LLP

James A. Gorton, Partner

JAG/jg
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Dear Sorin,

As Nicole may have told you, my concern is that projected development of the subject lot for Variance No. 201400008 seeks to develop the lot to a degree which is unprecedented in the Briggs Terrace neighborhood. Excluding the garage, the ratio of improvements to the lot area is 37.59%, nearly double the average density of development in the area. Including the garage, the ratio jumps to 58.51%, nearly triple the average local density.

Attached are two spreadsheets. The first is a compilation of all residences in Briggs Terrace, including Vista del Arroyo, a portion of Shields and Goss Canyon. The second excludes the latter three streets. Since the latter three streets aren't on the mesa portion of Briggs Terrace, some mightn't consider them to be a part of the neighborhood.

In both spreadsheets I have excluded undeveloped lots and properties of multiple acres (there are three, developed multi-acre properties). There are also five properties in which two lots are being used as one property. In those instances, for the purposes of calculating lot coverage, I've combined the lot areas and improvements to arrive at the percentage of lot area consumed by improvements and have noted the cases in which this was done.

You'll see in the first spreadsheet that for Briggs Terrace, the average improvements are 1,899 sq. ft., the average lot is 9,207 sq. ft. and the average ratio of improvements to lot size is 22.68%. The median house size is 1,781 sq. ft., the lot size is 7,673 sq. ft. and the median coverage is 20.47%.

Subtracting the lower streets resulting in an average improvements of 1,888 sq. ft., average lot size of 9,028 sq. ft., with coverage of 23.08%; median values are improvements, 1,773 sq. ft., 7,497 sq. ft. and 21.28%, respectively.

I believe that the improvements on the lot which is the subject of the variance in this matter should conform much more closely to the average ratio of improvements to lot area in the Briggs Terrace area. This is particularly so in view of the bizarre configuration of the lot.

Very little has also been done to mitigate the siting of the proposed improvements. The proposed garage placement is not only a zero lot line placement, but sites the garage on Canyonside. Virtually all other properties fronting on Canyonside use the Canyonside Rd. frontage as a front yard area. The siting of the garage in this area and its zero lot placement is extremely insensitive and will be a blight on the appearance of the street. It would be far better if the garage were placed on the Maurice Ave. side of the property and the existing driveway access used; perhaps the garage could be incorporated into the volume of the planned residence. This would allow the currently undeveloped Canyonside Rd. frontage to be landscaped as a front yard in conformance with almost all other Canyonside Rd. properties.

Finally, this lot has numbers of old growth trees, some of which may possibly be native pines of the area, most of which were logged out of this area of La Crescenta in the late 19th c. Whether they are or not, it would be unfortunate if this beautiful, mature tree canopy were destroyed in an attempt to maximize every inch of this tiny lot.

An additional detail which may be of interest - I called the realtor who handled this sale, Giancarlo Madariaga (818 807 7056), who confirmed that both the subject lot and the lot to the south, Lot 12 of Tr. 5784, were purchased by the same buyer in March 2014. I also attempted to speak to the sellers, Anthony and Alexandra Palazzola. I spoke to Mrs. Palazzola (626 792 4765) who was alarmed and became agitated when I began asking questions about whether both parcels had been purchased by the same buyer and ended by refusing to answer any questions. The conclusion seems inescapable that Mr. Anderson has chosen to hold Lot 12 in nominee title to avoid being required to consent to a lot line adjustment in order to develop the property. This would certainly lessen the cramped, bizarre character of the lot and the applicant could then place a house closer to the desired size on the adjusted lot without doing so much violence to the character of the neighborhood.

Please let me know if you have any questions in regard to the foregoing.

Best regards,
Jim Gorton

James A. Gorton
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Briggs Terrace Lot and House Sizes

Excluding Shields, Vista del Arroyo and Goss

	house sq. ft.		lot sq. ft.		ratio bldg to lot	
5501 **Canyonside**	2710		9579		28.29%	
5529	3278		9361		35.02%	
5533 [1]	140		4347			
5533 [2]	3044	3184	3489	7836	40.63%	combined 5533
5535	844		4552		18.54%	
5601	520		7497		6.94%	
5604	2246		7018		32.00%	
5605	2584		7497		34.47%	
5608	2204		7079		31.13%	
5609	2102		7697		27.31%	
5612	1638		6617		24.75%	
5613	2009		8006		25.09%	
5617	1620		8076		20.06%	
5620	2149		9300		23.11%	
5623	1620		8076		20.06%	
5625	2171		8176		26.55%	
5700	1222		7758		15.75%	
5701	1769		10799		16.38%	
5711	537		11238		4.78%	
5721	1200		17860		6.72%	
5725	1702		20634		8.25%	
5733	1392		7658		18.18%	
5800	1226		17089		7.17%	
5843	1922		3899		49.29%	
5848	1592		15956		9.98%	
5853	2682		4016		66.78%	
5863	2280		3916		58.22%	
5866	2027		6756		30.00%	
5901	1875		7958		23.56%	
5902	1432		7680		18.65%	
5905	2848		7823		36.41%	
5906	1432		8777		16.32%	
5910	1582		9936		15.92%	
5911	1394		7937		17.56%	
5914	1847		11108		16.63%	
5915	no data		8024			
5918	1585		12280		12.91%	
5919	280		8159		3.43%	
5922	2235		12798		17.46%	
5926	1585		11840		13.39%	

5930		1627		10568		15.40%	
5936		3504		12667		27.66%	
6001		2908		14998		19.39%	
6002		2679		10746		24.93%	
6010		2991		6978		42.86%	
6016		2766		11077		24.97%	
6020		1626		12537		12.97%	
6023		5379		82328		6.53%	
6026		1718		9156		18.76%	
6034		2156		8899		24.23%	
6040		1820		9309		19.55%	
6048		1476		20417		7.23%	
6065			6.27 AC				
2305	**Dorothy**	1985		7497		26.48%	
2307		2691		7497		35.89%	
2311		1098		7497		14.65%	
2315		2432		7497		32.44%	
2321		1648		7497		21.98%	
2325		1216		7497		16.22%	
2326		970		9374		10.35%	
2327		1216		7497		16.22%	
5807	**Edmund**	1492		7497		19.90%	
5811		2086		7497		27.82%	
5815		1468		7497		19.58%	
5816		1574		9566		16.45%	
5819		1672		7497		22.30%	
5820		2075		8459		24.53%	
5823		2941		7497		39.23%	
5824		1574		9217		17.08%	
5827		1581		7497		21.09%	
5830		1540		8568		17.97%	
5831		1510		7497		20.14%	
5835		1806		7497		24.09%	
5839		1990		7497		26.54%	
5840		2500		4996		50.04%	
5841		1428		7497		19.05%	
5845		1738		7497		23.18%	
5846		1454		4996		29.10%	
5849		1627		7497		21.70%	
5850		1595		4996		31.93%	
5516	[1]**Freeman**			2936		0.00%	
5516	[2]	1830		2910	5846	31.30%	combined 5516
5526		3407		4217		80.79%	

5527	1601	9579		16.71%	
5532 [1]	921	4099	7166	12.85%	combined 5532
5532 [2]		3067			
5601	1633	7610		21.46%	
5604	933	16148		5.78%	
5607	2663	5258		50.65%	
5610	3170	11247		28.19%	
5611	1360	6238		21.80%	
5613	1380	6029		22.89%	
5616	2069	15098		13.70%	
5617	1504	6059		24.82%	
5621	810	5057		16.02%	
5624	1285	7497		17.14%	
5628	2354	7797		30.19%	
5632	1756	8067		21.77%	
5636	1782	7998		22.28%	
5637	1465	7288		20.10%	
5638	1887	8529		22.12%	
5641	1780	7497		23.74%	
5702	1835	8686		21.13%	
5703	1408	7497		18.78%	
5706	1468	8438		17.40%	
5707	1624	7497		21.66%	
5711	1793	7497		23.92%	
5712	1468	8577		17.12%	
5714	1826	8716		20.95%	
5715	1369	7497		18.26%	
5718	2033	8847		22.98%	
5719	1396	7497		18.62%	
5723	1414	7497		18.86%	
5724	1776	8847		20.07%	
5728	1940	7497		25.88%	
5814	1552	13107		11.84%	
5831	3333	30597		10.89%	
5841	3569	35284		10.12%	
5846	1654	10690		15.47%	
5854	4752	7998		59.41%	
5856	2204	7497		29.40%	
5857	2468	19837		12.44%	
5859	2936	25539		11.50%	
5860	1472	7497		19.63%	
5864	2392	7497		31.91%	
5866	1468	7497		19.58%	

5869		2524	16836	14.99%
5870		1468	7497	19.58%
5871		1248	21249	5.87%
5874		2504	7497	33.40%
5875		785	15677	5.01%
5880		1029	7497	13.73%
5516 1/2	**Goss**			
5504				
5510				
5512				
5514				
5516				
5518				
5522				
5524				
5530				
5534				
5538				
5542				
5548				
5550				
5554				
5801	**Irving**	1277	5066	25.21%
5802		2677	6247	42.85%
5806		1992	7497	26.57%
5807		1674	7379	22.69%
5809		4374	7497	58.34%
5810		1414	7497	18.86%
5814		1844	7497	24.60%
5815		1972	7497	26.30%
5817		2470	7497	32.95%
5818		1492	7497	19.90%
5821		1623	7497	21.65%
5822		1468	7497	19.58%
5825		3108	7497	41.46%
5826		1434	7497	19.13%
5830		1738	7497	23.18%
5831		1738	7497	23.18%
5834		2465	7497	32.88%
5835		1724	7497	23.00%
5838		1690	7497	22.54%
5839		1448	7497	19.31%
5840		1738	7497	23.18%

5843		1824	7497		24.33%	
5844		1428	7497		19.05%	
5845		1433	7497		19.11%	
5850		1627	7497		21.70%	
2302	**Jayma**	1485	8507		17.46%	
2311		2864	11387		25.15%	
2315		2272	11138		20.40%	
2319		1366	10877		12.56%	
2320		2776	10746		25.83%	
2323		1555	10777		14.43%	
2326		1937	10080		19.22%	
2331		2120	10581		20.04%	
2334		1618	10080		16.05%	
2335		1802	10729		16.80%	
2338		1890	9997		18.91%	
2339	[1]		8276			
2339	[2]	1958	11888	20164	9.71%	Combined 2339
2343		1764	10916		16.16%	
2344		1802	10237		17.60%	
2345		1734	10476		16.55%	
2349		1481	11888		12.46%	
2350		1386	10106		13.71%	
2351		1574	10620		14.82%	
2352		1353	10428		12.97%	
2353		2050	10367		19.77%	
2354		1838	11138		16.50%	
2356		1376	11108		12.39%	
2358		1506	12297		12.25%	
2215	**Manzanita**	1808	7497		24.12%	
2217		2113	7497		28.18%	
2223		1105	14998		7.37%	
2235		1150	14998		7.67%	
2239		1401	7497		18.69%	
2241		1788	7497		23.85%	
2303		1804	7497		24.06%	
2306		1423	6247		22.78%	
2307		1359	7497		18.13%	
2311		1750	7144		24.50%	
2315		1359	6460		21.04%	
2209	**Maurice**	2448	7497		32.65%	
2211		2627	10058		26.12%	
2212		1985	17729		11.20%	
2224		2056	7562		27.19%	

2226		2518	7497		33.59%
2229		2001	10794		18.54%
2230		1406	7497		18.75%
2233 [1]			7497		
2233 [2]		2779	7497	14994	18.53% combined 2233
2234		2061	7497		27.49%
2236		3276	7497		43.70%
2240		2902	7497		38.71%
2241		2710	7497		36.15%
2244		2530	7497		33.75%
2245		2955	7497		39.42%
2247		3093	7497		41.26%
2248		2228	7166		31.09%
2251		1224	7170		17.07%
2255		2825	7079		39.91%
2303		1080	7497		14.41%
2312		1925	7667		25.11%
2315		3190	7497		42.55%
2325 [1]			4722		
2325 [2]		1630	6573	11295	14.43% combined 2325
2221	**Phyllis**	1627	7497		21.70%
2228		2684	8729		30.75%
2232		2520	6656		37.86%
2200	**Shields**				
2207					
2223					
2229					
2330					
2331					
2337					
5504	**Terrace**	2612	7867		33.20%
5508		1633	7549		21.63%
5510		1128	5698		19.80%
5514		1926	5127		37.57%
5515		1859	9148		20.32%
5518		1298	4988		26.02%
5519		2118	8999		23.54%
5522		1244	4487		27.72%
5525		1786	8999		19.85%
5526		1053	3781		27.85%
5529		1777	10799		16.46%
5535		2328	7096		32.81%
5539		1963	13560		14.48%

5551		1851	14379	12.87%
5552		1786	5776	30.92%
5555		1807	8708	20.75%
5556		2540	3781	67.18%
5560		1244	4487	27.72%
5561		1550	8982	17.26%
5565		2093	12297	17.02%
5566		2570	4988	51.52%
5570		1128	5262	21.44%
5574		1468	5698	25.76%
5575		2618	16596	15.77%
5578		2264	7619	29.72%
5581		3.67 AC		
5584		1438	7518	19.13%
5592		1723	7518	22.92%
5598		1438	7497	19.18%
5615		2561	11848	21.62%
5621		1380	5946	23.21%
5625		2488	7362	33.80%
5629		4712	7488	62.93%
5401	**Vista Del Arroyo**			
5404				
5410				
5414				
5420				
5421				
5424				
5428				
5432				
5443				
5444				
5450				
5451				
5456				
5457				
5464				
5468				
5472				
5472				
5476				
	Total	466283	2283976	5700.39%
	Average	1887.8	9027.57	23.08%
	Median	1772.5	7497	21.28%