

Thomas E. Olson
Bruce Alan Finck
Donald R. Wood
Kevin M. McCormick
Carlos C. Cabral
Oscar C. González
James S. Eicher, Jr.
Randolph W. Andell

—
Ronald L. Colton
Of Counsel
Terrence J. Bonham
Of Counsel



A Tradition of Service Since 1882

BENTON, ORR,
DUVAL &
BUCKINGHAM

Donald L. Benton
Retired

H. Frank Orr
1888-1969

Edwin Duval
1918-1998

Henry P. Buckingham
Retired

SENT VIA E-MAIL

Ehoward@planning.lacounty.gov

April 21, 2014

Emma Howard
Regional Planning Department
COUNTY OF LOS ANGELES
Zoning Enforcement North
320 West Temple Street
Los Angeles, CA 90012

Re: Wang-Epstein APN 2813-020-002
Reference: 14253 Agua Dulce Road
Public Hearing 4/23/14
O/File No. WANG-003

Dear Ms. Howard:

I have been trying, along with a civil engineering firm, to get permitting of a client's property at 14253 Davenport Road, Agua Dulce, APN 2813-020-002.

TOPOGRAPHIC MAP

Enclosed is a topographic survey, Department of Regional Planning map, and photo of the above property.

SEA PROTEST

On behalf of my client, ArmyTrucks, Inc., and its owners, Mike Epstein and David Wang, I would like to launch a protest of having less than one percent (1%) of that property impacted by a Sensitive Environmental Area.

Bell, James
Re: Wang-003
April 21, 2014
Page 2

The area is devoid of stickleback fish, red-shouldered hawks, riparian environments, vegetation and is approximately 700 square feet of an 11½ acre parcel. Such intrusion constitutes an improper and irrational taking of private property in violation of Article 1, §19 and 14th Amendment application through 42 U.S. Code §§1983 and 1985.

It may very well be that the mapping of the so-called Sensitive Environmental Area that impacts less than one percent of the client's property is the result of a mapping error. The mapping error or other designation of the property is irrational in terms of the habitat objective of the Santa Clara River SEA published in Planning Department documents.

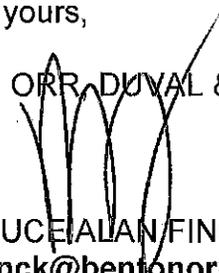
FURTHER WORK

I would request full plenary opportunities to present the planning staff, planning commission, and/or the Board of Supervisors the nature and extent of the irrational damaging of private property as a pre-requisite for any potential or actual judicial intervention.

I would request instructions as to the full plenary opportunities for exhaustion of administrative remedies in protesting SEA applications on the above-mentioned property.

Very truly yours,

BENTON, ORR, DUVAL & BUCKINGHAM

By:  BRUCE ALAN FINCK
bfinck@bentonorr.com

BAF/kl/dlp
Enclosures

cc: Tracy Swan, Esq.
Los Angeles County Council
Los Angeles, CA 90028
tswan@council.lacounty.gov



Department of Regional Planning

APN: 2813-020-002

Printed: Jan 08, 2013

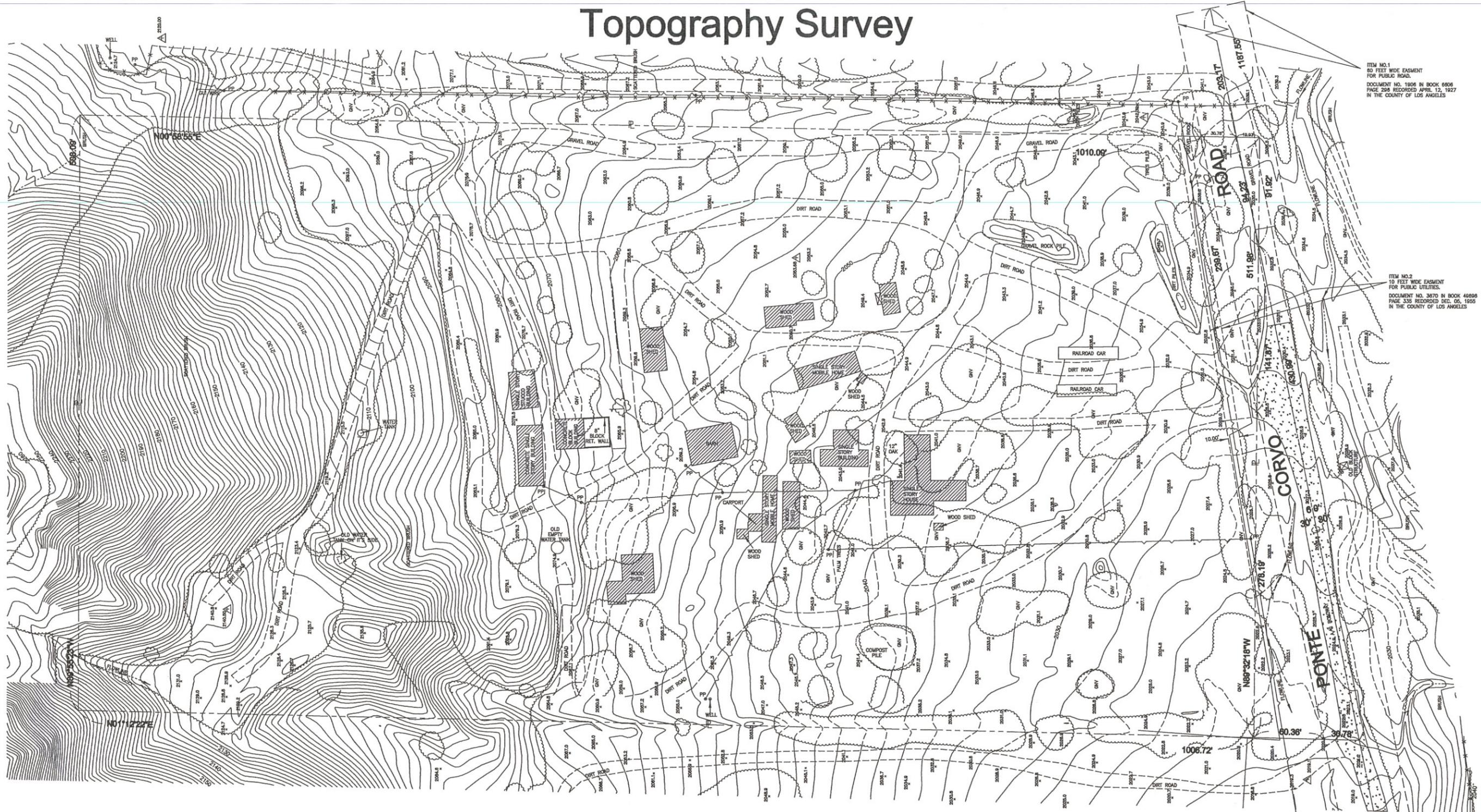


Copyright 2012 - Los Angeles County Department of Regional Planning, GIS Section.
 Note: This map represents a quick representation of spatial imagery or vector layers using GIS-NET3. The map should be interpreted in accordance with the GIS-NET3 disclaimer statement.
 Printed with permission from the Los Angeles County Dept. of Regional Planning.





Topography Survey



ITEM NO.1
65 FEET WIDE EASEMENT
FOR PUBLIC ROAD.
DOCUMENT NO. 1906 IN BOOK 6606
PAGE 296 RECORDED APRIL 17, 1927
IN THE COUNTY OF LOS ANGELES

ITEM NO.2
10 FEET WIDE EASEMENT
FOR PUBLIC UTILITIES.
DOCUMENT NO. 3670 IN BOOK 4698
PAGE 335 RECORDED DEC. 05, 1955
IN THE COUNTY OF LOS ANGELES

Legal Description: The West 1/2 of the NW 1/4 of the SE 1/4 of the SE 1/4; the West 1/2 of the East 1/2 of the NW 1/4 of the SE 1/4 of the SE 1/4; the NW 1/4 of the SW 1/4 of the SE 1/4 of the SE 1/4; and the West 1/2 of the NE 1/4 of the SW 1/4 of the SE 1/4 of the SE 1/4, all in Section 30, T.5.N., R.14.W, S.B.M., in the County of Los Angeles, State of California, according to the official plat of said land filed in the District Land Office on April 22, 1880, assessor's I.D. No. 2813-020-002.

Basis of Bearing: The Bearing of S89°24'41"E along the South line of the Southeast quarter of section 30, T. 5 N., R. 14 W., S.B.M, per CSB 5426.

Bench Mark: The elevation of 1967.224 on BM No. L3759 described as, L&T in S end HDWL culv 35m S & 8.2m E/O centerline Int. Sierra Highway & Davenport Road NAVD 88, 1995 Adjustment.

Boundary: Record information adjusted to found county section monuments. Refer to Record of Survey filed by me in November, 2005 for monuments found or set and boundary establishment methods. Preliminary Title Report used as follows: Lawyers Title Insurance Corporation, Order No. 02351122, dated January 13, 2005

Scale: 1" = 40'

Legend:

- = center line
- = property line
- = tree or heavy brush canopy limits
- = wire fence
- = chain link fence
- = flowline
- = aerial panel used for mapping purposes
- = overhead wires
- = power pole
- = ground not visible

Date of Survey: October, 2005

Site Address: 14253 Ponte Corvo Road, Agua Dulce

Area: 514,281 Square feet, 11.81 Acres (Gross)
508,337 Square feet, 11.67 Acres (Net, less road easement)

Survey Prepared for:

Dave & Jeanette Ward
14253 Ponte Corvo Road
Agua Dulce, CA

Survey Prepared by:

Rothman-Hahn Inc.
28145 Avenue Crocker, 2nd floor
Valencia, CA 91355
(681) 775-9500
Brandon M. Hahn, L.S. 7582

This map has been compiled in AUTOCAD VERSION 14, using a DATUM mapping system with universal distortions. This map contains both natural and cultural elements, except where ground is not visible. The areas of heavy trees, clear areas in heavy brush with no canopy elements, heavy brush, heavy shrubs, or light areas in the back of some structures or old buildings, the areas with more canopy elements than shown, and the areas with more canopy elements than shown, are shown as ground not visible. The map was prepared by the Surveying and Mapping Division of the U.S. Department of the Interior. Photography Date: 10-28-05