



Staff Report to the Planning Commission

Application Number: **07-0310**

Applicant: Sid Goldstien

Owner: Paul Goldstone

APN: 030-131-05, -22, -23, -26, -27

Agenda Date: February 25, 2009

Agenda Item #: 7

Time: After 9:00 a.m.

Project Description: Proposal to convert the existing Alimur Mobile Home Park from a rental occupied park to an ownership park with 147 spaces. Requires a Vesting Tentative Map (Subdivision).

Location: The property is located on the west side of Robertson Avenue at the intersection of Soquel Drive in Soquel at 4300 Soquel Drive.

Supervisory District: First District (District Supervisor: John Leopold)

Permits Required: Vesting Tentative Map

Technical Reviews: infrastructure study

Staff Recommendation:

- Determine that the presumption set forth in County Code Section 14.08.070(c)(2) applies to the proposed project, and that there is insufficient evidence in the record to rebut the presumption.
- Determine that the findings for approval required by County Code Section 14.08.070 cannot be made in that the proposed mobile home park conversion is not a bona-fide resident conversion.
- Forward a recommendation to the County Board of Supervisors of **DENIAL** of Application Number **07-0310**, based on the attached findings.
- Certification that the proposed project is exempt from further Environmental Review under Title 14 CCR Section 15270 of the California Environmental Quality Act.

Exhibits

- | | |
|---|--|
| A. Project plans | E. Location map |
| B. Findings | F. Comments & Correspondence |
| C. Categorical Exemption (CEQA determination) | G. County Code Chapter 14.08, Conversion of Mobilehome Parks to Resident Ownership |
| D. Assessor's parcel map | |

County of Santa Cruz Planning Department
701 Ocean Street, 4th Floor, Santa Cruz CA 95060

Parcel Information

Parcel Size: 12.3 acres total (5 parcels)
Existing Land Use - Parcel: Mobile Home Residential
Existing Land Use - Surrounding: Single and multi-family residential, community commercial, professional offices
Project Access: From Robertson St. off the corner of Robertson and Soquel
Planning Area: Soquel
Land Use Designation: R-UH (urban high residential)
Zone District: RM-3-MH (manufactured home residential)
Coastal Zone: Inside Outside
Appealable to Calif. Coastal Comm. Yes No

Environmental Information

Geologic Hazards: Not mapped/no physical evidence on site
Soils: N/A
Fire Hazard: Not a mapped constraint
Slopes: N/A
Env. Sen. Habitat: Not mapped/no physical evidence on site
Grading: No grading proposed
Tree Removal: No trees proposed to be removed
Scenic: Not a mapped resource
Drainage: Existing drainage adequate
Archeology: Portion mapped; no ground disturbance is proposed

Services Information

Urban/Rural Services Line: Inside Outside
Water Supply: City of Santa Cruz Water
Sewage Disposal: County Sanitation
Fire District: Central Fire District
Drainage District: Zone 5

History

The mobile home park was originally constructed in 1957. In 1966, Permit 2605-U was approved for the expansion of the existing trailer park at the project site from 104 spaces to 146 spaces. In 1966, Permit 774-V was also approved to allow for trailer spaces within 10 feet of the west side setback and rear setback. In 1975, a single-family residence on the project site was converted to 3 apartments under Permit # 75-145-PD. Other permits have been issued through the years for a variety of infrastructure and site improvements, including improvements to individual units.

Project Setting

The project site is near the westerly limits of the Soquel Village area, situated on a knoll that rises steeply above the corner of Soquel Drive and Robertson Street. Site improvements include a park office and clubhouse building, a swimming pool and a laundry/ recreation room building.

County Code & General Plan Consistency

The subject property is a 12.3-acre multi-parcel lot, located in the RM-3-MH (multi-family residential, 3,000 square feet per unit density, mobilehome park combining District) zone district, a designation that allows mobile home residential parks. The density of the mobile home park is consistent with the site's (R-UH) urban high residential General Plan designation.

Chapter 14.08 of the County Code (entitled "Conversion of Mobilehome Parks to Resident Ownership") implements the requirements of Government Code Section 66427.5, including a stated Legislative intent that its provisions be applied only to bona fide resident conversions (see Stats. 2002, ch.1143, Section 2, p. 3324). The proposed conversion to resident ownership is not consistent with County Code Section 14.08.070 (see Exhibit G) in that a finding necessary for approval cannot be made. Section 14.08.070 requires that an application for the conversion of a mobile home park to resident ownership shall only be approved if the decision-maker finds that (a) a survey of resident support has been conducted and properly filed; (b) a tenant impact report has been completed and properly filed; and (c) the conversion is a bona fide resident conversion. The results of the survey completed by the applicant and filed with the County evidenced that far less than the required 50% of residents voted in favor of conversion. The survey results were: 2 residents in favor, 119 residents not in favor, and 2 declining to vote.

Thus, pursuant to Section 14.08.070(2), the conversion is presumed to not be a bona-fide resident conversion. Following this conclusion, the ordinance states "...The subdivider shall have the burden of demonstrating that the proposed conversion is a bona-fide resident conversion supported by and in the interests of the park's residents, and not a sham transaction for the purpose of avoiding the County's mobilehome rent adjustment ordinance." At this time, there is no supporting evidence in the record to overcome this presumption.

Along with the inconsistency of the project with County Code Section 14.08, which specifically addresses the conversion of mobile home parks to resident ownership, the proposed conversion is also inconsistent with General Plan Housing Element 4.7 goals, policies and objectives that seek to conserve the existing stock of affordable housing in the County.

In addition, the property is currently out of compliance with the number of units approved by permits 2605-U (1966), 3666-U (1970) and 75-145-PD (1975), all of which specify 146, not the existing 147, mobile home units. To be in compliance, the applicant must either remove one unit, or apply for an Amendment to Use Permit 75-145-PD to request approval for an additional unit.

Also, the property is not consistent with General Plan Policy 6.5.5, which requires a secondary access way for any new subdivision in the Urban area where lots are more than 500 feet from a through road. Due to site topography and the constraints of the surrounding off-site development, the only feasible option for the creation of a secondary access into the site may be to improve an existing paved drive that goes up to the site from the west side of Robertson Street approximately 500 feet from the intersection of Robertson and Soquel Drive. Project plans that were approved with Applications 2605-U and 774-V on March 25, 1966 clearly show the secondary access driveway in that location, and thus the current configuration of the site is out of compliance with that approval. This access driveway from Robertson could connect with all other driveways on site, except that

vehicular access is now blocked by a mobile home within the secondary drive at the top of the knoll. The mobile home, shown as lot # 110 on the map exhibit and addressed as # 200 on the project site, would need to be relocated in order to create a useable secondary access in compliance with the previously-approved site plans.

Analysis and Discussion

Conversion of the mobile home park to a resident-owned subdivision would exempt the park from local rent control requirements. Low-income tenants who do not choose to purchase their space may continue to rent under State rent control law that would limit their annual rent increases. However, rent control for low-income tenants would be in effect only for as long as those tenants remained at the Park; once low-income tenants leave, there would be no further rent control on those spaces, resulting in a net loss of affordable housing units over time. Furthermore, it appears that if a low-income tenant's income exceeded the limits set by Health and Safety Code Section 50079.5, even temporarily, they would no longer receive the State rent control protection.

Low-income tenants who do not purchase their units will no longer have local rent control/stabilization per County Code Chapter 13.32. After conversion, State Government Code Section 66427.5(f)(2) will allow for an increase in the pre-conversion rent equal to the average monthly rent increase in the 4 years preceding the conversion, not to exceed the average monthly increase in the Consumer Price Index for the most recently reported period.

Moderate-income non-purchasing tenants can have their rents raised to market level pursuant to State Government Code Section 66427.5(f)(1), in equal annual increases over a 4-year period.

Environmental Review

Because the proposed conversion is being brought forward with a staff recommendation for denial, and no physical development is being proposed at this time, Environmental review of the proposed project per the requirements of the California Environmental Quality Act (CEQA) has resulted in the determination that the proposed project is exempt per CEQA Section 15270: Projects Which Are Disapproved.

Should a decision be made to approve the proposed conversion, additional environmental review would be required, due to the need to fully examine the potential for significant impacts that may result from conversion of Alimur Park from a rental facility to individual-ownership units. An Initial Study would allow for a review and discussion of the possible environmental impacts, and whether the impacts, if any, could be mitigated to less than significant levels.

Possible impacts to evaluate under CEQA may include whether the proposed conversion might displace substantial numbers of people over time and cumulatively necessitate the construction of replacement low-and-moderate-income housing elsewhere. With the increased property values of owner-occupied park spaces, an accelerated schedule of replacement or upgrades to existing units could result in impacts to aesthetics, intensification of demand on public utilities, increased traffic, short-term construction impacts, increased levels of night lighting or potential disturbance of mapped archeological resources, to name some of the possible issues that may require CEQA analysis.

Conclusion

As proposed, the project is not consistent with codes and policies of the County Code and

General Plan that are applicable to the conversion of mobilehome parks to resident ownership. Please see Exhibit "B" ("Findings") for a complete listing of findings and evidence related to the above discussion.

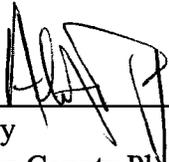
Staff Recommendation:

- Determine that the presumption set forth in County Code Section 14.08.070(c)(2) applies to the proposed project, and that there is insufficient evidence in the record to rebut the presumption.
- Determine that the findings for approval required by County Code Section 14.08.070 cannot be made in that the proposed mobile home park conversion is not a bona-fide resident conversion.
- Forward a recommendation to the County Board of Supervisors of **DENIAL** of Application Number **07-0310**, based on the attached findings.
- Certification that the proposed project is exempt from further Environmental Review under Title 14 CCR Section 15270 of the California Environmental Quality Act.

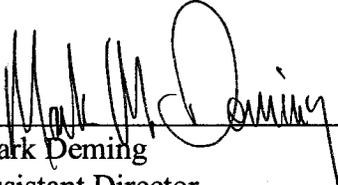
Supplementary reports and information referred to in this report are on file and available for viewing at the Santa Cruz County Planning Department, and are hereby made a part of the administrative record for the proposed project.

The County Code and General Plan, as well as hearing agendas and additional information are available online at: www.co.santa-cruz.ca.us

Report Prepared By: _____


Alice Daly
Santa Cruz County Planning Department
701 Ocean Street, 4th Floor
Santa Cruz CA 95060
Phone Number: (831) 454-3259
E-mail: alice.daly@co.santa-cruz.ca.us

Report Reviewed By: _____


Mark Deming
Assistant Director
Santa Cruz County Planning Department

Tentative Map Findings
Santa Cruz County Code Section 14.01.403 - Denials

The Board of Supervisors or Planning Commission shall deny approval of a tentative map if it makes any of the following findings:

1. That the proposed map is not consistent with applicable general and specific plans.

This finding for denial is appropriate, in that the proposed project is not consistent with applicable General Plan Housing policies that intend to preserve existing affordable housing in Santa Cruz County, and specifically with the General Plan goals, objectives and policies that address mobile home park preservation. Individually-owned airspace condominiums under the proposed map would no longer be subject to mobile home rent stabilization under local County Code Section 13.32; thus the subdivision of the existing park would not be consistent with sections of the General Plan Housing Element, specifically GP Section 4.7, Goal 3.9, Mobile Home Park Preservation and Affordability, and Housing Element Objective 3.6, which seeks to conserve the existing stock of mobile home housing and provide for rent stabilization protection.

If the proposed project complied with the requirements of Government Code Section 66427.5 and County Code Chapter 14.08, the County would be preempted from making a finding for denial based on the displacement of non-purchasing tenants. However, because the proposed project fails to meet the requirements of Government Code Section 66427.5 and Chapter 14.08 (see applicable findings), this finding for denial can be made.

2. That the design or improvement of the proposed subdivision is not consistent with applicable general and specific plans.

This finding for denial is appropriate, in that the design of the proposed project does not allow for a secondary access to the site and is thus inconsistent with General Plan Policy 6.5.5, which requires a secondary access way for any new subdivision in the Urban area where lots are more than 500 feet from a through road. Existing development on the project site and adjacent to the project site constrains the options for development of secondary access, and the proposed subdivision would need to be re-designed in order to be consistent with this finding.

Project plans that were approved with Applications 2605-U and 774-V on March 25, 1966 clearly show a secondary access driveway, and thus the current configuration of the site is out of compliance with that approval. This secondary access driveway from Robertson could connect with all other driveways on site, except that vehicular access is now blocked by a mobile home at the top of the knoll. The mobile home, shown as lot # 110 on the map exhibit and addressed as # 200 on the project site, would need to be relocated in order to create a useable secondary access in compliance with the previously-approved site plans.

3. That the site is not physically suitable for the type of development.

A finding for denial is appropriate. While no new site development is being proposed as part of the project, the present site configuration is not compliant with prior approvals with regard to secondary access (see finding # 2 above) and the number of permitted mobile home spaces (see finding # 4 below).

4. That the site is not physically suitable for the proposed density of development.

A finding for denial is appropriate. The density of the mobile home park is consistent with the site's (R-UH) urban high residential General Plan designation. However, the proposed subdivision is not in compliance with use permits 2605-U and 75-145-PD, which authorized 146 mobile home spaces, not the 147 spaces proposed for this project.

In addition, project plans that were approved with Applications 2605-U and 774-V on March 25, 1966 clearly show a secondary access driveway, and thus the current configuration of the site is out of compliance with that approval. This secondary access driveway from Robertson could connect with all other driveways on site, except that vehicular access is now blocked by a mobile home at the top of the knoll. The mobile home, shown as lot # 110 on the map exhibit and addressed as # 200 on the project site, would need to be relocated in order to create a useable secondary access in compliance with the previously-approved site plans.

5. That the design of the subdivision or the proposed improvements is likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

No new site development is being proposed as part of the project, and there is thus no evidence at this time that environmental damage or injury to wildlife or habitat would result. However, environmental review would be required prior to consideration of the proposed project for approval.

6. That the design of the subdivision or the type of improvements is likely to cause serious public health or safety problems.

A finding for denial is appropriate, as the 147-unit subdivision is designed to have only one point of access, with many of the units being more than 500 feet from the single point of access/ egress to the site from a public road. As designed, in the event of a fire or other emergency, there is substantial potential for health or safety problems due to the lack of a secondary access to the site; thus, there is basis for denial of the proposed subdivision due to potential public health and safety issues. Existing development on the project site and adjacent to the project site and adjacent to the project site constrains the options for development of secondary access, and the proposed subdivision would need to be re-designed in order to be consistent with this finding.

Project plans that were approved with Applications 2605-U and 774-V on March 25, 1966 clearly show a secondary access driveway, and thus the current configuration of the site is out of compliance with that approval. This secondary access driveway from Robertson could connect with all other

Application #: 07-0310
APN: 030-131-05, -22, -23, -26, -27
Owner: Paul Goldstone

driveways on site, except that vehicular access is now blocked by a mobile home at the top of the knoll. The mobile home, shown as lot # 110 on the map exhibit and addressed as # 200 on the project site, would need to be relocated in order to create a useable secondary access in compliance with the previously-approved site plans.

7. That the design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through, or use of, property within the proposed subdivision.

No site improvements or new development is proposed, and the design of the subdivision would not conflict with any public access easement.

Vesting Tentative Map Findings

Santa Cruz County Code Section 14.01.614

A vesting tentative map may be conditionally approved or denied if the Board of Supervisors makes any of the following determinations:

1. A failure to do so would place the residents of the subdivision or the immediate community, or both, in a condition dangerous to their health or safety, or both.

No new development is proposed with the proposed conversion to an airspace condominium ownership park, and thus action on the proposed Vesting Tentative Map would not impact public health or safety. However, a finding for denial is appropriate, as the 147-unit subdivision is designed to have only one point of access, with many of the units being more than 500 feet from the single point of access/ egress to the site from a public road. As designed, in the event of a fire or other emergency, there is substantial potential for health or safety problems due to the lack of a secondary access to the site; thus, there is basis for denial of the proposed Vesting Tentative Map due to potential public health and safety issues. Project plans that were approved with Applications 2605-U and 774-V on March 25, 1966 clearly show a secondary access driveway, and thus the current configuration of the site is out of compliance with that earlier approval.

2. The condition or denial is required in order to comply with State or Federal laws.

The finding for denial is appropriate, in that State Government Code Section 66427.5 (the section of the Subdivision Map Act that regulates conversions of rental mobilehome parks to ownership parks) includes a stated Legislative intent that its provisions be applied only to bona fide resident conversions (see Stats. 2002, ch.1143, Section 2, p. 3324). County Code Section 14.08.070 seeks to implement Government Code Section 66427.5 in regards to allowing conversions that have bona fide resident support.

The proposed conversion to resident ownership is not consistent with County Code Section 14.08.070, which requires that an application for the conversion of a mobile home park to resident ownership shall only be approved if the decision-maker finds that (a) a survey of resident support has been conducted and properly filed; (b) a tenant impact report has been completed and properly filed; and (c) the conversion is a bona fide resident conversion. The results of the survey completed by the applicant and filed with the County evidenced that far less than the required 50% of residents voted in favor of conversion. The survey results were: 2 residents in favor, 119 residents not in favor, and 2 declining to vote. Thus, pursuant to Section 14.08.070(2), the conversion is presumed to not be a bona-fide resident conversion, and there is no supporting evidence in the record at this time that would override that presumption.

3. The vesting tentative map is for a subdivision whose intended development is inconsistent with the Local Coastal Plan, General Plan, any applicable Specific Plan, the Zoning Ordinance, or any other applicable provision of the County Code in effect at the time any vesting tentative map is acted upon by the Board of Supervisors.

This finding for denial is appropriate, in that the proposed project is not consistent with County Code Section 14.08.070 (see discussion above) that regulates mobilehome

Application #: 07-0310
APN: 030-131-05, -22, -23, -26, -27
Owner: Paul Goldstone

conversions.

The project is also inconsistent with applicable General Plan Housing policies that intend to preserve existing affordable housing in Santa Cruz County, and specifically with the General Plan goals, objectives and policies that address mobile home park preservation. Individually-owned airspace condominiums under the proposed map would no longer be subject to mobile home rent stabilization under local County Code Section 13.32; thus the subdivision of the existing park would not be consistent with sections of the General Plan Housing Element, specifically GP Section 4.7, Goal 3.9, Mobile Home Park Preservation and Affordability, and Housing Element Objective 3.6, which seeks to conserve the existing stock of mobile home housing and provide for rent stabilization protection.

In addition, the property is not consistent with General Plan Policy 6.5.5, which requires a secondary access way for any new subdivision in the Urban area where lots are more than 500 feet from a through road. Project plans that were approved with Applications 2605-U and 774-V on March 25, 1966 clearly show a secondary access driveway, and the current configuration of the site, as well as the proposed Vesting Tentative Map, is out of compliance with that approval.

14.08.070 Findings for Conversion of Mobilehome Park to Resident Ownership

1. A survey of resident support has been conducted and filed.

A resident survey prepared by the applicant was filed with the County on September 8, 2008. The survey results were: 2 residents in favor, 119 residents not in favor, and 2 declining to vote.

2. A tenant impact report has been completed and filed.

A tenant impact report was prepared by the applicant and filed with the County on September 29, 2008.

3. The conversion is a bona fide resident conversion.

Pursuant to Section 14.08.070(2), the conversion is presumed to not be a bona-fide resident conversion. There is insufficient evidence in the record to overcome this presumption.

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION**

The Santa Cruz County Planning Department has reviewed the project described below and has determined that it is exempt from the provisions of CEQA as specified in Sections 15061 - 15332 of CEQA for the reason(s) which have been specified in this document.

Application Number: 07-0310
Assessor Parcel Number: 030-131-05, -22, -23, -26, -27
Project Location: 4300 Soquel Drive

Project Description: Proposal to convert an existing tenant-occupied mobile-home park to an ownership park with 147 spaces

Person or Agency Proposing Project: Sid Goldstien

Contact Phone Number: 805-688-1526

- A. The proposed activity is not a project under CEQA Guidelines Section 15378.
- B. The proposed activity is not subject to CEQA as specified under CEQA Guidelines Section 15060 (c).
- C. **Ministerial Project** involving only the use of fixed standards or objective measurements without personal judgment.
- D. **Statutory Exemption** other than a Ministerial Project (CEQA Guidelines Section 15260 to 15285).

Specify type:

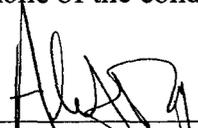
- E. **Categorical Exemption**

Specify type: Section 15270: Projects Which Are Disapproved

F. Reasons why the project is exempt:

The proposed project is not consistent with County Code and is recommended for denial.

In addition, none of the conditions described in Section 15300.2 apply to this project.



Alice Daly, Project Planner

Date: 2/4/09

FOR TAX PURPOSES ONLY

THE ASSESSOR MAKES NO GUARANTEE AS TO MAP ACCURACY NOR ASSUMES ANY LIABILITY FOR OTHER USES. NOT TO BE REPRODUCED. ALL RIGHTS RESERVED.

© COPYRIGHT SANTA CRUZ COUNTY ASSESSOR 1998

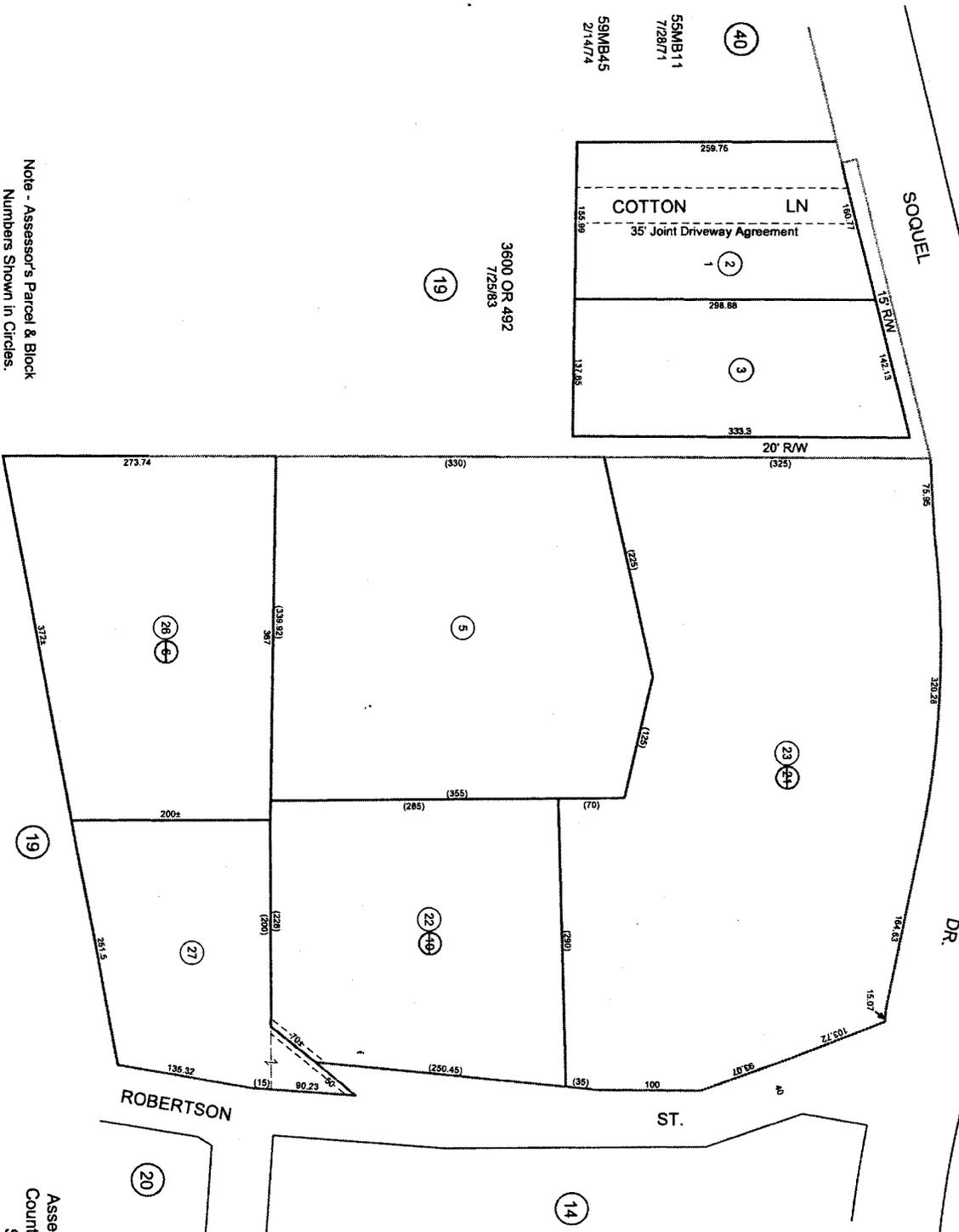
Electronically Redrawn 9/9/98 rw
Rev. 2/8/02 mvm (sf. name)
Rev. 8/23/05 mvm (por. to pg. 40)

POR. RANCHO ARROYO DEL RODEO
SEC. 10, T. 11S., R. 1W., M.D.B. &M.

(34) 75RS30
2/27/86

Tax Area Code
96-103

30-13

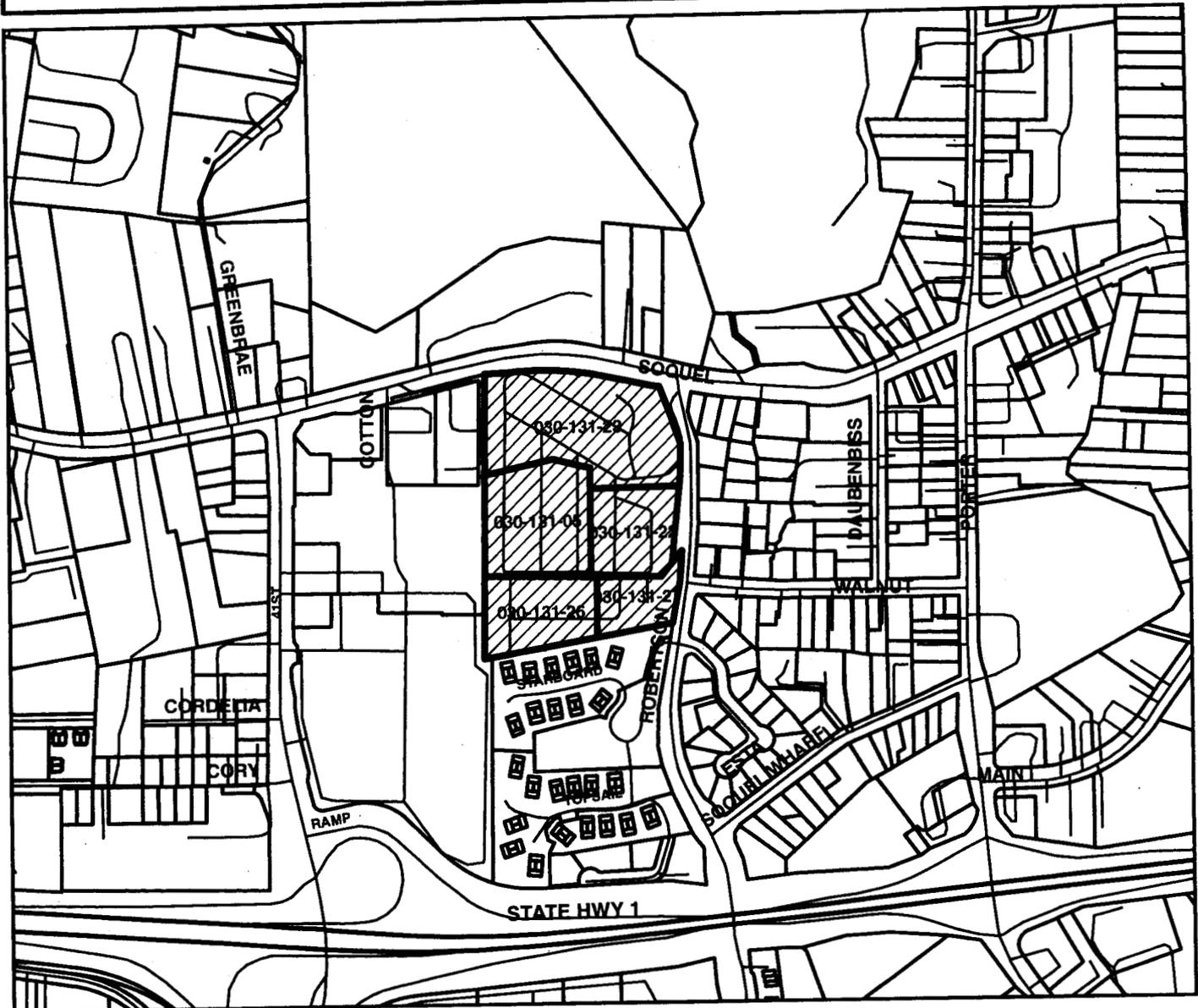


Note - Assessor's Parcel & Block
Numbers Shown in Circles.

Assessor's Map No. 30-13
County of Santa Cruz, Calif.
September, 1998



Location Map



LEGEND

-  Subject Parcels
-  Assessors Parcels
-  Streets
-  State Highways



Map Created by
County of Santa Cruz
Planning Department
January 2009

January 26th 2009

Dear Planning Department and Commission,

Re: Application # 07-0310

I own a mobile home and live full time at the Alimur Mobile Home Park in Soquel.

I have lived here over 15 years.

A conversion to Condominium status in this park would be disastrous.

The rent control we depend on would become null and void.

I would like to think the owner of the park Paul Goldstone would not raise the rent.

Would he pass up the golden opportunity with those that cannot afford or do not want to buy the land underneath them?

Please consider the disruption of over 300 residents in the future planning of

Alimur Mobile Home Park
4300 Soquel Drive
Soquel, California

Thank you,

Denise Aldelia Ward
Alimur Mobile Home Park #19



*Ms. Denise Ward
4300 Soquel Dr. Spc 19
Soquel, CA 95073*

Alice Daly, AICP
Project Planner, Development Review
County of Santa Cruz Planning Department
tel: 831-454-3259
fax: 831-454-2131

RE: Application 07-0310 Alimur Mobile Home Park Condo Conversion

Currently, mobile home park owners all across the state are ecstatic at the thought of exploiting the current loophole in government code section 66472.5. This loophole allows them to push through "sham" condo conversions, against the wishes of residents and local governments, and reap huge financial windfalls. This financial windfall comes at the expense of thousands of mobile home park residents whom have scrimped and saved to have a chance, however small, at the American Dream of homeownership.

But in the case of Alimur Park, it's personal.

My name's Clay Butler, I'm self employed, and I'm currently the Vice President of the Alimur Park Homeowners Association in Soquel, California.

While financially I'm doing quite well now, it wasn't always that way.

Seven years ago I was a struggling graphic designer and my partner Rosalee was a preschool teacher. To complicate matters I was also recovering from a debilitating work injury and had been on Workman's Comp for the previous 12 months. Needless to say we were a couple of modest means. However, we'd always hoped that we would be able to buy a small condo or town home some day. But as the economy started heating up during the dot com boom, housing costs in the bay area started to double and triple and our hopes were dashed.

Later, at the height of the dot com bubble, our landlord informed us that the rent on our two bedroom apartment was being raised from \$800 a month to \$1,500 a month.

Why? Had their expenses gone up? Were they investing in upgrades? Were the taxes on their property being re-assessed? No, the true answer, as they explained, was that they did a survey and they determined they were simply not charging enough. They explained that they had no choice but to raise the rents to the going market rate. That's right, according to them, they were the victims!

My partner said that if we don't figure something out now, we will be forced out of the area by skyrocketing rents. She aggressively started searching all the mobile home parks in the Santa Cruz area. After much searching she found a 41 year old single wide mobile home with an add-on. A total of 750 square feet. The yard was full of weeds, the carpet was matted like the hair on an old dog, the deck was falling apart and it reeked of cigarette smoke. Even with these defects it was still priced at \$85,000, just at the outer limit of possibility for us, but about \$10,000 less than comparable homes in the park

Since it was an old mobile home there was only one local bank, Bay Federal Credit Union, that would finance the mortgage. But they required 1/3 down and the interest rate was about three points higher than a typical mortgage. So we liquidated our IRA accounts and walked away with \$6,700.00 after penalties. I ask my dad for \$10,000 which he was fortunately in a position to give me. Still needing more, I asked my grandfather for a \$5,000.00 loan. All this just to squeak into a cracker box mobile home that still needed thousands of dollars of improvements just to make it livable.

So here I am eight years later. My partner and I have been together for twenty years now, my business is doing great and we have a beautiful 5 year old daughter. Our combined space rent and mortgage is about \$800 a month and I'm fortunate enough that my income allows my partner to stay at home and be a fulltime mom. It's a cramped yet comfortable existence.

Unfortunately the owner of the park, Paul Goldstone, wants to destroy that. Not content to simply live a life of luxury off property that he inherited from his parent's estate, he's hired the extremely aggressive law firm of Gilchrist and Rutter to bully us into a "sham" condo conversion. The proposed condo conversion would immediately eliminate local rent controls that we've enjoyed for over 25 years, and allow him to raise the rent 25% a year for four years to fair market value. After four years he could charge whatever he wants. The only way to escape this is to buy your lot at an as yet unspecified price or qualify as low income and benefit from California State rent control law. He's refused to give us even an estimate but we know that buyers looking to move in the park are being told by the owner that he expects the lots to sell for \$175,000 to \$225,000 per space. Plus, we would still have home owner dues of around \$200 per month on top of that for the maintenance of the common areas.

This is assuming that you could even afford \$200,000 and that you could find a bank to finance that purchase. The other choice is to simply sell your home and move out of the area. However, this results in an immediate loss of most of your home's equity.

Let's do the math. We paid \$85,000, seven years ago, for a 41 year old mobile home on a 30 amp spot. If a potential buyer had to pay \$200,000 to the park owner for the land itself, how much do you think they would be willing to pay for the 750 square foot mobile home that sits on top of it? The answer is simple. It's zero. Who would even finance the purchase of the home itself? The answer is no one.

EL Dorado Mobile Home Park in Palm Springs was the first park in California to fall under one of these conversions. The result? Five years later, barely 60% of the lots have been sold. Of that 60% only 75% were bought by current residents with the rest going to newcomers and speculators. They are currently 50 spaces that are simply empty. Just barren parcels of concrete slabs and weeds. In a park of 355 lots that's in one in seven left vacant.

This is the sad truth of this type of conversion. The owner will tell you that our home's will increase in value, that buyers will flock to the park for the chance to buy, that banks will eagerly lend is the money to buy our lots and that MPROP financing will make it affordable for all who wish to purchase. Yet El Dorado tells the opposite story.

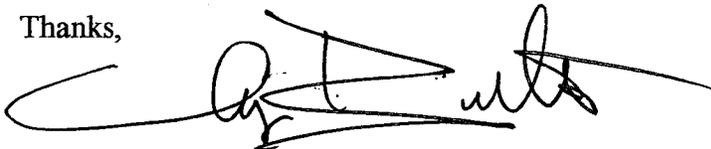
Now of course we would love to purchase our park and own "real" property. In fact we have made several formal offers over the course of five years to do so. Unfortunately the owner, Paul Goldstone, has repeatedly refused our offers. Why? I think his longtime property manager a friend Richard Odenheimer summed it up well when told me personally that the owner's long term goal was to wait until things change, and rent control is abolished, so he can do what he wants. Now, with the help of law firm Gilchrist & Rutter he is trying to do just that under the guise of "helping the residents become landowners".

What nonsense! He's had years to help us become landowners by simply selling us the park at a fair market value. Now that he's found a way to artificially inflate the price of the lot's with a subdivision scheme and overturn rent control as well, he's suddenly become "concerned" that we don't own our lots.

This is not the American Dream I signed up for and this is not the legacy I want to leave my children. This is why I strongly urge you to deny the conversion permit. In our official resident survey of support we voted 119 to 1 to reject the conversion. Out of 147 spaces that is a very good turnout. The only person to vote for the conversion was the park manager.

If you deny the permit you will most likely face a lawsuit from the park owner. This has been the practice for all the parks being represented by Gilchrist and Rutter. I urge you to uphold the resident's wishes and stop this conversion that ultimately threatens the security of thousands of seniors and working families in Santa Cruz County.

Thanks,



Clay Butler – Resident of Alimur Mobile Home Park
4300 Soquel Dr #66
Soquel, Ca 95073

Phone: 831-477-9029

Email : clay@claybutler.com

Kevin Garcia
4300 Soquel Drive, #34
Soquel, Calif. 95073

Project Planner/ Alice Daly
%Planning Department
701 Ocean St., 4th Floor
Santa Cruz, Calif. 95060
Application #07-0310

Dear Planning Department and Commission:

I am a resident at Alimur Mobile Home Park living there for over 3 years. I am very concerned about what will happen if this Park Conversion is allowed.

I, like many residents here are a low income person and am struggling to find steady work. If this conversion goes through, my living expenses will increase dramatically and I won't be able to stay. And as an owner of an older, single wide coach, selling will gain me nothing with the current real estate market. And I would be lucky if I could even find a buyer.

Please listen to those of us in this park. We need you to understand what a tough position we will be in.

Sincerely,



Kevin Garcia

January 2, 2009

Project Planner / Alice Daly
Planning Dept.
701 Ocean St., 4th Floor
Santa Cruz, CA 95060

Re: Application 307-0310

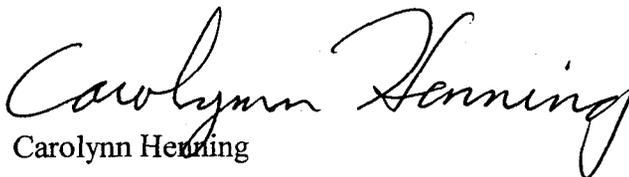
Dear Planning Dept. and Commission,

My son and I have lived in Alimur Mobile Home Park for nearly ten years and I am terribly worried about the proposed park conversion. I believe this would be the kiss of death for those of us with low, fixed incomes. Everything I own is tied up in my investment in my mobile home. The proposed park conversion puts that all at risk, not to mention the possible lose of an affordable place for my son and I to live. Please do not let this go through. There is little enough in the way of low income housing in Santa Cruz and this conversion would be the start of a process that would not only reduce the availability of low income housing in Santa Cruz, but could also trigger a chain of events that could eliminate this type of low income housing in the entire state.

Please do not pass this proposal! It will only benefit the park owners at the expense of the park residents. Thank you for your consideration.

Sincerely,
Carolynn Henning
Alimur Mobile Home Park #18

If you have any Questions, please contact me at 428-2111


Carolynn Henning

January 6, 2009

Planning Department
Project Planner – Alice Daly
701 Ocean Street, 4th Floor
Santa Cruz, CA 95060

RE: APPLICATION # 07-0310

Dear Planning Department,

I live at Alimur Mobile Home Park, and have resided there for 10 years. My family would be devastated if this conversion is approved. The rent control is the only thing that has enabled us to stay in this area.

Please feel free to contact me if you have further questions.

Thank you for your kind consideration.

Sincerely,

Sally Grancich Cole

Sally Grancich Cole
4300 Soquel Dr. #232
Soquel, CA 95073
831-476-5747 Home
831-331-3213 Cell

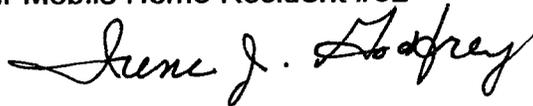
JAN 05 2009

Dear Planning Department and Commission,

I live at Alimur Mobile Home Park. I am 68 years old now and have resided here for over 21 years. When I moved in all those years ago I never thought that someone would come up with a change as devastating to us homeowners as this. For what? More money? There are 142 families that call this our Home! One person can do this? Does not seem right! Please keep us in mind when you make your decision.

Regards,

Irene Godfrey
Alimur Mobile Home Resident #52

A handwritten signature in cursive script that reads "Irene J. Godfrey". The signature is written in black ink and is positioned below the typed name and address.

December 23, 2008

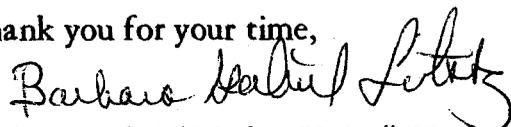
Dear Planning Department and Commission:

I live at Alimur Mobile Home Park. I have been a resident for 8 1/2 years. I have been a single mother most of that time. My daughter just recently moved out of my house. When I moved in, I took out a loan that would be paid by the time I was ready to retire. I am now finishing paying that off and have looked forward to being able to retire and live off of Social Security and a small pension. The conversion plan would not allow me to retire. I could not afford to buy the property my mobile home is on and would not be able to afford more than a slight yearly increase (the cost of living increase it is now based upon) and still be able to make it. My plan for the last 8 years would be totally devastated.

I am very concerned about the resale value of my house if I have a financial emergency. If the conversion goes through, I will not be able to sell my house, if need be, without having to include whatever they plan to charge for the land. I am afraid what happened to my mother will happen to me. She lived at De Anza Mobile Home Park and after that park won getting rid of rent control, her house, which she and my father purchased for \$60,000 is now worth nothing. When she had to go into assisted living (she's 90 and bedridden) we tried to sell it but couldn't. We had to walk away from it. My mother is now in a nursing home and the money she counted on (the proceeds from the sale of her house) is non existent. She has nothing and is now a burden on the rest of the family, who have to come up with the difference between social security and her board. I am afraid the same thing will happen to me and my only child will have to accept that burden. For a low income person, I work in an Infant/Toddler Center, that is a very stressful worry.

In the meantime, the park management is difficult to work with, I feel like my future is totally out of control and the stress level just walking around the park is taking a toll on me. I do not support the conversion, which I see as a way someone rich with lots of lawyers but does not live or even come to the park gets richer, while I am barely surviving and just want a way to be able to retire and still live in Santa Cruz near friends and family.

Thank you for your time,



Barbara Gabriel Litsky, Unit # 72

December 17, 2008

Planning Dept.
701 Ocean Street 4th floor
Santa Cruz, CA 95060
Reg: Application #0310

Dear Planning Dept. and Commission,

I am a resident at Alimur Mobile Home Park in Soquel and have been so for seven years. I didn't choose to live in a mobile home park but life circumstances placed me in the position of being a single mom making it solely on my own income. Mobile Home Parks are the only affordable living options for many people in my situation as well as those on fixed incomes due to age or illness. With the current economy it will only continue to be of greater importance to protect them for what they were designed to be and not alter them to provide excess profit for the landowner at the expense of putting the current residents out of their homes. The Landowner currently makes a profit on his investment in the park but wants more. We would all like more. Should the county approve the conversion, it would show a lack of support for the Santa Cruz community as a whole as well as bad judgment. The county's priority should favor the people who live here, work here, and sacrifice much in order to afford to do so. Keep in mind we already have a housing crisis, but this particular situation was not created by homeowners over extending, it has nothing to do with the residents having any wrong doing at all, nor are we asking for a financial bail out. We just want to continue our lives. This situation is a direct result of the greed of an out of area landowner.

From a personal perspective, the cost is far too great.

From a business perspective, the cost is far too great. The county cannot afford to put more people on the streets or to provide shelter for those driven from their homes.

I ask for your support.

I ask for your good judgment

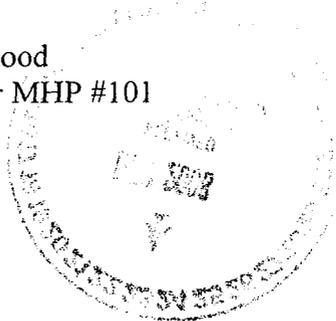
I ask that you preserve affordable living spaces

I ask that you don't contribute to more people becoming homeless

Can Santa Cruz really afford more homeless?

Thank you in advance for your help.

Patti Good
Alimur MHP #101



December 20, 2008

Project Planner, Alice Daly
Planning Department
701 Ocean St., 4th Floor
Santa Cruz, CA 95060

Application # 07 0310

Dear Planning Department and Commission,

I live at Alimur Hobile Home Park. I have resided here for 4 years, since Jan. 2003. I will be devastated by this proposed conversion.

It is my understanding that (quoting from our resident web site):

Residents are given a "choice" to buy the land under the home at a price set by the owner or continue renting but without the benefit of rent control. Those who cannot afford to buy will see their rent increase by 20% of the difference between the current rate and the appraised fair market value, per year for the first four years. **After four years the owner can raise rents to any level they desire. Those who qualify as low income will be protected from these increases by state rent control although they will still lose most of their home's equity in the conversion.**

As a senior and low-income, this proposal is unsettling and frightening. When I bought the home for cash in 2003, I had ~~no~~ idea this would ever happen and feel blind-sided.

We are hoping for your assistance,

Sincerely,


Colleen O'Driscoll
Alimur Mobile Home Park #5
Soquel, CA 95073

December 20.2008

Project Planner, Alice Daly
Planning Department
701 Ocean St., 4th Floor
Santa Cruz, CA 95060

Application # 07 0310

Dear Planning Department and Commission,

I live at Alimur Hobile Home Park. I have resided here for more than 20 years. I will be devastated by this proposed conversion.

It is my understanding that (quoting from our resident web site):

Residents are given a "choice" to buy the land under the home at a price set by the owner or continue renting but without the benefit of rent control. Those who cannot afford to buy will see their rent increase by 20% of the difference between the current rate and the appraised fair market value, per year for the first four years. **After four years the owner can raise rents to any level they desire. Those who qualify as low income will be protected from these increases by state rent control although they will still lose most of their home's equity in the conversion.**

As a low-income resident, this proposal is unsettling and frightening. When I purchased my space, I had ~~no~~ idea this would ever happen and feel blind-sided.

We are hoping for your assistance,

Sincerely,


Lisa K. Beek,
Alimur Mobile Home Park #5
Soquel, CA 95073

Pei Qing Huang
Alimur Mobile Home Park
4300 Soquel Dr., #29
Soquel, CA 95073
Tele: 831 332 5528

Project Planner/Alice Daly
Planning Department
701 Ocean St., 4th Floor
Santa Cruz, CA 95060
Tele: 831 454 3259

Sunday, December 21, 2008

**Re: Conversion of Alimur Mobile Home Park in Soquel
Application # 07-0310**

Dear Planning Department and Commission:

I am the resident of Alimur Mobile Home Park in Soquel, and I have been living in the park for seven years. As you know, the owner of the park has filed an application to convert the park to an ownership park. If the conversion is approved, my life will be DEVASTATED. I will lose all of my blood and sweat money that I have invested in the mobile home as a result of the removal of the rent control. I am writing to plead you please carefully consider the impact of the conversion on the residents in the park. We will have a broken community with conflict interests.

I really appreciate your attention in this matter. Thank you for your time.

Sincerely


Pei qing Huang

12-19-08

PROJECT PLANNER

ALICE DALY

701 OCEAN STREET 4TH FLOOR

831 454 3259

APPLICATION # 07-0310

DEAR PLANNING DEPARTMENT AND COMMISSION.

I LIVE AT ALIMUR MH PARK I HAVE RESIDED HERE -
FOR SIX YEAR.

MY FAMILY WILL BE DESVASTE BY THIS
CONVERSION THANK YOU FOR YOUR TIME

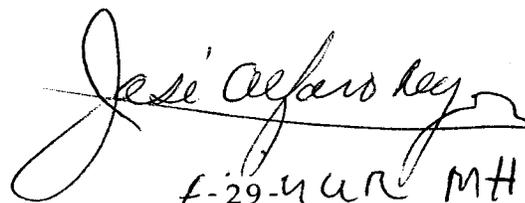
 # 14
4-29-MUR MH PARK

EXHIBIT F

S

Ms. Nanette Saucier
4300 Soquel Dr Spc 46
Soquel, CA 95073

re: application # 07-0310

Dear Planning Department and Commission,

I live at Alimur Mobile Home Park, space #46 and have lived there for 5 years now. I would be financially devastated by such a conversion. Thank you for your time and careful consideration.

Sincerely,

Nanette M. Saucier

Nanette M Saucier



Alice Daly/Project Planner
Planning Department
701 Ocean Street, 4th Floor
Santa Cruz, CA 95060

4300 Soquel Drive
Space#235
Soquel, CA 95073
December 16, 2008

Re: Application #07-0310

Dear Ms Daly:

Like the majority of my neighbors in Alimur Park, I am sorely distressed by the owner's application for the so-called "conversion" of Alimur Mobile Home Park where I have lived for the past 22 years, investing money on improvement of my residence and the space on which it sits.

If approved by the county, the conversion would have devastating results for me, my neighbors, and the other mobile home park residents who are also anxiously watching the threat to Santa Cruz County's small bastion of affordable housing and rent control.

What recourse does a retired senior like myself have when faced with health conditions necessitate a major change and I cannot count on any equity to satisfactorily address them, despite years of careful investment in the upkeep of my residence and the space itself.

What happens to families who, despite the owner's carrots and stick approach allowing some to continue renting at the uncontrolled rate agreeable to him, will be captive to the landlord's laissez-faire park maintenance and other whims?

This is indeed a stressful time at national, state and local levels. It is also a time for government at all levels to demonstrate prudence and justice.

Thanks you for your attention to my comments. I look forward to hearing from you.

Sincerely,



Tel#:(831) 475-0774

Jane McCormick Crowley

12/15/08

Dear Alice Daly,

It is my concern that local mobile park owners are beginning to take advantage of a loop hole in the law that allows park owners to 'convert' their mobile home parks into ones that are partially rental and partially a 'condominium air space mobile home park'.

If this plan actually went through we would loose rent control. This is not a traditional sale of a mobile home park. The owner remains the owner and controls all the homes that are not bought. The residents of Alimur Park have offered to buy the park in the traditional way but the owner has refused without even looking at an offer.

My concern is that if we let this happen then other parks will go the same way. There are buyers that are backing out of deals in various parks because they are afraid that the park owner may get the same idea to 'convert'. In Alimur Park the sales have come to a stand still because there are no loans available for a park with this cloud hanging over its head. Bay Federal is not lending on homes in this park!! Think about what this could mean to low cost housing. If clients are fearful very few homes will sell.

The telling factor for the conversion is the overwhelming vote by the residents of Alimur Park not to allow conversion! We are well informend amd do not want our park converted! It would be a loss for us and for Santa Cruz County.

Sincerely,



Shelley Patton

My life here in Alimur Park has not been the same: a secure, lovely, tranquil spot to live. In 2000, I chose Alimur specifically for those reasons,

If the conversion goes through, my life-long plans and dreams of staying here and owning my own home will be severely impacted and changed. I could possibly be forced to walk away from the home I love. Please don't allow this to happen.

Home is where your heart is and mine is here. I do not want the change.

Sincerely,

Nora Lee Dorsa
Nora Lee Dorsa

December 16, 2008
4300 Soquel Dr. #63
Soquel, CA 95073

Alice Daly, Project Planner
Planning Department
701 Ocean Street
Santa Cruz, CA 95060

Dear Ms. Daly,

I am very much against the proposed conversion of Alimur Park by the park owner.

I'm a 56 year old single lady, and since my only brother died of cancer in 2004, I am virtually on my own in this area, except for my widowed sister-in-law and close friends.

Moving to Alimur Park from another county in 2000, I believed my dreams had been answered and my future in my little home was safe and secure. I thought I was here to stay, which may not be true after all.

I resent the fact that someone came along with multitudes of money, such as the park owner, with his only desire to make more money by taking from us "little people," upsetting our small lives, and altering our futures in order to get richer himself.

In addition, I am completely dumbfounded how he continually disregards the ordinance which was passed by the Santa Cruz County Board of Supervisors and proceeds with his plans as if any Board directives or law didn't exist. How can this be allowed?

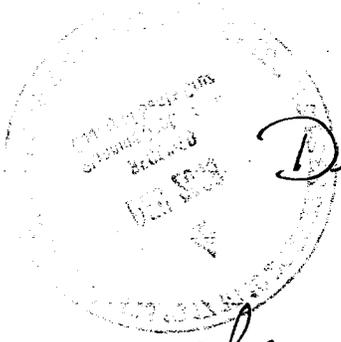
Again, I am against any sham conversion of Alimur Park for it would alter and ruin so many lives while putting more money in the owner's pocket. Please take all of this in consideration. There must be a place for everyone to be happy.

In appreciation,

Malinda Love

Malinda Love

December 16, 2008



Dear Planning Department & Commission,

I have lived in Alimex Mobile Home Park for 10 years. I am totally against the owners plan to convert this park, as are the majority of the residents. Surely you will take this into consideration. Thank you for your time.

Sincere Regards,
Michelle Chaldi
Space # 32
Alimex Mobile Home Park

Application #
07-0310

12/16/08

To Whom It May Concern:

I am writing in regards to the application of the owner of Alimur Park to convert to condo-conversion. This whole application if approved would be extremely detrimental to me. I have lived in Alimur Park for 6yrs. 2yrs ago I put my manufactured home up for sale in Sept. of 06. I was getting multiple looks for possible purchase; which I was going to use the money to buy a small 2 bdr house. Two months after, I put the house up. The owner put his application in for condo-conversion. I have not had any buyers come thru for 2yrs. Nobody is going to buy my home if condo-conversion takes place. I will be stuck with a home I cannot move from or sell. Condo -conversion will break rent control. Why would anyone buy my home with a jacked up rent- when given the current home crisis- they could buy a home-rather than pay the price to move in here. I have been held hostage here for 2yrs. If you approve this application- I'm stuck- I would like to move and buy a home. I ask you to not approve this application.

With Respect,

Thomas M. Burke



831-476-4568



Project Planner / Alice Daly
Planning Department
701 Ocean Street, 4 th Floor
Santa Cruz, CA 95060
831-454-3259
Application # 07-0310

Dear Planning Department and Commission,

I live at Alimur Mh Park. I have resided here for *five* years. My family will be devastated by this conversion.

Thank you for your time.

Teresa Edwards
Alimur MH Park # *237*

If you have any questions, please call me at *1.8.31 477 0906*

**Project Planner/Alice Daly
Planning department
701 Ocean Street, 4th Floor
Santa Cruz, CA 95060**

December 15 . 2008

Re Application # 07-0310

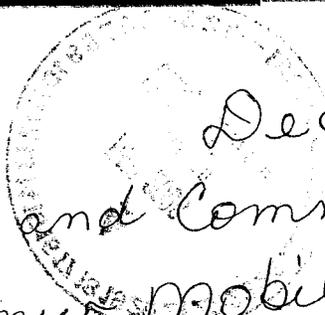
Dear Planning Department and Commission,

**I live at Alimur Mobile Home Park. I have resided here for
nineteen years. I and my family will be devastated, if this conversion
will be allowed to take place.**

Thank you for your time and compassion/

Yours truly,  Britta Zetterberg

Alimur Mobile Home Park # 91



Dec 08

Dear Planning Dept and Commission

I live in Alimur Mobile Park and I have lived here for seven years. My family and I will be devastated by this conversion.

Thankyou for your time,

Linda Cullen
#67 Alimur Park

EXHIBIT F



Project Planner / Alice Daly
Planning Department
701 Ocean Street, 4th Floor
Santa Cruz, Ca 95060
831.454.3259
Application # 07-0310



Dear Planning Department and Commission,

I live at Alimur Mobile Home Park and have lived here for almost 5 years. I am writing this to let you know that if the conversion is approved I will loose everything. Please do not approve this application.

Thank You

Margo Mac Kinnon

Margo Mac Kinnon
Alimur MH Park #53

Project Planner / Alice Daly
Planning Dept.

Re: Application # 07-0310

Dear Planning Department and Commission,

I have resided at Alimur Mobile Home Park for 10 years. I would like to let you know that conversion of this park would totally devastate my husband and I. We both have two jobs and in this horrible economic downturn, each of us has one of those employers' that is struggling to keep their businesses open, which may end up causing one or both of us to lose that job. We are in no condition to be able to get a loan to purchase the mobile home space (not to mention we are both 55 years old), so we only have approximately 10 years more of employment income.

Thank you for your time .



Debra Monard
Alimur Mobile Home Park Space # 78



Margret R. Crane
4300 Soquel Dr. #101A
Soquel, CA. 95073

I have lived in Santa Cruz now for 20 years. During that time I have seen the cost of housing go through the roof. Even though I have a decent paying job I could not afford to purchase a house or condo here. If I hadn't purchased my mobile home in 1996 I don't think I would be able to afford to live here.

I live in a mobile home that is 36 years old. It is my primary residence and I was hoping to retire within a few years. If the conversion happens it is doubtful that I will be able to afford to retire.

My understanding is that mobile homes provide 70% of the affordable housing in Santa Cruz County. Losing rent control would strike a serious blow against persons who can't afford to buy a home here. Even with the current market, the majority of us still can't afford to purchase a home.

The majority of the residents of our park (91%) are against this conversion. I know that because I am the secretary for the Alimur Park Home Owners Association. When the Goldstone attorneys originally presented the conversion idea to us they tried to convince us that it is a good thing. How lucky we will be to be able to own our land! Fortunately we have become adequately educated about what will happen if they are successful and we know that is not true.

These are not our second homes or vacation homes; we live in them year round. There are many residents of our park who are professionals that can't qualify for a home here. We are able to continue living here because there is rent control. We are also what must be designated as a captive audience. It's not as if we can just uproot our place and move it elsewhere if the rent increases beyond our ability to pay.

The owners are greedy. They make a very decent amount of money with the rent we pay. But, they want more! They don't live in mobile home parks; surely they have nice, large expensive homes. Let's see if we can trade places with them temporarily, in order to let them experience what it is like to be unsure of your future and the security of your home.

Please help us to preserve our homes.

Sincerely,
Margret R. Crane

12-10-2010-42-

Dear Alice Daily,

I have lived here at Alimur Mobile Home Park for the last 10 years with my family. If the Park Conversion goes through I will lose everything and become homeless. I will not be able to afford Mortgage, Land cost, and fees for use of Alimur Park Streets, Pool, and Community Clubhouse. I beg you "PLEASE DON'T LET THIS HAPPENED" I do not want to become another casualty of our economy.

Thank-

You Alice!!!

Sincerely, Jack Trotter resident of Alimur Park.

Jack Trotter

Space # 41

Phone # 831 479 - 0212



Alimur Mobile Home Park Conversion
4300 Soquel Dr. # 41
Soquel, CA 95073

December 9, 2008

Ms. Alice Daly, Project Planner
Planning Department
701 Ocean St., 4th floor
Santa Cruz, CA 95060

RE: Application for Conversion #07-0310

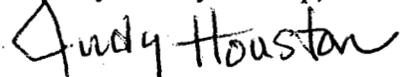
Dear Ms. Daly,

I am a resident of the Alimur Park and wish to let you know that I am against the conversion off the park by the owner. The man wishes to destroy our rent control, which may not affect the current residents but is causing a great deal of upset and worry to all of those who live here, especially concerning the value of our homes should we need to sell them. I am a woman of 71 years of age and I moved here to retire and to be near my only son, (who is also out of work now, due to the economy and struggling to survive himself). I have all my life savings invested in my mobile home and have only a small social security income to live on, which does not even cover all the necessities, rapidly eating up the small amount of savings I have left. The fear and worry caused by this threat has required me see my doctor to receive medication for my depression and anxiety, which has begun since this effort was begun on the part of the owner.

Please do not hurt the many senior citizens who live in this park by allowing a conversion to go through...almost all of our community voted against it. It needs to be stopped now, please, for the sake of all the low income people who live here. We need rent control and the security of residing in the homes we have worked so hard to pay for. While I know we will still be protected on rent control (or so I have been told), we know the owner will find other ways of charging more for everything and withholding needed repairs and improvements...we are already feeling the effects of the discrimination against us for trying to block the conversion in many subtle ways.

Thank you for taking the time to read the words of an old lady who is frightened of becoming homeless in the future.

Thank you for your help,



Mrs. Judy Houston
4300 Soquel Drive, #98
Soquel, CA 95073
831-462-1709

12/16/08

Dear Planning Department and
Commission,

I live here at Alimur Mh
Park. I have resided here
since Jan. 2005. I took off
& paid my mother's mortgage
off. I am totally disabled.
I would be devastated
by this conversion.
Thank you for your time.

Sincerely Michele Ann Kemly
Alimur M.H. Park # 42

Robert B. Walker
4300 Soquel Drive, #215
Soquel, CA 95073-2150

December 15, 2009

Alice Daly/Proj. Planner
Planning Dept.
701 Oean Str., 4th Fl.
Santa Cruz, CA 95060

RE: Application #07-0310

Dear Alice Daly:

I have been a resident of Alimur Mobile Home Park since August of 1984, and I write regarding the application of the park owners to convert the park to resident-owned spaces.

On the whole, I am generally neutral on this subject as my income is so low the conversion won't impact negatively my monthly rent unless my income were to have a particular rise. However, I am uncomfortable having to relate to a distant and large bureaucracy in Sacramento on issues of my rent. Each year, we would be required to verify our incomes to qualify for lower rents. The possibility for red tape and error over a matter as life important as one's rent leaves me uneasy at the least.

For many years when I first moved to Alimur, we use to hand deliver our rent payments to the office in the park; then a few years ago, we were required to send them to an out-of-state address which recently got moved for our greater convenience to a San Francisco Bay Area address. Just this example of a dislocation of connectedness created some anxiety that one's rent would be received on time.

I realize we would not be sending our actual rent payments to Sacramento, but there would be the need for paperwork to be transmitted there and back to a large faceless entity which could create some undue concern I would rather be without.

Yours Truly;

Robert B. Walker

Robert B. Walker

ANGELA DYSLE

4300 Soquel Drive, Space 212
Soquel,
CA.
95073

Alice Daly/ Project Planner
Planning Department
701 Ocean Street, 4 Th Floor
Santa Cruz, Ca 95060

Re: Application# 07-0310

December 15, 2008

Dear Planning Department and Commission,

I live at Alimur Mobile Home Park. I have resided here for eight years. My family will be devastated by this conversion.

This is not a resident supported conversion.

Thank you for your time.

Angela Dysle

**PETITION OPPOSING CONVERSION
& ENDORSEMENT OF REPRESENTATION**

I am a homeowner and resident of Alimur Mobilehome Park (Park). I oppose the Park owner's plans to convert the Park to a resident-owned condominium project. I authorize the efforts of the residents' independent association, the Alimur Park Homeowners Association (Association), to represent my interests on this issue including entering into the agreement with the Park owner, which is required by Government Code §66427.5, for conducting the-required written ballot of resident support. The current president of the Association is Mr. Clay Butler, Space #66.

**LA PETICIÓN LA CONVERSIÓN CONTRARIA
& EL ENDOSO DE REPRESENTACIÓN**

Yo soy un propietario y residente de Alimur Mobilehome Parque (Parque). Yo opongo los planes del dueño del Parque para convertir el Parque a un proyecto de condominios poseído por los residentes. Yo autorizo los esfuerzos de la asociación independientes de los residentes, el Alimur Park Homeowners Association (Asociación), para representar mis intereses en este problema esto incluye entrar en un acuerdo con el dueño del Parque, que se requiere por el Código Governamental §66427.5, para conducir la voleta por escrita que se requiere para enseñar el apoyo de los residentes. El presidente actual de la Asociación es Sr. Clay Butler, el Espacio #66.

| NO. | PRINTED NAME NOMBRE IMPRIMIDO | SIGNATURE FIRMA | PHONE # EL TELÉFONO | SPACE NO. EL ESPACIO NO. |
|-----|----------------------------------|---------------------------|------------------------|-----------------------------|
| 1. | TIM NORTON | <i>Tim Norton</i> | | 21 |
| 2. | Esther Edger | <i>Esther Edger</i> | | 45 |
| 3. | Barbara Guzman | <i>Barbara Guzman</i> | | 92 |
| 4. | Nita Lamendola | <i>Nita Lamendola</i> | | # 100 |
| 5. | Judy Houston | <i>Judy Houston</i> | | # 98 |
| 6. | Evelyn Lauman | <i>Evelyn Lauman</i> | | # 203 |
| 7. | ESTHER EDGER | | | |
| 8. | SARA FINNEGAN | <i>Sara Finnegan</i> | | # 84 |
| 9. | DAVID DARDINO | <i>David Dardino</i> | | # 224 |
| 10. | Claire Chapette | <i>Claire Chapette</i> | | 23A |
| 11. | Pat Martin | <i>Pat Martin</i> | | # 28 |
| 12. | COLLEEN O'DRISCOLL | <i>Colleen O'Driscoll</i> | | # 5 |
| 13. | K Chapman | <i>Kennedy Chapman</i> | | 3 64 |
| 14. | Donna Starks | <i>Donna Starks</i> | | 33 |
| 15. | Robin Evenden | <i>Robin Evenden</i> | | 43 |
| 16. | Franco Fortina | <i>Franco Fortina</i> | | 82 |
| 17. | ESTHER EDGER | <i>Heard Chamber</i> | | 85 |

Opposition to Park Owners
Proposal to Convert Park to resident owned
condominium project

| NO. | PRINTED NAME NOMBRE IMPRIMIDO | SIGNATURE FIRMA | PHONE EL TELÉFONO | SPACE NO. EL ESPACIO NO. |
|-----|----------------------------------|-------------------------|----------------------|-----------------------------|
| 18. | Nora Lee Davis | Nora Lee Davis | | #164 |
| 19. | Jeremy Bruce | Jeremy Bruce | 816-8854 | #229 |
| 20. | Rachel Nilsson | Rachel Nilsson | | #234 |
| 21. | Carolynn Henning | Carolynn Henning | | #18 |
| 22. | Freya Kay Beck | Lisa Beck | | #201 |
| 23. | Bonnie [unclear] | Bonnie [unclear] | | #88 |
| 24. | Jane M. Cormick Crowley | Jane M. Cormick Crowley | | #235 |
| 25. | Jane Stofrey | Jane Stofrey | | #52 |
| 26. | Beverly A. Dutton | Beverly Dutton | | #226 |
| 27. | John Bonsall | John D. Ball | | #57 |
| 28. | Heather Thy | Heather Thy | | #68-B |
| 29. | ROD FINNIGAN | Rod Finnigan | | #84 |
| 30. | MARGRET CRANE | Margret Crane | | 101A |
| 31. | BEN ARONOWITZ | Ben Aronowitz | | 56 |
| 32. | William D. SIE | William Sisk | | 212 |
| 33. | Debra Monard | Debra Monard | | #78 |
| 34. | MELISSA HARDY | Melissa Hardy | | #10 |
| 35. | Teresa Edwards | Teresa Edwards | | #237 |
| 36. | Robert Kutsch | Robert Kutsch | | #218 |
| 37. | Roger Willenborg | Roger Willenborg | | 204 |
| 38. | Laura Brinson | Laura Brinson | | #86 |
| 39. | Michelle Tvaldi | Michelle Tvaldi | | #32 |
| 40. | Mary A. Eggulden | Mary A. Eggulden | | #76 |
| 41. | MARY O'NEILL | Mary O'Neill | | #55 |
| 42. | MALINDA LOVE | Malinda Love | | #63 |
| 43. | Ka | | | |
| 44. | BRENDA KUTSCH | Brenda Kutsch | | #218 |
| 45. | PATRICIA A. MYATT | Patricia A. Myatt | | #220 |

600-7

NO

| NO. | PRINTED NAME NOMBRE IMPRIMIDO | SIGNATURE FIRMA | PHONE # EL TELÉFONO | SPACE NO. EL ESPACIO NO. |
|-----|----------------------------------|------------------------|------------------------|-----------------------------|
| 46. | Bernice Cohn | Bernice Cohn | | 219 |
| 47. | ANDREW MADDEN | A. Madden | | 99 |
| 48. | Mickey Finn | Mickey Finn | | 36 |
| 49. | Tina Jett | Tina Jett | | 208 |
| 50. | Shelley P. Gatto | Shelley P. Gatto | | 98 |
| 51. | Rose Teixeira | ROSE TEIXEIRA | | 209 |
| 52. | BARBARA GABRIELI | Barbara Gabriel | | 72 |
| 53. | JUNE PARKER | June Parker | | 4 |
| 54. | Cathy Bartlett | Cathy Bartlett | | 50 |
| 55. | Severiano Lora | SEVERIANO LORA | | # 73 |
| 56. | FRANCISCO POPE | Francisco Pope | | 68-A |
| 57. | SYLVIA RHONDS | Sylvia Rhonds | | 67B |
| 58. | ANN GILLIGAN | Ann Gilligan | | 210 |
| 59. | Ruth Becked | Ruth Becked | | 15 |
| 60. | JAN ELLEN JORGENSEN | Jan Ellen Jorgensen | | # 20 ✓ |
| 61. | COLIS FREEMAN | Colis Freeman | | 31 |
| 62. | Jack Trotter | Jack Trotter | | 41 |
| 63. | Ann Trotter | Ann Trotter | | |
| 64. | Dana St. Pierre | Dana St. Pierre | | 214 |
| 65. | Genevieve Worrell | Genevieve Worrell | | 95 |
| 66. | LAURA RODRIGUEZ | Laura Rodriguez | | # 1 |
| 67. | Britta Zetterberg | BRITTA ZETTERBERG | | 8275 # 91 |
| 68. | Margo Mac Kinna | Margo Mac Kinna | | # 53 |
| 69. | Rick Dimeo | Rick Dimeo | | # 80 |
| 70. | David Regan | David Regan | | # 221 |
| 71. | Teresa A. Browok | Teresa A. Browok | | # 217 |
| 72. | D.K.H. FEWES | D.K.H. FEWES | | 7228 |
| 73. | Sally Nagana | Sally Nagana | | # 211 |

| NO. | PRINTED NAME NOMBRE IMPRIMIDO | SIGNATURE FIRMA | PHONE # EL TELEFONO | SPACE NO. EL ESPACIO NO. |
|------|----------------------------------|--------------------|------------------------|-----------------------------|
| 74. | | | | |
| 75. | Bernadean Kelly | Bernadean Kelly | | #225 |
| 76. | Lola L. Rogers | Lola L. Rogers | | #22 |
| 77. | Natalie Davis | Natalie Davis | | #37 |
| 78. | ELISE J SMITH | Elise J Smith | | 38 |
| 79. | Michael Carter | Michael Carter | | #94 |
| 80. | Tim Petersen | Tim Petersen | | #103 |
| 81. | ROBERT GOLDSTEIN | Robert Goldstein | | 85 |
| 82. | BARBARA JETTER | Barbara Jetter | | #17 |
| 83. | BETTY F. BLAKE | Betty F. Blake | | #47 |
| 84. | Cherie Lovett | Cherie Lovett | | 213 |
| 85. | JOSE A. REYES | Jose A. Reyes | | #14 |
| 86. | William Stursberg | William Stursberg | | #23 |
| 87. | Dianna Brint | Dianna Brint | | #27 |
| 88. | John N. Gruber | John N. Gruber | | #25 |
| 89. | Michele Green | Michele Green | | #8 |
| 90. | Jack Ryan | Jack Ryan | | #6 |
| 91. | Linda Winston | Linda Winston | | #13 |
| 92. | Chris Ballas | Chris Ballas | | #2 |
| 93. | JAN McANALLY | Jan McAnally | | #222 |
| 94. | CLAY BUTLER | Clay Butler | | #66 |
| 95. | JACKIE REED | Jackie Reed | | #63 |
| 96. | Wilbur W. Hatt | Wilbur W. Hatt | | #104 |
| 97. | LISA STEWART | Lisa Stewart | | #24 |
| 98. | JAN ELLEN JORGENSEN | Janella Jorgensen | | #20 |
| 99. | Kathryn Nation | Kathryn Nation | | #11 |
| 100. | Barbara Bundage | Barbara Bundage | | #87 |
| 101. | MARGARET REBARD | Margaret Rebard | | TOTAL |

Already signed earlier.

419-7583

| NO. | PRINTED NAME NOMBRE IMPRIMIDO | SIGNATURE FIRMA | PHONE # EL TELÉFONO | SPACE NO. EL ESPACIO NO. |
|------|----------------------------------|--------------------|------------------------|-----------------------------|
| 102. | ANNEEN BIRD | Anneen Bird | | #102 |
| 103. | Jeremy Martin | Jeremy Martin | | #7 |
| 104. | C. Paster | CHRIS PASTER | | #39 |
| 105. | Sally G. Cole | Sally G. Cole | | #232 |
| 106. | ROSE TEIXEIRA | Rose Teixeira | | #209 |
| 107. | DENISE ALDEIA WARD | Denise Aldeia Ward | | #19 |
| 108. | Pei Ring Huang | Pei Ring Huang | | #29 |
| 109. | BLAKE LVA | Blake Lva | | #12 |
| 110. | DONALD ATWELL | Donald Atwell | | #48 |
| 111. | MARILKE EWING | Marilke Ewing | | #58 |
| 112. | DOROTHY WOOLEY | Dorothy Wooley | | #71 |
| 113. | Michele Keny | Michele Keny | | #42 |
| 114. | Kevin Michael | Kevin Michael | | #227 |
| 115. | Dan Wakefield | Dan Wakefield | | #70 |
| 116. | DIANA McBride | Diana McBride | | #79 |
| 117. | Linda Cullen | Linda Cullen | | #67 |
| 118. | Carol Melusq | Carol A. Melusq | | #40 |
| 119. | Patricia Nelson | Patricia Nelson | | #25 |
| 120. | Duane O. Smith | Duane O. Smith | | #26 |
| 121. | Annette Diney | Annette Diney | | #81 |
| 122. | Bernard Bromley | BERNARD BROMLEY | | #83 |
| 123. | GARY JACKSON | GARY JACKSON | | #84 |
| 124. | Julie Galea | Julie Galea | | #96 |
| 125. | Genevieve Worel | Genevieve Worel | | #95 |
| 126. | Michael Israel | Michael Israel | | #51 |
| 127. | Denise Crichton | Denise Crichton | | #54 |
| 128. | Alvin Taylor | Alvin Taylor | | #61 |
| 129. | Joseph M Collins | Joseph M Collins | | #49 |

Already signed

| NO. | PRINTED NAME NOMBRE IMPRIMIDO | SIGNATURE FIRMA | PHONE # EL TELÉFONO | SPACE NO. EL ESPACIO NO. |
|------|----------------------------------|-----------------------|------------------------|-----------------------------|
| 130. | Nanette Spaucier | Nanette Spaucier | | 46 |
| 131. | Doreen Kern | Doreen Kern | | 35 |
| 132. | Kui Li | Kui Li | | 34 |
| 133. | Dana Strickland | Dana Strickland | | 202 |
| 134. | Flaine Souperon-Risat | Flaine Souperon-Risat | | 236 |
| 135. | THOMAS MATTHEWS | Thomas Matthews | | 30 |
| 136. | Patti Good | Patti Good | | 101 |
| 137. | Scott Taylor | Scott Taylor | | 233 |
| 138. | Thomas M. Burke | Thomas M. Burke | | 223 |
| 139. | Nita Avenell | Nita Avenell | | 93 |
| 140. | Kristine Plant | Kristine Plant | | 206 |
| 141. | Cynette DellPonte | Cynette DellPonte | | |
| 142. | G. Heblacker | G. Heblacker | | 77 |
| 143. | Elva Grauel | Elva Grauel | | 97 |
| 144. | | | | |
| 145. | | | | |
| 146. | | | | |
| 147. | | | | |
| 148. | | | | |
| 149. | | | | |
| 150. | | | | |
| 151. | | | | |
| 152. | | | | |
| 153. | | | | |
| 154. | | | | |
| 155. | | | | |
| 156. | | | | |
| 157. | | | | |

22 DECEMBER 2008

From: LOIS A FREEMAN
LOT #31
4300 SOQUEL DRIVE
SOQUEL, CA 95073-2152

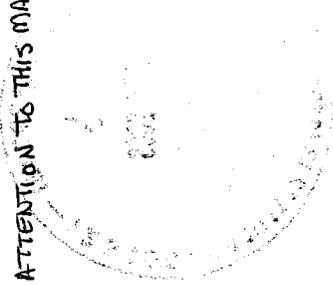
To: PROJECT PLANNER / ALICE DAHL
PLANNING DEPARTMENT
701 OCEAN AVENUE, SANTA CRUZ, CA 95060

RE: APPLICATION # 07-0310

THIS CONVERSION WOULD RESULT IN DEVASTATING MEDICAL AND FINANCIAL HARDSHIPS FOR ME;
#31, ALMUR MOJAVE HOME PARK HAS BEEN MY HOME FOR NINETEEN YEARS, I AM PERMANENTLY
DISABLED SENIOR OF 75 YEARS AGE.
I EMPLOY YOU TO PREVENT THIS CONVERSION.

THANK YOU! FOR YOUR TIME AND ATTENTION TO THIS MATTER.
ALL BEST WISHES,

Lois A. Freeman
831/462-1804 (24hr msg)



12-28-08

Dear Alice Daly,

I have lived in Alimer
Mobil Home Park for 25 yrs.
My husband has lived here
for 24 yrs. We own 2 mobile
homes in this park.

If this conversion goes
through we will stand to
lose a great deal on our
investments, this will be
twice the devastation for
us.

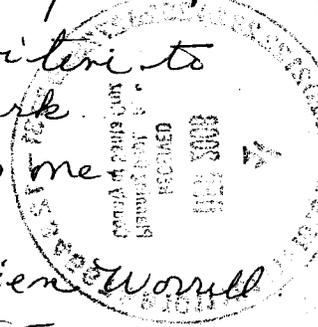
Thank you for your time
and consideration.

Donna Sankes
Alimer Park # 33

July 17

Attention Alice Daly -
I purchased my place
July 2001. The upkeep
would be Prohibited to
maintain the park
sewer system for me.

Genevieve Worrell
Space 95 -



12/16/08

To: Santa Cruz County
Planning Dept

Attention: Alice Daly

Re: Application # 07-0310

I am a homeowner &
resident in Alimur Mobile
Home Park, located at 4300
Soquel Drive, Space # 100

I have lived here since
July 2005 & whole heartedly
object to the proposed Sham
Condo Conversion by
owner Paul Goldstone
because it will devalue
my investment & →

and create financial hardship.

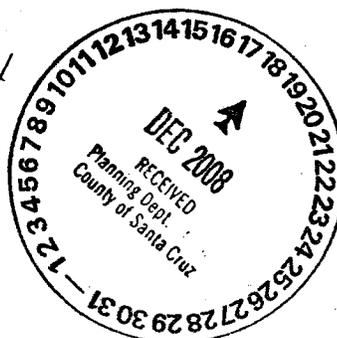
As a first time home owner
I came in to this park
because it was affordable
& offered me the security
I wanted for all my
adult life!!!

- through
the
County!!
///

Please, don't let that be
taken away!

Kind regards,
Nita Lamendola
100

(h) 831.465.1594



Dec 17-2008



Dear Planning Department
Commission

I love ad Alimus Mt Park.
we have been here over 12 yrs.
we are on a fixed income as
we are retired. My husband
and I will be devastated
by this conversion and we
would not be able to afford
to live here.

Thank you

Ron & Sara Linnegar # 84

Project Planner/Alice Daly
Planning Department
Santa Cruz, CA 95060

Application #07-0310

Dear Planning Department and Commission

We live in Alimur MH Park and are on a fixed income. We hope the yes/no survey results will be honored by the owner and his lawyers as true wishes of the majority of the residents here opposing the proposed Conversion Plan.

We hope the owner will look beyond his vision of a secure financial future for his lifetime and face the present realities that many people here will be hard pressed to ever get an affordable mortgage to pay for their land, plus the fact many are suffering from reduced income due to the present economy. So, please Mr. Goldstone, you who inherited this property which provides reasonable income for you, please give the residents peace of mind regarding their humble homes here. Thank you Planning Dept. and Owner Mr. Goldstone for your consideration of this appeal.

Sincerely,
Mr.&Mrs. Gary Cohn
AlimurMH Park #219

January 1, 2009

To Whom it may concern,

I am a resident of Alimur Mobile Home Park at 4300 Soquel Drive #55, Soquel, CA.

Our park owner is currently in the process of converting our mobile home park into a "condominium conversion."

I am against the 'SHAM' conversion as ~~it~~ it will not serve the community of residents in this park. My greatest fear is that I will lose my entire investment as a result of the proposed conversion.

Buying into Alimur Park was my only option for home ownership. Please do not allow this to be taken from me.

Sincerely,

MARY M. O'NEILL
4300 Soquel Drive #55
Soquel, CA 95073
831-476-2668

To: Alice Daly

From: Nita Lamendola
4300 Soquel Dr, #100
Soquel, CA 95073

2-5-09

Re: Alimur Mobile Home Park
Proposed Conversion

.....

I am writing this letter to express my OBJECTION to the proposal for converting Alimur Mobile Home Park from a rental occupied park to condo sub-divided ownership park

As a homeowner with a fixed income and limited resources I could not afford a second mortgage nor handle a space rental increase above and beyond the current guidelines.

The term fair market value seems questionable as well, in relation to purchasing and future rentals of our space

**I am unable to buy or support a rent increase of more than what is in place.
Rent control is our saving grace.**

**Thank you for listening to my concern via written process
I am unable to attend the 2/25/09 meeting as I work and do not get paid for time off**

**Kind regards,
Nita Lamendola**



February 9, 2009

Dear Planning Department and Commission,

I have lived at Alimur Mobile Home Park for about twenty years. I am reaching retirement. This conversion proposed by the owner of the park and his attorneys would be devastating for me and my family. It is causing me a great deal of stress, especially with the current economic state.

My feeling is that this park is older and in need of expensive repairs. I believe the owner is trying to dump this park on to the homeowners to pass those expenses on to the residents. For example, my sewer was clogged with roots and sewage backed up into the bathtubs and overflowed all over. This type of problem will be occurring more and more frequently throughout this park because of the failure on the owner's part to maintain the infrastructure.

Please do not approve this conversion plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barbara Brundage', with a long horizontal flourish extending to the right.

Barbara Brundage

Alimur MH Park, #87

February 9, 2009

Roger Willenborg

Alimur Mobile Home Park

4300 Soquel Dr Space 204

Soquel, Ca 95073

Santa Cruz County Planning Department

Re: Item 7 Application 07-0310 on Wed Feb 25, 2009 hearing

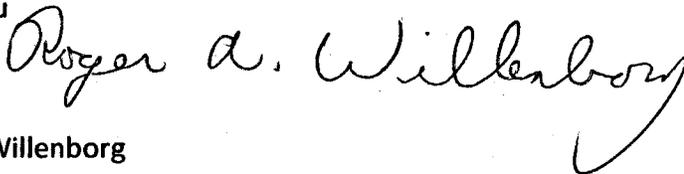
I, Roger Willenborg, and most all the residents of Alimur Mobile Home Park **urge you to not approve** Mr. Paul Joel Goldstone and Sid Goldstein's application to convert Alimur Mobile Home Park.

The residents of 141 out of 147 mobile homes voted against this proposed conversion scheme. Only two voted for it, the remainder did not vote.

Mr. Goldstone, Sid Goldstein and his lawyers obvious main agenda is to do away with rent control in the park resulting in the elimination of low income housing. They have pursued every avenue to eliminate rent control, low income housing and the persons who so desperately need it.

In closing, I once again urge the planning department to veto Mr. Goldstone and Mr Goldstein's application.

Thank you



Roger A Willenborg

02/10/09
09:11 AM
11/10/09
11/10/09

Chapter 14.08
CONVERSION OF MOBILEHOME PARKS TO
RESIDENT OWNERSHIP

14.08.010 Purpose and intent.

The purpose of this chapter is to establish requirements and procedures that are necessary and appropriate to comply with state laws related to the conversion of mobile home parks to resident ownership. The County of Santa Cruz further declares that the purposes of these provisions are also as set forth below:

- (a) To ensure that conversions of mobile home parks to resident ownership are bona fide resident conversions in accordance with state law;
- (b) To balance the need for increased homeownership opportunities with the need to protect existing affordable housing opportunities;
- (c) To ensure that park residents receive appropriate and timely information to assist them in fully understanding their rights and obligations under the statute; and
- (d) To ensure the public health and safety in converted parks. (Ord. 4880 § 1 (part), 8/7/07)

14.08.020 Definitions.

For the purpose of this chapter, the following words, terms and phrases shall be defined as follows:

- (a) "Mobile Home Park Conversion to Resident Ownership" means the conversion of a mobile home park composed of rental spaces to a condominium or common interest development, as described in and/or regulated by Government Code § 66427.5 and/or § 66428.1.
- (b) "Resident" or "Tenant" means the person or persons owning a mobilehome in a space within a mobilehome park pursuant to a rental agreement. (Ord. 4880 § 1 (part), 8/7/07)

14.08.030 Applicability.

The provisions of this chapter shall apply to all conversions of mobile home parks to resident ownership, except those conversions for which mapping requirements have been waived pursuant to Government Code § 66428.1. These provisions do not apply to the conversion of a mobile home park to an alternate use pursuant to Government Code §§ 65863.7 and 66427.4. (Ord. 4880 § 1 (part), 8/7/07)

14.08.040 Information and disclosure requirements for resident survey.

To assist the residents in determining how to respond to the resident survey required by subdivision (d) of Government Code § 66427.5, the following information and disclosures shall be provided by the park owner to each tenant household sufficiently in advance of the survey to allow its consideration:

- (a) A statement describing the effects that the mobilehome park conversion will

have on the application of the rent control provisions of Chapter 13.32 for both lower income households and for other households who continue residency as tenants. The statement shall specifically describe the effects that the conversion will have on the application of the vacancy control provisions of Chapter 13.32 of this Code, and a statement describing the effects of vacancy decontrol under Government Code § 66427.5 on the resale value of mobilehomes of both lower income households and of other households who continue residency as tenants. Included with this statement shall be a separate statement prepared by the County summarizing the major provisions of the County's mobilehome park rent adjustment Ordinance (Chapter 13.32 of the County Code.)

(b) A statement specifying the income level that is applicable pursuant to subdivision (f)(2) of Government Code § 66427.5, to determine whether households in the mobilehome park qualify as a lower income household or are not a lower income household, and requesting that the households identify whether they are a lower income household, or are not a lower income household.

(c) A statement specifying whether the subdivider will begin the phase-in of market level rents pursuant to subdivision (f)(1) and the rent adjustment provisions of subdivision (f)(2) of Government Code § 66427.5 upon the sale of one lot, upon the sale of more than 50% of the lots, or upon the sale of some other percentage of lots.

(d) A statement specifying the method by which the fair market rent levels authorized by subdivision (f)(1) of Government Code § 66427.5 will be established, or in the alternative, the specification of the range of rent levels that will be applicable to the subdivided units in the mobilehome park, including, but not limited to, the inclusion of any inflation adjustment formula to be utilized.

(e) A statement specifying how space rents will be set for purchasers of mobilehomes owned by lower income households and by other households (who continue residency as tenants under subdivision (f) of Government Code § 66427.5).

(f) A statement specifying the method by which the sales prices of the subdivided units will be established, or in the alternative, the specification of a range of purchase prices that will be applicable to the subdivided units in the mobilehome park, including, but not limited to, the inclusion of any inflation adjustment formula to be utilized.

(g) A statement specifying the method for determining and enforcing the controlled rents for non-purchasing households pursuant to Government Code § 66427.5(f)(2), and, to the extent available, identification of the number of tenant households likely to be subject to these provisions.

(h) Identification of the potential for non-purchasing residents to relocate their homes to other mobile home parks within Santa Cruz County, including the availability of sites and the estimated cost of home relocation.

(i) An engineer's report on the type, size, current condition, adequacy, and remaining useful life of each common facility located within the park, including but not limited to water systems, sanitary sewer, fire protection, storm water, streets, lighting, pools, playgrounds, and community buildings. A pest report shall be included for all common buildings and structures. "Engineer" means a

registered civil or structural engineer, or a licensed general engineering contractor.

(j) If the useful life of any of the common facilities or infrastructure is less than thirty (30) years, an engineer's estimate of the cost of replacing such facilities over their useful life, and the subdivider's plan to provide funding for same.

(k) An estimate of the annual overhead and operating costs of maintaining the park, its common areas and landscaping, including replacement costs as necessary, over the next thirty (30) years, and the subdivider's plan to provide funding for same.

(l) A maintenance inspection report conducted within the previous twelve (12) calendar months demonstrating compliance with Title 25 of the California Code of Regulations ("Title 25 Report"). Proof of remediation of any Title 25 violations or deficiencies shall be confirmed in writing by the California Department of Housing and Community Development (HCD).

(m) A detailed description of the County and State procedures to be followed for the proposed conversion, including, but not limited to, a tentative timeline.

(n) The phone number and address of an office designated by the County Board of Supervisors that can be contacted for further information relating to the proposed mobilehome park conversion.

(o) The subdivider shall attach a copy of this chapter to each survey form. (Ord. 4880 § 1 (part), 8/7/07)

14.08.050 Information and disclosure requirements for impact report.

The report by the subdivider on the impact of the mobilehome park conversion required by subdivision (b) of Government Code § 66427.5 shall include, but not be limited to, the following disclosures:

(a) That information specified by subsections A through M of § 14.08.040, required to be provided to park tenants for purposes of the resident survey.

(b) A statement specifying the number of mobile home spaces in the park and the rental rate history for each such space over the four years prior to the filing of the application.

(c) A statement specifying the method and timetable for compliance with Government Code § 66427.5(a), and, to the extent available, an estimate of the number of existing tenant households expected to purchase their units within the first four (4) years after conversion including an explanation of how the estimate was derived.

(d) An estimate of the number of residents in the park who are lower income households pursuant to subdivision (f)(2) of Government Code § 66427.5, including an explanation of how the estimate was derived.

(e) An estimate of the number of residents in the park who are seniors (62 years of age or older) or disabled, including an explanation of how the estimate was derived. (Ord. 4880 § 1 (part), 8/7/07)

14.08.060 Application submittal requirements.

The following information shall be submitted as part of the resident survey results with any subdivision application for conversion to a resident owned mobilehome

park pursuant to Government Code § 66427.5:

- (a) A statement of the total number of spaces occupied by residents (excluding any spaces occupied by the subdivider, a relative of the subdivider, or employee of the subdivider); and the total number of votes of such residents in favor of the conversion and the total number of votes of such residents in opposition to the conversion, with no more than one vote allocated for each mobilehome space.
- (b) The subdivider shall demonstrate that the procedures and timing used to conduct the survey were in accordance with an agreement between the subdivider and an independent resident homeowners association, if any. In the event that more than one resident homeowners association purports to represent residents in the park, the agreement shall be with the resident homeowners association which represent the greatest number of tenant homeowners in the park.
- (c) A written statement signed by the authorized representative(s) of an independent resident homeowners' association verifying that the survey form was approved by the association in accordance with the requirements of subdivision (d)(2) of Government Code § 66427.5.
- (d) A copy of the information and disclosures provided to tenant households pursuant to § 14.08.040.
- (e) A copy of the tenant impact report required pursuant to § 14.08.050.
- (f) A Tentative Subdivision and Final Map or Parcel Map unless waived pursuant to Government Code § 66428.1. A parcel map shall be required for all projects that contain less than five parcels and do not create more condominium units or interests than the number of rental spaces that exist prior to conversion. If additional interests are created or if the project contains more than 5 parcels a Tentative and Final map shall be required. The number of condominium units or interests to be created shall not determine the type of map required unless additional condominium units or interests are created over and above the number of rental spaces that exist prior to conversion. (Ord. 4880 § 1 (part), 8/7/07)

14.08.070 Criteria for approval of conversion application.

An application for the conversion of a mobile home park to resident ownership shall be approved only if the decision maker finds that:

- (a) A survey of resident support has been conducted and the results filed with the County in accordance with the requirements of Government Code § 66427.5 and this Chapter.
- (b) A tenant impact report has been completed and filed with the County in accordance with the requirements of Government Code § 66427.5 and this Chapter.
- (c) The conversion is a bona-fide resident conversion. For purposes of determining whether a proposed conversion is a bona-fide resident conversion, the following presumptions shall be applied based on the results of the survey of resident support conducted accordance with Government Code § 66427.5 and with this Chapter. The presumptions created by this subsection may be overcome through the submission of substantial evidence either at or prior to the hearing.
 - (1) Where the survey of resident support shows that 50% or more of the resident

survey vote supports the conversion to resident ownership, the proposed conversion shall be presumed to be a bona-fide resident conversion. Any interested person opposing the conversion shall have the burden of demonstrating that the proposed conversion is not a bona-fide resident conversion.

(2) Where the survey of resident support shows that less than 50% of the resident survey vote supports the conversion to resident ownership, the proposed conversion shall be presumed to not be a bona-fide resident conversion. The subdivider shall have the burden of demonstrating that the proposed conversion is a bona-fide resident conversion.

(d) Applications meeting the presumption established by subsection (c)(1) of this section shall be processed at Level VI. Applications meeting the presumption established by subsection (c)(2) of this section shall be processed at Level VII. (Ord. 4880 § 1 (part), 8/7/07)

14.08.080 Tenant notification.

The following tenant notifications are required:

(a) If the application for conversion is approved, the subdivider shall give each resident household written notice of its exclusive right to contract for the purchase of the unit of space it occupies at the same or more favorable terms and conditions than those on which such unit of space shall be initially offered to the general public. The right shall run for a period of not less than ninety (90) days from the issuance of the subdivision public report ("white paper") pursuant to California Business and Professions Code § 11018.2, unless the subdivider received prior written notice of the resident's intention not to exercise such right.

(b) If the application for conversion is approved, the subdivider shall give each resident household written notice of its right to continue residency as a tenant in the park as required by Government Code § 66427.5(a). (Ord. 4880 § 1 (part), 8/7/07)