

William J. Constantine, Attorney

303 Potrero Street, Building # 29, Suite 106
 Santa Cruz, California 95060

(831) 420-1238 Fax: (831) 480-5934

E-mail: wconstantinesantacruz@gmail.com

November 15, 2016

Trudi Ryan, Director
 Community Development Department
 City of Sunnyvale
 PO Box 3707
 Sunnyvale, CA 94088-3707

Re: Applications 2015-7566 and 2016-7065 for the Conversion of Blue Bonnet Mobile Home Park from a 54-Unit Mobile Home Park into a 60-Unit Three-story Townhouse Subdivision Requiring Tentative Map Approval and Compliance with the Provisions of Government Code Sections 66427.4 and 66473.5.

FOR SUBMISSION FOR THE ADVISORY RECOMMENDATION HEARING OF THE SUNNYVALE HOUSING AND HUMAN SERVICES COMMISSION.

HEARING DATE: NOVEMBER 16, 2016

Dear Ms. Ryan:

My office represents the Blue Bonnet Mobile Home Park Residents' Committee (the Residents' Committee), an unincorporated association of the residents and manufactured home owners of Blue Bonnet Mobile Home Park (the Park).

On their behalf, I have reviewed the Blue Bonnet Mobile Park Conversion Impact Report, dated October 3, 2016 (the CIR) on the Park owner's proposed project to convert the Park from an existing - low income affordable - 54 mobile home unit mobile home park into a new subdivision consisting of 60 - not low income affordable - three-story townhouses (the Project). Please submit this letter and its tables and exhibits into the City's administrative record for the **both** of the applications listed above and into the proceedings of the Housing and Human Services Commission's November 16, 2016 - hearing on this matter.

I am submitting the comments and objections on the CIR that are contained in this letter on the Residents' Committee's behalf, and it explains why the Committee believes that the CIR is inadequate and must be rejected and why the process that the City is following in evaluating it and in processing both of the above listed applications is unlawful. My comments conclude that, from all the information submitted in the CIR, and from information that we have independently obtained, both the CIR and Project cannot be approved, as their approval would violate the City's Mobile Home Park Conversion Ordinance (the Ordinance), the State Statutes that control it, the City's Housing Element, and California's General Plan and Housing Element Statutes, for the reasons that are discussed below. My office's representation is limited to representing the

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Committee in pointing out these inadequacies and in possibly pursuing litigation if they are not adequately corrected. However, my office is not, at this time, representing any individuals regarding the particular mitigation benefits that they are being offered. Any discussion of their circumstances in this letter is for the sole purpose of illustrating the inadequacies of the CIR and of the process that the City is following.

I. SINCE THE CIR FAILS TO DEMONSTRATE THAT ANY OF THE DISPLACED HOMEOWNERS WILL BE ABLE TO “OBTAIN HOUSING IN ANOTHER MANUFACTURED HOME PARK” WITH THE MITIGATION BENEFITS THAT ARE BEING OFFERED, IT MUST BE REJECTED.

A. Sunnyvale’s Conversion Ordinance and Controlling State Statutes Require the CIR to Demonstrate That the Benefits That It Proposes Will Enable the Displaced Residents That it Describes to Obtain the Alternate Housing That it Identifies.

The purpose of the CIR, under both the controlling state statutes and Sunnyvale’s Ordinance, is not merely to be an academic exercise that only “identifies” the “adverse social and economic impacts of a manufactured home park closure on its displaced residents” by producing the socioeconomic information called for in the Ordinance, which is all this CIR really does. Instead, the information produced must demonstrate that the displaced homeowners will **actually** obtain the replacement housing that the Ordinance requires it to report on. Since it does not do this, the CIR fails and must be rejected.

The above laws command that the City must use the information that the CIR provides to ensure that the “adverse social and economic impacts of a manufactured home park closure on its displaced residents” are not only “identified” in the CIR but also that the information produced demonstrates that those socioeconomic impacts are then actually “**mitigated through adequate relocation and other assistance.**” In that regard, SMC Section 19.72.010(b), the “Purpose” section of the Ordinance, clearly states that this is the purpose of Sunnyvale’s mobile home park conversion ordinance:

“Purpose This chapter establishes requirements to ensure that the adverse social and economic impacts of any mobile home park conversion on displaced residents are identified and mitigated through adequate notice reasonable **relocation and other assistance.**”

The CIR does not do this; instead, it provides summary demographic information on the residents and a description of possible alternate housing, but it fails to provide the information that shows that the mitigation benefits that it proposes will actually enable the specific displaced

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homeowners and residents that it describes to obtain the housing that it reports on. It simply fails to perform that analysis. In short, it fails to connect the dots that it's required to connect. That failure appears to be intentional, since, when that information gap is filled in and that analysis is performed, the outcome demonstrates that almost none of the of the displaced homeowners will be able to obtain the alternate housing that the CIR reports on with the mitigation benefits that it provides. For that reason, although the CIR has produced some raw information in response to various subsections of the Ordinance, it does not present the easily available information that would actually enable the CIR to achieve the purpose that SMC Section 19.72.010(b) requires it to.

As is explained below, for this reason alone, the CIR must be rejected and the Park closure and conversion to a higher-end housing subdivision must be rejected until this deficiency is corrected. The park owner's current advocates, both in this CIR and in prior manufactured home park conversion hearings, have wrongly argued that the controlling State Statutes do not allow the City to enforce the Ordinance's purpose section by rejecting the conversion. This conclusion flies in the face of the clear directive of Government Code Section 66427.4, which controls this type of conversion, since that statute clearly directs that the City may approve, **disapprove** or conditionally approve the tentative map application, **in which process this CIR is required to be evaluated and decided upon:**

66427.4. (a) At the time of filing a tentative or parcel map for a subdivision to be created from the conversion of a mobilehome park or floating home marina to another use, the subdivider shall also file a report on the impact of the conversion upon the displaced residents of the mobilehome park or floating home marina to be converted. In determining the impact of the conversion on displaced mobilehome park or floating home marina residents, the report shall address the availability of adequate replacement space in mobilehome parks or floating home marinas.

.....

(c) The legislative body, or an advisory agency **that is authorized by local ordinance** to approve, conditionally approve, or **disapprove** the map, may require the subdivider to take steps to mitigate any adverse impact of the conversion on the ability of displaced mobilehome park or floating home marina residents to find adequate space in a mobilehome park or floating home marina, respectively.

This statute provides a clear mandate that, if its required CIR does not demonstrate that the **mitigation** that it proposes will allow a "conditionally approved" tentative map to adequately mitigate the adverse impact of the conversion on the displaced residents' ability to relocate to other

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manufactured home parks, then the City is required to “disapprove” of **both** the CIR and the tentative map application that it is required to be part of until the mitigation benefits that it proposes support the conditional approval of the tentative map.

So this process is unlawful for two reasons. First, the City is unlawfully evaluating the CIR separately from the Project’s future tentative map application. The City cannot do this, and that alone makes this whole process, any resulting CIR approval, and any approval of the Project’s future tentative map all unlawful. Secondly, even if the City were in fact following the correct procedures mandated by these Statutes, the information currently provided by this CIR fails to demonstrate that any of the homeowners and residents that it identifies that will be displaced by the conversion will be able to obtain alternative housing in other manufactured home parks. This deficiency is discussed in Section B, directly below.

B. The CIR Fails to Demonstrate That the Displaced Homeowners and Residents That it Describes Can Qualify for Residency to Obtain the Alternate Housing in the Manufactured Home Parks That it Reports on.

Among other requirements, SMC Section 19.72.090(c) requires the CIR to list any “restrictions on the type of the residents accepted” of the parks listed in its listing of parks that have vacant manufactured home spaces available. Likewise, SMC Section 19.72 .090(d) requires the CIR to state the “availability” of rentals and purchases of comparable housing. Comparable housing means, among other requirements, that the housing is located in manufactured home parks within a reasonable distance. Those manufactured home parks will have firm **residency approval requirements**, the most stringent of which are household income requirements, typically requiring a 33% or 40% total monthly housing cost-to-monthly income ratio. Thus, the income levels of the low and below low income Blue Bonnet households who will be displaced, apart from limiting their ability to purchase housing and actually cover the substantial monthly housing costs at local parks identified in the CIR, will also be the critical factor in determining their ability to be accepted as residents in the disclosed parks. These are the parks that the CIR identifies as either having spaces available and a willingness to accept displaced manufactured homes from Blue Bonnet or as having manufactured homes that the displaced homeowners can purchase and move into.

Obviously these household income residency requirements constitute both a **restriction** on the type of residents that will accepted in the alternative parks under SMC Section 19.70 2.090(c) and a **limit** on the “availability,” under SMC Section 19.72 .090(d), of comparable housing that is available in other manufactured home parks for purchase or rental, since **neither those spaces nor that housing is available to the homeowners who will be displaced from Blue Bonnet and who do not meet the parks’ household income-based residency requirements.**

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The CIR reports that 16 of Blue Bonnet's households are low income, 12 are very low income and 12 are extremely low income, and that only 3 households are non-low-income. (CIR p. 22 Table 3). The CIR also reports that, of the 46 households that were interviewed, 25 were resident homeowners--owned the homes that they occupied and were to be displaced by the park closure--and that 21 either rented their homes and spaces from the park owner or were subtenants of a homeowner who did not live in the park (3 households). (CIR p. 21, Table 2B) The CIR also reported that only 3 of the resident-owned manufactured homes could, due to their age and condition, be relocated into an available space in another manufactured home park, if one could be found. Thus, the CIR must demonstrate that the mitigation benefits being paid to the 25 resident homeowner households will be sufficient enough to enable them to purchase available alternate housing in other nearby manufactured home parks and **that those households actually can do so by meeting the residency requirements of those other parks.**

To comply with the above requirements, the CIR has to provide two sets of information: first, it has to report the **actual income** and the other residency-approval-related circumstances of each of the homeowners--particularly indicating whether they are seniors or not--who will be displaced and who will have to **both** be able to afford to purchase the alternate manufactured homes available in other manufactured home parks and to pay the park's rent and other costs, while also being qualified to meet both the income and senior-status-based residency requirements of those parks. The second set of information has to report what those homes are selling for in those parks, the rents and other housing costs in those parks and the income and senior-status restrictions for residency in those parks.

Table 3 of the CIR attempts to provide the first part of this equation by listing income status but fails because it lists only the number of people in each raw-income category. As has been explained above, this is an insufficient, showing, since park residency approval is based upon each household's **actual income** rather than just the raw income category that the household belongs to. In that regard, the Association has collected its own surveys from more than half of Blue Bonnet's resident homeowner households and summarized this needed information in Table A to this letter. Although Table A groups these homeowners by income category, it also lists each household's actual income, their senior status (i.e., 55 and older or not) and the maximum monthly housing costs that their actual income level, rather than their income group, will support, for residency approval. This is the information that is needed to determine whether they are qualified for park residency in the parks listed in the CIR as being affordable to them. (See Table A to this letter.)

Section 16 of the CIR, entitled "Housing Alternatives," provides only a small part of the information needed for the second part of this equation. It states that, due to the age of the units at Blue Bonnet, a majority of the residents will have to obtain alternative housing (CIR p. 28), presumably meaning that they cannot relocate their manufactured homes to these other

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manufactured home parks but will have to either purchase manufactured homes that are already located in those parks or find non-manufactured home housing alternatives.

Table 6 of Section 16 then lists 9 comparable sales from 7 manufactured home parks, with one of the sales occurring in a Sunnyvale park and the remainder occurring in San Jose, Fremont and Hayward. However, again, no information is provided that demonstrates what the income and senior status residency requirements are for those parks so that it can be determined whether **each** of Blue Bonnet's displaced homeowners who the CIR's Table 6 implies can purchase its listed housing can actually qualify for residency in the listed home's park, so that it can then be determined whether that housing is **actually available** to those displaced homeowners. The listed comparable sales are sales that occurred between June 2015 and June 2016, and they range from \$72,000 to \$100,000. However, that listing does not show the number of homes in that price range that are available for sale **now**, were available at any one time since, or would likely be available at any single point in time (*i.e., to show likely availability at the future point in time when the displaced homeowners actually will have to purchase their homes*). If it did provide that information, then it would show that there are only a fraction of that many homes at best, and often none at all, available in that low price range, since that Table 6 data covers one whole year's worth of the **lowest sales prices** in those parks over that time, rather than showing the typical sales prices in those parks that will likely be available for sale at any given time. To supplement that information, the CIR has also to show how many homes in these price ranges were actually still available **for sale** on the date that the CIR was produced.

Table 6 also does not show what the total monthly housing costs will be for each of those homes reported as being sold in those parks. This information is needed, since, as will be shown below, those low price ranges are simply not going to be available for all of the Blue Bonnet homeowners when they need to move, so most will have to use their mitigation benefits as a down payment and take on mortgages, rather than being able to purchase their alternate housing free and clear. These monthly housing costs will be an aggregate of their monthly mortgage payments, their new homes' new space rents, taxes, insurance and utilities. If this information is provided, it can then be compared with the household income information contained in Table A (¹) to this letter to determine whether the displaced households will actually be able to obtain alternate housing in those other manufactured home parks.

Although Table 6 of the CIR fails to do this, Table B, of this letter, looks at those same parks and applies the information on the manufactured homes located in those parks that were

¹ As has been explained in this letter, the information contained in Table 3 is worthless for performing this task, so it has to be redone to produce the information contained in Table A to this letter for all of the homeowners who are going to be displaced by the closure.

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actually still for sale on November 3, 2016, so it can be used to determine which of the households in Table A will actually be able to obtain and qualify for the housing that is listed in Table B. This was a very easy task to perform, but the CIR did not even attempt to do this. Why? An educated guess would be that the owners or their counsel did not want to provide this needed information because it shows that almost all of these displaced households will **not be able to afford to purchase the homes that are actually now available in these parks or be qualified for residency in the parks listed in Table 6 of the CIR**. Obviously, if these homeowners cannot qualify for residency in these parks, these homes are not **available** to them.

Likewise, Table C in this letter lists all of the manufactured home parks in Sunnyvale, and then, applying the average manufactured home sales price of homes sold in those parks from Appendix 19 of the CIR, it determines the total monthly housing cost for all of Sunnyvale's parks. When compared with the displaced homeowner - household income information from Table A, it shows that none of Blue Bonnet's displaced homeowners - households will come even close to being able to purchase alternate housing in any of the Sunnyvale's manufactured home parks or be qualified for residency approval in those parks.

There are also no alternate forms of affordable rental housing available in Sunnyvale for the Blue Bonnet's displaced homeowners. Although, the CIR does not fully admit to this fact in its analysis, Sunnyvale's housing element clearly **does** admit to this:

"As the table below clearly indicates, Citywide median rents are well above the level of affordability for very low income households, with an affordability gap ranging from approximately \$500 per month for one person households to \$1700 dollars for four person households. Low income households, with the exception of single person households, also have trouble affording the median apartment rent, with affordability gaps ranging from approximately \$250 to \$970." [p. 36 of Sunnyvale's 2015-2023 Housing Element (Housing Element), adopted December 16, 2014]

Non-manufactured home - home ownership in Sunnyvale is also not an option for not either the low income residents displaced from Blue Bonnet or even for the 3 moderate income households identified in Table 3 of the CIR, a fact that the CIR also ignores but that Sunnyvale's Housing Element clearly admits to ⁽²⁾:

² Condominium prices in Sunnyvale are also not affordable to the moderate income homeowners who will be displaced from Blue Bonnet and are well beyond the affordability of the low and below low income homeowners. In that regard, Sunnyvale's housing element states that the maximum affordable purchase price for a four-person moderate income household is \$547,400, whereas the median-priced

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“As illustrated in this table, median single-family home prices in Sunnyvale are well beyond the level of affordability for moderate income households. For example, the maximum affordable purchase price for a moderate income, four person household was \$54,400 in 2013, whereas the median price of a single-family home in Sunnyvale was \$1,012,500 at that time, and affordability gap of \$465,100. (p. 36 of Housing Element)

Accordingly, the CIR should be disapproved of because it does not provide the information that is required by SMC Sections 19.72.090(c) and (d), which information is essential for their purpose of determining whether either adequate spaces or forms of alternate housing are **actually available** for the displaced homeowners of Blue Bonnet.

II. Since the CIR Fails to Demonstrate that the Conversion of Blue Bonnet’s 54 Affordable Manufactured Homes into 60 High End Three-Story Townhouses Is Consistent with the City’s Housing Element’s Affordable Housing Preservation Goals and Policies, the City Is Required to Disapprove of the CIR, the Park Closure and the Project’s Tentative Map.

A. The CIR Is Required to Be Evaluated and Decided upon at the Project’s Tentative Map Hearing and both Are Required to Be Rejected if the Closure and Conversion of Blue Bonnet Is Found to Be Inconsistent With Sunnyvale’s Housing Element.

1. The CIR Is Required to Be Rejected Because It Is Only Permitted to Be Evaluated and Approved at the Project’s Tentative Map Hearing and Its Mitigation Conditions Must Be Part of the Conditions of the Project’s Tentative Map Approval.

The CIR is unlawful and must be rejected because its evaluation of the proposed park closure applies the wrong State Statute and because it is unlawfully being considered for approval outside of the Blue Bonnet Development Project’s Tentative Map Approval Hearing. Section 3 of the CIR, “Applicable Law Regarding Mobile Home Park Conversion And/or Closure,” misinforms the City that Government Code Section 65863.7 controls the evaluation of the closure, the CIR and the review of it that the City must conduct in deciding upon the Park’s conversion. (pp. 5-6 of CIR). That is incorrect because the CIR is required to be produced and evaluated not under Government Code Section 65863.7 but under Section 66427.4, since the Park is being replaced

condominium in Sunnyvale sold for \$643,500 in 2013. (p. 35) The prices have increased drastically since then.

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with a subdivision, which project requires tentative map approval.³

In such circumstances, the State Legislature chose to then require, through Government Code Sections 66427.4 and 66473.5, that the City must at that point ensure that the conversion is consistent with the important statewide policy of preserving the State's scarce affordable housing stock. These two statutes are intended to be applied together to promote this important State policy.

³ The CIR unlawfully attempts to apply the provisions of Government Code Section 65863.7 to this project. It does not apply because it clearly excludes conversions of mobile home parks to subdivisions:

**“(a) prior to the conversion of mobile home park to another use, except pursuant to the Subdivision Map Act (Division 2 commencing with Section 66410 of Title 7)...”
 (Subdivision a of Section 65863.7)**

Here, the “Project Information” sheet of the “Planning Division Application Form,” which the park owner and developer submitted on July 14, 2015, clearly states under that form’s “Project Description” inquiry: “60 new townhouses to replace 54 existing mobile home units.” This is a project that clearly requires a tentative map approval, under the Subdivision Map Act. (*See* page 1 of Planning Division Application Form, Project Number 2015 – 7566, Parcel Number 209 – 02 – 001, filed by Sue Chuang and Eastern Dune Investors LLC on July 14, 2015.) The City acknowledged this in the “Planning PRC Comments” that it issued on August 3, 2015 and in which it stated that “this project shall be subject to, and contingent upon, the approval of a tentative map and recordation of a final map prior to any building permit issuance.” (*See* Item 2 p. 1 of August 3, 2015 - City of Sunnyvale, Planning PRC Comments, Project Number 2015 – 7566, PRC: 7/29/15). The developer then subsequently unlawfully submitted, and the City unlawfully accepted and began the process for, a second Planning Division Application seeking the independent approval of the CIR and this time only listing “Closure Impact Report Review” as the project description, rather than its required description under sections 66427.4 and 66473.5 (*i.e.*, *60 New Townhouses to Replace 54 Existing Mobile Home Units*). (*See* page 1 of Planning Division Application Form, Project Number 2016 – 7065, Parcel Number 209-02-001, filed by Sue Chuang and Eastern Dune Investors LLC on January 20, 2016.) The city then issued a second Preliminary Review Committee - Review Comments on February 9, 2016, under the project number 2015 – 7566, which, under General Comments, stated that the park owner was required to **submit a “mobile home park conversion impact report”** that required approval by the housing and human services commission and City Council, as well as again stating that the project **would require approval of a Tentative Map**. (*See* Items 1 and 2 of the top section of p. 1 of February 9, 2016 - City of Sunnyvale, Planning PRC Comments, Project Number 2015 – 7566, PRC: 7/29/15). Accordingly, while clearly acknowledging that the conversion impact report is part of a project requiring tentative map approval, the city has unlawfully permitted the conversion impact report to be separated out of the tentative map approval and is allowing it to be unlawfully considered and approved outside of the tentative map approval - hearing at a separate hearing, in violation of Government Code Sections 66427.4 and 66473.5

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They do this by mandating that the City must determine whether or not the Project is consistent with the affordable housing preservation Goals and Policies of the City's Housing Element.

In that regard, since Government Code Section 66427.4 applies, it requires that the CIR must be evaluated and approved of at the Project's tentative map hearing and that the homeowner displacement mitigation conditions, which it requires the City to impose, must be conditions contained in the project's tentative map approval, rather than contained in a stand-alone approval of the CIR, which it does not permit:

"66427.4. (a) At the time of filing a tentative or parcel map for a subdivision to be created from the conversion of a mobilehome park or floating home marina to another use, the subdivider shall also file a report on the impact of the conversion upon the displaced residents of the mobilehome park or floating home marina to be converted. In determining the impact of the conversion on displaced mobilehome park or floating home marina residents, the report shall address the availability of adequate replacement space in mobilehome parks or floating home marinas.

(b) The subdivider shall make a copy of the report available to each resident of the mobilehome park or floating home marina at least 15 days prior to the hearing on the map by the advisory agency or, if there is no advisory agency, by the legislative body.

(c) The legislative body, or an advisory agency that is authorized by local ordinance to approve, conditionally approve, or disapprove the map, may require the subdivider to take steps to mitigate any adverse impact of the conversion on the ability of displaced mobilehome park or floating home marina residents to find adequate space in a mobilehome park or floating home marina, respectively."

(d) This section establishes a minimum standard for local regulation of conversions of mobilehome parks and floating home marinas into other uses and shall not prevent a local agency from enacting more stringent measures.

These provisions prohibit the park closure from being separated out and approved prior to Section 66427.4's tentative map hearing.

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Section 66473.5 must then be applied, and it does **not** allow the City to approve of either the Project's tentative map or the project's required CIR at the tentative map hearing, unless the proposed conversion is found to be consistent with the affordable housing preservation Goals and Policies of the City's Housing Element, since the City's Housing Element is one of the most important **mandatory** components of its General Plan:

"No local agency shall approve a tentative map, or a parcel map for which a tentative map was not required, unless the legislative body finds that the proposed subdivision, together with the provisions for its design and improvement, is consistent with the general plan required by Article 5 (commencing with Section 65300) of Chapter 3 of Division 1, or any specific plan adopted pursuant to Article 8 (commencing with Section 65450) of Chapter 3 of Division 1.

A proposed subdivision shall be consistent with a general plan or a specific plan only if the local agency has officially adopted such a plan and the proposed subdivision or land use **is compatible with the objectives, policies, general land uses, and programs specified in such a plan.**" [*See* Government Code section .66473.5]

Accordingly, it is unlawful to approve of the CIR and the park closure and conversion except in the project's tentative map approval proceedings, at which the affordability of the housing that is being lost due to the park closure can be compared with the affordability of the housing that is replacing it to determine whether the conversion is consistent with the City's Housing Element's affordable housing preservation Goals and Policies. These current proceedings are, therefore, unlawful and void, as well as a waste of the City's financial resources and time.

2. Even If It Is Evaluated under Government Code Section 65863.7 the CIR Must Be Rejected Because Section 65302 Also Requires the Conversion of Blue Bonnet into High End Condos Requires It to Be Found to Be Consistent with the Affordable Housing Preservation Goals and Policies of the City's Housing Element and the CIR Does Not Address That Issue.

Moreover, even if the closure of Blue Bonnet and its CIR approval were not clearly components of a project that clearly requires approval of a tentative map, Government Code Section 65302 would then apply, and it imposes an implied requirement of general plan consistency, which would require the disapproval of the park closure and conversion, including disapproval of its CIR under Section 65863.7, if its approval is found to be inconsistent with the

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affordable housing preservation Goals and Policies of the City's Housing Element:

The City of Hayward was required to adopt all mandatory elements specified in Government Code section 65302, including a noise element, and was required to conform its proposed public works projects to its general plan. The implied statutory requirement of consistency has no less effect than the express statutory subdivision map consistency requirement invoked in *Save El Toro Assn. and Woodland Hills I.* See *Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988 at 988

B. Sunnyvale's Housing Element Shows the City Is Suffering a Horrible Deficit in its Current Affordable Housing Stock and Cannot Afford the Unmitigated Loss of the Affordable Housing Located in Blue Bonnet.

Sunnyvale's 2015-2023 Housing Element shows that Sunnyvale is suffering a horrible deficit in its current affordable housing stock. For example, it shows that, in 2010, Sunnyvale contained 10,540 very low income and below households and 4,175 low-income households (Table 30 p. 44 of Housing Element). It then shows that 7,815 of these very low income and below households are overpaying more than they can afford on their housing and experiencing "cost burden" and that 5,365 of that same group are experiencing "severe cost burden." Id. This means that Sunnyvale has a current deficit of 7,815 affordable housing units to meet the needs of its current very low income and below households and, thus, is causing 74% of those households to have to live in housing that they cannot afford and still be able to meet their other basic living expenses. The Housing Element also shows that 2,785 of Sunnyvale's 4,175 low income households (67% of them) are overpaying more than they can afford on their housing and experiencing "cost burden." Thus, Sunnyvale has a deficit of 10,600 affordable housing units to meet the needs of its current low income, very low income and extremely low income population. Id.

Sunnyvale's Housing Element also shows that Sunnyvale has consistently been able to meet only an extremely small fraction of its RHNA - allocated share of the new construction of affordable housing that is needed to meet the expanding population needs of the region. (Table 47, p. 102 of Housing Element) For example, it shows that Sunnyvale was able to meet only 17% of its RHNA quota for the construction of new very low income - affordable housing units of the quota that was assigned to the City for the 2007 – 2014 housing element period. Id. This occurred because Sunnyvale was able to produce only 187 of its RHNA new construction goal of 1,073 very low-income units and that it, therefore, fell short by 886 very low-income units. Id.

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Likewise, the Housing Element also shows that Sunnyvale was able to meet only 37% of its 2007 – 2014 - RHNA quota for the construction of new low income - affordable housing units by being able to produce only 260 units of its RHNA - new construction quota of 708 low income units, thus falling short by 448 low-income housing units. Id. This means that Sunnyvale has an additional deficit of 1,335 low and very low income housing units. On the other hand, Sunnyvale came very close to meeting its full 2007 – 2014 RHNA allocation for new construction of above moderate income housing, meeting 95% of that allocation by producing 1,773 of its 1,869 RHNA - new construction - above moderate income housing units goal. Id.

Sunnyvale's Housing Element also recognizes Blue Bonnet's 54 mobile home units to be part of the City's 16 mobile home parks' current supply of 4,000 mobile home units that, it states, are an important segment of Sunnyvale's current stock of affordable housing:⁴

⁴ The fact that Blue Bonnet is one of the three of the City's sixteen remaining mobile home parks that is not zoned RMH (Residential Mobile Home) but, instead, zoned R-4 does not alter the fact that it is still part of the City's 16 mobile home parks that the City's Housing Element acknowledges to comprise an important segment of Sunnyvale's stock of affordable housing, which it then sets a Goal and a Policy of preserving (*i.e.*, *Goal B and Policy B.1*). This is particularly true because, as Table C of this letter shows, Blue Bonnet is likely to be Sunnyvale's only remaining park that actually has any affordable housing left in it. The only significance of Blue Bonnet's not being protected by RMH zoning is that, although the City's zoning code allows for the redevelopment of Blue Bonnet into non-mobile home park use, **for that non-mobile home park use to be consistent with Goal B and Policy B1 of the Housing Element, the City would have to require the production of an equivalent number of affordable housing units that are equally as affordable as the affordable mobile home units that would be lost.** Blue Bonnet's zoning designation appears to allow for this, since its R-4 zoning designation provides for high-density residential zoning of up to 36 dwelling units per acre. If, however, that R-4 zoning designation was not sufficient to allow for all of the affordable housing to be replaced, then the City would be required to change the zoning designation of Blue Bonnet to one that would either require the preservation of Blue Bonnet as an ongoing mobile home park or that would allow all of its affordable housing to be replaced within that new zoning designation. The reason for this is that Government Code 65860 applies in this case, and it requires the City's zoning code to be consistent with the mobile home park affordable housing preservation Goal and Policy of the Housing Element and for the City to amend Blue Bonnet's zoning designation if it is not:

"65860 (a) County or city zoning ordinances shall be consistent with the general plan of the county or city by January 1, 1974. A zoning ordinance shall be consistent with a city or county general plan only if both of the following conditions are met:

(1) The city or county has officially adopted such a plan.

(2) The various land uses authorized by the ordinance are compatible with the objectives,

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“With 16 mobile home parks and over 4,000 mobile home units, mobile homes comprise an important segment of Sunnyvale’s stock of affordable housing.” [See p 116 of 2015 - 2023 Sunnyvale Housing Element]

Sunnyvale’s Housing Element also has a stated Goal to “maintain and enhance condition and affordability of existing housing in Sunnyvale. [See Goal B on p 105 of 2015 – 2023 Sunnyvale Housing Element]. In support of that Goal, Sunnyvale’s Housing Element also has a stated policy of “Preserving Sunnyvale’s mobile home parks as an affordable housing option. Maintain at least 400 acres of mobile home park zoning.” [See Policy B.1 on p. 105 of 2015 – 2023 Sunnyvale Housing Element]

C. Even If the CIR Had Properly Evaluated the Consistency of the Replacement of Blue Bonnet, with the Project’s Intended High-End Condominiums, It Would Have To Be Rejected As Being Inconsistent with Sunnyvale’s Housing Element’s Affordable Housing Preservation Goals and Policies.

1. Sunnyvale Is in Violation of California’s Housing Element Law and its own Housing Element Because It Has Failed to Protect, and Has Now Lost the Affordability of Most of the Affordable Housing Located in Its Manufactured Home Parks. For This Reason, Sunnyvale is required to protect the Remaining Affordable Housing Located Its Manufactured Home Parks, Including the 54 Affordable Units That Will Be Lost in Blue Bonnet.

Sunnyvale’s policy of preserving Sunnyvale’s mobile home parks’s affordable housing is predicated upon its mobile home zoning ordinance’s maintaining of at least 400 acres of mobile

policies, general land uses, and programs specified in the plan.

(b) Any resident or property owner within a city or a county, as the case may be, may bring an action or proceeding in the superior court to enforce compliance with subdivision (a). Any such action or proceeding shall be governed by Chapter 2 (commencing with Section 1084) of Title 1 of Part 3 of the Code of Civil Procedure. No action or proceeding shall be maintained pursuant to this section by any person unless the action or proceeding is commenced and service is made on the legislative body within 90 days of the enactment of any new zoning ordinance or the amendment of any existing zoning ordinance.

(c) In the event that a zoning ordinance becomes inconsistent with a general plan by reason of amendment to the plan, or to any element of the plan, the zoning ordinance shall be amended within a reasonable time so that it is consistent with the general plan as amended.” See Government Code Section 65860.

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home park zoning.” **Id. Unfortunately, almost all of that affordable housing has already been either eliminated or is no longer affordable.** In that regard, maintaining 400 acres of mobile home park zoning **does not** preserve Sunnyvale’s mobile home parks as affordable housing, because the City has discriminated with that zoning and applied it primally to large higher-end parks that are no longer affordable and, thereby, encouraged the City’s smaller affordable parks to be redeveloped. This is what has occurred in Sunnyvale over the last 20 years. Because of this, as will be shown below, Sunnyvale cannot afford to lose the affordable manufactured home units that are located in Blue Bonnet.

The reason why Sunnyvale cannot allow the conversion of Blue Bonnet without violating policy B.6 of this Housing Element, is that the City has been very careless and has neither monitored the affordability of the housing in its manufactured home parks nor adopted local regulations to keep the huge majority of that housing affordable (i.e., manufactured home park rent control), which is protected by that zoning, while at the same time the City strongly appears to be pursuing a policy of encouraging the elimination of the manufactured home housing that was still affordable in the City’s smaller parks, which the City intentionally did not protect with its manufactured home park zoning and which it encourages to be redeveloped through the provisions of its conversion ordinance and its other development policies.

In that regard, Table D shows Sunnyvale’s current and now closed manufactured home parks, along with the acreage and number of manufactured homes in each of them from 1996 through 2016. Table D shows that, 20 years ago, Sunnyvale had a total of 426.5 acres of mobile home parks containing 4,220 spaces, which Sunnyvale’s current and past Housing Elements stated were all affordable and were being relied on as an “important segment of Sunnyvale’s affordable housing stock.” Table D also shows which parks Sunnyvale chose to preserve with manufactured home park zoning and which ones they chose to leave out, the latter of which included Blue Bonnet. Between 1996 and 2016, Sunnyvale allowed five parks to be closed. This meant that Sunnyvale then lost 17.7 acres of manufactured home park and 286 affordable manufactured homes. Since taking those actions, Sunnyvale now has only 405.6 acres of parks and 3880 spaces.

However, Sunnyvale’s loss of affordable manufactured homes is actually much worse than it would seem from that data. The reason for this is that Sunnyvale has neither done anything to preserve the actual affordability of those manufactured homes nor even monitored their continued affordability, even though the legality of the City’s current Housing Element still relies on the enforcement of their continued affordability. In that regard, Table 24 of Sunnyvale’s 2015 - 2023 - Housing Element lists the maximum affordable rents for the categories of very low, low and moderate income households and is reproduced below.

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Sunnyvale 2015 – 2023 Housing Element

Table 24: 2013 Maximum Affordable Rents, Sunnyvale

Income Level	Studio (1 person)	1 Bedroom (2 persons)	2 Bedroom (3 persons)	3 Bedroom (4 persons)
Very Low Income (50% AMI)	\$924	\$1,055	\$1,187	\$1,319
Low Income (80% AMI)	\$1,485	\$1,697	\$1,909	\$2,123
Moderate Income (120% AMI)	\$2,216	\$2,532	\$2,849	\$3,165

Since manufactured homeowners pay not only rent but also a mortgage, homeowners' insurance, taxes, home maintenance and repair, and utilities, the affordability of Sunnyvale's manufactured homes can be determined by comparing the affordability information contained in Table 24 to the monthly aggregate of these six manufactured home monthly cost components for in City's manufactured home parks. In that regard, a real estate sales listing service, Trulia.com, lists the sales price, related monthly mortgage cost and manufactured home size (by both square feet and number of bedrooms) for all the manufactured homes that were for sale in all of Sunnyvale's manufactured home parks for approximately the same time period analyzed in the CIR and space rents were taken from the real estate multiple listing service. (See Tables E and F to this letter.

This information shows that there were no one-bedroom manufactured homes listed for sale during that time but that there were a significant number of two and three bedroom manufactured homes. This information has been summarized in Tables E and F of this letter, and it shows that there are no low income affordable two or three-bedroom manufactured homes and no one-bedroom manufactured homes at all being offered for sale in Casa de Amigos, Plaza Del Ray, Willow Ranch or Cape Cod manufactured home parks, thereby reducing Sunnyvale's affordable manufactured home stock by 247 acres and 2,133 manufactured homes. This information also shows that there were no affordable three-bedroom manufactured homes, and no one or two-bedroom manufactured homes at all that were being offered for sale in El Dorado, Rancho La Mesa and Adobe Wells manufactured home parks, a finding that further reduces Sunnyvale's affordable manufactured home stock by another 105 acres and 1,113 manufactured homes. Table C to this letter confirms that these Sunnyvale parks are unaffordable to low income households with sales information from Appendix 19 of the CIR.

When all of these reductions of affordable housing are taken into account, Sunnyvale's affordable manufactured home stock can be seen to consist of only 57 acres of manufactured home parks and 688 spaces, which is only 12% of the 400 acres and 14% of the 4,000 affordable manufactured home spaces of what the City's Housing Element's Goal and Policy was attempting to preserve.

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Manufactured Home Park but also for Ranchero and Thunderbird manufactured home parks as the city's website shows that they have filed applications to do so. When those two other parks are also closed, Sunnyvale will then lose another 21.8 acres of manufactured home parks and 277 spaces, thus reducing the City's supply of manufactured homes down to 35 acres and 411 only potentially affordable manufactured homes, which is a reduction that is 90% below the City's Housing Element's preservation goal and policy for its affordable manufactured home stock.

With that in mind, the CIR reports that the average appraised value for both one- and two-bedroom manufactured homes in Blue Bonnet is \$87,586 (CIR at 44). It further reports that the current average rent in the park is \$900. According to the comparable monthly mortgage information provided by Trulia.com, the mortgage on an \$87,586 manufactured home would be \$396 per month, but that, when adding in the same insurance, utilities and tax costs that were used for Sunnyvale's other parks in Tables E and F, the total monthly housing costs for a homeowner in Blue Bonnet can be seen to equal \$1,416 for both one- and two-bedroom manufactured homes. According to Table 24 of Sunnyvale's housing element, that amount is affordable to both one- and two-bedroom low income households in Sunnyvale, and, according to the CIR, there are currently a total of 16 low income, 12 very low income and 12 extremely low income households that currently have housing in Blue Bonnet. Accordingly, in light of Sunnyvale's crisis in regard to both the need for and the unavailability of affordable housing and the devastation that the City has allowed to occur to its affordable manufactured home stock over the past 20 years, it cannot afford to lose Blue Bonnet's 56 very affordable manufactured homes. For this reason, the closure and conversion of the Blue Bonnet manufactured home park is required to be rejected as inconsistent with Sunnyvale's Housing Element's affordable housing preservation goal and policy.

2. The CIR Should Be Disapproved Because It Does Not Evaluate the Affordability of the Housing That Will Be Replacing Blue Bonnet's Affordable Homes, and Information Filed by the Developer and from the City's Housing Element Strongly Indicates That They Will Be Unaffordable.

The CIR and the analysis in this letter highlight three issues for the City's Housing Element's enforcement: 1) that Sunnyvale's manufactured home park zoning and conversion ordinance have not really preserved any affordable manufactured home housing, 2) that the City has allowed its stock of 400 acres and 4,000 affordable manufactured homes to be decimated, and 3) that these two circumstances have intensified the need to preserve or replace the 56 low-income affordable homes that will be lost in Blue Bonnet's conversion in order for the approval of that conversion to be in compliance with the affordable housing goal and policy of its Housing Element. However, the current CIR does not comply with the requirements of either Government Code Section 66427.4 or 65302 because, without disclosing the housing that will be replacing Blue Bonnet's lost affordable housing, the level of affordability of any replacement housing is unknown, and so it cannot be determined whether or not the project's approval would be consistent with Goal

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B and Policy B.1 of the City's Housing Element.

In that regard, information submitted by the developer and from Sunnyvale's Housing Element strongly indicates that this housing is not going to be low-income affordable. The Project Information Sheet from the July 14, 2015 - Planning Division Application Form that the developer submitted to initiate the consideration of this Project describes it as being "60 new townhouses to replace 54 existing mobile home units." Then the City of Sunnyvale's Planning Department's August 3, 2015 - Planning Project Review Committee Comments, which it issued in response to the filing of that application, describe it as the "redevelopment of an existing 54-unit mobile home park with 60 new three-story townhome units." Although the developer has not yet further disclosed the size and type of three-story townhouse units that will be replacing Blue Bonnet's affordable mobile homes, it is reasonable to assume that he wants them to be just as profitable as the homes being sold in the property adjacent to Blue Bonnet (701 East Evelyn Ave.), which is already being developed and is selling its two-bedroom townhouses for \$919,990 and its three-bedroom townhouses for \$1,049,990. (See Exhibit A to this letter.)

These prices are way beyond the affordability of low, very low or extremely low income households in Sunnyvale. In fact, Sunnyvale's Housing Element's shows that these prices are even about twice the Maximum Allowable Purchase Price that moderate income households could afford in Sunnyvale (\$547,400; see pp. 35 - 36).

The CIR does not address the affordability of these homes that will be replacing the affordable manufactured homes that will be lost through Blue Bonnet's closure. The only place that the affordability loss is mentioned is in the second set of the Project Review Committee review comments that the city issued on Project Number 209-02-001, which appears to be the proceedings to approve of the homes that will be replacing Blue Bonnet, including approval of their tentative map, in which, after stating in bold that this CIR and a tentative map application must be submitted and approved and, apparently, allowing them to be processed separately, it stated that the project would have to provide 8 units at Below Market Rate per SMC 19.67 [below market rate ownership housing]. (See Item 1 under the heading "Below Market Rate Units" on the bottom of p. 1 of February 9, 2016 - City of Sunnyvale, Planning PRC Comments, Project Number 2015 - 7566, PRC: 7/29/15.) However, this does not meet the requirements of the Government Code Sections 66473.5 being applied to this project through either sections 66427.4 or 65302, since all SMC 19.67 requires and then informs us about the housing that will be replacing the low income housing lost through the closure of Blue Bonnet is that the 8 of its 56 low-income affordable manufactured home units that will be lost will be replaced with housing that is affordable to median income households. (See SMC 19.67.070(d)).

For these reasons, the CIR must also be rejected, because its approval is inconsistent both with the provisions of Government code sections 66427.4 and 65302 and the provisions of

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Sunnyvale's Housing Element.

Sincerely,

Will Constantine

William J Constantine, Attorney for the
Blue Bonnet Residents' Association

cc: clients

Table A
Sample of 13 Blue Bonnett Resident Homeowner Households by Income
Category, Actual Annual Income and Maximum Affordable Monthly
Housing Costs Limits That They Qualify For Under 33% and 40%
Manufactured Home Park Residency Approval Requirements

Space Number	Size of Household & Senior Status 55 +	Household Annual Income (to nearest \$1,000)	Monthly Housing Costs Limit at 33%	Monthly Housing Cost Limit at 40%
Extremely Low Income Households				
26	2 - Senior	\$15,000	\$414	\$497
39	2-NonSenior	\$15,000	\$416	\$500
31	5-NonSenior	\$29,000	\$805	\$966
Very Low Income Households				
41	1 - Senior	\$26,000	\$722	\$867
3	1 - Senior	\$27,000	\$749	\$900
30	1 - Senior	\$33,000	\$916	\$1,100
12	4-NonSenior	\$35,000	\$971	\$1,167
33	3 -NonSenior	\$38,000	\$1,054	\$1,266
Low Income Households				
11	2-Senior	\$49,000	\$1,369	\$1,633
52	5-NonSenior	\$60,000	\$1,665	\$2,000
45	1-Senior	\$63,000	\$1,748	\$2,100
48	3-Senior	\$66,000	\$1,832	\$2,200
17	5-NonSenior	\$72,000	\$1,988	\$2,400

Table B

Residency Approval Income and Senior Status Limits For Parks In Table 5 of the CIR
(To be qualified for residency if buying homes listed on November 3, 2016)

1. PARK & SP #	2. PRICE Note: Must put down 20% of price to then get the mortgage with monthly payments in #3.	3. MONTHLY MORTGAGE PAYMENT	5. Rent & Insurance, Maintenance, Taxes, Utilities	6. Total Monthly Housing Cost (3. + 5.)	7. Annual Income Needed to Meet 33% Housing Cost to Income Limit	7. Annual Income Needed to Meet 40 % Housing Cost to Income Limit	9. 55 + Senior Only Limit
Besaro	Seniors Only 55+						
	\$169,950	\$756	\$925+\$140	\$1,821	\$65,556	\$54,630	Seniors Only 55+
	\$98,000	\$441	\$940+\$140	\$1,521	\$54,756	\$45,630	Seniors Only 55+
New England Village	Seniors Only 55+						
	\$299,500	\$1,325	\$919+\$140	\$2,384	\$85,824	\$71,521	Seniors Only 55+
	\$229,900	\$1,015	\$773+\$140	\$1,928	\$69,408	\$57,840	Seniors Only 55+
	\$129,900	\$567	\$754+\$140	\$1,461	\$53,596	\$43,830	Seniors Only 55+
Casa Alondra							
	\$215,000	\$959	\$918+\$140	\$2,017	\$72,612	\$60,510	
Rancho La Mesa							
	\$230,000	\$1,026	\$1050+\$140	\$2,216	\$79,776	\$66,480	
Colonial Manor	Seniors Only 55+						
	\$149,900	\$685	\$644+\$140	\$1,469	\$52,884	\$44,070	Seniors Only 55+
Niles Canyon	Seniors Only 55+						
	None for Sale	None for Sale	None for Sale	None for Sale	None for Sale	None for Sale	Seniors Only 55+
River Glen							
	None for Sale	None for Sale	None for Sale	None for Sale	None for Sale	None for Sale	

TABLE C
AFFORDABILITY OF MANUFACTURED PARKS IN SUNNYVALE
(By Prices of Manufactured Homes Sold from Appendix 19 of CIR, 6/30/15 to 6/30/16)

1. Park	2. No. of Spaces & Homes in Park	3. Average Price Sold At	4. Monthly Mortgage Payment on Average Sale Price	5. Rent + Insurance, Maintenance, Taxes, Utilities	6. Total Monthly Housing Cost (4. + 5.)	7. Affordability to Low Income (three person households \$1,909)	8. Affordability to Low Income (four person households \$2,123)
Adobe Wells	613	\$206,954	\$924	\$1,041+\$120	= \$1,965	Not Affordable	Affordable
Casa de Amigos	909	\$267,113	\$1192	\$1,000+\$120	= \$2,192	Not Affordable	Not Affordable
Plaza Del Ray	800	\$234,882	\$1046	\$1,290+\$120	= \$2,336	Not Affordable	Not Affordable
Fox Hollow	99	\$208,500	\$932	\$1,393+\$120	= \$2,325	Not Affordable	Not Affordable
El Dorado	285	\$216,856	\$966	\$1,200+\$120	= \$2,166	Not Affordable	Not Affordable
Fair Oaks	102	NL in CIR	NL in CIR	NL in CIR	NL in CIR	NL in CIR	NL in CIR
Willow Ranch	236	\$198,669	\$885	\$1,195+\$120	= \$2,080	Not Affordable	Affordable
Cape Cod	188	\$214,807	\$956	\$1,027+\$120	= \$2,103	Not Affordable	Affordable
Mary Manor	117	NL in CIR	NL in CIR	NL in CIR	NL in CIR	NL in CIR	NL in CIR
Ranchero	111	NL in CIR	NL in CIR	NL in CIR	NL in CIR	NL in CIR	NL in CIR
Rancho La Mesa	215	\$96,637	\$429	\$2,145+\$120 ¹	= \$2,694	Not Affordable	Not Affordable
Thunderbird	166	NL in CIR	NL in CIR	NL in CIR	NL in CIR	NL in CIR	NL in CIR
Blue Bonnett	56	\$87,686	\$400	\$899+\$120	= \$1,419	Affordable	Affordable

¹ Table 5 of the CIR reports that Rancho La Mesa's space rent one \$1,150. (CIR at p. 30) However, in Section 15 of the CIR (Relocation and Vacant Spaces within Desired Locations) it reports that there were only "two vacancies that lease at \$2145 per month." (CIR at p. 27) Accordingly, that appears to be the rent that would be charged to new low income households who wish to obtain housing in Rancho La Mesa so it is used in Table 5.

TABLE D
SUNNYVALE PARK CLOSURE HISTORY AND CURRENT STATUS

<i>PARKS NO CURRENT APPLICATIONS FOR CLOSURE (RMH Zoning Protected)</i>	Park Acreage	Park Number of Spaces	Year Closed
Aloha Mobile Village <i>(Not RMH Zoning Protected)</i>	1.46	39	
Adobe Wells <i>(RMH Zoning Protected)</i>	63.15	613	
Casa de Amigos <i>(RMH Zoning Protected)</i>	98.04	909	
Plaza Del Ray <i>(RMH Zoning Protected)</i>	98	800	
Fox Hollow <i>(RMH Zoning Protected)</i>	11.72	99	
El Dorado <i>(RMH Zoning Protected)</i>	27.68	285	
Fair Oaks <i>(RMH Zoning Protected)</i>	8.69	102	
Willow Ranch <i>(RMH Zoning Protected)</i>	27.75	236	
Cape Cod Village <i>(RMH Zoning Protected)</i>	22.70	188	
Mary Manor <i>(RMH Zoning Protected)</i>	9.85	117	
Rancho La Mesa <i>(RMH Zoning Protected)</i>	14.76	215	
Total No Current Applications Filed For Closure	383.8	3603	
<i>PARKS TO BE CLOSED (Applications filed)</i>			
Blue Bonnet <i>(Not RMH Zoning Protected)</i>	3.26	54	
Ranchero <i>(RMH Zoning Protected)</i>	9.86	111	
Thunderbird <i>(RMH Zoning Protected)</i>	11.92	166	
Total Acres & Spaces To Be Closed (Applications Filed)	25.04	331	
<i>CLOSED PARKS</i>			
Ferndale <i>(Not RMH Zoning Protected)</i>	2.42	41	1996
Deluxe Trailer Park <i>(RMH Zoning Protected)</i>	1.67	30	1992
Oasis <i>(RMH Zoning Protected)</i>	4.77	67	2005
Flicks <i>(Not RMH Zoning Protected)</i>	1.85	29	2007
Nicks <i>(Not RMH Zoning Protected)</i>	1.82	44	2016
Mobileland Manor <i>(RMH Zoning Protected)</i>	6.8	105	1991
Total Acres and Spaces Closed	19.33	316	

TABLE E
AFFORDABILITY OF TWO BED ROOM MANUFACTURED HOMES LISTED
FOR SALE IN SUNNYVALE MANUFACTURED HOME PARKS (June 13, 2016)

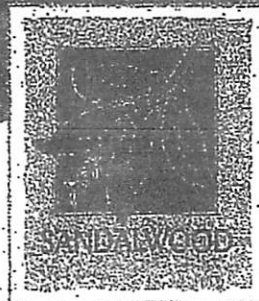
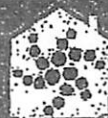
1. PARK & SP #	2. PRICE	3. MORTGAGE	4. SIZE (square feet)	5. Rent & Insurance, Maintenance, Taxes, Utilities	6. Total Monthly Housing Cost (3. + 5.)	7. \$1,909 = Affordable to Low Income (3 person HH)
CASA DE AMIGO						
854	\$198,000	\$885	1344			
114	\$229,000	\$1,024	1156			
Park Average	\$213,500	\$942		\$1,064 + \$120	= \$2,126	Not Aff LI
PLAZA DEL RAY						
78	\$129,900	\$581	1200			
939	\$207,700	\$929	1320			
983	\$229,500	\$1,026	1300			
308	\$145,000	\$648	1536			
Park Average	\$178,000	\$795		\$1,189+ \$120	= \$2,104	Not Aff LI
WILLOW RANCH						
121	\$179,900	\$804	1728	\$1,055+\$120	= \$1,979	Not Aff LI
CAPE COD						
73	\$169,000	\$756	1780			
94	\$245,000	\$1,095	1730			
93	\$229,900	\$1,028	1968			
61	\$149,000	\$666	1568			
Park Average	\$198,225	\$885		\$1,027+\$120	= \$2,032	Not Aff LI

TABLE F
AFFORDABILITY OF THREE BED ROOM MANUFACTURED HOMES LISTED FOR SALE
IN SUNNYVALE MANUFACTURED HOME PARKS (June 13, 2016)

1. PARK & SP #	2. PRICE	3. MORTGAGE	4. SIZE (square feet)	5. Rent & Insurance, Maintenance Taxes, Utilities	6. Total Monthly Housing Cost (3. + 5.)	7. \$2,123 = Affordable to Low Income (4 person HH)
ADOBE WELLS						
481	\$239,000	\$1,069	1213			
114	\$229,000	\$1,024	1056			
Park Average	\$234,000	\$1,051		\$1,041+\$120	= \$2,212	Not Aff LI
CASA DE AMIGOS						
427	\$248,900	\$1,113	1526			
185	\$249,000	\$1,113	1763			
391	\$359,000	\$1,605	1698			
906	\$259,000	\$1,162	1830			
205	\$248,900	\$1,115	NL			
403	\$349,000	\$1,560	1680			
Park Average	\$285,633	\$1,290		\$1,064+\$120	= \$2,474	Not Aff LI
PLAZA DEL RAY						
659	\$248,000	\$1,109	1746			
152	\$269,000	\$1,203	1940			
183	\$169,900	\$760	1344			
110	\$239,000	\$1,069	1512			
33	\$258,500	\$1,156	1542			
641	\$230,000	\$1,028	1740			
218	\$239,000	\$1,069	1573			
93	\$248,500	\$1,111	1760			
175	\$254,900	\$1,140	1620			
69	\$389,000	\$1,739	1884			
Park Average	\$254,580	\$1,152		\$1,189+\$120	= \$2,461	Not Aff LI

TABLE F
AFFORDABILITY OF THREE BED ROOM MANUFACTURED HOMES LISTED FOR SALE
IN SUNNYVALE MANUFACTURED HOME PARKS (June 13, 2016)

1. PARK & SP #	2. PRICE	3. MORTGAGE	4. SIZE (square feet)	5. Rent & Insurance, Maintenance Taxes, Utilities	6. Total Monthly Housing Cost (3. + 5.)	7. \$2,123 = Affordable to Low Income (4 person HH)
EL DORADO						
182	\$209,000	\$934	1512			
40	\$239,900	\$1,073	1450			
175	\$289,900	\$1,296	1590			
Park Average	\$246,267	\$1,107		\$1,200+\$120	= \$2,427	Not Aff LI
WILLOW RANCH						
117	\$250,000	\$1,118	1674			
27	\$287,000	\$1,283	1524			
205	\$350,000	\$1,565	1680			
Park Average	\$295,666	\$1,308		\$1,055+\$120	= \$2,483	Not Aff LI
RANCHO LA MESA						
114	\$255,888	\$1,144	1410			
214	\$230,000	\$1,028	1320			
Park Average	\$242,944	\$1,086		\$1,050+\$120	= \$2,256	Not Aff LI
CAPE COD VILLAGE						
19	\$329,000	\$1,471				
Park Average	\$329,000	\$1,471		\$1,027+\$120	= \$2,618	Not Aff LI



Move In July &
August 2018

RESIDENCE THREE • 1,700 sq. ft. (approx.)

3 Bedrooms, 3.5 Baths, 2-Car Garage

<u>Lot</u>	<u>Plan/Elevation</u>	<u>Address</u>	<u>Price</u>
8	3A - Phase 1	102 Hornbeam Terrace	\$1,049,990
9	3A - Phase 2	103 Incence Terrace	\$1,069,990

RESIDENCE FOUR • 1,375 sq. ft. (approx.)

2 Bedrooms, 2.5 Baths, 2-Car Garage

<u>Lot</u>	<u>Plan/Elevation</u>	<u>Address</u>	<u>Price</u>
1	4A - Phase 1	116 Hornbeam Terrace	\$919,990
16	4A - Phase 2	117 Incence Terrace	\$941,990

RESIDENCE FIVE • 1,653 sq. ft. (approx.)

3 Bedrooms, 3.5 Baths, 2-Car Garage

<u>Lot</u>	<u>Plan/Elevation</u>	<u>Address</u>	<u>Price</u>
15	5A - Phase 2	115 Incence Terrace	\$1,064,990 RSVD

RESIDENCE SIX • 1,683 - 1,735 sq. ft. (approx.)

3 Bedrooms, 3.5 Baths, 2-Car Garage

<u>Lot</u>	<u>Plan/Elevation</u>	<u>Address</u>	<u>Price</u>
12	6A - Phase 2	109 Incence Terrace	\$1,064,990

RESIDENCE EIGHT • 1,914 sq. ft. (approx.)

4 Bedrooms, 3.5 Baths, 2-Car Garage

<u>Lot</u>	<u>Plan/Elevation</u>	<u>Address</u>	<u>Price</u>
Phase 3 Coming Soon - Interest List Forming Now!			

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Linh Truong-Ruiter, Sales Representative, BRE Lic. #01774071
LHTruong-Ruiter@DRHorton.com (925) 788-0176

Woanhwa Feng, Sales Representative, BRE Lic. #01900423
WFeng@DRHorton.com

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March 3, 2016

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EXHIBIT A

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