

REPORT TO THE HEARING OFFICER

DATE ISSUED: June 19, 2025

HEARING DATE: July 1, 2025 AGENDA ITEM: 4

PROJECT NUMBER: PRJ2022-003669-(5)

PERMIT NUMBER: Conditional Use Permit ("CUP") RPPL2022011581

SUPERVISORIAL DISTRICT: 5

PROJECT LOCATION: 21210 East Arrow Highway, Charter Oak

OWNER: Steinberg Properties

APPLICANT: Steinberg Properties

INCLUSIONARY ZONING ORDINANCE (IZO): The Project is not subject to the IZO because it is not a new housing development.

CASE PLANNER: Anthony M. Curzi, Planner
acurzi@planning.lacounty.gov

RECOMMENDATION

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

Los Angeles County ("LA County") Planning staff ("Staff") recommends **APPROVAL** of Project Number PRJ2022-003669-(5), CUP Number RPPL2022011581, based on the Draft Findings (Exhibit C – Findings) contained within this report and subject to the Draft Conditions of Approval (Exhibit D – Conditions of Approval).

Staff recommends the following motion:

CEQA

I, THE HEARING OFFICER, CLOSE THE PUBLIC HEARING AND FIND THAT THE PROJECT IS CATEGORICALLY EXEMPT PURSUANT TO STATE AND LOCAL CEQA GUIDELINES.

ENTITLEMENT:

I, THE HEARING OFFICER, APPROVE CONDITIONAL USE PERMIT NUMBER RPPL2022011581 SUBJECT TO THE ATTACHED FINDINGS AND CONDITIONS.

PROJECT DESCRIPTION

A. Entitlement Requested

Conditional Use Permit (“CUP”) to authorize the continued use, operation and maintenance of an existing mobilehome park (“MHP”) in the R-3 (Limited Density Multiple Residence) Zone pursuant to County Code Section 22.18.030 (Land Use Regulations for Zones R-A, R-1, R-2, R-3, R-4, and R-5).

B. Project

The Project is a request to continue the use, operation and maintenance of an existing MHP (“Royal Palms”) comprised of 166 mobilehome spaces as well as numerous amenities, including a recreation center containing a clubhouse, community kitchen, billiards room, playground, two laundry rooms, a basketball court, two swimming pools, and recreational vehicle parking on a 14.10-acre lot. Each mobilehome space is designed to accommodate two tandem covered parking spaces for residents. An additional 69 vehicle parking spaces are provided, including 52 visitor spaces (including one accessible space), and 17 recreational vehicle/general spaces. The Project also includes a freestanding sign and a single vehicular access point to a public street that are legal non-conforming, which can be modified by the Hearing Officer pursuant to the County Code Section 22.140.370.C (Modification).

The Project was first established by Plot Plan No. 11711, which authorized the development of a 128-unit MHP with recreation room and swimming pool on May 7, 1962. This permit authorized the easterly 10.2 acres of the current MHP. Special Use Permit (“SUP”) No. 1647 authorized the remaining 3.9 acres as a separate MHP with 50 spaces and swimming pool on January 20, 1966. Records show that SUP No. 2016, approved on August 11, 1970, authorized a 39-space addition to the MHP.

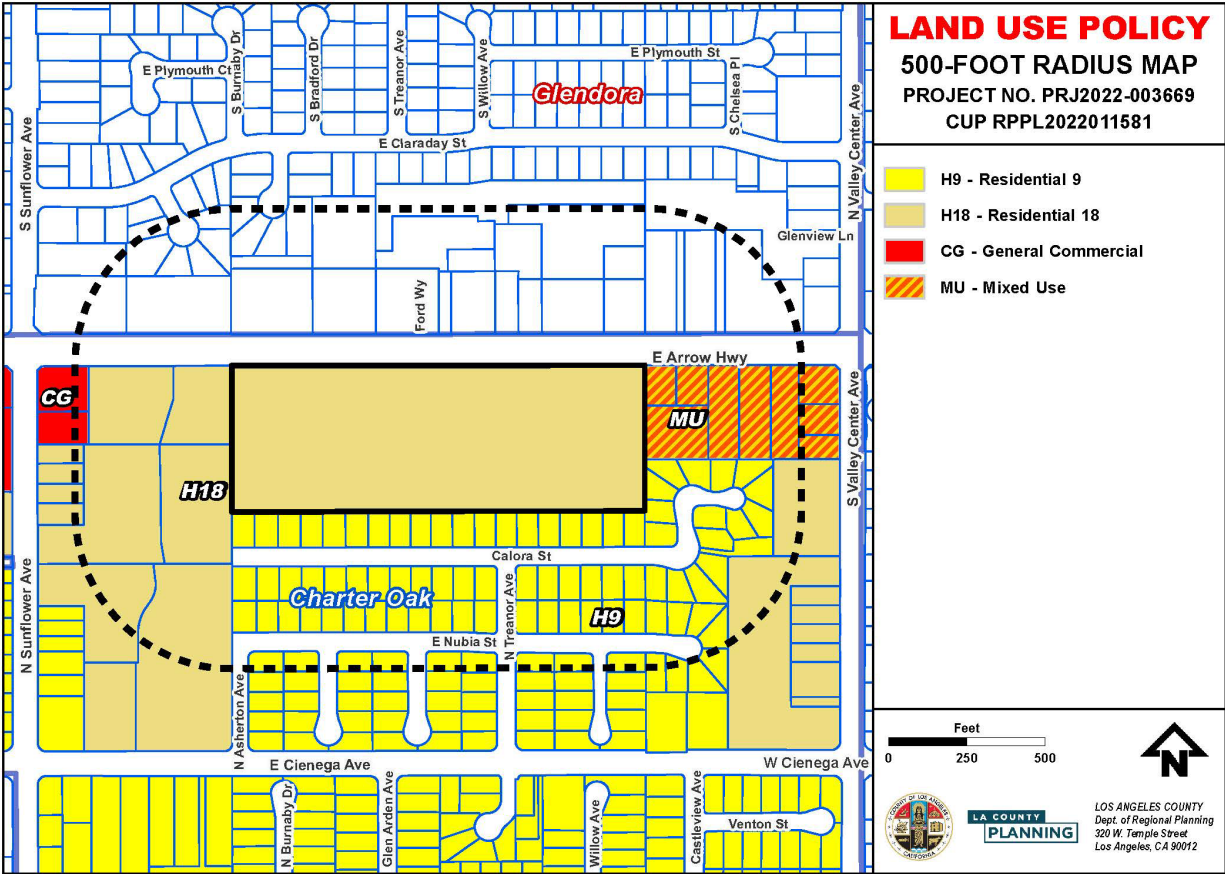
In August 1987, the subject property was rezoned to R-3, which requires the mobilehome park use to be permitted by a CUP. The Project now requires a CUP for continued operation of the MHP. No physical expansion or improvements are proposed. Staff recommends no grant term for the MHP as it is a residential use.

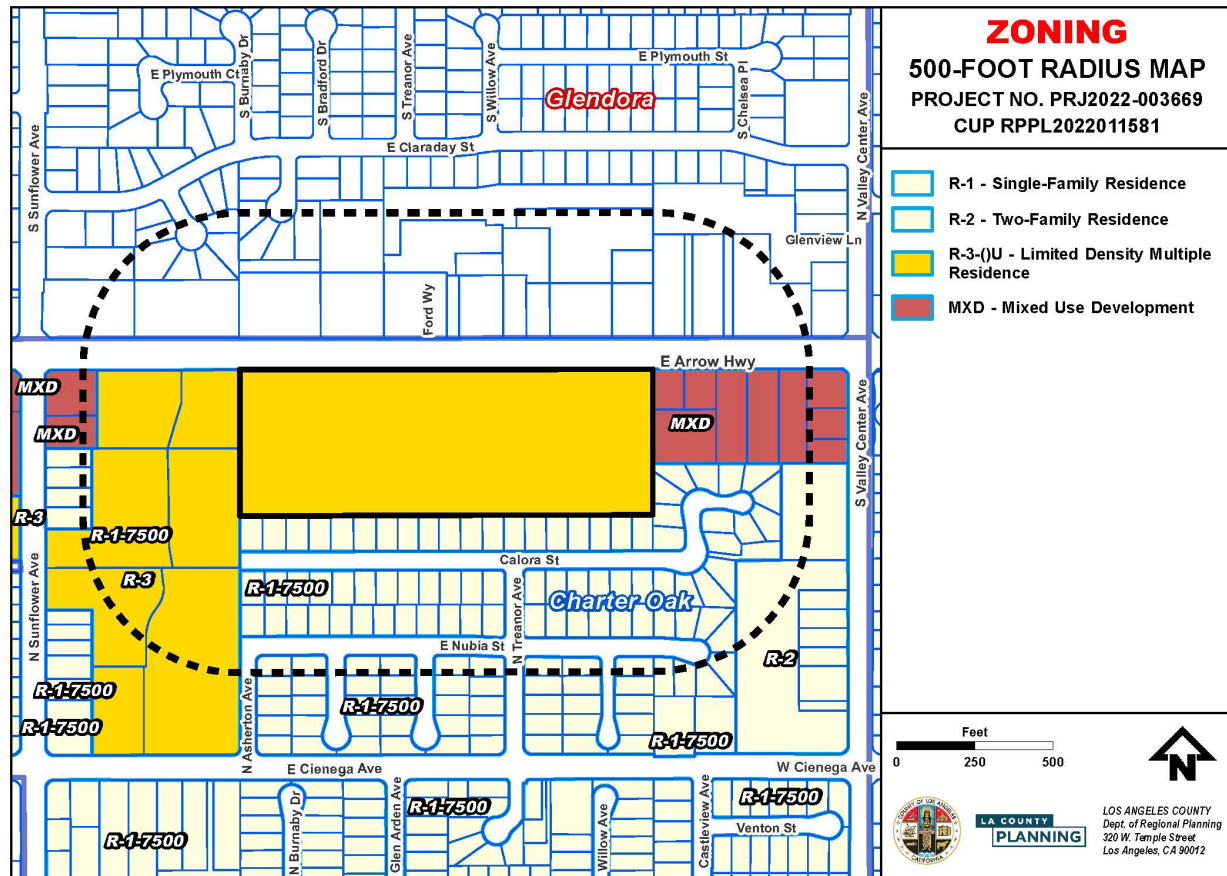
SUBJECT PROPERTY AND SURROUNDINGS

The following chart provides property data within a 500-foot radius:

LOCATION	GENERAL PLAN LAND USE POLICY ¹	ZONING	EXISTING USES
SUBJECT PROPERTY	H18 (Residential 18 – 0 to 18 Dwelling Units per Net Acre)	R-3	MHP
NORTH	City of Glendora	City of Glendora	Hair salon, multi- family residences ("MFRs"), floor materials supplier, auto care center, boat and recreational vehicle storage, adult residential facility
EAST	MU (Mixed Use – 50 to 150 Dwelling Units per Net Acre), H9 (Residential 9 – 0 to 9 Dwelling Units per Net Acre), and H18	MXD (Mixed Use Development), R-1- 7,500 (Single- Family Residence – 7,500 Square Feet Minimum Required Lot Area), R-2 (Two-Family Residence)	Single-Family Residences ("SFRs"), church, auto parts shop, auto repair shop, pet grooming
SOUTH	H9	R-1-7,500	SFRs
WEST	H18 and CG (General Commercial)	MXD, R-1-7,500, R- 3	MFRs, auto service facility, car wash, SFRs, MFRs

¹ The East San Gabriel Valley Area Plan (ESGVAP), which encompassed the Project Site, became effective on June 20, 2024, after this CUP application was deemed complete on December 17, 2022 . However, since the subject CUP application was deemed complete prior to the adoption of the ESGVAP, the CUP is still being reviewed under the General Plan. The ESGVAP did not change the land use or zoning designations of the subject property.





PROPERTY HISTORY

A. Zoning History

ORDINANCE NO.	ZONING	DATE OF ADOPTION
ZCO 1494-1	Zone 7 (Unrestricted)	September 12, 1927
ZCO 5023	A-4 (Second Agricultural Estates)	October 15, 1947
ZCO 5553	A-1-7,500 (Light Agricultural – 7,500 Square Feet Minimum Required Lot Area)	June 27, 1950
ZCO 7087	R-A-7,500 (Residential Agriculture – 7,500 Square Feet Minimum Required Lot Area)	February 15, 1957
ZCO 7503	C-4 (Restricted Commercial)	April 7, 1959

ZCO 870144z	R-3	August 25, 1987
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B. Previous Cases

CASE NO.	REQUEST	DATE OF ACTION
Plot Plan No. 11711	Develop 128-unit MHP	May 7, 1962
Special Use Permit ("SUP") No. 1647	Develop 50-unit MHP	January 20, 1966
SUP No. 2016	Authorize 39-space addition to MHP	August 11, 1970
	Elimination of wall and addition of two mobilehome spaces	April 13, 1971
No case number assigned but was approved by Hearing Officer	Five-year extension for MHP	May 16, 2006
No case number assigned but was approved by Hearing Officer	Five-year extension for MHP	August 11, 2015

C. Violations

CASE NO.	VIOLATION	CLOSED/OPEN
None	N/A	N/A

ANALYSIS

A. Land Use Compatibility

The subject MHP has existed at the location for more than 60 years; and is clean, neat, and well-maintained. The use is compatible with the surrounding neighborhood as mobilehomes are similar in use, density, and scale to surrounding SFRs. The MHP is well buffered from surrounding residential and commercial areas with perimeter concrete masonry unit (CMU) walls. There is one primary entrance along East Arrow Highway; all internal access is provided by on-site driveways, which minimizes traffic impacts along Arrow Highway and surrounding streets.

B. Neighborhood Impact (Need/Convenience Assessment)

The subject MHP has provided convenient and affordable housing for six decades in a manner that is respectful of the surrounding commercial and residential uses by maintaining the facility in a clean and orderly manner. Staff found no record/history of zoning code violations on the Project Site. MHP residents have onsite access to numerous amenities, including a clubhouse, community kitchen, billiards room,

playground, two laundry rooms, a basketball court, two swimming pools, and visitor parking.

C. Design Compatibility

The subject MHP is well-buffered from neighboring land uses by perimeter CMU solid walls as required by previous approvals. The perimeter of the MHP is surrounded by a CMU wall. The MHP is neat and well-kept. The MHP contains some interior landscaping, mostly within the yards of the individual mobilehomes. The Project was designed to meet the development standards of Title 22 (Planning and Zoning) of the County Code. The Project will continue the residential use on the site with no expansion or modification.

GENERAL PLAN/COMMUNITY PLAN CONSISTENCY

The Project is consistent with applicable goals and policies of the General Plan. Consistency findings can be found in the attached Findings (Exhibit C – Findings).

ZONING ORDINANCE CONSISTENCY

The Project complies with all applicable zoning requirements. Consistency findings can be found in the attached Findings (Exhibit C – Findings).

BURDEN OF PROOF

The applicant is required to substantiate all facts identified by Section 22.158.050.B (Findings) of the County Code. The Burden of Proof with applicant's responses is attached (Exhibit E – Applicant's Burden of Proof). Staff is of the opinion that the applicant has met the burden of proof.

ENVIRONMENTAL ANALYSIS

The Project qualifies for a Categorical Exemption (Class 1 - Existing Facilities) under the California Environmental Quality Act ("CEQA") and the County's environmental guidelines. Class 1 Exemption allows for the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use, as well as minor additions to existing structures provided the addition does not increase the floor area of the structure by more than 50 percent or 2,500 square feet, whichever is less, or 10,000 square feet if the project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan, and the area in which the project is located is not environmentally sensitive. The Project is a request for the continued use of a 166-unit MHP. There is no expansion of use proposed to the MHP as a part of this request.

As no physical change is proposed to the Project, no exceptions to the categorical exemption apply to the Project. No conditions, characteristics or circumstances are found to preclude the use of this categorical exemption under CEQA Statute and Guidelines Section 15300.2.

- a) Location: This exception applies to Classes 3, 4, 5, 6 and 11, and not Class 1, where there is consideration of where the Project is to be located. It mainly concerns particularly sensitive environments with rich biological resources or “environmental resources of hazardous or critical concern where designated, precisely mapped, and officially adopted under law by federal, state, or local agencies” (CEQA Guidelines section 15300.2(a)). The Project is located on a property containing an MHP, in a fully developed, urbanized area. The Project Site is not in a Significant Ecological Area.
- b) Cumulative Impacts: The Project involves the continued use and maintenance of an existing MHP and will not change the nature of the underlying use nor will it fundamentally increase the intensity of such use, which has existed at the Project Site for over more than 60 years. The concern for cumulative impact of successive projects of the same type is minimal as the Permittee is requesting to continue the existing MHP use of the Project Site and is not proposing other work that would intensify the use of the Project Site.
- c) “Unusual Circumstances” or Significant Effects: The Project will not pose a significant effect on the environment because it will meet all other requirements of the County Code, is small in scale, will be located on a Project Site within an already developed area, and will adhere to the conditions specified in the CUP. Adequate utilities and roadway infrastructure already exist to serve the subject property, and no environmentally sensitive areas will be impacted by any additional development as none is proposed.
- d) Scenic Highways: According to California’s Scenic Highway Program, which is administered by the California Department of Transportation (“Caltrans”), the Project Site is not located within or near an officially designated state scenic highway.
- e) Hazardous Waste Sites: The Project Site is not located on a property which is included on any list compiled pursuant to Government Code Section 65962.5. According to the California Department of Toxic Substances Control’s EnviroStor and State Water Resources Control Board’s GeoTracker web databases, no active or open hazardous waste sites were identified at the Project Site. A review of the Hazardous Waste and Substances Site List–Site Cleanup database also shows no records on the Project Site. There are no public drinking wells within the Project Site that may pose conflicts with the lists compiled by the State Department of Health Services. Finally, the Project Site is not included in any Water Board’s list of solid waste disposal sites, list of “active” orders where necessary actions have not yet been completed (known as Cease-and-Desist Orders and Cleanup and Abatement Orders).

- f) Historical Resources: The Project Site does not contain any historical resource listed in, or determined to be eligible for listing in, the National Register of Historic Places, California Register of Historical Resources or included in a local register of historical resources. According to the County's Historic Resources Sites Policy mapping, there is no historic or cultural resource site within the vicinity of the Project Site. The property is not designated by the County's Historic Preservation Ordinance in the Registry of Landmarks and Historic District. The County also does not consider the Project Site to be a discretionary historical resource per Public Resources Code Section 21084.1. The existing MHP has largely remained intact since its development in the 1960s.. Therefore, the Project will not impact any identified historical resources and will not result in new impacts to historical resources. The Project would not cause an adverse change in the significance of historical resources, as defined in CEQA Guidelines section 15064.5.

Therefore, staff recommends that the Hearing Officer determine that the project is categorically exempt from CEQA. An environmental determination (Exhibit F – Environmental Determination) was issued for the Project.

COMMENTS RECEIVED

A. County Department Comments and Recommendations

1. County Department of Public Works has stated in email correspondence, dated December 5, 2024, that they do not need to review the Project.
2. County Fire Department, in a letter dated July 12, 2024, recommended that the Project proceed to public hearing with conditions.
3. County Department of Public Health, in a letter dated November 22, 2023, recommended that the Project proceed to public hearing with conditions.

B. Other Agency Comments and Recommendations

Staff has not received any comments at the time of report preparation.

C. Public Comments

Staff has not received any comments at the time of report preparation.

Report

Reviewed By:



Michele R. Bush, Supervising Regional Planner

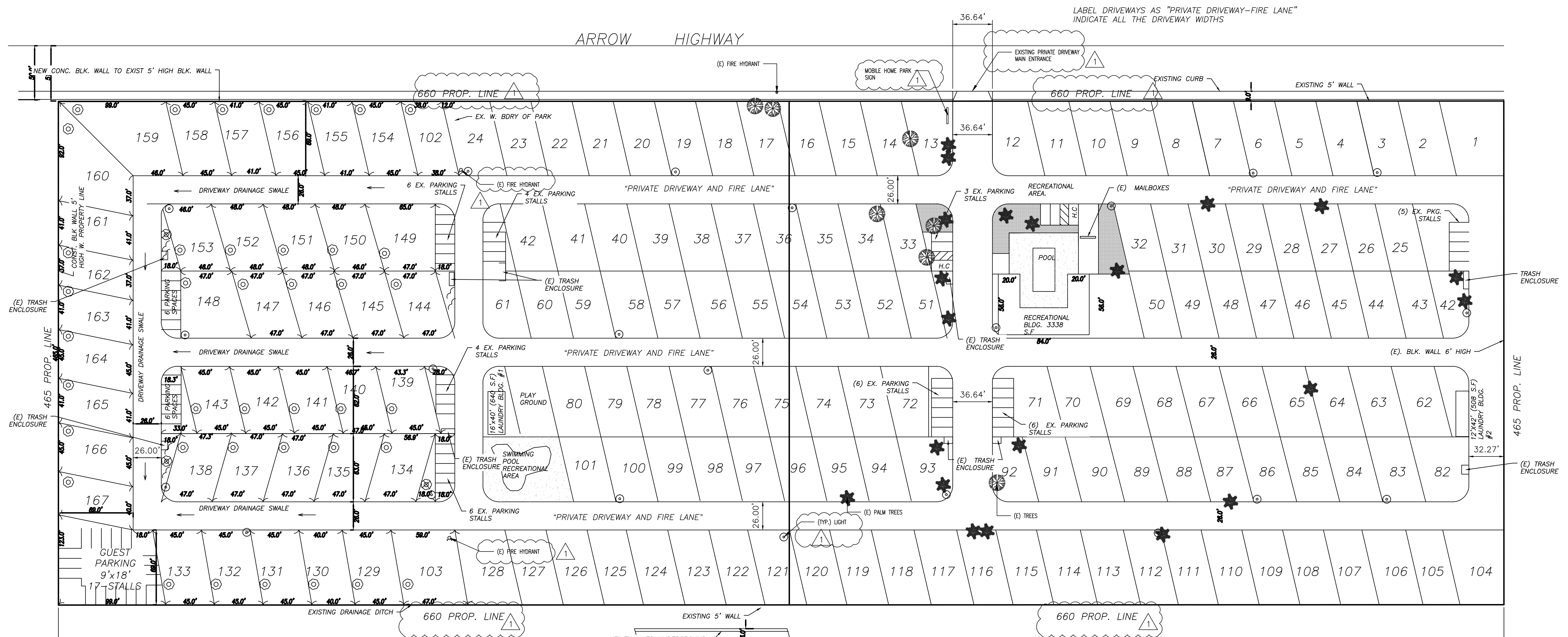
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






Approved By:

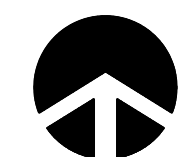
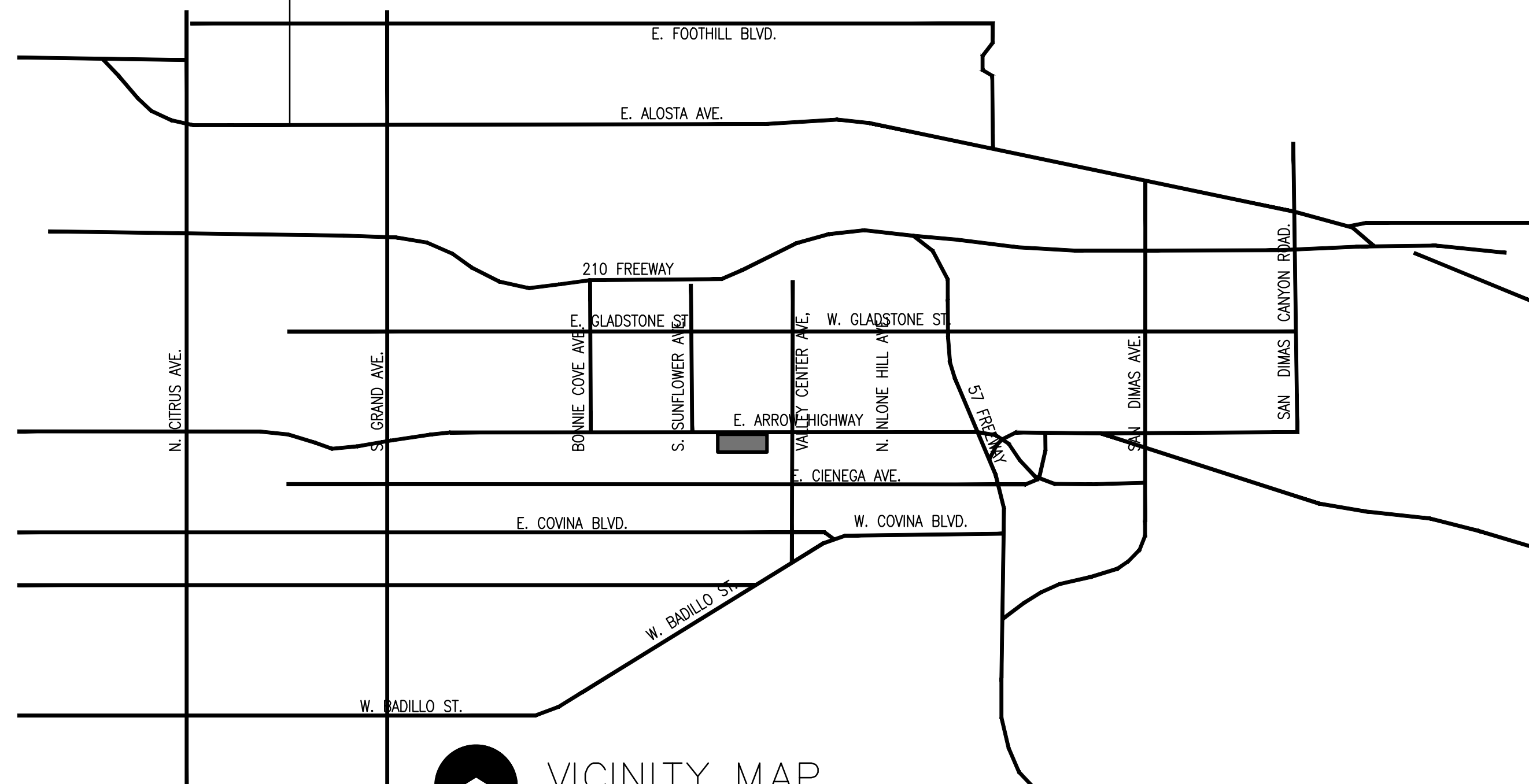
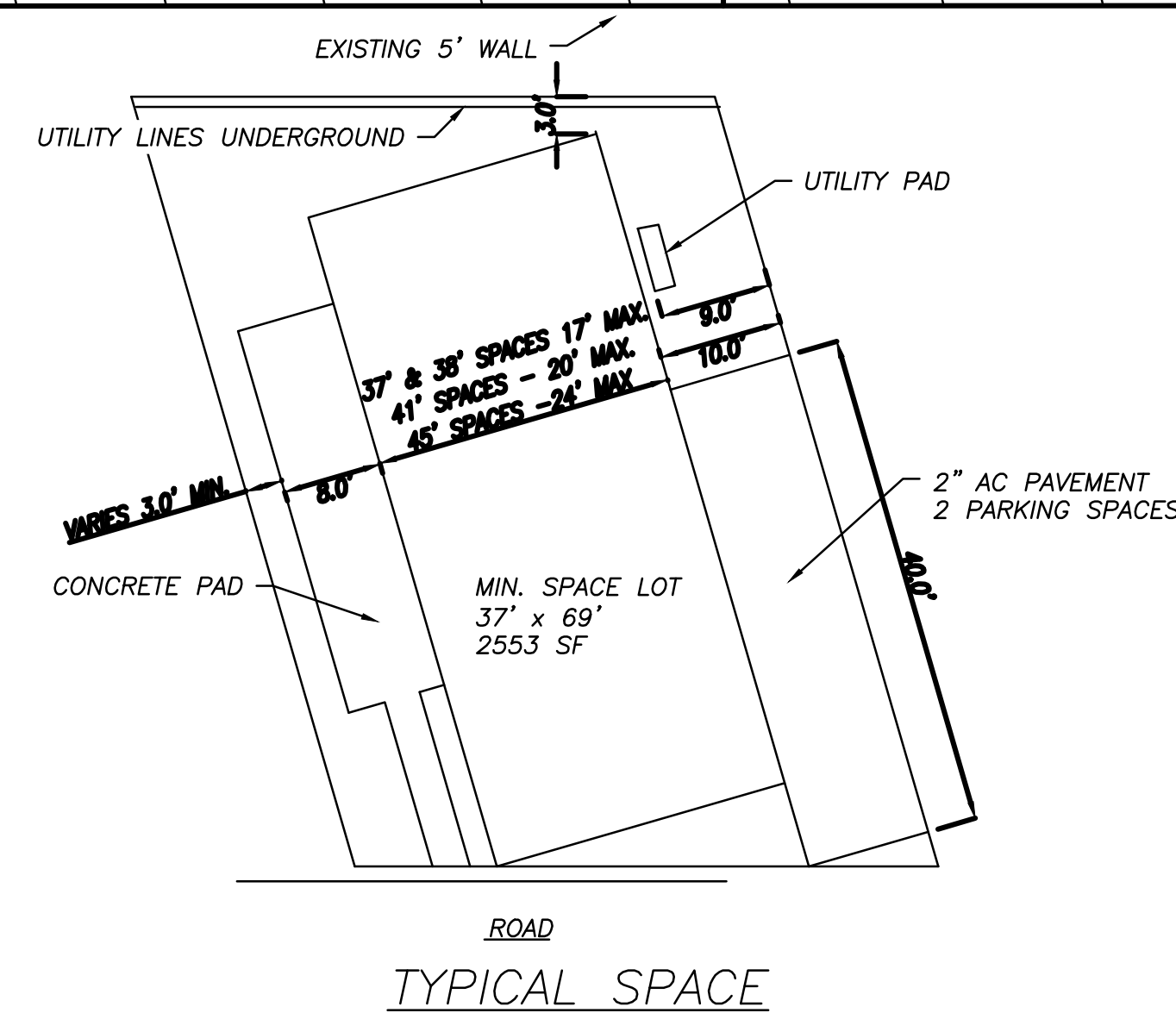


Susan M. Tae, AICP, Assistant Administrator

LIST OF ATTACHED EXHIBITS	
EXHIBIT A	Plans
EXHIBIT B	Project Summary Sheet
EXHIBIT C	Draft Findings
EXHIBIT D	Draft Conditions of Approval
EXHIBIT E	Applicant's Burden of Proof
EXHIBIT F	Environmental Determination
EXHIBIT G	Informational Maps
EXHIBIT H	Photos
EXHIBIT I	Project Narrative
EXHIBIT J	Agency Correspondence



LEGEND	
	TRAILER SPACE (NEW)
	TRAILER SPACE EXISTING
	FLOW LINE
	NEW TREE CUPANIA ANACARDIODES (15 GAL)
	NEW TREE PYRUS KAWAKAMI EVERGREEN PEA (15 GAL.)
	GROUND COVER HELIX (FLATS)
	WATER HOSE BIBB



AS-BUILT SITE PLAN
SCALE: 1" = 40'

SCOPE OF WORK

CUP RENEWAL FOR ROYAL PALMS MOBILE HOME PARK

LOT INFO.

ZONE: R3

LOT SIZE:
GROSS: 15.81 AC
NET: 14.10 A.C

APN: 8401-031-024

PARKING

GUEST PARKING: (9'x20')
69 STALL PROVIDED

ALL UTILITIES UNDERGROUND

OF SPACES

166 SPACES PROVIDED

PARKING REQUIREMENTS

CLUB HOUSE 3314 S.F

- ASSEMBLY AREAS = $108 / 3 = 36$ STALLS REQUIRED
- KITCHEN & OFFICE = $886 / 250 = 4$ STALLS REQUIRED
- TOTAL PARKING STALLS REQUIRED = 40 STALLS
- PARKING PROVIDED = 69 STALLS
- EVERY SPACE HAS 2 PARKING SPACES

OCCUPANT LOAD

CLUB HOUSE 3314 S.F

- ASSEMBLY AREAS = 1620 / 15 = 108 OCCUPANTS
- KITCHEN = 166 / 200 = 2 OCCUPANTS
- OFFICE = 720 / 100 = 8 OCCUPANTS
- STORAGE AREA = 172 / 300 = 1 OCCUPANTS
- REMAINING AREA OF 636 S.F. DON'T REQUIRE OCCUPANT LOAD
- (EX. RESTROOM, MAINTENANCE AREA, POOL EQUIPMENT ETC.)

UTILITY'S

PUBLIC WATER (PROVIDED BY MOBILE HOME PAR)
SEWER (PROVIDED BY MOBILE HOME PAR)

A triangle with the number 1 inside.

Project Information
ROYAL PALMS
MOBILE HOME
PARK

21210 E. ARROW HIGHWAY
CHARTER OAK, CALIF.

SITE PLAN

rev	DESCRIPTION	DATE
1	PLANNING	8.16.23

PROJECT NUMBER: 412-2022

DATE: 3/27/2022

Sheet

SP-1



PROJECT NUMBER
PRJ2022-003669-(5)

HEARING DATE
July 1, 2025

REQUESTED ENTITLEMENT
Conditional Use Permit (“CUP”) No.
RPPL2022011581

PROJECT SUMMARY

OWNER / APPLICANT

Steinberg Properties

MAP/EXHIBIT DATE

August 16, 2023

PROJECT OVERVIEW

The applicant requests a CUP to authorize the continued use, operation and maintenance of an existing 166-space mobilehome park (“MHP”) known as “Royal Palms.” The MHP contains a clubhouse, community kitchen, billiards room, playground, two laundry rooms, a basketball court, two swimming pools, guest and recreational vehicle parking. Each mobilehome space is designed to accommodate two tandem parking spaces for residents. An additional 69 vehicle parking spaces are provided, including 52 visitor spaces (including one accessible space), and 17 additional RV/general spaces.

LOCATION

21210 East Arrow Highway, Charter Oak

ACCESS

East Arrow Highway

ASSESSORS PARCEL NUMBER

8401-031-024

SITE AREA

14.10 Acres

GENERAL PLAN / LOCAL PLAN

General Plan

ZONED DISTRICT

Charter Oak & San Dimas

PLANNING AREA

East San Gabriel Valley

LAND USE DESIGNATION

H18 (Residential 18 - 0-18 dwelling units per net acre)

ZONE

R-3 (Limited Density Multiple Residence)

PROPOSED UNITS

166 (Existing)

MAX DENSITY/UNITS

254

COMMUNITY STANDARDS DISTRICT

NA

ENVIRONMENTAL DETERMINATION (CEQA)

Class 1 Categorical Exemption – Existing Facilities

KEY ISSUES

- Consistency with the County General Plan
 - Satisfaction of the following portions of Title 22 of the County Code:
 - Section 22.18.030 (Land Use Regulations for Residential Zones)
 - Section 22.140.370 (Mobilehome Parks)
 - Section 22.158.050 (Conditional Use Permit, Findings and Decision)
 - Section 22.18.040 (Development Standards for Residential Zones)
-

CASE PLANNER:

Anthony M. Curzi

PHONE NUMBER:

(213) 893 - 7016

E-MAIL ADDRESS:

acurzi@planning.lacounty.gov

LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL PLANNING
DRAFT FINDINGS OF THE HEARING OFFICER
AND ORDER
PROJECT NO. PRJ2022-003669-(5)
CONDITIONAL USE PERMIT NO. RPPL2022011581

RECITALS

1. **HEARING DATE.** The Los Angeles County ("County") Hearing Officer conducted a duly noticed public hearing in the matter of Conditional Use Permit ("CUP") No. **RPPL2022011581** on July 1, 2025.
2. **HEARING PROCEEDINGS.** *Reserved.*
3. **ENTITLEMENT REQUESTED.** The Permittee, Steinberg Properties ("Permittee"), requests the CUP to authorize the continued use, operation and maintenance of an existing 166-space mobilehome park ("MHP") with numerous recreational amenities ("Project") on a property located at 21210 East Arrow Highway in the unincorporated community of Charter Oak ("Project Site") in the R-3 (Limited Density Multiple Residence) Zone pursuant to County Code Section 22.18.030 (Land Use Regulations for Zones R-A, R-1, R-2, R-3, R-4, and R-5).
4. **LOCATION.** The Project is located within the Charter Oak and San Dimas Zoned Districts and East San Gabriel Valley Planning Area.
5. **PREVIOUS ENTITLEMENTS.** Plot Plan No. 11711 authorized the development of a 128-unit MHP with recreation room and swimming pool on May 7, 1962 on the easterly 10.2 acres of the current MHP. Special Use Permit ("SUP") No. 1647 authorized the remaining 3.9 acres as a separate MHP with 50 spaces and swimming pool on January 20, 1966. No records exist to depict how these two portions were connected into the current single MHP; however, records show that SUP No. 2016, approved on August 11, 1970, authorized a 39-space addition to the MHP. A 39-space addition to the 128-space MHP would have resulted in a 167-space MHP. SUP No. 2016 included an expiration date of August 11, 1990. Lastly, the available records contain only the conditions of SUP No. 2103, approved on April 13, 1971.
6. **LAND USE DESIGNATION.** The Project Site is located within the H18 (Residential 18 – 0 to 18 Dwelling Units per Net Acre) land use category of the General Plan Land Use Policy Map. The East San Gabriel Valley Area Plan.
7. **ZONING.** The Project Site is located in the San Dimas and Charter Oak Zoned Districts and is currently zoned R-3. Pursuant to County Code Section 22.18.030 (Land Use Regulations for Zones R-A, R-1, R-2, R-3, R-4, and R-5), a CUP is required for an MHP in the subject zone.
8. **SURROUNDING LAND USES AND ZONING**

LOCATION	GENERAL PLAN LAND USE POLICY	ZONING	EXISTING USES
NORTH	City of Glendora	City of Glendora	Hair salon, multi-family residences (“MFRs”), floor materials supplier, auto care center, boat and recreational vehicle storage, adult residential facility
EAST	MU (Mixed Use [50-150 du/net ac), H9 (Residential 9 [0-9 dwelling units per net acre]), and H18	MXD (Mixed Use Development), R-1-7,500 (Single-Family Residence – 7,500 Square Feet Minimum Required Lot Area), R-2 (Two-Family Residence)	Single-family residences (“SFRs”), church, auto parts shop, auto repair shop, pet grooming
SOUTH	H9	R-1-7,500	SFRs
WEST	H18 and CG (General Commercial)	MXD, R-1-7,500, R-3	MFRs, auto service facility, car wash, SFRs, MFRs

9. PROJECT AND SITE PLAN DESCRIPTION.

A. Existing Site Conditions

The Project Site is 14.10 acres in size and consists of one legal lot. The Project Site is rectangular in shape with flat topography and is developed with the subject existing 166-space MHP and accessory uses/structures, including on-site identification and directional signs, recreational facilities (including a recreation center containing a clubhouse, community kitchen, billiards room, playground, two laundry rooms, a basketball court, two swimming pools, and recreational vehicle parking), and a perimeter wall.

B. Site Access

The Project Site is accessible via East Arrow Highway to the north. Primary access to the Project Site is via a 44-foot-wide vehicular entrance/exit on East Arrow Highway, a 100-foot-wide Major Highway as identified in the County Master Plan of Highways. East Arrow Highway contains four travel lanes, two parking lanes, a center median, two 8-foot-wide sidewalks, and two Class 2 buffered bike lanes.

C. Site Plan

The site plan depicts the 14.10-acre rectangular-shaped property with 166 mobile home spaces, one 35-foot-wide and three 26-foot-wide internal driveways, two

swimming pools, a 3,338-square-foot recreational building, two laundry rooms, and trash enclosures.

D. Parking

The MHP contains a total of 69 vehicle parking spaces, including 52 visitor spaces, (including one accessible space), and 17 additional general spaces. Each mobilehome space also contains two tandem parking spaces. Total mobilehome and visitor spaces amount to 401.

10. **CEQA DETERMINATION.** The Project qualifies for a Categorical Exemption (Class 1 - Existing Facilities) under the California Environmental Quality Act ("CEQA") and the County's environmental guidelines. The Class 1-Existing Facilities Exemption allows for minor additions to existing structures provided the addition does not increase the floor area of the structure by more than 50 percent or 2,500 square feet, whichever is less, or 10,000 square feet if project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan and the area in which the project is located is not environmentally sensitive. There are no improvements proposed to the MHP. The Project is to authorize the operation and maintenance of an existing 166-space MHP with no physical changes or improvements.

No exceptions to the categorical exemption also apply to the Project. No conditions, characteristics or circumstances are found to preclude the use of this categorical exemption under CEQA Statute and Guidelines Section 15300.2 for the following reasons:

- a) Cumulative Impacts: The Project involves the continuing use and maintenance of an MHP and will not change the nature of the underlying use nor will it fundamentally increase the intensity of such use, which has existed at the Project Site for more than 60 years. The concern for cumulative impact of successive projects of the same type is minimal as the Permittee is requesting to continue the existing MHP use of the Project Site and is not proposing other work that would intensify the use of the Project Site.
- b) "Unusual Circumstances" or Significant Effects: The Project will not pose a significant effect on the environment because it will meet all other requirements of the County Code, is small in scale, will be located on a Project Site within an already developed area, and will adhere to the conditions specified in the CUP. Adequate utilities and roadway infrastructure already exist to serve the subject property and no environmentally sensitive areas will be impacted by any additional development as none is proposed.
- c) Scenic Highways: According to California's Scenic Highway Program, which is administered by the California Department of Transportation ("Caltrans"), the Project Site is not located within or near an officially designated state scenic highway.

- d) **Hazardous Waste Sites:** The Project Site is not located on a property which is included on any list compiled pursuant to Government Code Section 65962.5. According to the California Department of Toxic Substances Control's EnviroStor and State Water Resources Control Board's GeoTracker web databases, no active or open hazardous waste sites were identified at the Project Site. A review of the Hazardous Waste and Substances Site List-Site Cleanup database also shows no records on the Project Site. There are no public drinking wells within the Project Site that may pose conflicts with the lists compiled by the California Department of Health Services. Finally, the Project Site is not included in any Water Board's list of solid waste disposal sites, list of "active" orders where necessary actions have not yet been completed (known as Cease-and-Desist Orders and Cleanup and Abatement Orders).
- e) **Historical Resources:** The Project Site does not contain any historical resource listed in, or determined to be eligible for listing in, the National Register of Historic Places, California Register of Historical Resources or included in a local register of historical resources. According to the County's Historic Resources Sites Policy mapping, there is no historic or cultural resource site within the vicinity of the Project Site. The property is not designated by the County's Historic Preservation Ordinance in the Registry of Landmarks and Historic District. The County also does not consider the Project Site to be a discretionary historical resource per Public Resources Code Section 21084.1. The existing MHP has largely remained intact since its development in the 1960s.. Therefore, the Project will not impact any identified historical resources and will not result in new impacts to historical resources. The Project would not cause an adverse change in the significance of historical resources, as defined in CEQA Guidelines section 15064.5.

Therefore, no exceptions to the exemption apply. Considering the request would result in the continued use, operation and maintenance of an existing MHP with no expansion of use proposed, the Project most suitably qualifies for Class 1 Categorical Exemption.

11. PUBLIC COMMENTS. No comments from the public were received.

12. AGENCY RECOMMENDATIONS.

- A. County Department of Public Works: In an email dated December 5, 2024 stated that they did not need to review the Project.
- B. County Fire Department: Recommended clearance to public hearing with conditions in a letter dated July 12, 2024.
- C. County Department of Public Health: Recommended clearance to public hearing with conditions in a letter dated November 22, 2023.

13. LEGAL NOTIFICATION. Pursuant to Section 22.222.120 (Public Hearing Procedure) of the County Code, the community was properly notified of the public hearing by mail, and newspaper (*San Gabriel Valley Tribune*), and property posting. Additionally, the Project was noticed and case materials were available on LA County Planning's

website. On May 15, 2025, a total of 621 Notices of Public Hearing were mailed to all property owners as identified on the County Assessor's record within a 1,000-foot radius from the Project Site, as well as four notices to those on the courtesy mailing list for the Charter Oak and San Dimas Zoned Districts and to any additional interested parties.

GENERAL PLAN CONSISTENCY FINDINGS

14. LAND USE POLICY. The Hearing Officer finds that the Project is consistent with the goals and policies of the General Plan because the H18 land use category is intended for SFRs, categories into which this Project falls as individual mobilehomes are very similar in use and size to SFRs. The Hearing Officer further finds that the Project is compatible in use and density to the surrounding area. The density of the MHP is below the maximum density allowed for the property, which is 254 units. There are 166 existing MHP spaces to remain.

15. GOALS AND POLICIES. The Hearing Officer finds that the following policies of the General Plan Housing and Land Use Elements are applicable to the Project.

Goal 3: A housing supply that ranges broadly in housing costs to enable all households, regardless of income, to secure adequate housing.

Policy 3.1: Promote Mixed income neighborhoods and a diversity of housing types through the unincorporated areas to increase choices for all economic segments of the population.

The subject MHP provides an affordable housing option in an area that has a range of housing types, including SFRs and MFRs. The MHP provides a unique housing product, offering the privacy of SFRs with the amenities of communal-type living similar to those found in apartment houses. Manufactured homes (the type of structures found in MHPs) are more affordable than traditional-built housing, are energy efficient, and help save residents money as they do not pay property taxes on the units.

Goal LU 5: Vibrant, livable and healthy communities with a mix of land uses, services, and amenities.

Policy LU 5.1: Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types and styles.

The existing MHP contains a housing type that is a mix between SFRs and MFRs, with residents having the privacy of a detached unit with the convenience of communal recreational amenities. Such housing is located in an area with a mix of commercial and a diversity of residential uses and densities.

ZONING CODE CONSISTENCY FINDINGS

16. **PERMITTED USE IN ZONE.** The Hearing Officer finds that the Project is consistent with the R-3 zoning classification as an MHP is permitted in such zone with a CUP pursuant to County Code Section 22.18.030 (Land Use Regulations for Zones R-A, R-1, R-2, R-3, R-4, and R-5).
17. **REQUIRED YARDS.** The Hearing Officer finds that the Project is consistent with the previous approvals, which did not require any yards, as depicted on the approved plans and as was the case at the time of approval. Furthermore, the MHP was approved prior to current requirements. Required yards in the R-3 Zone are 15 feet for the front, 5 feet for the side, and 15 feet for the rear. The MHP is legally nonconforming.
18. **HEIGHT.** The Hearing Officer finds that the Project is consistent with the standard identified in County Code Section 22.18.040.D (Maximum Height), which allows a maximum height of 35 feet above grade for every residence and every other building and structure in the R-3 Zone. No structure in the MHP exceeds this height as both the mobilehomes and the accessory buildings of the MHP are less than 35 feet in height.
19. **PARKING.** The Hearing Officer finds that the Project is consistent with the standard identified in County Code Section 22.112.070 (Required Parking Spaces), which requires two standard parking spaces per mobilehome. Each mobilehome contains parking for two vehicles, and a total of 52 vehicle spaces are assigned as guest spaces, above the 42 required parking spaces by the County Code (one standard guest parking space per four mobilehomes). Total parking onsite includes 332 tandem spaces for mobilehomes, 52 spaces specifically designated for guests, and an additional 17 spaces and two accessible spaces.
20. **MOBILEHOME PARK DEVELOPMENT STANDARDS.** The Hearing Officer finds that the Project is consistent with the standards identified in County Code Section 22.140.370.E (Development Standards) and as modified by this CUP, as summarized below:
 - a. Section 22.140.370.D.1 (Density) states that the total number of dwelling units not exceed the maximum density. The maximum density for the subject property is 254 units and there are 166 mobilehome spaces to accommodate 166 mobilehome units on site.
 - b. Section 22.140.370.E.1 (Access and Circulation) requires two points of access to a public street or highway. The MHP presently contains one access point to a highway, which was developed in the 1960s. County Code Section 22.140.370.C.1 (Modification) authorizes the Hearing Officer, in granting the CUP, to impose additional conditions or modify the requirements of Section 22.140.370 E. (Development Standards), which included access and circulation. County Fire Department was consulted and did not have issue with a single access point. As such, the Hearing Officer finds that the present single access point is sufficient for the MHP, and no additional access points are required.

- c. Section 22.140.370.E.2 (Screening) requires a five- to eight-foot wall, fence, plants, or landscaped berm to screen MHPs from public view. While specifically for new MHPs, the subject MHP does contain an approximately five-foot-tall CMU decorative wall along its public frontage on East Arrow Highway.
- d. Section 22.140.370.E.3 (Signs) allows for one wall-mounted or freestanding sign not to exceed 20 square feet per face, or 40 square feet in total sign area, at the principal entrance to the MHP and one directional or informational sign indicating the location of each residence by number at the principal entrance and at other appropriate locations for use by emergency vehicles, as well as the convenience of guests. The size, location, and number of such signs shall be established by the Hearing Officer. The subject MHP contains one 50-square-foot double-sided (100-square-foot-total) freestanding sign at the entrance to the MHP and one informational sign/map also at the entrance. The freestanding sign was established under a previous approval (SUP No. 1647) when the Project Site was zoned C-4, which allowed for a freestanding sign of up to 170 square feet per face. The current sign, therefore, is legal nonconforming and will be authorized under this CUP.
- e. Section 22.140.370.F (Local Park Space Obligation) requires that space for parks be provided, or in lieu fee be paid, as required for subdivisions by Title 21 (Subdivisions) of the County Code. This dedication or in lieu fee is applicable at the time the MHP is established. On-site park and recreational amenities are provided.
- f. Section 22.140.370.G (Fire Protection) allows the Hearing Officer to require additional amenities or conditions in accordance with Title 32 (Fire Code) to protect life and property. The Fire Department did not have any additional requirements for the MHP.

CONDITIONAL USE PERMIT FINDINGS

21. **The Hearing Officer finds that the proposed use at the site will not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area; will not be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; and will not jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.** The MHP has existed for more than 60 years without detriment to the surrounding area. The MHP provides an important and affordable housing option for the community. The MHP is well maintained and compatible with the surrounding neighborhood, as mobilehomes are similar in use, density, and scale to neighboring SFRs. The MHP is sufficiently buffered from surrounding residential and commercial areas by perimeter CMU walls, East Arrow Highway and surrounding streets. The MHP is a self-contained development with sufficient internal circulation, resident and guest parking, and recreational amenities. There is no record/history of zoning code violations on the Project Site.

22. **The Hearing Officer finds that the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.** The MHP site is over 14 acres in size and contains 166 spaces for mobilehomes. Access to the MHP from East Arrow Highway and within the facility is sufficient and minimizes traffic impacts along Arrow Highway and surrounding streets. The MHP meets development standards that were established by regulations in effect at the time of previous approvals, in terms of operation and maintenance, parking and signs. In addition, the MHP meets applicable development standards, pursuant to County Code Section 22.140.370 (Mobilehome Parks), such as those pertaining to density of housing units and screening of the MHP from public view. Furthermore, the MHP is adequately buffered from surrounding land uses with perimeter CMU walls. Modifications to signs and number of access points to the MHP are required.
23. **The Hearing Officer finds that the proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.** The Project Site is accessed by a vehicular entrance on East Arrow Highway, a 100-foot-wide Major Highway as identified in the County Master Plan of Highways. Requiring a secondary access to a public street in accordance with Section 22.140.370.E.1 (Access and Circulation) for the MHP would not be necessary as both the on-site driveway and East Arrow Highway are adequately improved and provide sufficient access to the Project Site. Class 2 buffered bike lanes and sidewalks on East Arrow Highway serve cyclists and pedestrians. Other services, such as water, sanitary sewer, electricity and gas are proximate to the Project Site. The Project Site is served by utilities. A modification to access points is permitted pursuant to Section 22.140.370.C.1 (Modification). The Fire Department did not express concerns with the MHP's current single access point to a public street.
24. The Hearing Officer finds that a grant term is not necessary as the Project is considered a housing development, and it would not be appropriate to include an expiration date to the CUP.

ENVIRONMENTAL FINDINGS

25. The Hearing Officer finds that the Project is exempt from the California Environmental Quality Act pursuant to State CEQA Guidelines section 15301 (Class 1, Existing Facilities categorical exemption). The Project qualifies for a Categorical Exemption (Class 1 - Existing Facilities) under the California Environmental Quality Act (CEQA) and the County's environmental guidelines. Class 1 Exemption allows for the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use, as well as minor additions to existing structures provided the addition does not increase the floor area of the structure by more than 50 percent or 2,500 square feet, whichever is less, or 10,000 square feet if project is in an area where all public services and facilities are

available to allow for maximum development permissible in the General Plan and the area in which the project is located is not environmentally sensitive. There is no expansion of use proposed to the MHP as part of this request. No exceptions to the categorical exemption apply to the Project. No conditions, characteristics or circumstances are found to preclude the use of this categorical exemption under CEQA Statute and Guidelines Section 15300.2.

ADMINISTRATIVE FINDINGS

26. LOCATION OF DOCUMENTS. The location of the documents and other materials constituting the record of proceedings upon which the Hearing Officer's decision is based in this matter is at LA County Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Foothills Development Services Section, LA County Planning.

BASED ON THE FOREGOING, THE HEARING OFFICER CONCLUDES THAT:

- A. The proposed use with the attached conditions will be consistent with the adopted General Plan.
- B. The proposed use at the site will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- C. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
- D. The proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.

THEREFORE, THE HEARING OFFICER:

- 1. Finds that the Project is exempt from the California Environmental Quality Act pursuant to State CEQA Guidelines section 15301 (Class 1, Existing Facilities categorical exemption); and
- 2. Approves **CONDITIONAL USE PERMIT NO. RPPL2022011581**, subject to the attached conditions.

PROJECT NO. PRJ2022-003669-(5)
CONDITIONAL USE PERMIT NO. RPPL2022011581

EXHIBIT C
FINDINGS
PAGE 10 OF 10

ACTION DATE: July 1, 2025

MRB:AMC

June 19, 2025

c: Hearing Officer, Zoning Enforcement, Building and Safety

LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL PLANNING

DRAFT CONDITIONS OF APPROVAL
PROJECT NO. PRJ2022-003669-(5)
CONDITIONAL USE PERMIT NO. RPPL2022011581

PROJECT DESCRIPTION

The project is a request to authorize the continued use, operation and maintenance of an existing 166-space mobilehome park with various residential and recreational amenities, located at 21210 East Arrow Highway, subject to the following conditions of approval:

GENERAL CONDITIONS

1. **Permittee.** Unless otherwise apparent from the context, the term “Permittee” shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.
2. **Affidavit of Acceptance.** This grant shall not be effective for any purpose until the Permittee, and the owner of the subject property if other than the Permittee, have filed at the office of the Los Angeles County ("County") Department of Regional Planning (“LA County Planning”) their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and that the conditions of the grant have been recorded as required by Condition No. 7 and until all required monies have been paid pursuant to Condition No. 9. Notwithstanding the foregoing, this Condition No. 2 and Conditions No. 3, 4, 7, shall be effective immediately upon the date of final approval of this grant by the County.
3. **Date of Final Approval.** Unless otherwise apparent from the context, the term “date of final approval” shall mean the date the County’s action becomes effective pursuant to County Code Section 22.60.260.
4. **Indemnification.** The Permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit approval, which action is brought within the applicable time period of Government Code section 65009 or any other applicable limitations period. The County shall promptly notify the Permittee of any claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to promptly notify the Permittee of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, the Permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.
5. **Litigation Deposit.** In the event that any claim, action, or proceeding as described above is filed against the County, the Permittee shall within ten days of the filing make an initial deposit with LA County Planning in the amount of up to \$5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in LA County Planning's cooperation in the defense, including but not limited to, depositions, testimony, and other assistance provided to Permittee or Permittee's counsel.

If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the Permittee shall deposit additional funds sufficient to bring the balance up to the amount of \$5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

At the sole discretion of the Permittee, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the Permittee according to County Code Section 2.170.010.

6. **Invalidation.** If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permit shall be void and the privileges granted hereunder shall lapse.
7. **Recordation.** Prior to the use of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall **record the terms and conditions** of the grant in the office of the County Registrar-Recorder/County Clerk (i.e. Recorder's Office). In addition, upon any transfer or lease of the property during the term of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.
8. **Use By Date.** This grant shall expire unless used within ninety (90) days from the date of final approval of the grant. A single thirty- (30-) day time extension may be requested in writing and with the payment of the applicable fee prior to such expiration date. For the purposes of this provision, continued operation of the mobilehome park and satisfaction of Condition No. 2 shall be considered use of this grant.
9. **Inspections.** The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the Permittee to cease any development or activity not in full compliance shall be a violation of these conditions. No provision of any easement of or any other encumbrance on the property shall exempt the Permittee and/or property owner from compliance with these conditions and applicable regulations. Inspections shall be made to ensure compliance with the conditions of this grant as well as to ensure that any development undertaken on the subject property is in accordance with the approved site plan on file. The Permittee shall deposit with the County the sum **\$456.00**, which shall be placed in a performance fund and be used exclusively to reimburse LA County Planning for all expenses incurred while inspecting the premises to determine the Permittee's compliance with the conditions of this grant. The fund provides for one **(1) inspection**.

Inspections may be unannounced. Inspections may be conducted utilizing any available technologies, including, but not limited to, unmanned aircraft systems (UAS). Use of an UAS requires the consent of the Permittee pursuant to LA County

Planning's UAS policy, which may be updated from time to time, and which shall be provided to the Permittee upon request.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the Permittee shall be financially responsible and shall reimburse LA County Planning for all additional enforcement efforts necessary to bring the subject property into compliance. The amount charged for additional inspections shall be **\$456.00** per inspection, or the current recovery cost established by LA County Planning at the time any additional inspections are required, whichever is greater.

10. **Revocation.** Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") or a Hearing Officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to Chapter 22.238 of the County Code.
11. **County Fire Department Requirements.** All development pursuant to this grant must be kept in full compliance with the County Fire Code to the satisfaction of the County Fire Department ("Fire").
12. **County Public Works Requirements.** All development pursuant to this grant shall conform with the requirements of the County Department of Public Works to the satisfaction of said department.
13. **Exhibit "A."** All development pursuant to this grant shall comply with the requirements of Title 22 of the County Code and of the specific zoning of the subject property, unless specifically modified by this grant, as set forth in these conditions, including the approved Exhibit "A," or a revised Exhibit "A" approved by the Director of LA County Planning ("Director").
14. **Maintenance.** The Permittee shall maintain the subject property in a neat and orderly fashion. The Permittee shall maintain free of litter all areas of the premises over which the Permittee has control.
15. **Revisions to the Exhibit "A".** The subject property shall be developed and maintained in substantial conformance with the plans marked Exhibit "A." If changes to any of the plans marked Exhibit "A" are required as a result of instruction given at the public hearing, **a digital copy of a modified Exhibit "A"** shall be submitted to LA County Planning by October 1, 2025.
16. **Subsequent Revisions to the Exhibit "A."** In the event that subsequent revisions to the approved Exhibit "A" are submitted, the Permittee shall submit **a digital copy of the proposed plans** to the Director for review and approval. All revised plans must substantially conform to the originally approved Exhibit "A". All revised plans must be

accompanied by the written authorization of the property owner(s) and applicable fee for such revision.

PROJECT SITE-SPECIFIC CONDITIONS

17. **Grant.** This grant shall authorize the continued use, operation and maintenance of an existing mobilehome park as shown on the Exhibit "A" with modifications to allow one access point to a public street in lieu of the required minimum two access points and to allow one 50-square-foot double-sided sign (100 square feet total) in lieu of the maximum 20-square-foot per face (40 square feet total) sign.
18. **State Requirements.** The mobilehome park shall comply with all applicable State requirements and possess all licensing required for mobilehome parks. The Permittee shall provide a copy of these permits/licenses to LA County Planning upon request..
19. **Parking.** At minimum, parking shall be maintained at the existing level of two tandem parking spaces for each mobilehome space and one standard guest parking space per four mobilehomes shall also be provided, as depicted on the Exhibit "A," or as required by County Code.
20. **Landscaping.** All landscaping shall be maintained as depicted on the approved Exhibit "A" in a neat and healthy condition to the satisfaction of Regional Planning.
21. **Recreational Facilities.** The use of on-site recreational facilities shall be limited to residents and their guests.
22. **Lighting.** Any lights that extend above the height of perimeter walls shall be shielded downward so as not to project light onto surrounding residential properties.
23. **Outside Display and Storage.** Outside display and storage of material on the property shall be prohibited.
24. **Prohibited Uses.** Commercial uses shall be prohibited.
25. **Supplemental Conditions.** The permittee shall comply with all conditions set forth in the attached letters from Fire and County Department of Public Health.

Attachments:

Exhibit D-1 Fire Department letter dated July 12, 2024

Exhibit D-2 Department of Public Health letter dated November 22, 2023

Land Development Unit
5823 Rickenbacker Road
Commerce, CA 90040
Telephone (323) 890-4293, Fax (323) 890-9783

DATE: 07/12/2024

Ward

EXHIBIT D-1: CONDITIONS

For any questions regarding the report, please contact Wally Collins at (323) 890-4243 or Wally.Collins@fire.lacounty.gov.

Reviewed by:

A handwritten signature in black ink, appearing to read "Wally Collins", is written over a light blue rectangular background.



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
Director

MUNTU DAVIS, M.D., M.P.H.
County Health Officer

MEGAN McCLAIRE, M.S.P.H.
Chief Deputy Director

LIZA FRIAS, REHS
Director of Environmental Health

BRENDA LOPEZ, REHS
Assistant Director of Environmental Health

SCOTT ABBOTT, REHS, M.P.A.
Assistant Director of Environmental Health

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www.publichealth.lacounty.gov/eh/



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November 22, 2023

TO: Carmen Sainz
Supervising Regional Planner
Department of Regional Planning

Attention: Anthony Curzi

FROM: Charlene Contreras 
Director, Community Protection Branch
Department of Public Health

SUBJECT: CONDITIONAL USE PERMIT (CUP) REQUEST
CASE: RPPL2022011581
PROJECT: MOBILE HOME @ 21210 E ARROW HIGHWAY
21210 E. ARROW HIGHWAY COVINA CA 91724

Thank you for the opportunity to review the application and project located at the subject property. This project request is for a Conditional Use Permit renewal for an existing 166-unit mobile home park with no proposed improvements.

Public Health provide clearance of the aforementioned project. This is conditioned by the current use of public water and wastewater systems. The applicant provided a water bill from Golden State Water Company dated October 14, 2023. Also provided a copy of the 2023-2024 Annual Secured Property Tax Bill indicating the consolidated sewer service as one of the direct assessments. Any change of methods for the provisions of potable water and sewage disposal shall invalidate this approval.

- ☒ Public Health conditions for this project have been met as of the date of this letter. Public Health recommends the approval of the aforementioned project.
- ☐ Public Health requires that the conditions or information requested below are addressed prior to agency approval; therefore, the Department **DOES NOT** recommend clearance of this project until the following conditions are met:

1. Community Protection Branch: Environmental Hygiene

Please Note: The following are general requirements for Noise recommendations for the proposed project.

The applicant shall abide by the requirements contained in Title 12, Section 12.08.390, 12.08.530, Noise Control Ordinance for the County of Los Angeles (reference available at municode.com). The section in Title 12 that apply to this project include but are not limited to 12.08.390 Exterior Noise Standards and 12.08.530 Residential Air-Conditioning.

1.1 Exterior Noise

Ordinance:

12.08.390 Exterior Noise Standards

No person shall operate or cause to be operated, any source of sound at any location within the unincorporated county, or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed any of the following exterior noise standards (See Table 1):

Area	Duration	Std # 1 = L50	Std # 2 = L25	Std # 3 = L8.3	Std # 4 = L1.7	Std # 5 = L0
		30min/hr	15min/hr	5 min/hr	1 min/hr	At no time
Residential	7 am – 10 pm	50	55	60	65	70
	10 pm – 7 am	45	50	55	60	65

1.2 Community Noise

Ordinance:

12.08.530 Residential air conditioning or refrigeration equipment

Operating or permitting the operation of any air conditioning or refrigeration equipment in such a manner as to exceed any of the following sound levels is prohibited (See Table 2):

Measuring Location	Units Installed on or after January 1, 1980, dBA
Any point on neighboring property line, 5 feet above grade level, no closer than 3 feet from any wall.	55
Center of neighboring patio, 5 feet above level, no closer than 3 feet from any wall.	50
Outside the neighboring living area window nearest the equipment location, not more than 3	50

feet from the window opening, but at least 3 feet from any other surface.	
---	--

For questions regarding above comments, please contact Yonas Taye of Public Health, Environmental Hygiene Program at (626) 430-5201 or ytaye@ph.lacounty.gov.

If you have any other questions or require additional information, please contact Veronica Aranda of Public Health, Planning & Land Use Liaison at (626) 430-5201 or varanda@ph.lacounty.gov.

CC:va

DPH_CLEARED_21210 E. ARROW HIGHWAY COVINA CA 91724_RPPL2022011581_11.22.2023



Los Angeles County
Department of Regional Planning



Planning for the Challenges Ahead

CONDITIONAL USE PERMIT FINDINGS

Pursuant to Section 22.158.050 (Findings and Conditions), the applicant shall substantiate the following:

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

B.1 The proposed use will be consistent with the adopted General Plan for the area.

See Conditional Use Permit Findings Attachment for full response.

B.2 The requested use at the location proposed will not:

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

See Conditional Use Permit Findings Attachment for full response.

B.3 The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping, and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.

See Conditional Use Permit Findings Attachment for full response.

Rev. 03/2019

320 West Temple Street • Los Angeles, CA 90012 • 213-974-6411 • TDD: 213-617-2292

   @LACDRP | planning.lacounty.gov

EXHIBIT E: APPLICANT'S BURDEN OF PROOF

B.4 The proposed site is adequately served: <ul style="list-style-type: none">a. By highways or streets of sufficient width, and improved as necessary to carry the kind and quantity of traffic such use would generate; andb. By other public or private service facilities as are required.
See Conditional Use Permit Findings Attachment for full response.

CONDITIONAL USE PERMIT FINDINGS ATTACHMENT

Response to Section B.1 of the Conditional Use Permit Findings

The property, located at 21210 E Arrow Highway, Covina, California 91722 is located in unincorporated Los Angeles County and, thus, falls under the purview of the Los Angeles County General Plan. The property is currently zoned R-3 – Limited Density Multiple Residence. According to Los Angeles County Municipal Code Table 22.18.030-B, mobilehome parks are permitted in R-3 zones with a CUP. This is the CUP Royal Palms Mobile Home Park ("Royal Palms") is currently applying for. Royal Palms has previously been issued "special" permits for such use as well. (SP 2016-(1) & SP 2103-(1).) Thus, the proposed and current use is consistent with the General Plan.

Response to Section B.2 of the Conditional Use Permit Findings

The property is a 166-space mobilehome park, located at 21210 E Arrow Highway, Covina, California 91722, and has been operating as such since at least 1970. Much of the surrounding land was developed around the Park, presumably acknowledging that the Park was and is a good "fit" for the neighborhood. The surrounding uses are largely residential, including single-family homes and other, denser housing, such as apartments. The Park provides housing for many families and individuals, with a housing density presumably in between the single-family homes and apartments, and is well maintained and managed. Thus, the property does not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area any more than other types of residences do that are also located in the immediate vicinity, nor does it jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare. Further, it is not materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site, as the mobilehome park has been located at this address since at least 1970. A thorough description is provided in the narrative section (Section 9) and in "An EIR Is Not Required Under CEQA" (Section 4).

Response to Section B.3 of the Conditional Use Permit Findings

The Park property was constructed in accordance with the various county laws and ordinances in existence at the time, and all conditions for prior grants of zoning exceptions have been complied with throughout the years, as evidenced by the county inspections included in this application. As a result, the proposed (current) site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping, and other development features as was prescribed at the time the property was developed. As the surrounding areas have developed over the last 50 years, they have developed with Royal Palms already present. Thus, Royal Palms is presently and completely integrated with the community. See the narrative sections "History of Royal Palms Special Permits" (Section 9.2.)

Additionally, the mobilehome parks in California are heavily regulated by state law, including the Health and Safety Code §§ 18200, et seq., California Code of Regulations, Title 25, §§ 1000, et

EXHIBIT E: APPLICANT'S BURDEN OF PROOF

seq., and the Mobilehome Residency Law, Civil Code §§ 798, et seq. The owner and management of Royal Palms has had to comply with all of these state laws throughout the years as they have been enacted and amended over the last 40 years.

The Health and Safety Code and Title 25 of the Code of Regulations strictly regulate the physical park property such as size and shape of the lots, setback requirements, roads, and parking. See the narrative sections "History of Royal Palms Special Permits" and "Owner of Royal Palms Has a Fundamental Vested Right to the Grant/Renewal of a Conditional Use Permit" (Sections 9.2, 9.4).

Response to Section B.4 of the Conditional Use Permit Findings

The property was among the first developments in the area. In 1970, the owner was given two special permits, each of which included specific conditions and limitations with regard to development and construction. The owner complied with all of these, as well as any other applicable requirements. The surrounding areas grew around the mobilehome park, including the streets, utilities, emergency, and other services. Given Royal Palms has been located at its current location for over 50 years, and this application does not propose increase the number of spaces, altering landscaping, construction, etc., there is no increased demand for the services which have already been serving it. Therefore, the proposed (current) site is adequately served by streets of sufficient width and have been improved as necessary to carry the quantity of traffic the mobilehome park has generated over the last 50 years. The park has also been adequately served by other public or private service facilities as have been required. See the narrative sections "History of Royal Palms Special Permits" and "Owner of Royal Palms Has a Fundamental Vested Right to the Grant/Renewal of a Conditional Use Permit" (Sections 9.2, 9.4).

PROPOSED ENVIRONMENTAL DETERMINATION

DETERMINATION DATE: July 1, 2025
PROJECT NUMBER: PRJ2022-003669-(5)
PERMIT NUMBER: Conditional Use Permit RPPL2022011581
SUPERVISORIAL DISTRICT: 5
PROJECT LOCATION: 21210 East Arrow Highway, Covina
OWNER: Steinberg Properties
APPLICANT: Steinberg Properties
CASE PLANNER: Anthony M. Curzi, Regional Planner
 acurzi@planning.lacounty.gov

The Project qualifies for a Categorical Exemption (Class 1 - Existing Facilities) under the California Environmental Quality Act (CEQA) and the County's environmental guidelines. The Class 1 Exemption allows for the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. It also covers minor additions to existing structures provided the addition does not increase the floor area of the structure by more than 50 percent or 2,500 square feet, whichever is less, or 10,000 square feet if the project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan and the area in which the project is located is not environmentally sensitive. The Project is a continuation of a mobilehome park (MHP) use that had operated at the existing location for 60 years. No physical change, expansion, or improvement is proposed as a part of this request.

No exceptions to the categorical exemption apply to the Project. No conditions, characteristics or circumstances are found to preclude the use of this categorical exemption under CEQA Statute and Guidelines Section 15300.2 for the following reasons:

- a) Cumulative Impacts: The Project involves the continued use and maintenance of an existing MHP and will not change the nature of the underlying use nor will it fundamentally increase the intensity of such use, which has existed at the Project Site for over 60 years. The concern for cumulative impact of successive projects of the same type is minimal as the Permittee is requesting to continue the existing

MHP use of the Project Site and is not proposing other work that would intensify the use of the Project Site.

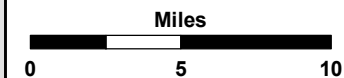
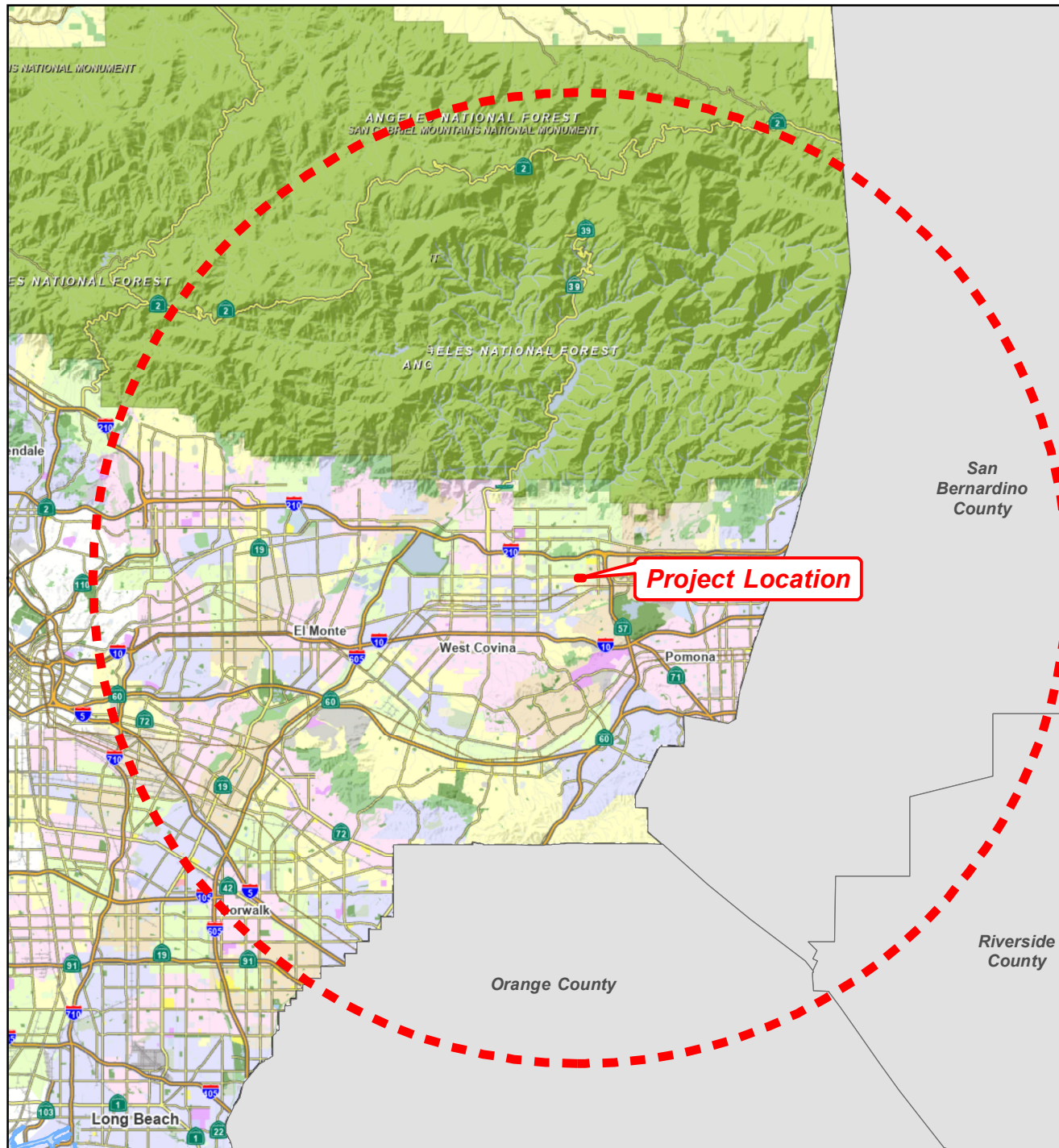
- b) "Unusual Circumstances" or Significant Effects: The Project will not pose a significant effect on the environment because it is an existing use with no proposed physical change to the environment. The Project Site is also located within an already developed urban area, and will adhere to the conditions specified in the conditional use permit. Adequate utilities and roadway infrastructure already exist to serve the subject property, and no environmentally sensitive areas will be impacted by any additional development as none is proposed.
- c) Scenic Highways: According to California's Scenic Highway Program, which is administered by the California Department of Transportation ("Caltrans"), the Project Site is not located within or near an officially designated state scenic highway.
- d) Hazardous Waste Sites: The Project Site is not located on a property which is included on any list compiled pursuant to Government Code Section 65962.5. According to the California Department of Toxic Substances Control's EnviroStor and State Water Resources Control Board's GeoTracker web databases, no active or open hazardous waste sites were identified at the Project Site. A review of the Hazardous Waste and Substances Site List-Site Cleanup database also shows no records on the Project Site. There are no public drinking wells within the Project Site that may pose conflicts with the lists compiled by the State Department of Health Services. Finally, the Project Site is not included in any Water Board's list of solid waste disposal sites, list of "active" orders where necessary actions have not yet been completed (known as Cease-and-Desist Orders and Cleanup and Abatement Orders).
- e) Historical Resources: The Project Site does not contain any historical resource listed in, or determined to be eligible for listing in, the National Register of Historic Places, California Register of Historical Resources or included in a local register of historical resources. According to the County's Historic Resources Sites Policy mapping, there is no historic or cultural resource site within the vicinity of the Project Site. The property is not designated by the County's Historic Preservation Ordinance in the Registry of Landmarks and Historic District. The County also does not consider the Project Site to be a discretionary historical resource per Public Resources Code Section 21084.1. Therefore, the Project will not impact any identified historical resources and will not result in new impacts to historical resources. The Project would not cause an adverse change in the significance of historical resources, as defined in CEQA Guidelines section 15064.5.

20-MILE RADIUS

LOCATOR MAP

PROJECT NO. PRJ2022-003669

CUP RPPL2022011581

LA COUNTY
PLANNING

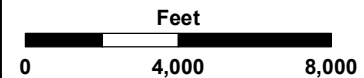
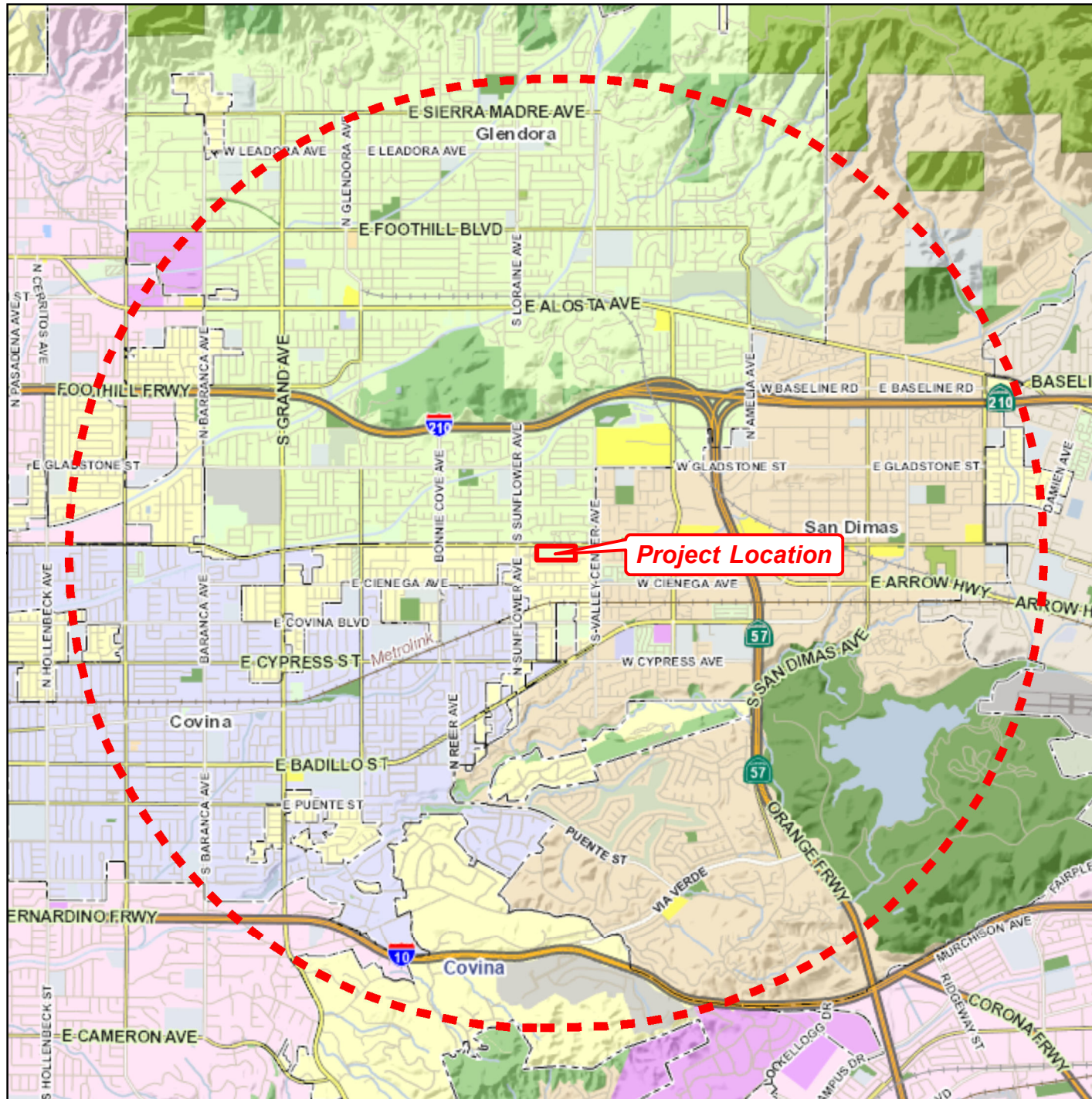
LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

3-MILE RADIUS

LOCATOR MAP

PROJECT NO. PRJ2022-003669

CUP RPPL2022011581



LA COUNTY
PLANNING

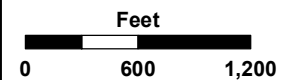
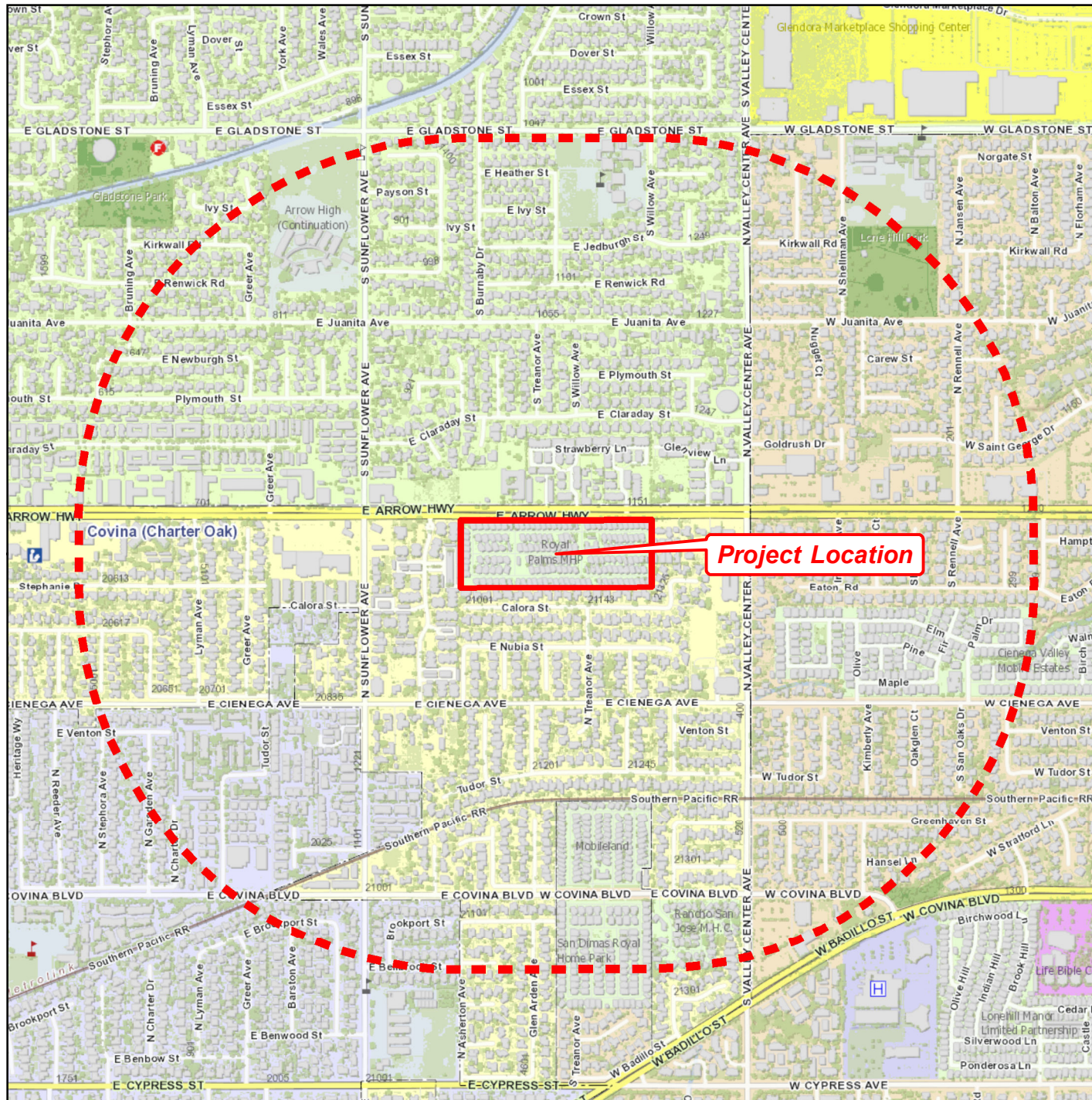
LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

HALF-MILE RADIUS

LOCATOR MAP

PROJECT NO. PRJ2022-003669

CUP RPPL2022011581



LA COUNTY
PLANNING

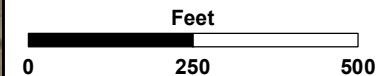
LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

AERIAL IMAGERY**SITE-SPECIFIC MAP**

PROJECT NO. PRJ2022-003669

CUP RPPL2022011581

Digital Ortho Aerial Imagery:
Los Angeles Region Imagery
Acquisition Consortium (LARIAC)
2024



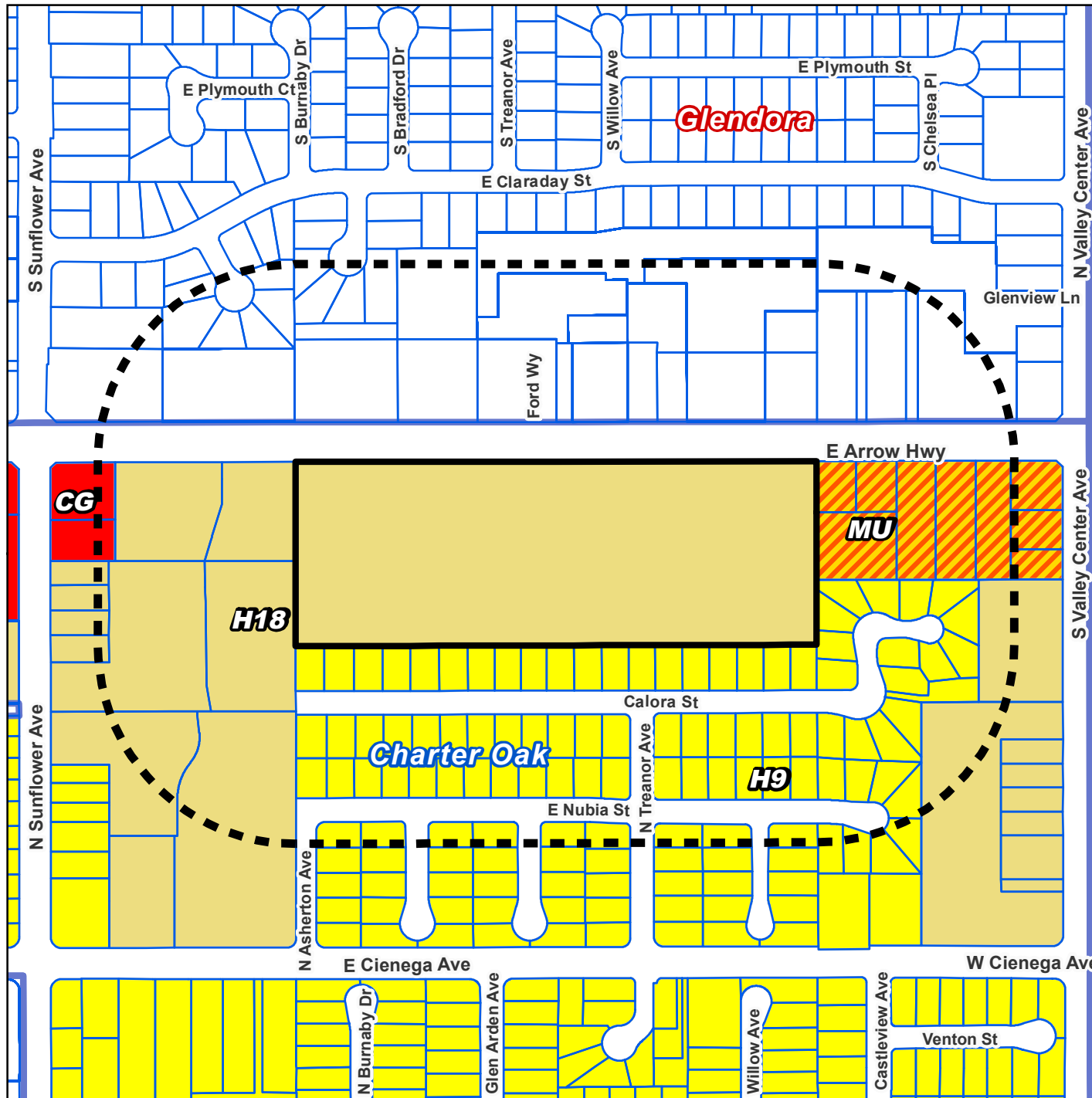
LA COUNTY
PLANNING





LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

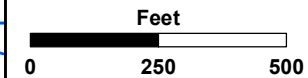
LAND USE POLICY**500-FOOT RADIUS MAP**

PROJECT NO. PRJ2022-003669

CUP RPPL2022011581



-  H9 - Residential 9
-  H18 - Residential 18
-  CG - General Commercial
-  MU - Mixed Use



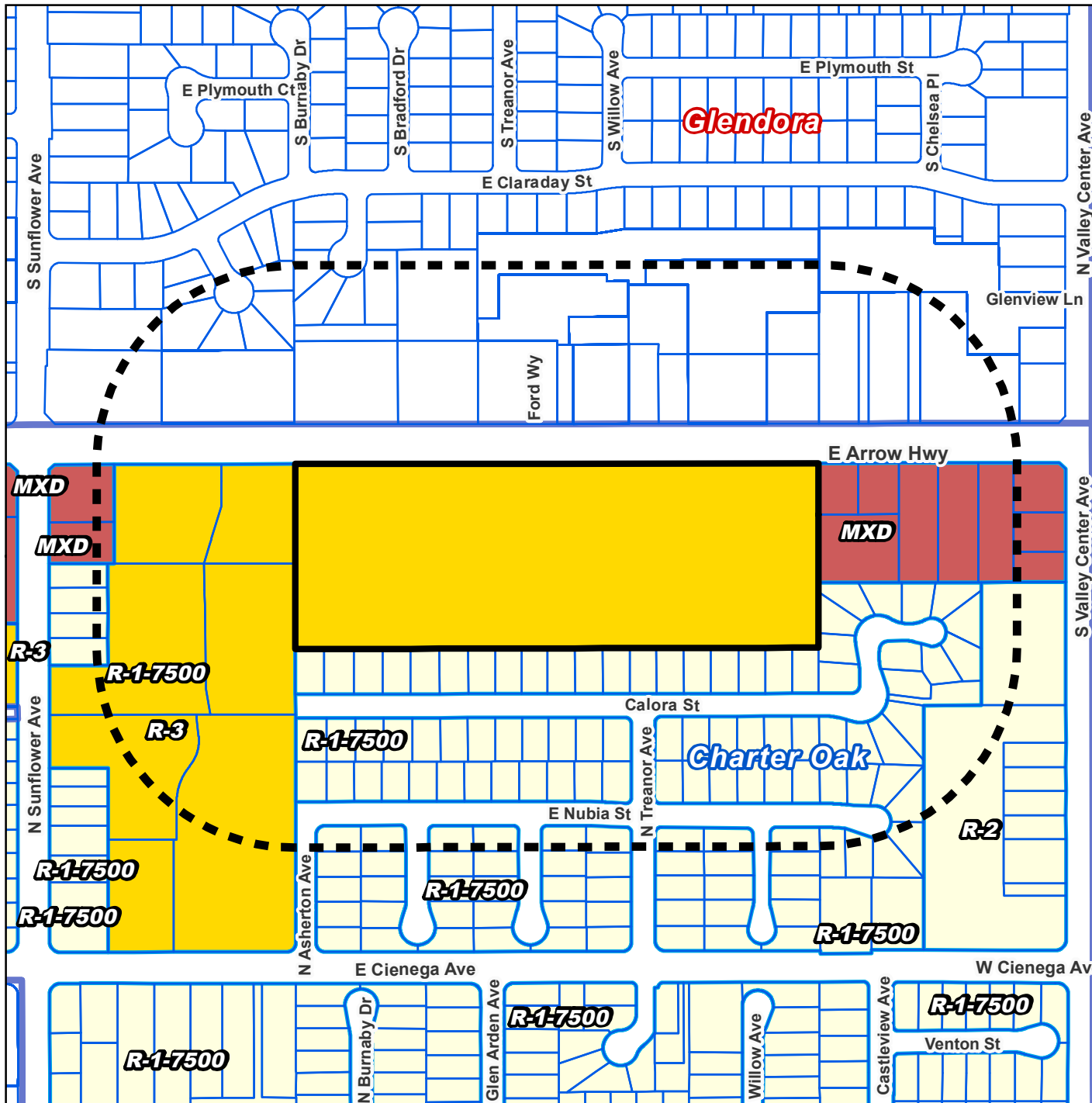
LA COUNTY
PLANNING





LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

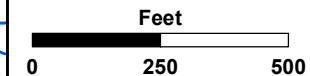
ZONING**500-FOOT RADIUS MAP**

PROJECT NO. PRJ2022-003669

CUP RPPL2022011581



-  R-1 - Single-Family Residence
-  R-2 - Two-Family Residence
-  R-3-(U) - Limited Density Multiple Residence
-  MXD - Mixed Use Development



LA COUNTY
PLANNING

LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

PHOTOGRAPHS #1-2: PARK CLUBHOUSE / OFFICE



PHOTOGRAPH #3: LOWER POOL



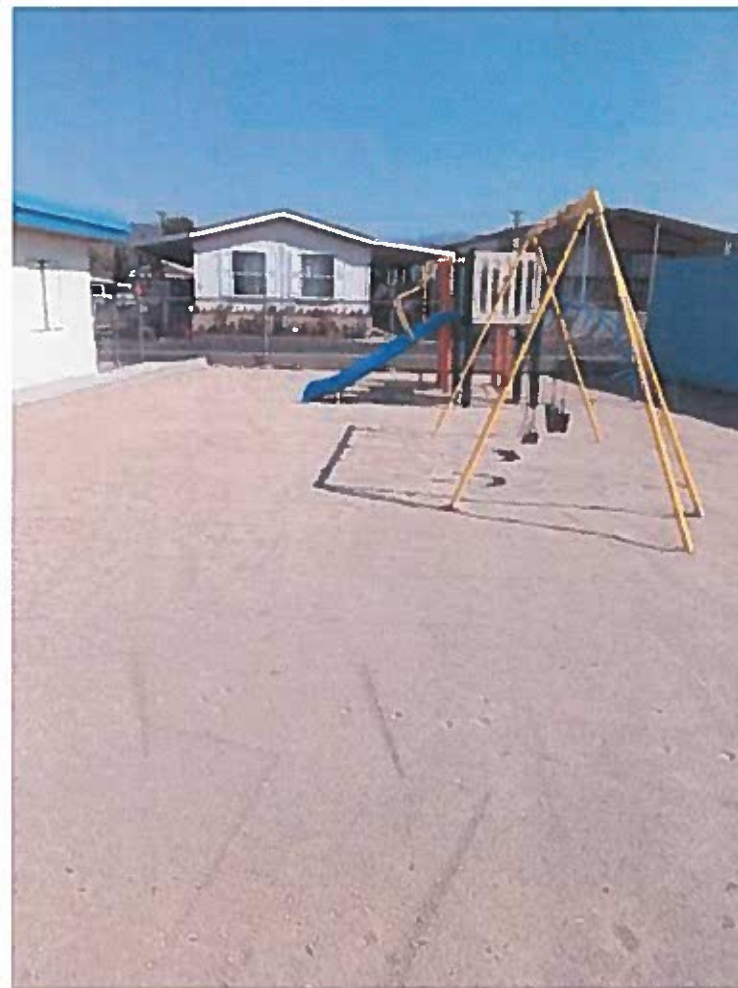
PHOTOGRAPH #4: UPPER POOL



PHOTOGRAPH #5: BASKETBALL COURT



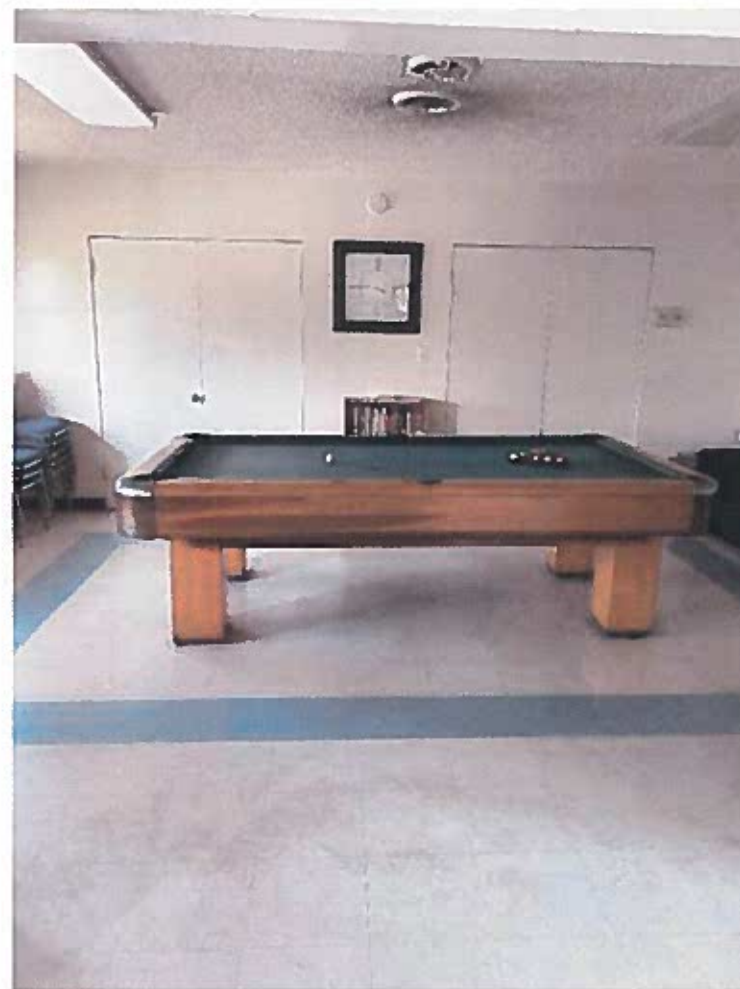
PHOTOGRAPH #6: PLAYGROUND



PHOTOGRAPH #7: PARK KITCHEN



PHOTOGRAPH #8: BILLIARD ROOM



PHOTOGRAPHS #9-10: CLUBHOUSE INTERIOR



PHOTOGRAPH #11: COMMON AREA



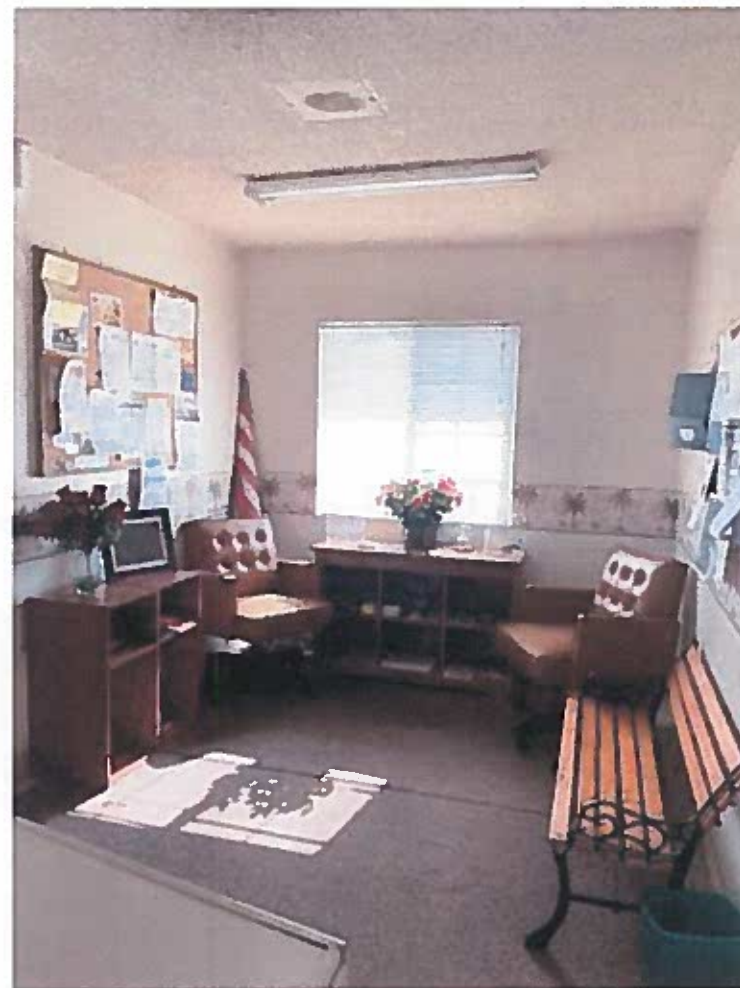
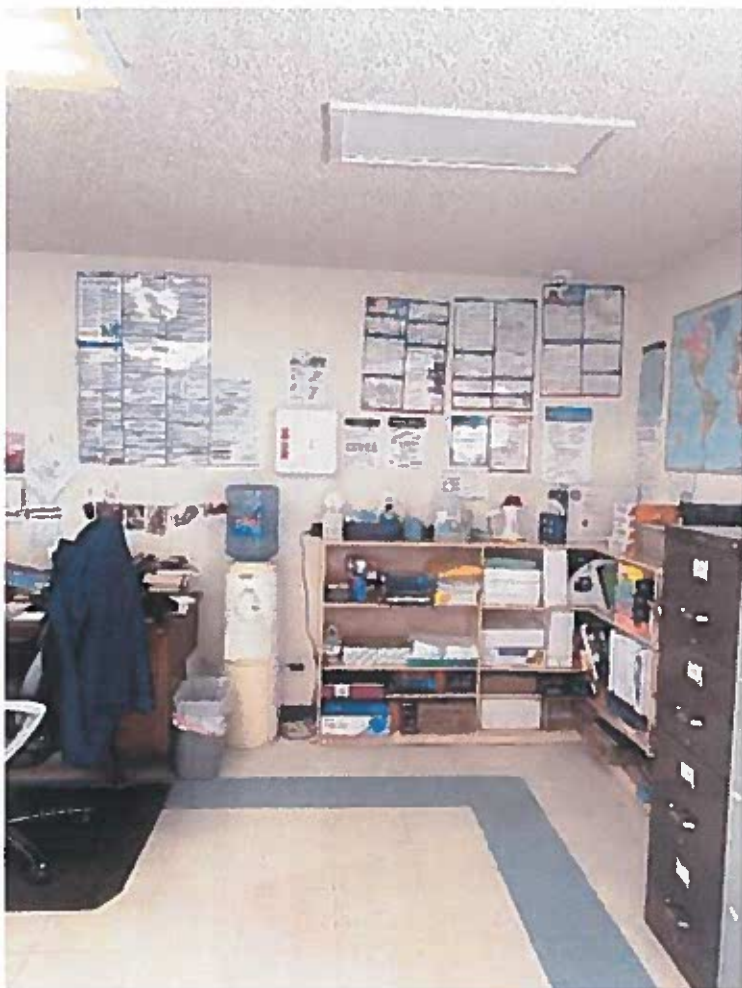
PHOTOGRAPH #12: MAILBOXES



PHOTOGRAPHS #13-14: PARK OFFICE INTERIOR



PHOTOGRAPHS #15-16: PARK OFFICE INTERIOR



PHOTOGRAPHS #17-18: LOWER LAUNDRY ROOM



PHOTOGRAPHS #19-20: UPPER LAUNDRY ROOM



PHOTOGRAPHS #21-22: VARIOUS PARKING SPACES



PHOTOGRAPHS #23-24: VARIOUS PARKING SPACES



ROYAL PALMS MOBILE HOME PARK 2021

Royal Palms Mobile Home Park ("Royal Palms") is a mobilehome park, defined in the Mobilehome Residency Law ("MRL"), Civil Code §§ 798, et seq., specifically § 798.4, as "an area of land where two or more mobilehome sites are rented, or held out for rent, to accommodate mobilehomes used for human habitation."

Since at least 1970, Royal Palms has been operating as a 166- to 167-space mobilehome park. The permitting history of the park is described in the history of special permits section of this application narrative. However, the zone Royal Palms is presently located in is R-3: Limited Density Multiple Residence. Pursuant to the Los Angeles County Municipal Code, mobilehome parks are permitted in R-3 zones with a conditional use permit. The park has provided housing in accordance with the zoning restrictions and General Plan of Los Angeles County for hundreds of persons each year, approximately, for the last fifty (50) years.

Typically, the "tenant" in a mobilehome park, referred to as the "homeowner" under the MRL, owns the mobilehome, and rents the space on which it sits. The mobilehome ownership has the advantage over apartment renting because the mobilehome owner builds equity in the home, and does not have common walls with other residents. It has the advantage over owning the typical single-family home because it does not have the additional costs associated with owning the land. It is thus an affordable alternative to the typical single-family residence, but with advantages over renting a house or apartment: not only the equity in the mobilehome, recoverable upon resale, but also a small yard surrounding the home, with no joint walls with co-tenants.

The MRL provides the homeowner the right to sell the mobilehome. Thus, while the mortgage on the mobilehome and the space rent in total are comparable to apartment rents in many cities, unlike an apartment dweller, if the tenant/homeowner moves from the mobilehome park, he or she may sell the mobilehome and walk away with whatever equity was represented in the proceeds after sale.

Of course, mobilehome parks vary in quality just as any other form of housing. Royal Palms is a very sought-after park, located at 21210 East Arrow Highway, Covina, California 91722. At the time of drafting this application, Royal Palms has 4.3/5 stars on Google with 78 reviews. The desirability of Royal Palms is demonstrated by the fact that there are generally few, if any, available spaces, and homes tend to sell very quickly. The price of the mobilehomes located onsite in Royal Palms currently ranges from \$99,000 to \$160,000. This is a reflection mainly of the value attributable to the home being located in Royal Palms. The size, age, and condition of the home are secondary factors affecting the value of the home.

Royal Palms also boasts many quality amenities. It has a clubhouse with a billiard room and full kitchen, two (2) swimming pools, two (2) laundry facilities, a play yard containing swings, a slide, and a jungle gym, a basketball court, and recreational vehicle storage. The laundry facilities contain seven (7) washing machines and seven (7) dryers. There are fifteen (15) dumpsters onsite. There is one (1) onsite park manager, one (1) assistant manager, one (1) weekend employee, and one (1) onsite maintenance persons, who take care of all aspects of park maintenance, except where the services of an expert are required in a particular area, such as out-of-the-ordinary electrical

EXHIBIT I: PROJECT NARRATIVE

issues or plumbing repairs. There is plenty of vehicle parking within the park premises (as can be seen in the parking matrix). Each rent space can accommodate at least two (2) vehicles in the carport. Additionally, there are 69 total spaces for other parking, which consist of: fifty (50) visitor parking spaces, two (2) handicap parking spaces, and seventeen (17) additional, general parking spaces.

Royal Palms is an "all age" park, accommodating families and individuals of all ages. The resident population is made up of approximately 500-750 persons of all ages. The community is located in one of the neighborhoods with a lower crime rate compared to the remainder of the City of Covina, and is typically quiet, aside from Arrow Highway, the street the park is located on.

There are various social activities in the Park which the residents sometimes design and host when there is not a global pandemic occurring. Given the easing of restrictions, and as the Park is permitted to open its facilities further, these activities are likely to resume. Residents consistently use both of the two pools, use the basketball court, and play billiards. Children are often seen playing on the playground.

Nearby, there are other desirable amenities and features. There is a State Bros. Market grocery store located just down the street, along with many other various businesses and restaurants. The Lone Hill Park, which maintains sports fields, tennis courts, basketball courts, a jungle gym, and other amenities, is located only a couple of blocks from the park. A little further and there are large retail stores for any of the park residents' needs. In addition, the park is located only several blocks from the 210 and 57 freeways, providing quick access to major southern California thoroughfares.

The residents of Royal Palms tend to be a well-behaved group, with very few evictions from the park. The police are seldomly called to the park, and there have been only a few minor crimes reported in the park over the last several years. Management never receives complaints from persons outside the park about residents or the park operations.

In all, Royal Palms is a high quality and desirable park. It is an asset to the community and should be permitted to continue its use.



COUNTY OF LOS ANGELES FIRE DEPARTMENT FIRE PREVENTION DIVISION

Land Development Unit
5823 Rickenbacker Road
Commerce, CA 90040
Telephone (323) 890-4293, Fax (323) 890-9783

EPIC-LA NUMBER:	RPPL2022011581	PROJECT NUMBER:	Mobile Home Park @ 21210 E Arrow Highway
CITY/COMMUNITY:	Covina (Charter Oak)	STATUS:	Cleared
PROJECT ADDRESS:	21210 E Arrow Highway Covina, CA 91724	DATE:	07/12/2024

CONDITIONS

1. All fire lanes shall be clear of all encroachments and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code, Section 503, which requires all weather access. All weather access may require paving.
2. All on-site Fire Apparatus Access Roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction in accordance too Fire Code Section 501.4
3. For buildings where the vertical distance between the access roadway and the highest roof surface does not exceed 30 feet, provide a minimum unobstructed width of 26 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Apparatus Access Roads to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building. The highest roof surface shall be determined by measurement of the vertical distance between the access roadway and the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater. Fire Code 503.1., 503.2.1.2 & 503.2.1.2.1
4. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official. Fire Code 503.2.2.1
5. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 pounds and shall be surfaced to provide all-weather driving capabilities. Fire Code 503.2.3
6. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE" shall be provided for Fire Apparatus Access Roads. Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for fire apparatus access roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector. A no-parking designation shall meet the requirements of California Vehicle Code Section 22500.1 and be approved by the fire code official. Fire Code 503.3
7. Approved building address numbers, building numbers or approved building identification shall be provided and maintained to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their background, be Arabic numerals or alphabet letters, and be a minimum of 4 inches high with a minimum stroke width of 0.5 inch. Fire Code 505.1
8. Approved building address numbers, building numbers or approved building identification shall be provided and maintained to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their background, be Arabic numerals or alphabet letters, and be a minimum of 4 inches high with a minimum stroke width of 0.5 inch. Fire Code 505.1
9. The required fire flow for the public fire hydrants for this project is 1500 GPM at 20 psi residual pressure for 2 hours. Two (2) public fire hydrants flowing simultaneously may be used to achieve the required fire flow. Fire Code 507.3 & Appendix B

EXHIBIT J: AGENCY CORRESPONDENCE

For any questions regarding the report, please contact Wally Collins at (323) 890-4243 or Wally.Collins@fire.lacounty.gov.

Reviewed by:

A handwritten signature in black ink, appearing to read "Wally Collins", is written over a light blue rectangular background.



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
Director

MUNTU DAVIS, M.D., M.P.H.
County Health Officer

MEGAN McCLAIRE, M.S.P.H.
Chief Deputy Director

LIZA FRIAS, REHS
Director of Environmental Health

BRENDA LOPEZ, REHS
Assistant Director of Environmental Health

SCOTT ABBOTT, REHS, M.P.A.
Assistant Director of Environmental Health

5050 Commerce Drive
Baldwin Park, California 91706
TEL (626) 430-5374 • FAX (626) 813-3000

www.publichealth.lacounty.gov/eh/



BOARD OF SUPERVISORS

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First District

Holly J. Mitchell
Second District

Lindsey P. Horvath
Third District


Janice Hahn
Fourth District

Kathryn Barger
Fifth District

November 22, 2023

TO: Carmen Sainz
Supervising Regional Planner
Department of Regional Planning

Attention: Anthony Curzi

FROM: Charlene Contreras 
Director, Community Protection Branch
Department of Public Health

SUBJECT: CONDITIONAL USE PERMIT (CUP) REQUEST
CASE: RPPL2022011581
PROJECT: MOBILE HOME @ 21210 E ARROW HIGHWAY
21210 E. ARROW HIGHWAY COVINA CA 91724

Thank you for the opportunity to review the application and project located at the subject property. This project request is for a Conditional Use Permit renewal for an existing 166-unit mobile home park with no proposed improvements.

Public Health provide clearance of the aforementioned project. This is conditioned by the current use of public water and wastewater systems. The applicant provided a water bill from Golden State Water Company dated October 14, 2023. Also provided a copy of the 2023-2024 Annual Secured Property Tax Bill indicating the consolidated sewer service as one of the direct assessments. Any change of methods for the provisions of potable water and sewage disposal shall invalidate this approval.

Carmen Sainz
November 22, 2023
Page 2 of 3

- ☒ Public Health conditions for this project have been met as of the date of this letter. Public Health recommends the approval of the aforementioned project.
- ☐ Public Health requires that the conditions or information requested below are addressed prior to agency approval; therefore, the Department **DOES NOT** recommend clearance of this project until the following conditions are met:

1. Community Protection Branch: Environmental Hygiene

Please Note: The following are general requirements for Noise recommendations for the proposed project.

The applicant shall abide by the requirements contained in Title 12, Section 12.08.390, 12.08.530, Noise Control Ordinance for the County of Los Angeles (reference available at municode.com). The section in Title 12 that apply to this project include but are not limited to 12.08.390 Exterior Noise Standards and 12.08.530 Residential Air-Conditioning.

1.1 Exterior Noise

Ordinance:

12.08.390 Exterior Noise Standards

No person shall operate or cause to be operated, any source of sound at any location within the unincorporated county, or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed any of the following exterior noise standards (See Table 1):

Area	Duration	Std # 1 = L50	Std # 2 = L25	Std # 3 = L8.3	Std # 4 = L1.7	Std # 5 = L0
		30min/hr	15min/hr	5 min/hr	1 min/hr	At no time
Residential	7 am – 10 pm	50	55	60	65	70
	10 pm – 7 am	45	50	55	60	65

1.2 Community Noise

Ordinance:

12.08.530 Residential air conditioning or refrigeration equipment

Operating or permitting the operation of any air conditioning or refrigeration equipment in such a manner as to exceed any of the following sound levels is prohibited (See Table 2):

Measuring Location	Units Installed on or after January 1, 1980, dBA
Any point on neighboring property line, 5 feet above grade level, no closer than 3 feet from any wall.	55
Center of neighboring patio, 5 feet above level, no closer than 3 feet from any wall.	50
Outside the neighboring living area window nearest the equipment location, not more than 3	50

Carmen Sainz
November 22, 2023
Page 3 of 3

feet from the window opening, but at least 3 feet from any other surface.	
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For questions regarding above comments, please contact Yonas Taye of Public Health, Environmental Hygiene Program at (626) 430-5201 or ytaye@ph.lacounty.gov.

If you have any other questions or require additional information, please contact Veronica Aranda of Public Health, Planning & Land Use Liaison at (626) 430-5201 or varanda@ph.lacounty.gov.

CC:va
DPH_CLEARED_21210 E. ARROW HIGHWAY COVINA CA 91724_RPPL2022011581_11.22.2023