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February 25, 2003

File No. 011-02020

VIA FACSIMILE AND U.S. MAIL
FAX NO. (650) 363-4849

Miroo Desai Brewer
Environmental Services Agency
County of San Mateo
400 County Center
Redwood City, CA 94063

Re: El Granada Manufactured Housing Community – Use Permit Renewal

Dear Ms. Brewer:

While attempting to process the application for a use permit, it became readily apparent that substantially more of the documentation did not apply to the El Granada Manufactured Home Community situation, then the small portion of general information that might apply to your review of the use permit for the community. Consequently, I will provide you with the relevant necessary information in letter form. Please let me know if this information will be sufficient for your review of the matter.

Again, the community has been continuously operated as a mobilehome park / manufactured housing community since approximately 1963. The current owners, and their direct predecessors, acquired the property in approximately 1978. They also have continuously operated the community as a mobilehome park / manufactured housing community. The use of the property has not changed since the initial use permit was granted in approximately 1963. The current owners, however, have made substantial and significant improvements to the community since their acquisition of the property. The most recent improvements included additions to the water treatment facility located on the property. All improvements to the property by the current owners have been made in compliance with county ordinances and proper county review. In addition, the community has received annually a permit to operate from the County. The current owners have no present intention of changing the historical operation of the community.

In view of this background, processing an use permit application simply does not make sense. My clients do not seek to change the use of the property. They are continuing the historical use of the property as a manufactured housing community. No changes in the operation of the community are proposed. The owners shall continue to operate the community in compliance with California Code of Regulations, Title 25 and the applicable county

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ordinances. The state and county regulations and ordinances do not have any provisions that govern the specifics of community management. I respectfully submit that the county does not have the current authority to regulate or mandate management procedures or policies at the community through the existing use permit or operating permit for the property. The current use of the property has been in effect since approximately 1963. The current owners have met all county requirements through the annual review of their permit to operate since their acquisition of the property in approximately 1978.

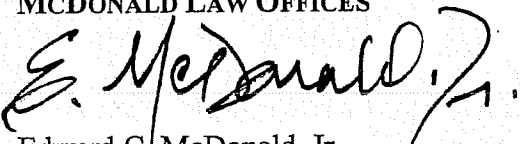
The only relevant information from the permit package is set forth below.

- Current owner of the property: El Granada-004-LP.
- Current Owner address: c/o Kingsley Management Corporation, P.O. Box 1848, Provo, Utah 84604, Tel (801) 228-9702 Fax (801) 434-3187
- Property address: El Granada Manufactured Home Community 164 Culebra Street, Moss Beach, CA 94038
- Zoning: H-1 Limited Highway Frontage
- APN: 047-300-040 and 047-300-060

I trust the above information will be useful in your review of the El Granada Manufactured Home Community. Please do not hesitate to call me if you have any questions concerning the above.

Very truly yours,

MCDONALD LAW OFFICES



Edward C. McDonald, Jr.

ECM/vm

cc: N. Nelson
B. Huerta