

Mr. John Wallace
January 6, 1989
Page 2

and B, as well as within the total study area being analyzed for potential rezoning.

For your information, the City Planning Department advises me that there are 13,736 single family units in the City, and 6,145 multiple family units (as of 1988). In the area being studied for rezoning, there are 882 single family units (one of which is, of course, owned by Mayor Hatch), and 4,673 multiple family units. The zoning category underlying the unit may or may not be consistent with the type of construction on the site. In particular, it is not uncommon for single family units to be built on multiple family zoned property, as in the case of Mayor Hatch's house. The data in the Agenda Item can give you some guidance as to the degree of discrepancy from existing zoning by demonstrating the effect of a change in zoning.

Regarding our conversation of the relevant "segment of the public" which must be affected by a decision for there to be an exemption pursuant to Government Code Section 87103, it appears to me that the relevant comparison does not necessarily have to be to all residential property owners in the City, under FPPC decisions. For example, in 2 FPPC 77, the Commission considered all merchants in an area to reasonably constitute the "public generally." In 4 FPPC 62, the Commission held that those persons who held three or fewer rental units were a significant segment of the public (although the owners of a greater number of residential rental properties were considered an industry.)

We appreciate your prompt attention to this matter. If you have any further questions, please do not hesitate to give me a call.

Very truly yours,


STEPHANIE R. SCHER

SRS:dsd
Enclosure
cc: Honorable Barry Hatch
Mr. Mark Lewis, City Manager

BROWN, WINFIELD & CANZONERI

INCORPORATED

ATTORNEYS AT LAW

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December 23, 1988

FAIR POLITICAL PRACTICES COMMISSION
428 J. Street, Suite 800
Post Office Box 807
Sacramento, California 95804-0807

DEC 27 8 55 AM '88
FPPC

Re: Request for Formal Written Advice

Dear Sir or Madam:

This letter is a request for formal written advice pursuant to Government Code Section 83114 and Title 2 California Administrative Code Section 18329. This advice is sought in respect to the facts set forth herein.

This request is submitted by the Honorable Barry Hatch, Mayor of the City of Monterey Park, whose mailing address is 448 Edgley Avenue, Monterey Park, California, 91754. The request is submitted by the authorized representative of Mayor Hatch, Stephanie Rose Scher, City Attorney for the City of Monterey Park. Mayor Hatch has specifically authorized this representation and this request for advice.

The question concerns Mayor Hatch's ability to participate in discussions concerning the change in zoning of numerous properties in the City of Monterey Park, which includes property which the Mayor owns and lives in. Mayor Hatch's property is located in a multiple family zone (R-3) and developed only with a single family residence; the proposal is to change the zoning from R-3 to a single family zone (R-1). It is anticipated that the change in zoning will have some financial effect upon the value of the real property, although it is not clear at this time whether the change would be positive or negative, or the degree of such change. However, pursuant to Section 18702.1 as recently amended, because Mayor Hatch's

property is within the district actually being rezoned, it appears that the degree of financial impact is irrelevant, and therefore Mayor Hatch seeks this opinion.

Because the proposed change of zoning is occurring in connection with the change of numerous other properties in the City, we request the Commission's advice as to whether Mayor Hatch may continue to participate in this matter, under the exemption found in Government Code Section 87103 and 2 California Administrative Code Section 18703 which provide that a public official may continue to participate in a decision if the effect of his decision will be substantially the same on him as it will be on "all members of the public or a significant segment of the public." To aid you in rendering this advice we provide the following facts:

In May, 1988, the City Council requested the City staff to consider the appropriate zoning for a significant percentage of lots in the multiple family zones in the City (i.e. R-2 and R-3). In particular, the staff was instructed to analyze the potential for down zoning R-3 lots to R-2 or R-1, and R-2 lots to R-1. R-2 properties may be built with multiple family units on them to a possible density of 15 units per acre. R-3 lots may be built with multiple family units on them to a density of 22 per acre. R-1 lots, on the other hand, may be only built with one house per lot, to a density of 7.25 units per acre (i.e. approximately 6,000 square feet per lot). The entire area under discussion at that time consisted of 428 net acres out of a total of 531 net acres zoned for multiple family development, or 80.6 percent of the total multiple family acreage in the City. Mayor Hatch's lot is 6,000 square feet (approximately one-seventh of an acre), and thus is at the existing R-1 zone density. This size lot is typical for much of the R-3 and R-2 zones, although the size of lots does vary considerably. The total gross acreage in the City of Monterey Park is as follows (total net acreage is unavailable, but the percentage relationships would be the same):

<u>ZONE</u>	<u>GROSS ACRES</u>	<u>%</u>	<u>NET ACRES</u>
R-1	2,949	60	NA
R-2	379	8	145
R-3	573	11	386
Commercial	453	9	NA
Manufacturing	591	12	NA

(The action taken by the Council in May 1988 was imposition of a moratorium to study these areas. Under the formula for materiality then in effect, it was felt the imposition of a moratorium would not have such a material effect as to trigger disqualification. Mayor Hatch is not seeking any advice as to this past action.)

Since May the City staff has undertaken a detailed analysis of the 428 acres involved in this proposed rezoning, and hearings have been held in front of the City's Planning Commission. Although these hearings are not complete, it is likely that the Planning Commission will not recommend rezoning of the entire 428 acres. Instead, two alternatives encompassing smaller areas of the City are being seriously considered.

The first, Alternative A, would rezone 77 net acres of the 531 total net acres of multiple family zoned property (14.5%), as follows:

<u>Change</u>	<u>Acres</u>
R-3 to R-2	18
R-3 to R-1	8
R-2 to R-1	51

A second alternative, Alternative B, would result in a down zoning of 221 net acres of the 531 (or 41.6%), as follows:

<u>Change</u>	<u>Acres</u>
R-3 to R-2	96
R-3 to R-1	8
R-2 to R-1	117

Pursuant to State law, any recommendation of the Planning Commission must be considered by the City Council after a properly noticed public hearing and approved by the Council before it can become law. In Monterey Park, as the result of an initiative approved by the voters and upheld by the Court of Appeal (Lee v. Monterey Park (1986) 173 Cal. App. 3d 798), any rezoning over one acre must also be approved by the voters before it can become effective.

FAIR POLITICAL PRACTICES COMMISSION

December 23, 1988

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At current R-3 densities, Mayor Hatch's property is large enough to build two units. If it is rezoned to either R-2 or R-1, he can only maintain the one unit currently on site. Mayor Hatch has no desire or intent to build multiple family housing on his property, and desires solely to maintain his house as a single family structure.

Under these circumstances, Mayor Hatch requests the advice of the Commission as to whether he may participate in the rezoning discussions when they reach the City Council. In particular, Mayor Hatch needs advice as to how much land must be subject to the proposed action so as to encompass a "significant segment of the public" pursuant to Government Code Section 87103. Further, since the amount of land to be rezoned will not be known until the Council actually votes, what, if anything, is the effect of a Planning Commission recommendation for rezoning pursuant to Alternatives A or B, or, indeed, some other possible combination of recommendations. Finally, is the fact that the rezoning is subject to a vote of the people of any relevance to this consideration?

Further information regarding this question is available at your request. It is anticipated that this matter will be before the City Council in February, 1989, and we would appreciate your response at your earliest convenience. If you have any questions, please do not hesitate to contact the undersigned or Mayor Hatch.

Very truly yours,


STEPHANIE R. SCHER

SRS:dsd

cc: Honorable Barry Hatch
Mr. Mark Lewis, City Manager



California Fair Political Practices Commission

December 29, 1988

Stephanie Scher
Brown, Winfield & Canzoneri
300 South Grand Avenue, Suite 1500
Los Angeles, CA 90071-3125

Re: 88-479

Dear Ms. Scher:

Your letter requesting advice under the Political Reform Act was received on December 27, 1988 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact John Wallace, an attorney in the Legal Division, directly at (916) 322-5901.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Code of Regs. Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

Kathryn E. Donovan
Acting General Counsel

KED:ld

cc: Honorable Barry Hatch
Mr. Mark Lewis, City Manager

AGENDA ITEM NO. 2

PLANNING COMMISSION
JULY 21, 1988
PAGE 1 OF 6

SUBJECT: CHANGES OF ZONE AND GENERAL PLAN AMENDMENTS
PROPERTY: CITY-WIDE
APPLICANT: CITY OF MONTEREY PARK

SITUATION & FACTS:

An amendment has been proposed to the Zoning Code regarding R-2 and R-3 properties. Said petition proposes that, within the area bounded by: northerly City boundary, easterly City boundary, south side of Mooney Drive and Electric Avenue, all R-3 (High-Density Residential) shall become R-2 (Medium-Density Residential) or R-1 (Single-Family Residential) and all R-2 shall become R-1. This includes R-2 and R-3 properties with C-D (Civic District) overlay designation.

Notice of this public hearing was published on July 7, 1988 with a copy and Affidavit of Publication on file.

An Environmental Impact Report has been prepared in accordance with the adopted procedures relating to the California Environment Quality Act and the City of Monterey Park.

STAFF REVIEW & REPORT:

There has been increasing concern regarding the City of Monterey Park's ability to provide adequate services to its residents. This concern and the study requested by the City Council led them to impose a moratorium on May 10, 1988, for one year for properties within the R-2 and R-3 zones in the northeast quadrant of the City. Staff has undertaken a study of lot sizes, physical characteristics, degree of nonconformity and regional trends in order to make reasonable recommendations with regard to possible rezoning. A staff report prepared June 9, 1988, which has previously been disseminated is part of the materials that went into the recommendations being made here.

Initially, the City staff identified 199 acres in the northeast area for intensive study for rezoning. This was done and the results of that study was contained in the June 9 memo. Following City Council direction, the staff expanded that area to include the entire 428 acre northeast quadrant of the City to be studied for possible rezoning.

This acreage has been divided into 32 sub-areas that have been identified in order to isolate the characteristics of individual portions of the City. The purpose of this study to identify those areas where any appropriate rezoning should be considered. Cross-referencing has been made to recommendations made by Sedway Cooke and

145
382
531

Associates in 1987, the sewer system master plan and historical zoning. (Copies of these documents are attached.)

Working with the available data staff has used the following prioritized considerations in making recommendations:

1. Percentage of properties which would have nonconforming units if rezoning was approved.
2. Location of property in proximity to collector and arterial highways; commercial zones; social services such as senior citizen center, parks, schools, etc.; sewer system identified impact areas; rate of development in recent years; quality of housing within the area and other adjacent residential property.
3. Sizes of lots.
4. General location within the City as a whole.
5. History of zoning.

Maps are attached showing two alternative proposals by staff.

Proposal A recommends the rezoning of seven identified sub-areas: 3B, 4C, 6A, 6B, 6E, 7A and 9A. Five of these areas are proposed to be changed to R-1 and two of these areas are proposed to be changed to R-2. The basis for the recommendation is that in all of these sub-areas the change would result in less than 45% nonconformance. In Alternative A sub-areas meet the criteria for possible rezoning, including small lot sizes, proximity to other similar zoned property, a lower percentage of nonconformance, protection of neighborhood and location on streets that do not provide optimum service.

Alternative A would result in a change of 77 acres, 18 of which would be changed from R-3 to R-2, 8 of which would be change from R-3 to R-1, and 51 of which would be changed R-2 to R-1 for a total of 384 units on 138 properties.

For the purpose of discussion and to enable the Planning Commission and ultimately the City Council to make an informed decision, the staff has also prepared data with regard to a second alternative identified Alternative B. This alternative would call for the approval of rezoning for the following sub-areas: 1, 2, 5A, 5B, 7B, 8A, 8B, 9B, 9C, 12 and 18. Alternative B adds 137 acres to the recommended areas to be rezoned, 78 of these acres are proposed to be changed from R-3 to

R-2, no acres are proposed to be changed from R-3 to R-1 and 66 acres are proposed to be changed from R-2 to R-1. The reasons for these alternative recommendations are several.

Areas 1, 2, 5A, 5B, 7B, and 9C have degrees of nonconformity ranging from 45.7 to 55.8%. Other projects have been identified as alternatives for consideration by the Planning Commission and City Council because it is felt there are special circumstances that may warrant consideration of rezoning, even though these projects would then have property developed with nonconforming units on more than 45% of the number of properties. For instance, areas 1 and 2 are located in an area surrounded by other R-1 residential properties and having small local streets as their primary access. Area 1 particularly has access from streets which are very narrow and hilly. While there is one large project within this area a substantial number of the parcels are appropriate for R-1 use. The average frontage is only 50 feet or less in nearly all cases except for the one large development at 830 through 908 East Mabel.

Area 7B is an area that has experienced a vast proportion of recent development. This area which is the 300, 400 and 500 block of South Pomelo, Orange and Sefton has been the area most often cited being most negatively affected by recent multi-family projects. This area is all within an identified sewer division area and has seen considerable parking and traffic difficulty. This area was changed in zoning in 1976 from R-2 to R-3. Although 46.8% of the properties would be developed with nonconforming units if the zoning were to be changed from R-3 to R-2 after the 46.8% (442 units), zoning and design guidelines as currently written show that the majority of projects are being built to a density that averages 12 units per acre which is within the realm of reasonableness for R-2 zoning. It is felt that it would not be a major disruption in this area were it to be zoned R-2.

Area 8B, while under 45%, would be appropriate for rezoning to R-2 if the nearby areas of 9B and 9C were also rezoned. These areas have an average 41.7% nonconformity if they were to be approved. These lots are particularly narrow and short, averaging 50 ft. in width and 100 to 150 ft. in length. Area 8B is proposed to be changed to R-2 to expand the R-2 zone directly to the south. Areas 9B and 9C are proposed to be changed from R-2 to R-1. These areas average in size 50 x 155 ft. and are therefore barely larger than single-family lots. Although, currently the lots are large enough for two units often times these units are overly large in size. If rezoned to R-1, properties would still be able to be developed with one large house and could be developed with a smaller guest house or second unit housing. This is an area of older homes and there is some consideration to the likelihood of their redevelopment if the zoning is changed. However,

it is felt because of their location the narrowness of streets that serve them, the fact that those streets (Gladys, Florence and Elizabeth) are not through streets but that they dead-end prior to reaching Hellman and the area is still substantially developed in single-family uses that this would be an appropriate area to maintain as a single-family neighborhood.

Area 12 is only 25.9% developed with uses that would be considered nonconforming if the zoning was changed from R-2 to R-1. However, staff placed this area of rezoning within Alternative B because again it is questionable whether or not these lots with many older homes would be redeveloped if the zoning were to be changed. The average lot size within this area is 47 x 121 ft. which is slightly substandard to a R-1 lot and the average units per lot is 1.9.

Area 18 is the final area for consideration within staff's alternative B. This is a three acre area that fronts along Garvey Avenue. This area is developed so that if a properties were rezoned, only 28.6% would become nonconforming. However, because of its location directly on Garvey Avenue and the fact that in the future these properties may wish to be rezoned to Commercial and may be the location of potential senior citizen or handicapped housing, staff questions the recommendation to change the zoning to R-2 as being unnecessary or inappropriate. However, because of the low level of nonconformity it is included in Alternative B for Planning Commission and Council consideration.

If both Alternative A and B were approved, the total change in zoning would be a change of 214 acres. A total of 89 acres would be changed from R-3 to R-2, a total of 8 acres from R-3 to R-1 and of 117 acres would be changed from R-2 to R-1.

The EIR as prepared indicates that the most important negative effect would be the immediate depreciative effect upon property value, the long term effects upon property maintenance and the community disruption. In speaking with local real estate agencies and endeavoring to track the elusive estimate of future real estate value. It has interestingly been the case that most agents feel the property values will maintain good levels regardless of the zoning in Monterey Park. Long time real estate agents feel that the demand is so heavy for property in this area and that most pieces of property are bought for the land value rather than the dwelling that property values can be maintained. It was also indicated that an obvious and immediate drop in property value can be expected based upon those who buy property for speculative purposes or who will only buy R-2 and R-3 property for its income potential.

Many of the impacts on zoning, however, can be mitigated by changes in abatement schedule and by changes in design standard so that there is increased interest in properties that are zoned with lower level density. Staff concurs that the maintenance of single-family neighborhoods is important and it has been shown by City staff that water supplies, particularly, cannot continue to meet continued demand. The impact upon surface streets of multi-family development is also dramatic over recent years is common knowledge.

STAFF RECOMMENDATION:

1. Recommend approval of Environmental Impact Report (EIR).
2. Adopt Resoulation approving selected General Plan Amendments.
3. Adopt Resolution approving selected Changes of Zone.

REASONS FOR CHANGE OF ZONE:

1. There are changed conditions since the adoption of the existing zoning to warrant additional zoning of the type requested, in that over the last decade the City of Monterey Park has experienced growth far in excess to that of the County average and far in excess that anticipated for the City. The zoning that was adopted in 1976 has proven to provide substantial areas for high-density residential development, which the City's infrastructure will be unable to service in the long-term future.
2. The proposed zone change will not adversely affect adjoining properties, in that property values have exceeded all anticipated levels during the last decade. Properties already developed with medium or high density residential developments will remain valuable properties and adequate abatement period will allow for reasonable maintenance to occur over a 25-year period.
3. The zone change will not be detrimental to the public health, safety or general welfare, in that the proposed zone changes will allow the City to be able to afford to continue to provide adequate sewer, water, police, fire, library and park services. With the burgeoning population, there is serious concern that continued high level growth will not enable the City to maintain adequate services.
4. The approval of the rezoning application will be consistent with the City's adopted General Plan, in that a General Plan Amendment is proposed along with the change of zone.

REASONS FOR GENERAL PLAN AMENDMENT:

1. The amendment will retain General Plan designations consistent with zoning.
2. The public streets within the area are better able to handle anticipated traffic at lower development densities than exists now. The proposed General Plan amendment will allow City services, including streets, to serve anticipated population growth in the future.

ACTION:

1. Conduct public hearing.
2. Make a motion: "based on the evidence of the Environmental Assessment Questionnaire the Planning Commission adopts the findings of said Questionnaire and determines that the project will have no significant adverse affect on the environment and adopts and affirms the submitted Negative Declaration."
3. Adopt Resolution recommending approval of General Plan Amendment to City Council for the reasons contained herein.
4. Adopt Resolution recommending approval of Change of Zone to City Council for the reasons contained herein.

MMW:rae

A
B

TABLE 1

PHYSICAL CHARACTERISTICS					
AREA	MOST COMMON LOT SIZE	AVERAGE SQ.FT.	UNIT RANGE	MOST COMMON # UNITS	AVE. # UNITS
B 1	50 X 100	10,393	1-30	1	3
B 2	50 X 181.5	9,755	1-3	1	1.75
3A	50 X 132	7,447	1-10	1	2.2
A- 3B	50 X 115	5,675	1-4	1	1.6
<u>4A</u>	45 X 196	9,999	1-20	1	3
<u>4B</u>	60 X 102	10,776	1-25	1	3.9
A- <u>4C</u>	N.A.	13,253	1	1	1
B <u>5A</u>	50 X 150	8,144	1-26	1	2.8
B <u>5B</u>	50 X 150	8,197	1-16	1	2.6
A- 6A	60 X 120	8,886	1-2	1	1.2
A- 6B	50 X 200	9,351	1-10	1	1.8
6C	50 X 221	9,899	1-7	1	2.2
6D	50 X 132	14,957	1-14	1	2.2
A- 6E	50 X 188	5,766	1-5	1	1.8
6F	62 X 235	9,704	1-8	1	2.5
A- <u>7A</u>	59 X 199	11,659	1-36	1	4.3
B <u>7B</u>	60 X 300	12,476	1-43	1	4.8
<u>7C</u>	60 X 300	12,314	1-20	1	5.2
B <u>8A</u>	50 X 188	19,269	1-20	4	6.3
B <u>8B</u>	N.A.	7,837	1-11	1	3.8
A- 9A	50 X 140	8,369	1-8	1	1.6
B 9B	50 X 152	9,233	1-6	1	1.6
B 9C	50 X 158	8,065	1-10	1	1.6
<u>10</u>	52 x 192	9,577	1-16	1	3.6

TABLE 1

<u>PHYSICAL CHARACTERISTICS</u>					
<u>AREA</u>	<u>MOST COMMON LOT SIZE</u>	<u>AVERAGE SQ.FT.</u>	<u>UNIT RANGE</u>	<u>MOST COMMON # UNITS</u>	<u>AVE. # UNITS</u>
<u>11</u>	63 x 300	10,678	1-21	1	3.7
<u>12</u>	47 X 121	6,684	1-19	1	1.9
<u>13</u>	63 X 273	12,810	1-28	1	5.5
<u>14</u>	86 X 294	25,201	1-28	9	11.5
<u>15</u>	50 X 145	5,250	1-24	1	1.8
<u>16</u>	50 X 153	9,277	1-16	1	2.9
<u>17</u>	65 X 150	14,877	1-18	2	7.6
<u>18</u>	50 X 123	5,871	1-12	1	1.8

TABLE 2

<u>REZONING</u>			
<u>AREA</u>	<u>NON-CONFORMING PROJECTS</u>	<u>% OF TOTAL PROJECTS</u>	<u>NON-CONFORMING UNITS</u>
B 1	29	55.8	62
B 2	7	53.3	9
*3A	27	42.9	78
A — *3B	2	28.6	4
<u>4A</u>	38	60.3	124
<u>4B</u>	45	54.2	212
A — *4C	0	0	0
B <u>5A</u>	32	45.7	101
B <u>5B</u>	25	49	88
A — *6A	2	11.1	2
A — *6B	33	39.8	123
6C	19	48.7	45
6D	72	49.7	170
A — *6E	21	16.3	34
6F	16	61.5	48
A — *7A	25	41.7	93
B <u>7B</u>	101	46.8	442
<u>7C</u>	14	50	70
B <u>8A</u>	25	69.4	132
B *8B	7	43.8	25
A — *9A	28	40	50
B *9B	12	34.3	19
B 9C	77	47	118
<u>10</u>	59	67	221

* Less than 45% of properties with non-conforming units
Underlined Areas proposed for R-2 (all others R-1)

TABLE 2

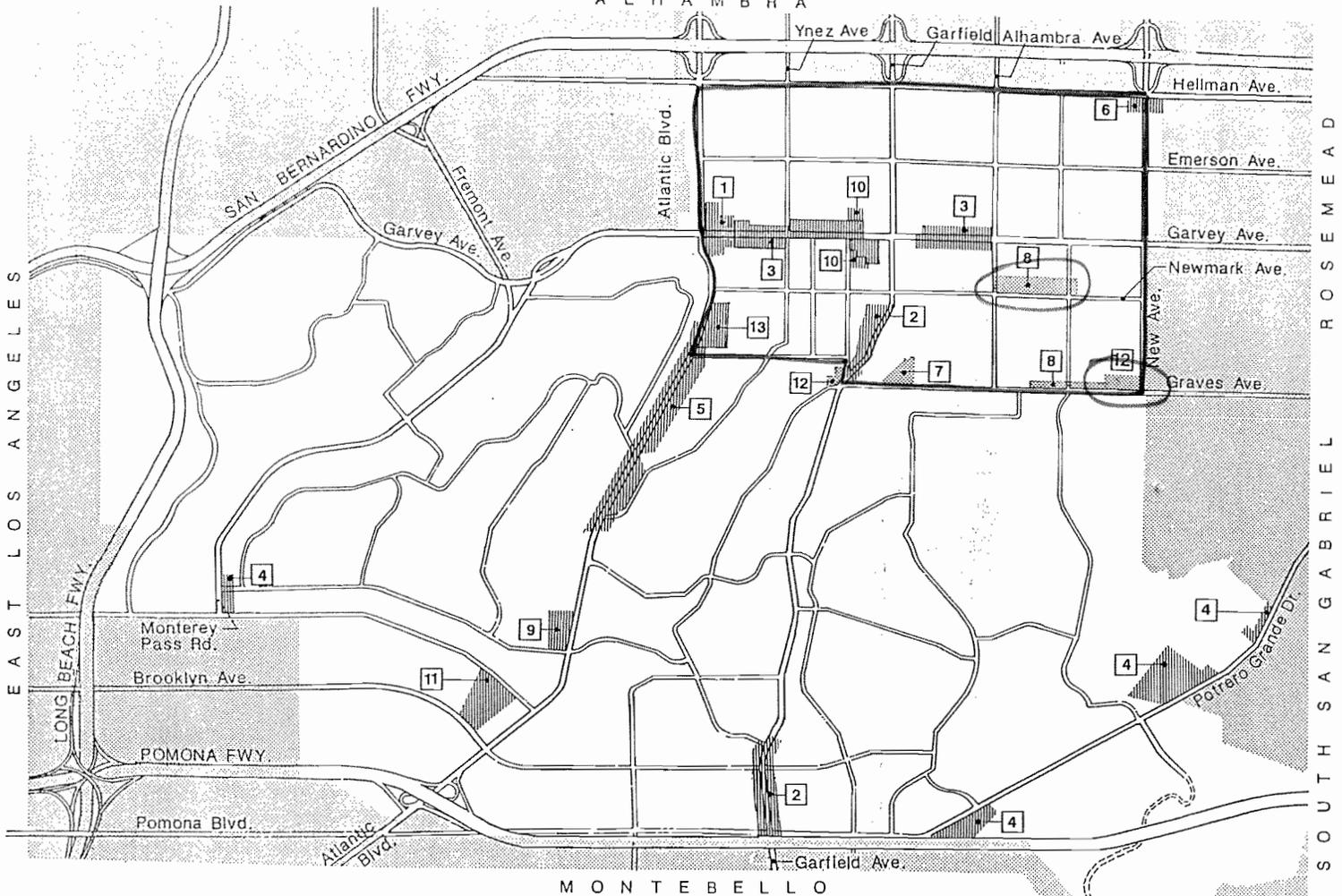
<u>REZONING</u>			
<u>AREA</u>	<u>NON-CONFORMING PROJECTS</u>	<u>% OF TOTAL PROJECTS</u>	<u>NON-CONFORMING UNITS</u>
<u>11</u>	84	63.6	279
B *12	51	25.9	29
<u>13</u>	140	66.	738
<u>14</u>	9	81.8	65
15	83	63.4	186
<u>16</u>	37	55.2	148
<u>17</u>	15	100	77
B * <u>18</u>	4	28.6	19

* Less than 45% of properties with non-conforming units
Underlined Areas proposed for R-2 (all others R-1)

MONTEREY PARK DESIGN

SEDWAY COOKE ASSOCIATES 1987

A L H A M B R A



-  Changes to Commercial Zones
-  Changes to Residential Zones

Note: Additional changes to zones may be warranted based upon more detailed evaluation following criteria discussed in the text.

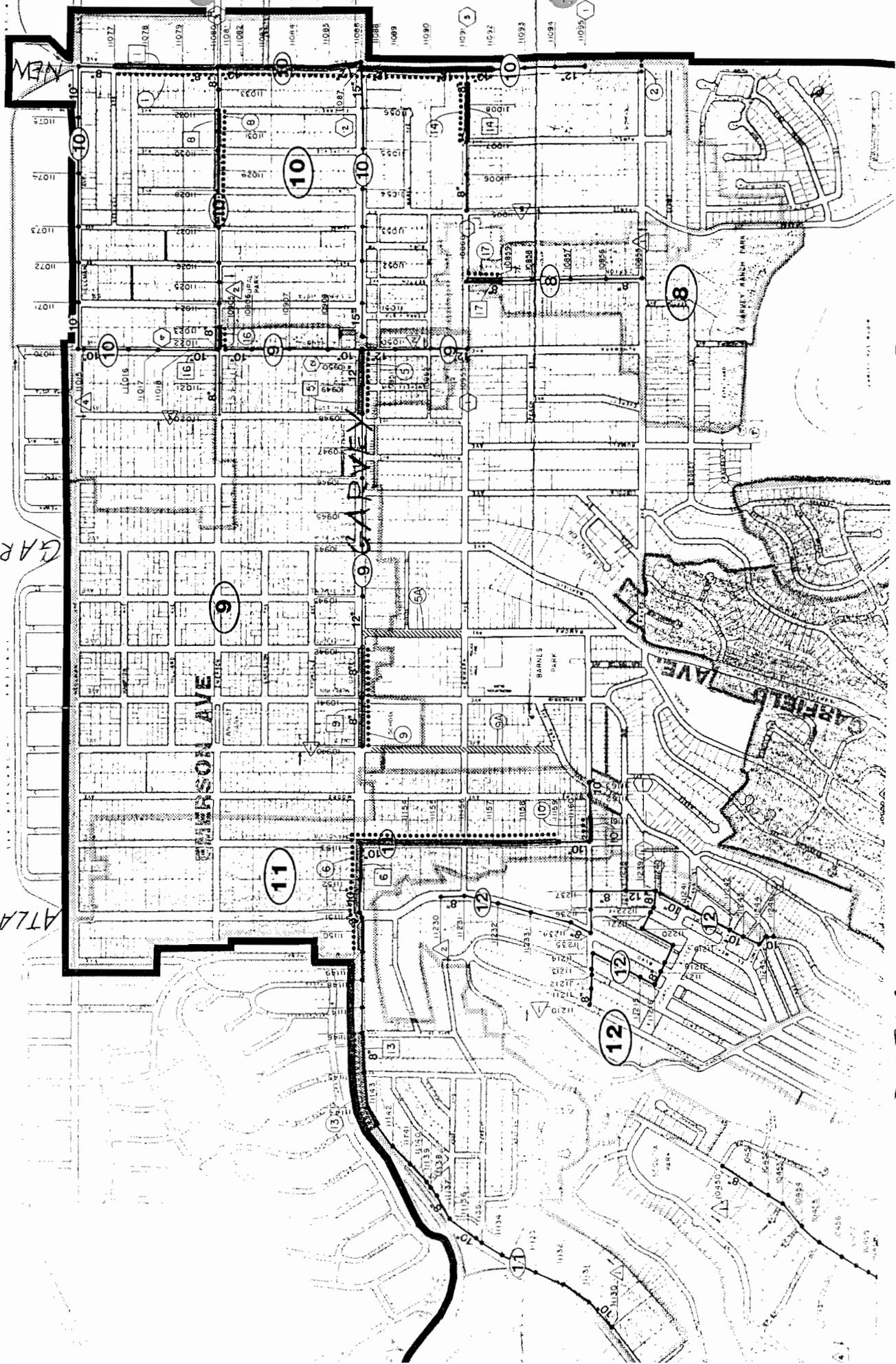
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SEWER MASTER PLAN
1981

ALHAMBRA

GARFIELD

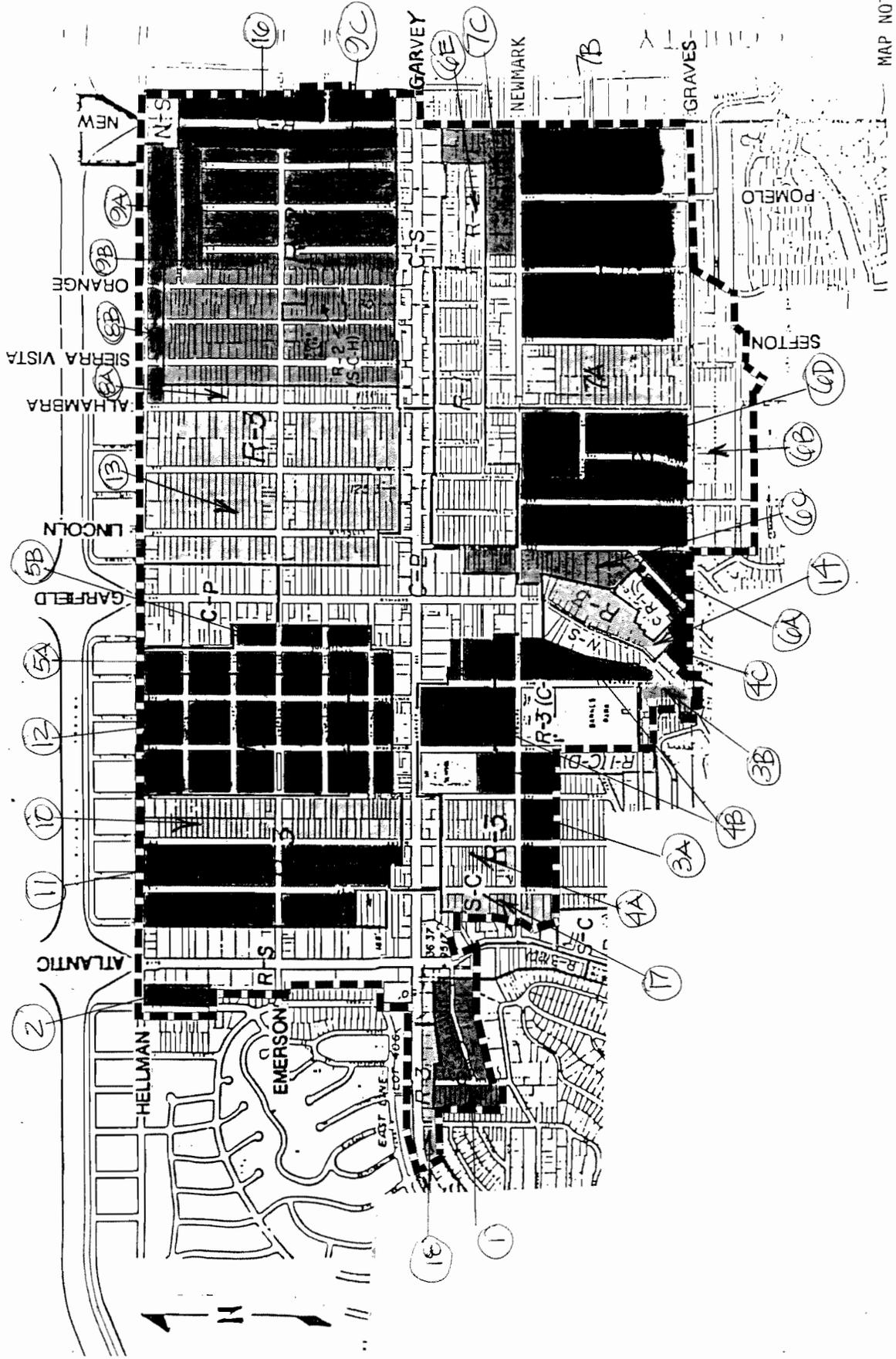
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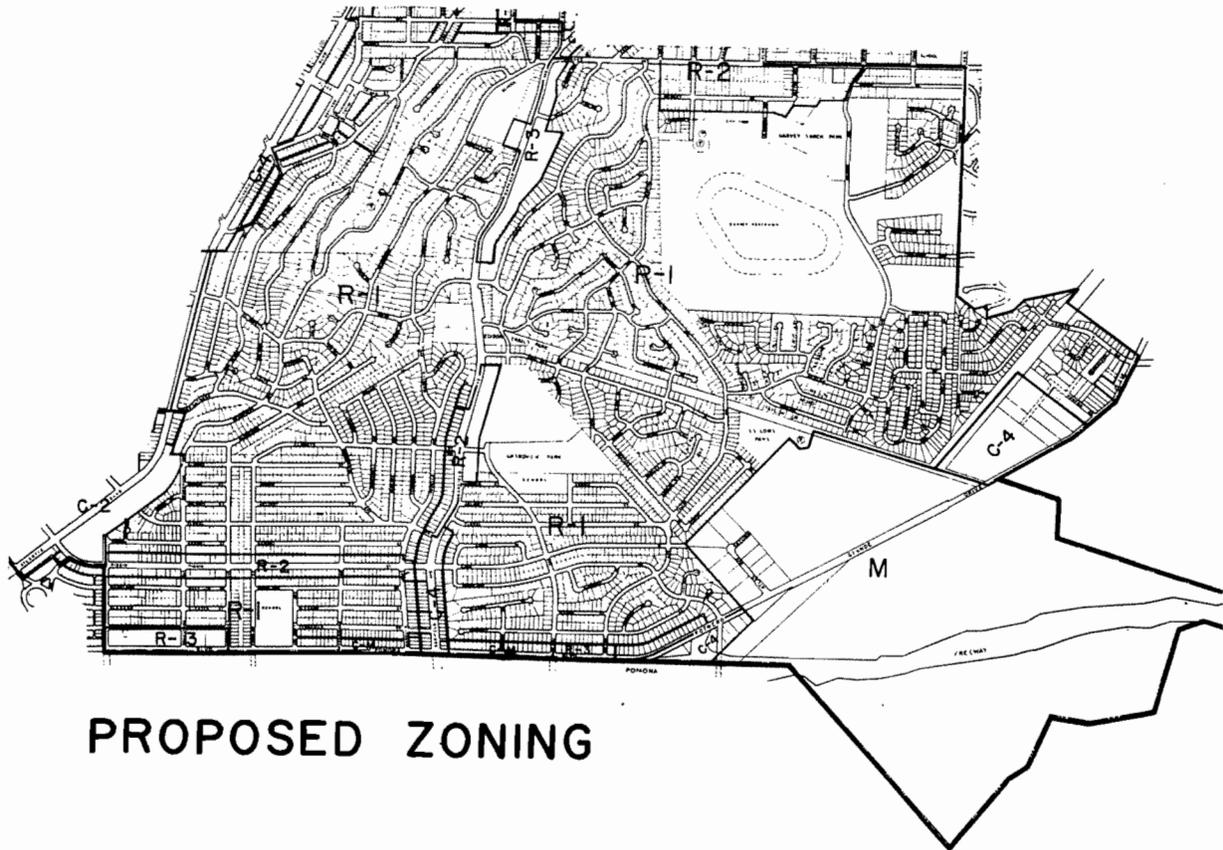


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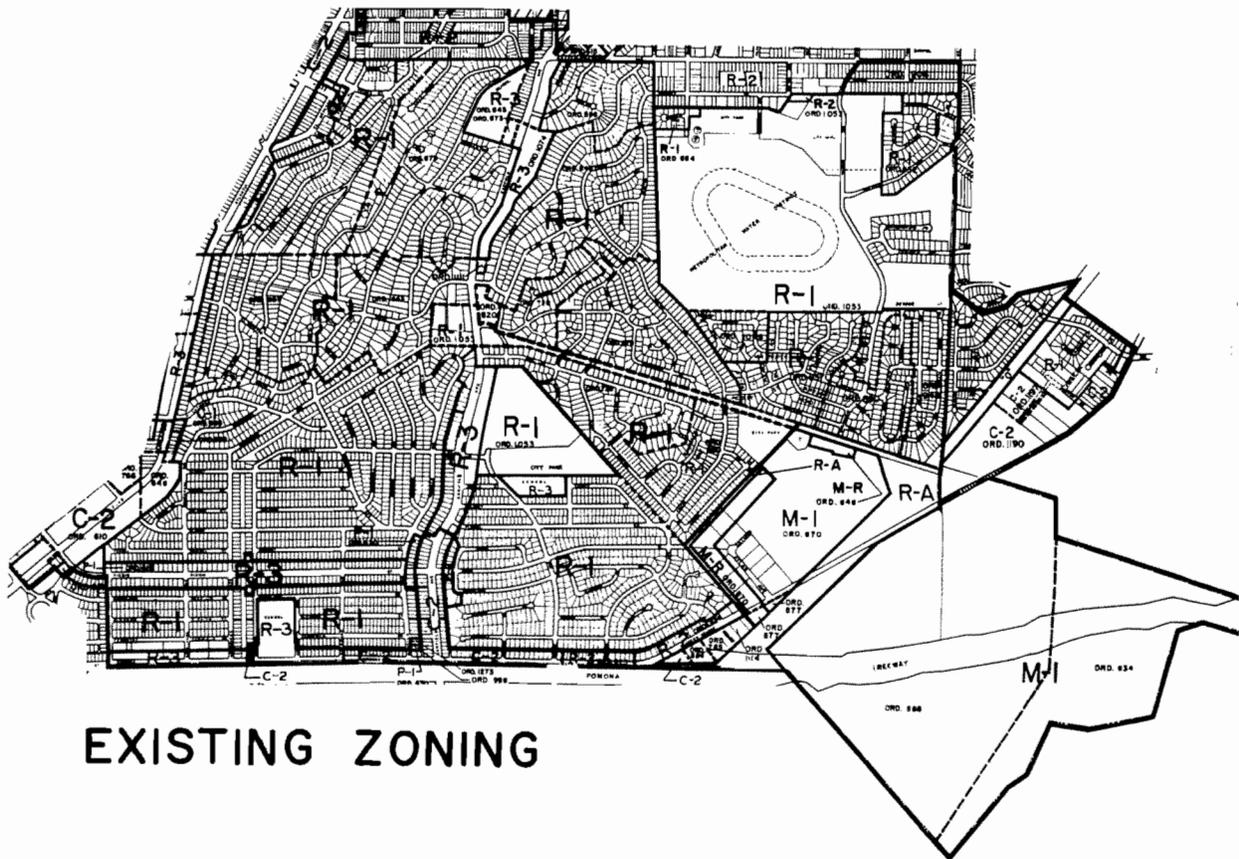
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ALHAMBRA





PROPOSED ZONING



EXISTING ZONING

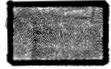
LEGEND



AREA 1



AREA 2



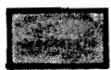
AREA 3A



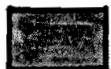
AREA 3B



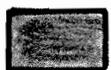
AREA 4A



AREA 4B



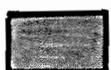
AREA 4C



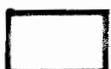
AREA 5A



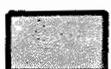
AREA 5B



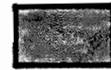
AREA 6A



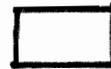
AREA 6B



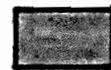
AREA 6C



AREA 6D



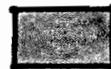
AREA 6E



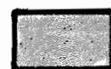
AREA 6F



AREA 7A



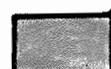
AREA 7B



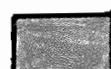
AREA 7C



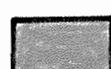
AREA 8A



AREA 8B



AREA 9A



AREA 9B

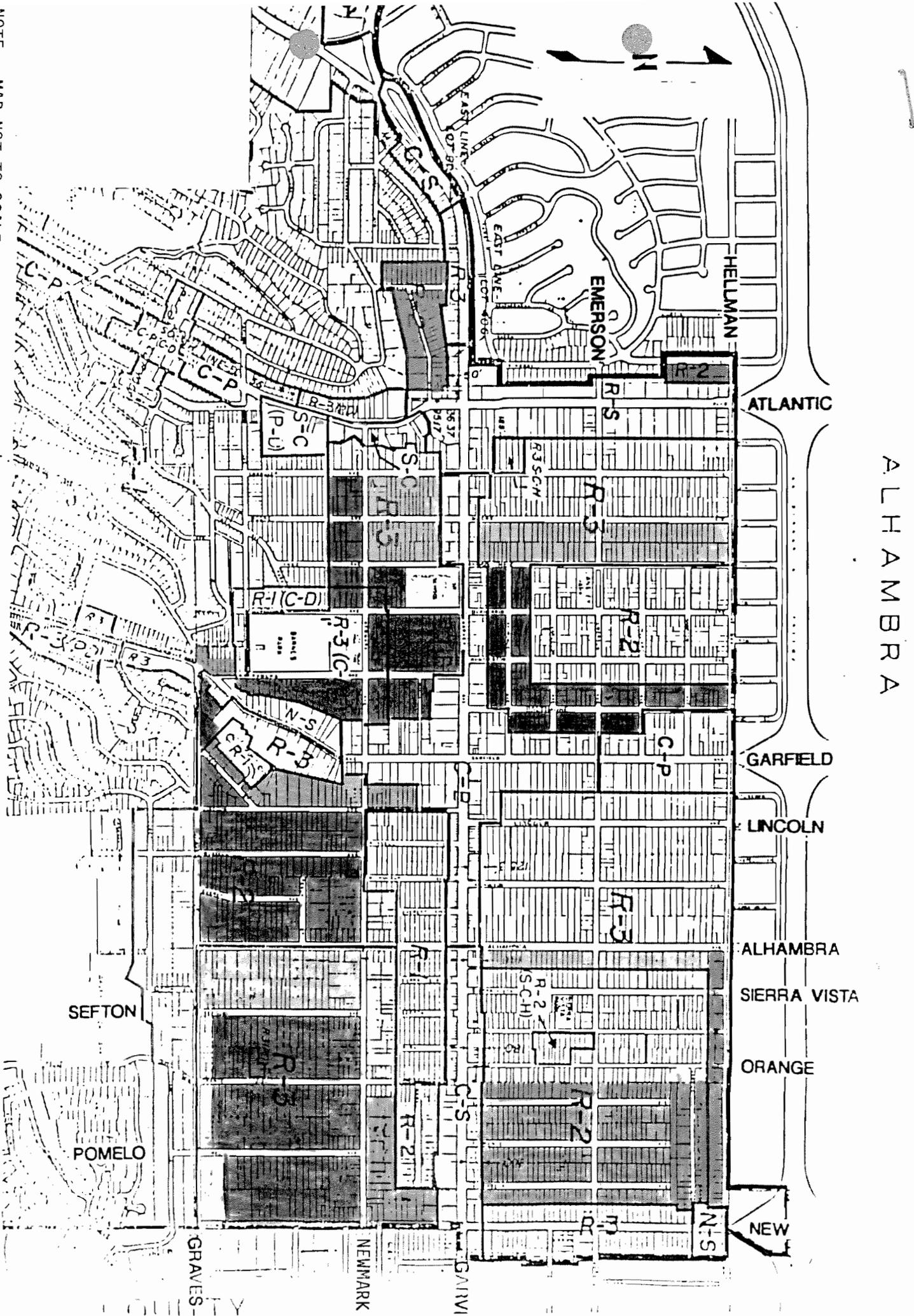


AREA 9C & 9D



AREA 10

NOTE: MAP NOT TO SCALE



ALHAMBRA

SEFTON

POMELO

GRAVES

NEWMARK

GAIMI