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DE ANZA COVE HOMEOWNERS  
6 ASSOCIATION, INC.

7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF SAN DIEGO**

10 DE ANZA COVE HOMEOWNERS  
ASSOCIATION, INC., a California non-profit  
11 corporation,  
12 Plaintiff,  
13 v.  
14 CITY OF SAN DIEGO;  
DE ANZA HARBOR RESORT AND GOLF,  
15 LLC, a California limited liability company;  
and DOES 1-100, inclusive,  
16 Defendants.  
17

Case No. GIC 821191

**DECLARATION OF CHARLES  
GREEN OF GREEN & SONS  
MOBILEHOME SERVICE &  
TRANSPORT IN SUPPORT OF  
PLAINTIFF'S REQUEST FOR A  
TEMPORARY RESTRAINING ORDER  
AND FOR PRELIMINARY  
INJUNCTION**

18 I, CHARLES GREEN, declare that:

- 19 1. I am an individual who manages and operates Green & Sons Mobilehome Service &  
20 Transport. I make this declaration based upon personal knowledge and would and could  
21 competently testify hereto in court if so requested.
- 22 2. I am 54 years old and have worked for Green & Sons Mobilehome Service & Transport for  
23 36 years. I am the operations manager. We are located at 7926 Lemon Grove Way, Lemon Grove,  
24 California 91945. Green & Sons has been located here in the San Diego area for all 36 years. My  
25 father, Blair L. Green, ran the company before me and still comes in from time to time.
- 26 3. Green & Sons is a complete mobilehome service company. We do virtually "everything"  
27 related to mobilehomes—from transportation of mobilehomes to customization, renovation, and  
28 repair of mobilehomes as licensed C-47 and B-1 contractors.

1 4. I am intimately familiar with the state of mobilehome parks in San Diego County,  
2 availability of space in mobilehome parks, issues relating to mobilehome transport, and the costs of  
3 attempting to transport mobilehomes.

4 5. I also have first-hand knowledge of the condition of many of the mobilehomes located in  
5 the De Anza Harbor Resort mobilehome park. I have visited the De Anza Harbor Resort  
6 mobilehome park hundreds of times over my 36 years at Green & Sons. I have been to the park  
7 probably 30-35 times in the past year alone at the request of various homeowners who wanted a  
8 quote on the cost of moving their home, the feasibility of moving their home, and other such  
9 information. According to a map of De Anza Harbor Resort mobilehome park, I counted 551  
10 mobilehome spaces. There are probably more than 1000 residents living in the mobilehome park.

11  
12 Availability of Vacant Spaces in Mobilehome Parks

13 6. Based on my 36 years of experience and my knowledge of the current state of nearby  
14 mobilehome parks, it is my opinion that there are no vacant spaces in any mobilehome park in the  
15 City of San Diego. Even if it were feasible for a De Anza Harbor homeowner to move their  
16 mobilehome to another mobilehome park in the City of San Diego—as more fully discussed  
17 below—there is no space available for them to do so.

18 7. In order to confirm my initial belief that there are no spaces in San Diego that are available  
19 to rent for an existing mobilehome, and to determine whether other mobilehome parks—both in the  
20 County of San Diego and elsewhere in the State of California—had vacant space available to rent, I  
21 attempted to contact nearly 30 different mobilehome parks. After calling mobilehome parks in El  
22 Cajon, Chula Vista, Oceanside, Borrego Springs, Fallbrook, Kearny Mesa, Lakeside, Santee, San  
23 Diego (3), Encinitas, and Vista, I learned that **none has a single vacant space available**. From my  
24 conversations with the people operating these mobilehome parks, it became clear to me that not only  
25 were there no vacant spaces, but they did not expect to have any vacant spaces in the near future.  
26 During my phone conversations, I asked if they knew of any available spaces. None knew of any. I  
27 was repeatedly told that they doubted that there were any available spaces in San Diego County.

28 8. In addition to the local calls that I placed, I also placed calls to other locations in California.

1 I called mobilehome parks in Ventura, Oxnard, Vacaville, Oroville, Hemet, Hayward, Broderick  
2 (West Sacramento), and even to two parks in the State of Oregon. Of all these locations throughout  
3 the State of California and Oregon, I found only one vacant space that was available for rent—in  
4 Hemet. I was informed by the Hemet mobilehome park (Echo Hills Mobile Estates) that in order for  
5 an existing mobilehome to qualify for the space, the home had to be in good shape, have a good  
6 appearance, pass the park's own inspection, and the occupants had to be 55 years or older. During  
7 my phone conversations with these parks in California and Oregon, I asked them to tell me if they  
8 knew of any available spaces. None of these mobilehome parks knew of other available vacant  
9 mobilehome spaces anywhere else in California or Oregon.

10

11 Cost of Transporting Mobilehomes

12 9. If it were feasible to transport a mobilehome from De Anza Harbor Resort (such as finding  
13 a vacant space nearby, and other factors discussed below), it would cost between \$13,000 to  
14 \$18,000 to transport a "doublewide" mobilehome within 100 miles of San Diego. This cost  
15 reflects the need to tear down the home, transport it, and then reset the home in its new location. In  
16 addition, the costs include, among other things, that the home would need to be brought up to the  
17 new standards, which would include the need for new piers, pads, lock top screw jacks, and  
18 earthquake system. Due to the age of most homes at De Anza Harbor Resort, all utility hook-ups  
19 would need to be upgraded and the rodent-proofing of the bottomside of the floor would have to be  
20 repaired in order to pass inspection. Under these same standards, it would cost between \$6,000 and  
21 \$13,000 to similarly transport a "singlewide" mobilehome within 100 miles of San Diego.

22

23 Problems Facing Transport of These Mobilehomes

24 10. A great number of the mobilehomes at De Anza Harbor Resort simply cannot be transported  
25 to another mobilehome park even if the homeowner found vacant space available at a mobilehome  
26 park.

27 11. First, many of the homes located in the newer part of the mobilehome park, which is closest  
28 to Mission Bay, cannot be transported and will have to be demolished on-site. The reason for this is

1 that the steel undercarriage of the homes have been corroded and eaten away by the saltwater in the  
2 soil and also by condensation. So even though some of these mobilehomes are newer, the  
3 undercarriage is so badly corroded that if transport were attempted the homes would sustain such  
4 extensive structural damage that they would become worthless. The cost—simply to remove these  
5 homes and properly dispose of them—will range from \$8,000 to \$12,000. Of the “doublewide”  
6 homes in the new part of the park that are moveable, the average cost to move them, including the  
7 upgrades and retrofitting described above, will be between \$14,000 and \$20,000.

8 12. Second, many of the mobilehomes in the park cannot be moved to another park because  
9 most parks restrict the age of an incoming home. The vast majority of parks restrict rental of a  
10 vacant space to either a brand-new mobilehome or to a mobilehome that is less than 10 years old.  
11 Most parks are even more stringent and limit mobilehomes to 5 years old or newer. Unfortunately,  
12 most of the mobilehomes in De Anza Harbor Resort are considerably more than 10 years old. Some  
13 even date back to the 1950’s. Even if a vacant mobilehome park space were found, it is unlikely that  
14 the park would accept any of the De Anza mobilehomes into the new park due to these typical age  
15 restrictions.

16 13. In sum, if the hundreds of De Anza Harbor Resort mobilehome owners were evicted by the  
17 City of San Diego, it would be virtually impossible for the current De Anza Harbor Resort  
18 mobilehome owners to transport and relocate their homes to other mobilehome parks in the City of  
19 San Diego, the County of San Diego, or elsewhere in the State of California. This problem is caused  
20 primarily by the unavailability of any vacant mobilehome park spaces, the significant cost to  
21 remove, transport, and reset the homes in a new location if one were found, and the inability to move  
22 many of the homes due to corrosion and due to their age.

23  
24 I declare under penalty of perjury under the laws of the State of California that the foregoing  
25 is true and correct.

26 Executed on November \_\_\_\_, 2003 at Lemon Grove, California.

27  
28 \*SEE ATTACHED FACSIMILE SIGNATURE  
CHARLES GREEN

