

Appeal of Minor Conditional Use Permit #7318 202 North Euclid Avenue

City Council November 17, 2025





Minor Conditional Use Permit #7318

- To allow a Safe Parking use (Destination Hope) for up to 25 vehicles in conjunction with a religious facility (All Saints Church).
- The property is located in the Central District Specific Plan, PS (Public and Semi-Public) zoning district.



September 2023 – City Council adopted Ordinance No. 7414

- > To implement General Plan Housing Element Program #19: Homeless Services.
- > Added Safe Parking use as part of a Religious Facility, College, and Transportation Terminal with the approval of an MCUP.

April 15, 2024 – City Council authorized funding

> City Council authorized the City Manager to enter into a funding contract with Shower of Hope in the amount of \$305,000 to operate a Safe Parking program at All Saints Church contingent on obtaining an MCUP.



Mearing Officer Public Hearing

- June 18, 2025 Hearing Officer Meeting
 - > Approved the MCUP, with conditions.
- June 30, 2025 Appeals Submitted
 - Three appeals were submitted opposing the decision of the Hearing Officer.
 - Silvio Nardoni of Archimedes Law Group, LLP, on behalf of The Maryland Homeowners Association:
 - Park and Velayos, LLP, on behalf of ARE-Pasadena No. 5, LLC;
 - Erica Tamblyn, on behalf of All Saints Church.



September 25, 2025 – BZA Meeting

- > Staff recommended upholding the Hearing Officer's Decision to approve the MCUP.
- > The BZA approved the MCUP by a vote of 5-0, with added and modified conditions summarized below. These three conditions are included in staff's recommendation, with modifications discussed later in this presentation:
 - Condition #12: The portable restroom facility shall be accessible to the Safe Parking program participants only (i.e., locked and equipped with a key code mechanism). The portable restroom serving Safe Parking shall be separate from the restroom serving the Safe Haven temporary homeless shelter. The restrooms shall be located so that participants of both programs do not cross paths utilizing their designated restroom. Prior to operation of the Safe Parking land use, a site plan indicating the location of both restrooms shall be submitted for review and approved by the Zoning Administrator.



BZA Public Hearing, cont'd.

- September 25, 2025 BZA Meeting
 - □ Condition #21: Recreational vehicles (e.g., motorhomes, travel trailers, camper vans, etc.) shall not be allowed to be used for the Safe Parking program.
 - Condition #22: Within six months of exercising the privileges granted by this application, the applicant shall file an application with the Planning Division for a Hearing Officer Review of this MCUP, to be considered at a duly-noticed public hearing to ensure the effectiveness, and compliance with, all conditions of approval herein.



BZA Public Hearing, cont'd.

Planning & Community Development Department

- October 6, 2025 Appeals Submitted
 - Silvio Nardoni of Archimedes Law Group, LLP, on behalf of The Maryland Homeowners Association, and
 - > Park and Velayos, LLP, on behalf of ARE-Pasadena No. 5, LLC.

This hearing before the City Council is a quasi-judicial de novo hearing where the Council may uphold the decision of the Board of Zoning Appeals or make an entirely different decision.



Proposed Operations

- Hours: 7:00 p.m. to 7:00 a.m., daily.
- Up to 25 participants at any one time (within a maximum of 25 vehicles.)
- > On-site locked portable restroom and hand washing station.
- > One state certified security guard on premises at all program hours.
- > Contact number to be available to the public, with a live person.
- > Shower of Hope would manage and operate intake, case management, and provide resources to participants as they seek employment and/or permanent housing and enforce Destination Hope Safe Parking Rules and Regulations.

Project Description

- Participants agree to "Destination Hope Safe Parking Rules and Regulations", which includes but is not limited to:
 - > No weapons, alcohol, or drugs on the property.
 - No cooking.
 - Must keep their designated parking space tidy.
 - > No loud music. All noise within vehicles.
 - Animals to be leashed outside vehicle and not left unattended.
 - No guests.
 - Acts of physical violence, aggressive behavior and/or verbal threats by participants or pets to staff or participants in the program will result in immediate termination from the program and the proper authorities will be contacted and notified.
 - > Should a participant violate the program agreement, they may be removed from the program.

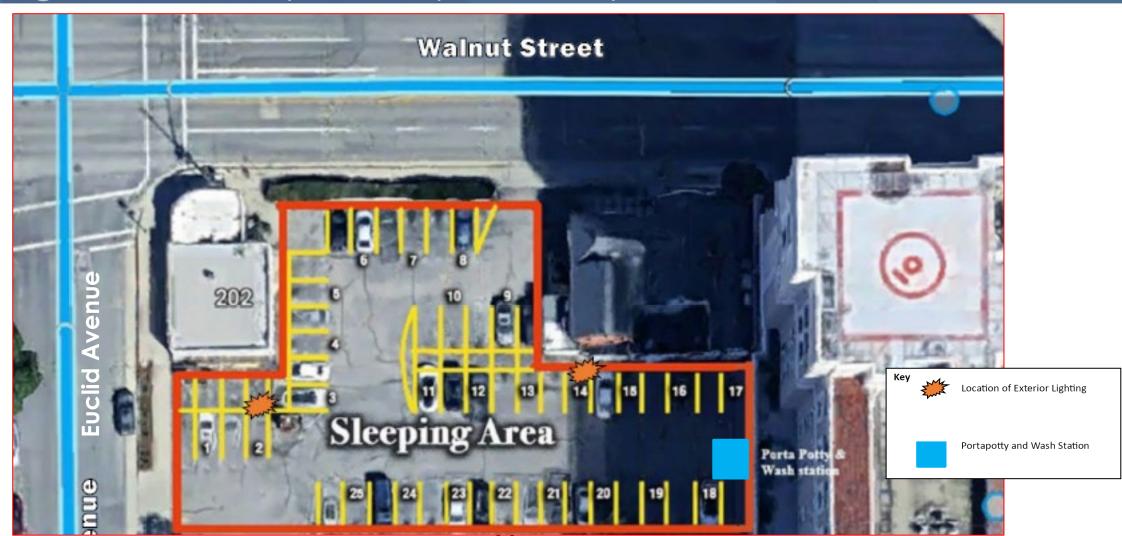


Aerial Vicinity Map





Enlarged Aerial Map

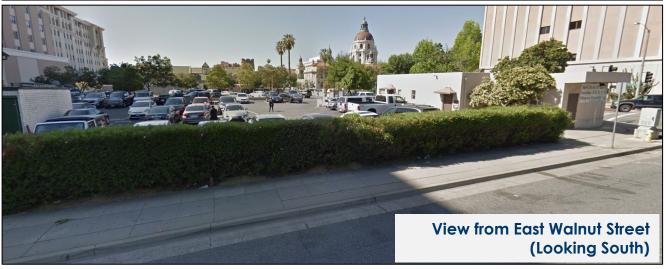






Street View of Proposed Safe Parking Area







- In the appeals, the appellants primarily cite the following:
 - 1. The Zoning Code does not allow Safe Parking on the proposed parking lot because it is not a religious facility site and the decision does not comply with the provisions of the Zoning Code;
 - 2. The proposed Safe Parking use is not an exempt project under the California Environmental Act (CEQA) as involving "negligible or no expansion" of existing use because the proposed Safe Parking operation is a change of use, and the intensity of activity will expand significantly, causing a negative environmental impact; and
 - The proposed Safe Parking operation would negatively affect the safety of the neighborhood.



Response to Appeals

- The Zoning Code does not allow Safe Parking on the proposed parking lot because it is not a religious facility site and the decision does not comply with the provisions of the Zoning Code.
 - The All Saints Church site consists of three contiguous parcels under single ownership. The northern two parcels are developed with surface parking and the southern parcel is developed with religious facility buildings and a courtyard.
 - The Zoning Code defines site as "a lot or group of contiguous lots not divided by any alley, street, other rightof-way or city limit that is proposed for development in accord with the provisions of this Zoning Code and is in a single ownership or has multiple owners, all of whom join in an application for development."
 - The site is occupied by a religious facility and is within the Public and Semi-Public (PS) Zoning District. The proposed Safe Parking use is permitted as a related accessory activity with an MCUP
 - The project also meets the operational requirements for Safe Parking uses of the Zoning Code.



Response to Appeals, cont'd.

- The proposed Safe Parking use is not an exempt project under the California Environmental Act (CEQA) as involving "negligible or no expansion" of existing use because the proposed Safe Parking operation is a change of use, and the intensity of activity will expand significantly, causing a negative environmental impact.
 - CEQA requires the proposed project be compared to the existing conditions. The existing conditions are then considered the environmental baseline and are used to assess the environmental impacts of a project. In the case of All Saints Church, religious services (1889), community serving activities, surface parking, and services for people experiencing homelessness have occurred at the site for many years.
 - A Class 1 (Existing Facilities) categorical exemption includes the operation, permitting, licensing or minor alteration of existing structures where there is negligible or no expansion of use. No construction or permanent physical alterations to the All Saints facility is required to accommodate the proposed Safe Parking use.
 - The parking lot is used for parking-by the religious facility for volunteers, parishioners, staff for youth night and adult choir practices, respectively, up until 10pm and during the weekdays for the adjacent courthouse.
 - The religious facility presently operates the Safe Haven temporary homeless shelter ("Safe Haven") on the property nightly, which is a similar operation to the safe parking use.

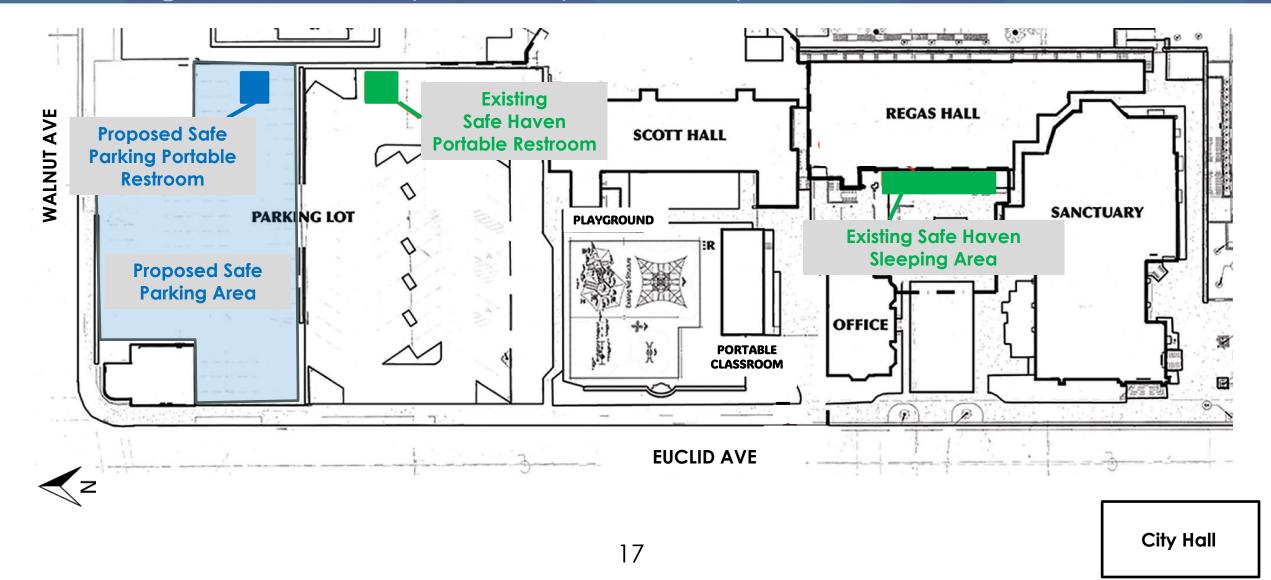


Response to Appeals, cont'd.

- The proposed Safe Parking operation would negatively affect the safety of the neighborhood.
 - > The recommended conditions of approval require oversight of the program, including conditions by the Pasadena Police Department. Collectively, these measures provide adequate safeguards to address neighborhood safety concerns. Such conditions include:
 - Condition 4 allows the Zoning Administrator to call for a review of the approved conditions at a public hearing. Conditions may be modified, or new conditions added to reduce any impacts of the use. The Hearing Officer may revoke the Minor Conditional Use Permit if sufficient cause is given.
 - Condition 9 limits where activities associated with the safe parking use may occur.
 - Condition 11 requires that live representative of the operating programs shall be available to take calls at all times. Their contact information shall be posted visible from the public right-of-way, at the church office, on the church's website, and provided to the City.
 - **Condition 14** requires that only participants of the program shall be allowed on-site and shall have their parking passes displayed at all times.
 - **Condition 19** requires that no personal items shall be outside the vehicles, no music shall be audible, no food preparation, and no camping tarps, or tents attached to vehicles is allowed.
 - Condition 23 requires one state certified security guard be present on-site during Safe Parking hours each night.



Proposed Restrooms





Staff concludes that:

- > The findings necessary for approving the Minor Conditional Use Permit to establish a Safe Parking land use in conjunction with a religious facility can be made.
- > Proposed conditions of approval have been included which would regulate the operations of the facility and ensure that a separate portable restroom facility would be accessible only to registered participants and monitored by on-site security guard to ensure the proposed use would not be detrimental to surrounding uses.



Staff Recommendation

- Staff recommends that the City Council:
 - Find that the action proposed herein is categorically exempt from environmental review pursuant to State CEQA Guidelines Section 15301 (Class 1, Existing Facilities); and
 - 2. Adopt the findings in Attachment A to uphold the Board of Zoning Appeals' decision and approve Minor Conditional Use Permit #7318, with the conditions in Attachment B.



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Zoning Code Definitions

- **Site:** A lot or group of contiguous lots not divided by any alley, street, other right-of-way or city limit that is proposed for development in accord with the provisions of this Zoning Code and is in a single ownership or has multiple owners, all of whom join in an application for development.
- **Religious Facility:** A facility in which the primary use is religious worship. The use may include some related accessory activities by-right including religious education, ministry, clothing and food distribution, counseling, employment assistance, referral services, and support groups
- Safe Parking: A parking program, operated on property located outside of the public right-ofway and managed by a social service provider, that provides individuals and families with vehicles, including recreational vehicles, a safe place to park overnight and services to facilitate a transition to permanent housing. Recreational vehicles are defined in Section 14.50.020.J.



Religious Facility Land Use

TABLE 2-7 - ALLOWED USES AND PERMIT REQUIREMENTS FOR SPECIAL PURPOSE ZONING DISTRICTS			
	PERMIT REQUIREMENT BY ZONE		Specific Use Standards
LAND USE (1)	os	PS, PS-1	
Religious facilities	_	С	<u>17.50.230</u>
with columbarium	_	MC	<u>17.50.230</u>
with temporary homeless shelter	_	С	<u>17.50.230</u>
with safe parking	_	MC	<u>17.50.265</u>

ZC 17.50.265 Safe Parking

- A. Applicability. The following standards apply to the provision of off-street parking areas intended for unhoused individuals and families living in vehicles, including recreational vehicles. Such parking is intended to be a safe place for overnight shelter and services to facilitate the transition to permanent housing.
- B. Prohibited Locations. Safe Parking is prohibited on religious facility sites located in a RS or RM zone. On parcels with multiple zoning designations, Safe Parking is prohibited on any portion of the site zoned RS or RM.
- C. Application requirements.
 - 1. The program operator shall have a written management plan subject to the review and approval of the Zoning Administrator. The management plan shall include the following:
 - a. Site plan indicating the location of trash and recycling facilities, water, restroom facilities, exterior lighting, location and distances to residential properties, location of nearest public transportation, and location of designated overnight parking spaces.
 - b. Hours of operation.
 - c. Total number of vehicles to be served on-site.
 - d. Maximum size of vehicles to be served on-site.
 - e. Monitoring and oversight program.
 - f. Neighborhood communications strategy plan, including contact information for the facility.
 - g. Any other information deemed necessary by the Zoning Administrator to ensure compliance with the requirements of this section.



ZC 17.50.265 Safe Parking, cont'd.

Planning & Community Development Department

D. Performance Standards.

- 1. Case Management. The safe parking use shall be managed by a program operator that participates or is willing to participate in the Pasadena Continuum of Care Program and Coordinated Entry System and provides access or linkage to the Coordinated Entry System.
- 2. Sanitation. Restroom, Water, and Trash Facilities shall be provided, maintained, and accessible to clients during safe parking facility hours.
- 3. Authorized Vehicles Only. The Program Operator shall ensure that only vehicles registered in the program are parked overnight during program hours. A parking permit shall be provided to all clients to be displayed in vehicle windows in a form approved by the Zoning Administrator.
- 4. Written Agreement. Only clients who have entered into a written agreement with the Program Operator shall be allowed to use parking spaces overnight. The written agreement shall include, but is not limited to, the following terms and conditions:
 - a. Only one vehicle allowed per individual or family.
 - b. Vehicles may only be occupied by clients and household members. Guests shall not be allowed.
 - c. Vehicles permitted on-site may include recreational vehicles, as defined in Section 14.50.020. J. Such vehicles are exempt from the provisions of Section 14.50.040.29 pertaining to prohibited activities or conditions.
 - d. No fires of any kind shall be allowed.
 - e. No music may be played that is audible outside of clients' vehicles.
 - f. No cooking or food preparation shall be performed by clients outside of their vehicles. Cooking inside of client vehicles is prohibited unless the vehicle was manufactured with cooking appliances.
 - g. Camping tarps, tents, or other related equipment attached to or beyond the clients' vehicles are prohibited.
 - h. Clients shall maintain control of animals. Animals shall be kept on a leash at all times. Animal waste shall be picked up immediately and disposed of properly.
 - i. Clients shall not dump sewage or other waste fluids or solids outside a vehicle.

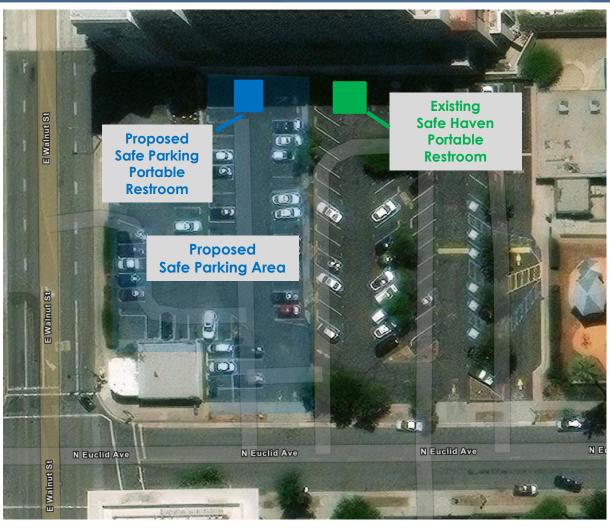


All Saints Church Site (3) Parcels





Enlarged Aerial Map





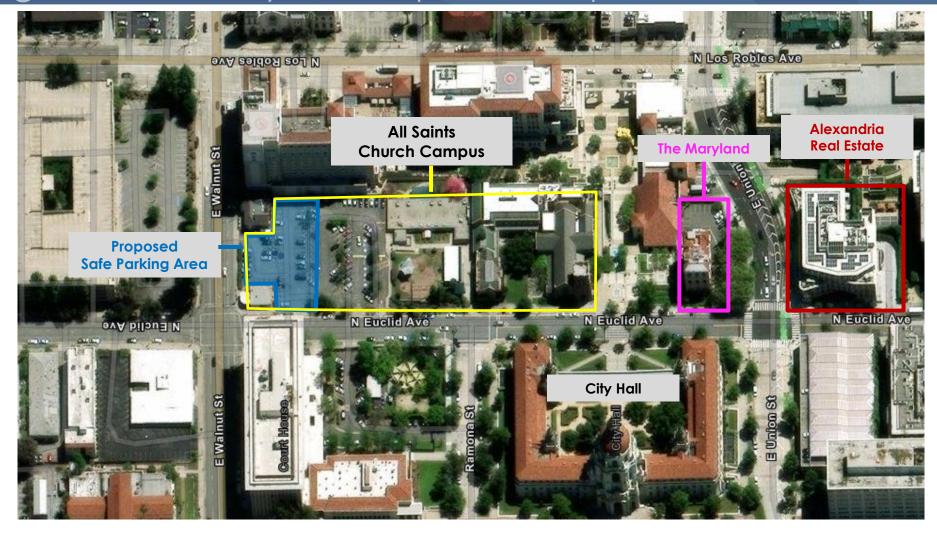


Nearest Residential Uses













BZA Adopted Condition 12:

Water, trash, and restroom facilities shall be provided, maintained, and accessible to clients during Safe Parking facility hours. The portable restroom facility shall be accessible to the Safe Parking program participants only (i.e. locked and equipped with a key code mechanism). The portable restroom serving Safe Parking shall be separate from the restroom serving the Safe Haven temporary homeless shelter. The restrooms shall be located so that participants of both programs do not cross paths utilizing their designated restroom. Prior to operation of the Safe Parking land use, a site plan indicating the location of both restrooms shall be submitted for review and approved by the Zoning Administrator.

Staff Recommended Condition 12:

Water, trash, and restroom facilities shall be provided, maintained, and accessible to clients during Safe Parking facility hours and they shall be separate and apart from the Safe Haven facilities. The portable restroom facility shall be accessible to the Safe Parking program participants only (i.e. locked and equipped with a key code mechanism). Participants from the Safe Haven temporary homeless shelter shall utilize a restroom that is not located in the parking lot and is within the church facility. If a second portable restroom is proposed it must be located or screened where it is not visible from the public right of way.



Recommended Conditions

Planning & Community Development Department

General

- 1. The proposed project shall conform to the site plan submitted with this application and dated "Approved at Hearing, November 17, 2025", except as modified herein.
- 2. In accordance with Section 17.64.040 (Time Limits and Extension) of the Pasadena Municipal Code, the exercise of the right granted under this application must be commenced within 36 months of the effective date of the approval, unless otherwise specified in the conditions of approval. The Director may grant two one-year extensions of the approval.
- 3. The approval of this application authorizes the establishment of a Safe Parking land use on an existing religious facility site for a maximum of 25 total participants at any one time within a maximum of 25 vehicles at any one time.
- 4. The Zoning Administrator, at any time, can call for a review of the approved conditions at a duly noticed public hearing. These conditions may be modified, or new conditions added to reduce any impacts of the use. The Hearing Officer may revoke the Conditional Use Permit if sufficient cause is given.
- 5. Any change to these conditions of approval or expansion of the use shall require the modification of this Minor Conditional Use Permit or a new Minor Conditional Use Permit.
- 6. The applicant or successor in interest shall meet the applicable code requirements of all other City Departments.
- 7. The project shall adhere to the City regulations governing the allowed level of ambient noise as specified in Chapter 9.36 of the Pasadena Municipal Code.

Planning Division

- 8. The hours of operation for the Safe Parking land use shall be limited to 7:00 p.m. to 7:00 a.m. Overnight stays are limited to the program hours and participants must enter and exit the site in accordance with the hours of operation.
- 9. All activities associated with the use shall be conducted within the areas identified on the approved site plan.
- 10. Prior to operation, the applicant shall provide a copy of the final written management plan that is distributed to program participants to the Zoning Administrator. The management plan shall include a copy of the approved site plan, specify hours of operation, total number of vehicles served on-site, maximum size of vehicles service on-site, monitoring and oversight program, and neighborhood communication strategy that includes contact information for the facility



Recommended Conditions, cont'd.

- A Live representatives of both All Saints Church and Shower of Hope the program responsible for the activities occurring on-site shall be available during all hours of operation and able to take and respond to calls as part of the Neighborhood Communication Strategy Plan. A response to calls shall be provided within a reasonable time, not to exceed 48 hours. The name and telephone number of the individual, owner, or designated representatives responsible shall be posted on a sign visible from the public right-of-way on the premises in accordance with the Pasadena Municipal Code, kept on record in the office of the religious facility, and on All Saints Church's website. The information shall also be furnished to the Zoning Administrator and be presented to any City official for review upon request.
- 12. Water, trash, and restroom facilities shall be provided, maintained, and accessible to clients during Safe Parking facility hours and they shall be separate and apart from the Safe Haven facilities. The portable restroom facility shall be accessible to the Safe Parking program participants only (i.e. locked and equipped with a key code mechanism). Participants from the Safe Haven temporary homeless shelter shall utilize a restroom that is not located in the parking lot and is within the church facility. If a second portable restroom is proposed it must be located or screened where it is not visible from the public right of way.
- 13. The portable restroom facility shall be maintained in a clean and sanitary manner at all times.
- 14. The Program Operator shall ensure that only vehicles registered in the program are parked overnight during program hours. Vehicles without a parking pass are prohibited from the program. A parking pass shall be provided to all clients and shall be displayed in vehicle windows during Safe Parking facility hours in a form approved by the Zoning Administrator.
- 15. Only clients who have entered into a written agreement with the Program Operator shall be allowed to use parking spaces overnight.
- 16. Every six months, the Program Operator shall provide the signed written agreements for the active participants in the Safe Parking program to the Zoning Administrator. The signed written agreements for the active participants shall also be available within the office of the religious facility, and upon request by the Zoning Administrator or any City official.
- 17. The premises, sidewalk, and street shall be maintained in a litter and graffiti free manner. All litter shall be removed from the property and surrounding sidewalk and street after Safe Program hours daily. Any graffiti that should appear on the site shall be removed within 48 hours. If at any time the Zoning Administrator determines that trash, litter, and debris have become a problem, the operator shall be required submit a litter clean-up plan. The litter clean-up plan shall address litter clean-up on-site and off-site and shall include, but not be limited to, a litter pick-up schedule and a map of the clean-up area. Upon approval of the plan by the Zoning Administrator, the measures of the plan shall be implemented. This condition may require the operator to post a bond to ensure trash and litter compliance.



Recommended Conditions, cont'd.

Planning & Community Development Department

- 18. The existing outdoor lighting shall be subject to Section 17.40.080 (Outdoor Lighting) of the Zoning Code to ensure its compliance with the requirements to avoid glare and reflection impacts on adjoining properties and public-rights-of-way.
- Outdoor storage shall be prohibited. Personal belongings shall be stored only within the participant vehicles. No music may be played that is audible outside of participants' vehicles. No cooking or food preparation shall be performed by participants outside or inside of their vehicles. Camping tarps, tents, or other related equipment attached to or beyond the participants' vehicles are prohibited.
- 20. These conditions of approval must be made available for public viewing at the religious facility site on a continuous basis for the duration of this Minor Conditional Use Permit, beginning on the date the Minor Conditional Use Permit is in effect.
- 21. Recreational vehicles (e.g. motorhomes, travel trailers, camper vans, etc.) shall not be allowed to be used for the Safe Parking program.
- 22. Within six months of exercising the privileges granted by this application, the applicant shall file an application with the Planning Division for a Hearing Officer Review of this Minor Conditional Use Permit, to be considered at a duly-noticed public hearing. Public notice for the hearing shall be given in the same manner required for this Minor Conditional Use Permit, as well as to any parties who request to be so notified. The purpose of the public hearing is to ensure the effectiveness, and compliance with, all conditions of approval herein. These conditions may be modified or new conditions added to reduce any impacts of the use. The Hearing Officer may revoke the Minor Conditional Use Permit pursuant to the procedures in Zoning Code Section 17.78.090.

Police Department

A minimum of one state certified security guard shall be present on-site during the Safe Parking hours each night. The security guard shall ensure that participants comply with the regulations of the program, monitor the safety of the participants, monitor the on-site restroom, confirm that vehicles display valid parking passes, and ensure that non-participants do not enter the premises during the Safe Parking facility hours. The security guard shall exclusively monitor the Safe Parking program, this is in addition to the security required for the Safe Haven temporary shelter.



CUP #6898 Safe Haven Adopted Conditions

Planning & Community Development Department

General

- 1. The proposed project shall substantially conform to the site plan submitted with this application and dated "Approved at Hearing, September 1, 2021", except as modified herein.
- 2. In accordance with Section 17.64.040 (Time Limits and Extension) of the Pasadena Municipal Code, the exercise of the right granted under this application must be commenced within three years of the effective date of the approval, unless otherwise specified in the conditions of approval. The Hearing Officer may grant a one-year extension of the approval.
- 3. The approval of this application authorizes the establishment of a Temporary Homeless Shelter land use at an existing Religious Facility (All Saints Church) with a maximum of 12 participants at any one time.
- 4. The Zoning Administrator, at any time, can call for a review of the approved conditions at a duly noticed public hearing. These conditions may be modified or new conditions added to reduce any impacts of the use. The Hearing Officer may revoke the Conditional Use Permit if sufficient cause is given.
- 5. Any change to these conditions of approval or expansion of the use shall require the modification of this Conditional Use Permit or a new Conditional Use Permit.
- 6. The applicant or successor in interest shall meet the applicable code requirements of all other City Departments.
- 7. The project shall adhere to the City regulations governing the allowed level of ambient noise as specified in Chapter 9.36 of the Pasadena Municipal Code.

<u>Planning Division</u>

- 8. All participants shall be required to agree to the "Safe Haven Bridge to Housing Covenant Expectation and Ground Rules" (Exhibit A), prior to residing at the shelter. A copy of each signed agreement shall be on file at the All Saints Church campus and at the Union Station Homeless Services office for the duration of the participant's residency at the shelter.
- 9. The Zoning Administrator shall be notified with any changes to the "Safe Haven Bridge to Housing Covenant Expectation and Ground Rules" (Exhibit A).
- 10. The "Safe Haven Bridge to Housing Covenant Expectation and Ground Rules" (Exhibit A) shall state that "Caseworkers will coordinate participants with drug and alcohol rehabilitation programs and mental health services, as needed".
- 11. All activities and any storage associated with the use shall be conducted within the areas identified on the approved site plan.



CUP #6898 Safe Haven Adopted Conditions, cont'd.

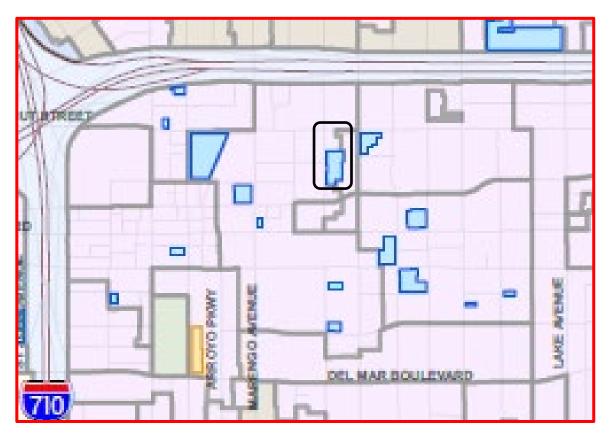
- 12. Temporary events and activities may require the approval of a Temporary Use Permit.
- 13. A representative of the program responsible for the activities occurring on-site shall be available during all hours of operation. The name, address, and telephone number of the individual, owner, or designated representative responsible shall be kept on record in the office of the religious facility. The information shall also be furnished to the Zoning Administrator and be presented to any City official for review upon request.
- 14. Any food services associated with the operation of the temporary homeless shelter shall be provided to participants only. Meals shall not be made available to non-participants.
- 15. At least one security guard shall patrol the subject property from 7:00 p.m. to 7:00 a.m., daily.
- 16. Signs indicating "No Loitering" shall be posted near the locker area. The size, location and contents of the sign shall be submitted for review and approval by the Zoning Administrator, within 30 days of the effective date of the Conditional Use Permit.
- 17. The bathroom and handwashing station area shall be maintained in a clean and sanitary manner at all times.
- 18. The premises, sidewalk, and street shall be maintained in a litter and graffiti free manner. Any graffiti that should appear on the site shall be removed within 48 hours. If at any time the Zoning Administrator determines that trash, litter, and debris have become a problem, the operator shall be required submit a litter clean-up plan. The litter clean-up plan shall address litter clean-up on-site and off-site and shall include, but not be limited to, a litter pick-up schedule and a map of the clean-up area. Upon approval of the plan by the Zoning Administrator, the measures of the plan shall be implemented. This condition may require the operator to post a bond to ensure trash and litter compliance.
- 19. The existing outdoor lighting shall be subject to Section 17.40.080 (Outdoor Lighting) of the Zoning Code to ensure its compliance with the requirements to avoid glare and reflection impacts on adjoining properties and public-rights-of-way.
- 20. Except within the designated storage area, lockers, and bike racks, storage, of any material or equipment, shall be prohibited.
- 21. These conditions of approval must be made available for public viewing at the religious facility campus on a continuous basis for the duration of this Conditional Use Permit, beginning on the date the Conditional Use Permit is in effect.

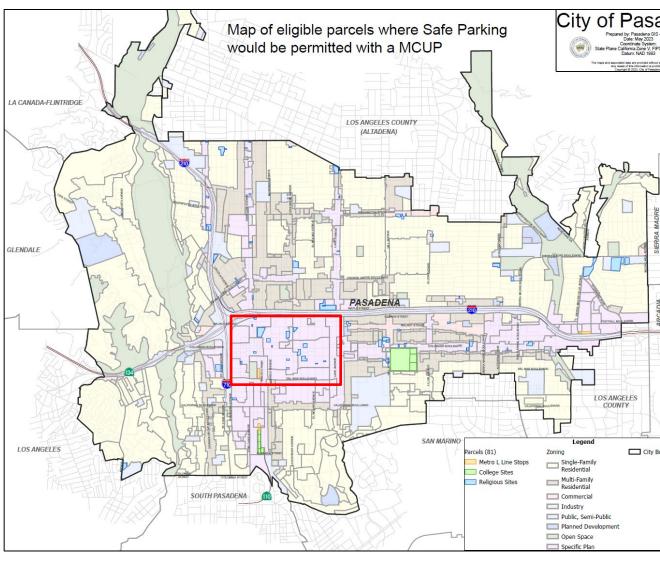


Additional Comments

Planning & Community Development Department

Attachment G of AR22 City Council 6/12/2023







Types of Recreational Vehicles

Planning & Community Development Department



Class A Recreational Vehicle:

largest motorhome that uses the frame of a bus or a semi-truck



Camper Van:

a Class B/C motorhome, uses the frame and body of a standard van



Trailer:

Towable by another vehicle and does not have its own engine or motor.



Truck Camper:

may be carried in the bed of a pickup truck

"Recreational vehicle" means either of the following:

- 1. A motor home, trailer, truck camper, with or without motive power, designed for human habitation for recreational use and which may be self-propelled on the highways without a permit.
- 2. A park trailer designed for human habitation for recreational or seasonal use only and which may only be transported upon public highways with a permit.