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February 17, 2026

VIA EMAIL AND ELECTRONIC UPLOAD

PLUM Committee
Honorable Mayor and Council Members
City of Los Angeles
200 North Spring Street
City Hall – Room 395
Los Angeles, CA 90012
Clerk.CPS@lacity.org
Clerk.PLUMCommittee@lacity.org

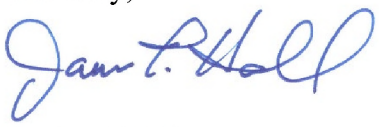
Re: Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

Dear Planning and Land Use Management Committee Members & Honorable Mayor and City Councilmembers:

This firm represents Angelenos for Historic Preservation ("Appellant") regarding the above-mentioned Project. Appellant has cited to a variety of reference materials in the Supplemental Appeal Justification concurrently submitted on February 17, 2026. As a courtesy, this letter is intended to provide copies of the cited source documents to ensure that they are made part of the Administrative Record. Please see these citations attached as **Exhibits 1 - 22.**

I may be contacted at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

Cc: Patrice Lattimore, City Clerk (patrice.lattimore@lacity.org)

Candy Rosales, Deputy City Clerk (candy.rosales@lacity.org)
Faruk Sezer, Building Civil Engineer (faruk.sezer@lacity.org)
Ronald Devin Myrick, Assistant Deputy Superintendent of Building
(devin.myrick@lacity.org)

Encls. **Exhibits 1-22**

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 1

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 2

Report on Appeal From Determination of Superintendent of Building ("Appeal Report")

Due to the volume of the document, please see the below link:
https://cityclerk.lacity.org/onlinedocs/2025/25-1518_misc_5_12-16-25.pdf

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 2

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 11

LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

NOTICE OF PREPARATION
OF ENVIRONMENTAL IMPACT REPORT

November 18, 2020

ENVIRONMENTAL CASE NO.:	ENV-2019-6645-EIR
PROJECT NAME:	11973 San Vicente Boulevard Project
PROJECT APPLICANT:	11973 San Vicente, LLC
PROJECT ADDRESS:	11973-11975 San Vicente Boulevard, Los Angeles, California 90049
COMMUNITY PLAN AREA:	Brentwood-Pacific Palisades
COUNCIL DISTRICT:	11 – Bonin
PUBLIC COMMENT PERIOD	November 18, 2020 – December 21, 2020

The City of Los Angeles (City) intends to prepare an Environmental Impact Report (EIR) for the proposed 11973 San Vicente Boulevard Project (Project). In accordance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, the City has prepared this Notice of Preparation to provide the public, nearby residents and property owners, responsible agencies, and other interested parties with information regarding the Project and its potential environmental effects. The EIR will be prepared by outside consultants under the supervision of the City of Los Angeles, Department of City Planning.

The City requests your written comments as to the scope and contents of the EIR, including mitigation measures or project alternatives to reduce potential environmental impacts from the Project. Comments must be submitted in writing according to directions below. If you represent a public agency, the City seeks written comments as to the scope and content of the environmental information in the EIR that are germane to your agency's statutory responsibilities in connection with the Project. Your agency may need to use the EIR prepared by the City when considering your permit or other approval for the Project.

PROJECT LOCATION AND EXISTING ON-SITE USES:
The Project Site is located in the Brentwood-Pacific Palisades Community Plan of the City of Los Angeles (City), at 11973-11975 San Vicente Boulevard. The existing development on the Project Site consists of a two-story, approximately 13,956 square foot commercial office building and an associated surface parking lot. The existing building, known as the Barry Building, was designated in 2007 as a Historic-Cultural Monument by the City (Monument No. LA-887). See attached Project Location Map.

PROJECT DESCRIPTION:
The Project consists solely of the demolition of the existing commercial building. The Project would not demolish the associated surface parking lot adjacent to the building, which would serve as a staging area for the demolition activities. No future development of the Site is proposed and/or considered as part of the Project.

REQUESTED ACTIONS:
1. Pursuant to LA Building Code Section 91.106.4.5 review by the City of Los Angeles Department of Building and Safety to determine whether the demolition, alteration, or removal may result in the loss of or serious damage to a significant historical or cultural assets and pursuant to LAMC Section 22.171.14

and 22.171.15, review by the Cultural Heritage Commission for objection or non-objection to issuance of the demolition permit.

2. Other permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, sign permits, and demolition permits.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT:
Based on an Initial Study, the Project could have potentially significant environmental impacts in the following topic areas, which will be addressed in the EIR: Air Quality; Cultural Resources; Greenhouse Gas Emissions; Land Use/Planning; Noise; Transportation; and Tribal Cultural Resources.

FILE REVIEW AND COMMENTS:
The enclosed materials reflect the scope of the Project. The environmental file is available for public review at the City of Los Angeles, Department of City Planning, 221 N. Figueroa Street, Room 1350, Los Angeles, CA 90012, during office hours Monday - Friday, 9:00 a.m. - 4:00 p.m. To review the file, please contact the Staff Planner listed below to schedule an appointment. A copy of this notice and the Initial Study prepared for the Project may be viewed with the environmental file or online at https://planning.lacity.org/development-services/eir

The City will consider all written comments regarding the potential environmental impacts of the Project and issues to be addressed in the EIR. If you wish to submit comments, please reference the Environmental Case No. above, and submit them in writing by Monday, December 21, 2020 **no later than 4:30 p.m.**

Please direct your comments to:

Mail: Bradley Furuya
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Room 1350
Los Angeles, CA 90012

Email: Bradley.Furuya@lacity.org

ACCOMMODATIONS: As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability. Other services, such as translation between English and other languages, may also be provided upon written request submitted a minimum of seven (7) working days in advance to: Bradley.Furuya@lacity.org. Be sure to identify the language you need English to be translated into, and indicate if the request is for oral or written translation services. If translation of a written document is requested, please include the document to be translated as an attachment to your email.

VINCENT P. BERTONI, AICP
Director of Planning

Bradley Furuya

Bradley Furuya
Major Projects Section
Department of City Planning
(213) 847-3642

Attachments:
Project Location Map



Legend

Project Site

Source: Google Maps 2020.

Project Location Map

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 3

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 14.1

Los Angeles Administrative Code: Division 19, Chapter 14 - Approval of Historic Property Contracts

Section
19.140 Purpose.
19.141 Definitions.
19.142 Limitations on Eligibility.
19.143 Required Provisions of Historical Property Contracts.
19.144 Procedures for Application and Approval of Historical Property Contracts.
19.145 Execution and Recordation of Approved Historical Property Contract.
19.146 Severability.

Sec. 19.140. Purpose.

Pursuant to California Government Code Section 50280, the City Council may contract with an owner or agent of the owner of any qualified historical property, as defined in Section 50280.1 thereof, provided the contract meets the requirements of Sections 50281 and 50282 thereof. Pursuant to Article 1.9 of the California Revenue and Taxation Code, historical properties that are "**restricted**" by the type of contracts referenced in the previous sentence shall be reassessed by the County Assessor in a manner that may result in lower real property taxes. The purpose of this chapter is to implement State law permitting the approval of such Historical Property Contracts by establishing a uniform procedure for the owners of certain qualified historic properties within the City of Los Angeles to follow when applying for approval of Historical Property Contracts.

The City Council finds and determines that entering into Historical Property Contracts as hereinafter provided, will provide an incentive for the owners of the City's Historic-Cultural Monuments to preserve their properties, thereby providing a cultural benefit to the citizens of Los Angeles. It is also the intent of the Council to provide the same preservation incentive to the owners of Contributing Structures within the City's Historic Preservation Overlay Zones, established pursuant to Section 12.20.3 of the Los Angeles Municipal Code. The City Council further finds that such preservation will assist in maintaining the City's existing stock of affordable housing, thereby providing a social and economic benefit to the citizens of Los Angeles.

SECTION HISTORY

Chapter and Section Added by Ord. No. 171,413, Eff. 12-28-96.

Sec. 19.141. Definitions.

For purposes of this chapter, the following words and phrases are defined as follows:

"Contributing Structure" shall mean a structure located within a Historic Preservation Overlay Zone, as defined in Section 12.20.3 A6 of the Los Angeles Municipal Code as contributing to the historic significance of the Historic Preservation Overlay Zone, or otherwise determined by the Cultural Heritage Commission to be a contributor to the Historic Preservation Overlay Zone. A structure which is designated in a Historic Resources Survey pursuant to Section 12.20.3 E of the Los Angeles Municipal Code as Non-Contributing may be rehabilitated, thereby becoming eligible for designation as a Contributing Structure.

"Downtown Historic Core" shall mean the area in downtown Los Angeles bounded by First Street on the north, Los Angeles Street on the east, Ninth Street on the south, and Hill Street on the west.

"Greater Downtown Los Angeles Area" shall mean the area in downtown Los Angeles located within the boundaries of the Central City Community Plan Area as shown on the General Plan of the City of Los Angeles and the Figueroa Economic Strategy Area, as further depicted on the map attached to the Planning Department staff report, dated October 4, 2001, and identified as Exhibit 1 in Council File No. 97-0648.

"Historic-Cultural Monument" shall mean a site, building or structure, as defined in Section 22.130 of this Code, which has been included in the City's list of monuments pursuant to Section 22.126 of this Code.

"Historical Property Contract" shall mean a contract between an owner(s) of a Historic-Cultural Monument or a Contributing Structure and the City of Los Angeles, meeting all the requirements of California Government Code Sections 50281 and 50282 and this chapter.

"Hollywood Historic District" shall mean the area defined in the Hollywood Redevelopment Plan map as the Hollywood Boulevard Commercial and Entertainment District.

SECTION HISTORY

Added by Ord. No. 171,413, Eff. 12-28-96.
Amended by Ord. No. 172,857, Eff. 11-15-99; Ord. No. 174,315, Eff. 12-20-01.

Sec. 19.142. Limitations on Eligibility.

It is the intent of the City Council that unrealized City revenue from loss of property taxes not collected due to executed Historical Property Contracts shall not exceed $2,000,000 annually. In furtherance of this policy, eligibility for Historical Property Contracts shall be limited, except within the Downtown Historic Core, the Hollywood Historic District or the Greater Downtown Los Angeles Area, to sites, buildings or structures with a pre-contract assessed valuation of $1,500,000 or less for single-family dwellings, and $3,000,000 or less for multi-family residential, commercial, or industrial buildings, unless the individual property is granted an exemption from those limits by the Cultural Heritage Commission.

The limitations on eligibility shall be based on the Priority Consideration Criteria as developed by the Historical Property Contracts Manager or the Cultural Heritage Commission and kept on file with the Office of Historic Resources in the Department of City Planning. The Priority Consideration Criteria are as follows:

(a) **Necessity.** The residential, commercial or industrial project will require financial incentives in addition to any mortgage financing, private capital or public loans, to help ensure the preservation of the property. This criterion shall establish that the structure is in danger of deterioration and in need of substantial rehabilitation that has significant associated costs.

(b) **Uniqueness.** The project is a unique example of a residential, commercial or industrial property. The unique characteristics of the Historic-Cultural Monument or HPOZ Contributing property are identified under this criterion.

(c) **Investment.** The residential, commercial or industrial project will result in additional private investment in the building other than for routine maintenance that may include seismic retrofitting, and substantial repair or rehabilitation work. This criterion will estimate the costs for the restoration and rehabilitation of the property that the owner is committed to undertaking.

(d) **Affordability.** Multi-family/Commercial mixed-use properties only: The residential or mixed-use project will result in the preservation or addition of safe and affordable dwelling units for low and moderate income households. Eligible properties under this criterion shall conform to current United States Department of Housing and Urban Development (HUD) criteria for affordable housing.

(e) **Employment.** Commercial and Industrial buildings only: The commercial or industrial project will primarily supply goods or services to residents of low and moderate income areas or provide employment of low and moderate income persons.

For the purpose of this section, "**assessed valuation**" does not include any portion of the value of a mixed-use project which is already exempt from payment of property taxes by a determination of the County Assessor pursuant to Sections 4(b) and 5 of Article XIII of the California Constitution and Sections 214, 254.5, and 259.5 of the Revenue and Taxation Code.

The Cultural Heritage Commission may grant an exemption from the limitations imposed by this section when:

(a) granting the exemption will not cause the cumulative loss of property tax revenue to the City to exceed $2,000,000 annually; and

(b) the site, building or structure is a particularly significant Historic-Cultural Monument or Contributing Structure; and

(c) granting the exemption will assist in the preservation of a site, building or structure which would otherwise be in danger of demolition, substantial alteration or relocation.

The City Council may, by majority vote, approve Historical Property Contracts not otherwise meeting the eligibility requirements contained in this chapter if it is found that the property meets all requirements of California Government Code Sections 50281 and 50282 and is especially deserving of a contract due to the exceptional nature of the property or other special circumstances.

SECTION HISTORY

Added by Ord. No. 171,413, Eff. 12-28-96.
Amended by: First and Third Paras., Ord. No. 172,857, Eff. 11-15-99; First Para., Ord. No. 179,713, Eff. 4-20-08; In Entirety, Ord. No. 182,068, Eff. 3-31-12; In Entirety, Ord. No. 182,332, Eff. 1-11-13.

Sec. 19.143. Required Provisions of Historical Property Contracts.

The required provisions of a Historical Property Contract shall be those required by California Government Code Sections 50281 and 50282, including, but not limited to:

(a) a minimum term of 10 years;

(b) the owner's commitment and obligation to preserve and, when necessary, restore and rehabilitate the property to conform to the rules and regulations of the Office of Historic Preservation of the Department of Parks and Recreation, the United States Secretary of the Interior's Standards for Rehabilitation, and the State Historical Building Code;

(c) permission for periodic examination of the interior and exterior of the premises by State and local officials as may be necessary to verify the owner's compliance with the agreement;

(d) a provision binding all successors in interest of the owner to the benefits and burdens of the contract;

(e) a requirement that the owner provide written notice of the contract to the Office of Historic Preservation within six months of entering into the contract;

(f) automatic annual renewal(s) of the contract, absent timely written notice of nonrenewal by the owner or the City, as prescribed in Section 50282(a).

Additionally, the contract shall require that the owner furnish the City with any information requested to determine the eligibility of the property. The contract shall state that the City may cancel the contract if it determines that the owner has breached any of the conditions of the contract or has allowed the property to deteriorate to the point that it no longer meets the standards for a Historic-Cultural Monument or Contributing Structure, and that the City may also cancel the contract if the City determines that the owner has failed to restore or rehabilitate the property in the manner specified in the contract. The contract shall also state that if the City does cancel the contract for the above reasons the owner shall pay the State of California a cancellation fee of twelve and one-half percent (12½%) of the full value of the property at the time of cancellation, as determined by the County Assessor without regard to any restriction on the property imposed pursuant to the Historical Property Contract.

The contract shall also provide that in the event preservation, restoration or rehabilitation becomes infeasible due to damage caused by natural disaster (e.g., fire, flood, earthquake, etc.), the City may cancel the contract without the owner being required to pay the State of California the above-referenced cancellation fee as a penalty. However, in such event, no contract shall be cancelled by the City unless the Cultural Heritage Commission determines, after consultation with the State Office of Historic Preservation pursuant to Public Resources Code Section 5028, that preservation, restoration or rehabilitation is infeasible.

The Department of Planning ("**Department**") shall maintain a sample "**Historical Property Contract**" containing all required provisions specified by this section. Contracts submitted on the City's form shall be deemed to contain all provisions necessary for a Historical Property Contract with the City. Additional provisions desired by the owner shall be subject to approval by the City Council and the City Attorney.

SECTION HISTORY

Added by Ord. No. 171,413, Eff. 12-28-96.
Amended by: Ord. No. 176,293, Eff. 1-1-05.

Sec. 19.144. Procedures for Application and Approval of Historical Property Contracts.

An owner of a Historic-Cultural Monument or Contributing Structure may file an application with the Department for approval of a Historical Property Contract. Each application shall be accompanied by a nonrefundable application fee as specified in Section 19.01 F. of the Los Angeles Municipal Code.

An application for approval of a Historical Property Contract must include a complete legal description of the property.

Upon receipt of an application on a form to be prescribed by the Department and upon the payment of the required fees as set forth in Section 19.01 F. of the Los Angeles Municipal Code, eligibility of the property for a Historical Property Contract pursuant to this chapter shall be determined. Upon verification that the property is a Historic-Cultural Monument or a Contributing Structure, the Department shall calculate the amount of revenue loss to the City from real property tax savings. If the amount of lost revenue from the proposed Historical Property Contract will not cause the City's lost revenues from Historical Property Contracts in the aggregate to exceed $2,000,000 annually, then the Department shall ascertain whether the property's current assessed

valuation is $1,500,000 or less for single-family dwellings, or $3,000,000 or less for multi-family residential, commercial or industrial buildings, unless the property is located within the Downtown Historic Core, the Hollywood Historic District, or the Greater Los Angeles Downtown Area, in which case the dollar limitations relating to assessed valuation are inapplicable. If those respective valuations are exceeded and the property is located outside of the Downtown Historic Core, the Hollywood Historic District or the Greater Los Angeles Downtown Area, the Cultural Heritage Commission shall determine whether an exemption should be granted, pursuant to Section 19.142 of this Code.

If the property is determined ineligible for a Historical Property Contract by the Historical Property Contracts Manager pursuant to this section, the owner or the owner's agent may appeal the Staff Determination of Ineligibility to the Cultural Heritage Commission. The appeal shall be filed on a form provided by the Department of City Planning, along with the fee specified in Section 19.01 F. of the Los Angeles Municipal Code. The Cultural Heritage Commission shall make a determination of eligibility subsequent to the appeal.

If the property is determined eligible for a Historical Property Contract pursuant to this section, the owner or the owner's agent shall prepare and submit to the Department a Historical Property Contract containing the required provisions as set forth in Section 19.143 and pay a Contract Execution Fee according to Section 19.01 F. of the Los Angeles Municipal Code. Historical Property Contracts shall also include a fee covering periodic inspections mandated by the State of California to occur once every five years. The fee shall be as set forth in Section 19.01 F. of the Los Angeles Municipal Code.

The City's standard Historical Property Contract or the owner's version, as approved by the City Attorney, shall then be submitted by the Department to the City Council for its consideration. Historical Property Contracts are subject to City Council approval by majority vote of the entire City Council.

SECTION HISTORY

Added by Ord. No. 171,413, Eff. 12-28-96.
Amended by: Third Para., Ord. No. 172,857, Eff. 11-15-99; First Para., Ord. No. 177,183, Eff. 1-15-06; In Entirety, Ord. No. 182,068, Eff. 3-31-12; In Entirety, Ord. No. 182,332, Eff. 1-11-13; In Entirety, Ord. No. 185,952, Eff. 2-28-19.

Sec. 19.145. Execution and Recordation of Approved Historical Property Contract.

Upon approval by the City Council of a Historical Property Contract, the General Manager of the Department and the owner of the property shall be authorized to execute the agreement on condition that the property owner submit a check to the Department made payable to the "**L.A. County Recorder**" in the amount of the fee for recording the agreement. No later than 20 calendar days after execution of the agreement, the Department shall deliver the check and cause a copy of the executed Historical Property Contract to be recorded in the Office of the Los Angeles County Recorder.

SECTION HISTORY

Added by Ord. No. 171,413, Eff. 12-28-96.

Sec. 19.146. Severability.

If any provision of this chapter is held to be invalid by a court of competent jurisdiction, it is the intent of the City Council that all other provisions of this chapter shall remain in full force and effect. The City Council hereby declares the provisions of this chapter to be severable.

SECTION HISTORY

Added by Ord. No. 171,413, Eff. 12-28-96.

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 4

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 14.2

An Official Website of the City of Los Angeles

City Services (https://myla311.lacity.org/) City Directory (https://lacity.gov/directory)

Mills Act Historical Property Contract Program

The Mills Act Historical Property Contract Program has served as Los Angeles's primary financial incentive for historic preservation since 1996, offering property tax savings for owners who invest in the rehabilitation and restoration of historic buildings.

Enabled by state legislation in 1972, the Mills Act offers a unique tool for historic preservation through a revolving 10-year contract between the City and the property owner. Contracts are automatically renewed each year and are transferred to new owners when the property is sold. The program's strength is that it incentivizes – through a property tax abatement – significant investment in historic preservation to retain and protect historic resources.

There are property assessed valuation thresholds in place for new applications: $1.5 million for single-family residences or $3 million for multi-family residential, commercial, or industrial properties. Any properties exceeding these valuation limits require an application for an exemption and the preparation of an Historic Structure Report.

Additional information about the program is available in the list of Frequently Asked Questions (https://planning.lacity.gov/odocument/e157655d-dce4-4a63-ad62-7f86d5cedb5b/Info%20Brief%20Mills%20Act%20FAQs.pdf).

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Terms of Use (/additional/terms-of-use) | Disclaimer (/additional/disclaimer)

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HELPFUL LINKS

Fraudulent Email Notification (/fraudulent-emails-notification-customers)
Social Media Policy (https://www.insidela.org/sites/default/files/City_Social_Media_Policy.pdf)
City of Los Angeles (https://www.lacity.org)
City Departments, Agencies, and Bureaus (https://www.lacity.org/your-government/departments-commissions/departments-bureaus)
2020 Census (https://census.lacity.org/)
Community Resource Guide (/resources/community-resource-guide)
Site Map (/sitemap)

CONTACT US

Locations and Hours (/contact/locations-hours)
Appointments (/project-review/planning-services)
Media Inquiries (/contact/communications)

(https://www.facebook.com/Planning4LA/) (https://twitter.com/Planning4LA)(https://www.instagram.

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 5

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 15.1

An official website of the United States government Here's how you know

National Park Service

Historic Preservation Tax Incentives

Tax Incentives for Preserving Historic Properties

The Federal Historic Preservation Tax Incentives program encourages private sector investment in the rehabilitation and re-use of historic buildings. It creates jobs and is one of the nation's most successful and cost-effective community revitalization programs. It has leveraged $127.12 billion in private investment to preserve more than 50,000 historic properties since 1976. The National Park Service, through its Technical Preservation Services (https://www.nps.gov/orgs/1739/index.htm) division, and the Internal Revenue Service (https://www.irs.gov/businesses/small-businesses-self-employed/rehabilitation-tax-credit-real-estate-tax-tips) administer the program in partnership with State Historic Preservation Offices (https://www.nps.gov/subjects/taxincentives/shpos.htm).

Historic Preservation Certification Application submission and review are fully electronic (https://www.nps.gov/subjects/taxincentives/hpca-electronic-submission.htm). Hard copy applications are not accepted. All applications must use the current application forms and instructions (https://www.nps.gov/subjects/taxincentives/historic-preservation-certification-application.htm) dated "(Rev. 6/2023)."

Banner photo: Cook County Hospital Administration Building, Chicago, Illinois, Dave Burk, SOM; Courtesy Murphy Real Estate Services



About the Tax Incentives ›

(https://www.nps.gov/subjects/taxincentives/about.htm)

Overview of the tax incentives



Before You Apply ›

(https://www.nps.gov/subjects/taxincentives/before-apply.htm)

Information to review before preparing an application



Application Process ›

(https://www.nps.gov/subjects/taxincentives/application-process.htm)

Application forms, documentation requirements, and fees



Standards for Rehabilitation ›

(https://www.nps.gov/subjects/taxincentives/secretarys-standards-rehabilitation.htm)

Regulatory for the Tax Incentives Program



Planning Successful Rehabilitations ›

(https://www.nps.gov/subjects/taxincentives/planning-successful-rehabilitation.htm)

Guidance on common rehabilitation treatments



IRS Information ›

(https://www.nps.gov/subjects/taxincentives/irs-information.htm)

Links to program information provided by the IRS

Was this page helpful?

Yes

No

An official form of the United States government. Provided by Touchpoints (https://touchpoints.app.cloud.gov/)

Last updated: May 27, 2025

Experience More

SUBJECTS

Historic Preservation (https://www.nps.gov/subjects/historicpreservation)

National Register of Historic Places (https://www.nps.gov/subjects/nationalregister)

ORGANIZATIONS

Cultural Resources Partnerships and Science Directorate (https://www.nps.gov/orgs/1345)

Technical Preservation Services (https://www.nps.gov/orgs/1739)

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 6

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 15.2

An official website of the United States government Here's how you know

National Park Service

Historic Preservation Tax Incentives

Eligibility Requirements

There are four factors that can help you decide whether your rehabilitation project would meet the basic requirements for the 20% tax credit.

1. The historic building must be listed in the National Register of Historic Places or be certified as contributing to the significance of a "registered historic district."

Buildings may be listed individually in the National Register of Historic Places or as a part of a historic district. Contact your local historic district commission, municipal planning office, or State Historic Preservation Office (SHPO) to find out if your building is listed.

If your property is located in a National Register district or a certified state or local district, it still must be designated by the National Park Service as a structure that retains historic integrity and contributes to the historic character of the district, thus qualifying as a "certified historic structure." Not every building in a district is contributing. When historic districts are designated, they are usually associated with a particular time period or "period of significance," such as "mid-1800s to 1935." In such a district, a 1950 office building would not contribute and would not be eligible for a 20% rehabilitation tax credit.

You can request the National Park Service to designate your building a "certified historic structure" by completing and submitting Part 1 of the Historic Preservation Certification Application.

Learn more about the application process

(https://www.nps.gov/subjects/taxincentives/application-process.htm).

2. The project must meet the "substantial rehabilitation test."

In brief, this means that the cost of rehabilitation must exceed the pre-rehabilitation cost of the building. Generally, this test must be met within two years or within five years for a project completed in multiple phases.

The cost of a project must exceed the greater of $5,000 or the building's adjusted basis. The following formula will help you determine if your project will be substantial:

A — B — C + D = adjusted basis

A = purchase price of the property (building and land)

B = the cost of the land at the time of purchase

C = depreciation taken for the property (the property must be depreciable, such as in a business, commercial or other income-producing use)

D = cost of any capital improvements made since purchase

For example, Mr. Jones has owned a small Victorian rental cottage for a number of years. He originally purchased the property for $150,000 and, of that purchase price, $70,000 was attributed to the cost of the land. Over the past years, he has depreciated the building for tax purposes by a total of $41,000. He recently replaced the air conditioning system at a cost of $1,500. Therefore, Mr. Jones's adjusted basis is $40,500 (or 150,000 — 70,000 — 41,000 + 1,500).

Mr. Jones intends to spend $50,000 to install a new roof, repair rotten siding, upgrade the wiring, and rebuild the severely deteriorated front porch, which will qualify as a substantial rehabilitation project. If he completes the application process and receives certification from the National Park Service that the rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation, Mr. Jones will be eligible for a 20% credit on the cost of his rehabilitation, or a $10,000 credit.

Some expenses associated with a project may not qualify for the tax credit, such as a new rear addition, new kitchen appliances, and landscaping.

Learn more about qualified rehabilitation expenses from the IRS (https://www.irs.gov/pub/irs-sbse/qualified-rehabilitation-expenditures.pdf).

3. The rehabilitation work must be done according to the Secretary of the Interior's Standards for Rehabilitation.

These are ten principles that, when followed, ensure the historic character of the building has been preserved in the rehabilitation. The Standards are applied to projects in a reasonable manner, taking into consideration economic and technical feasibility.

Learn more about the Standards for Rehabilitation (https://www.nps.gov/subjects/taxincentives/secretarys-standards-rehabilitation.htm).

4. After rehabilitation, the historic building must be depreciable, such as in a business, commercial or other income-producing use, for at least five years. Owner-occupied residential properties do not qualify for the federal rehabilitation tax credit.

The 20% credit is available only to properties rehabilitated for income-producing purposes, including commercial, industrial, agricultural, rental residential or apartment use. The credit cannot be used to rehabilitate your private residence.

However, if a portion of a personal residence is used for business, such as an office or a rental apartment, in some instances the amount of rehabilitation costs spent on that portion of the residence may be eligible for the credit.

Additional Eligibility Requirements

Additional factors and conditions can determine whether a potential project is eligible for the 20% tax credit.

- **Buildings, not structures.** Although the National Register of Historic Places lists structures, objects, and sites in addition to buildings, the 20% rehabilitation tax credit is only available for buildings. Treasury Regulation 1.48-1(e) defines a building as any structure or edifice enclosing a space within its walls, and usually covered by a roof, the purpose of which is, to provide shelter or housing, or to provide working, office, parking, display, or sales space.
- **Physical integrity.** The 20% tax credit for historic preservation is meant to preserve historic buildings, and not to create buildings that look old, but that are in effect new buildings. Thus, the credit is not available if the building does not have sufficient historic material to preserve at the outset of the rehabilitation. Once the integrity of a building has been lost due to deterioration, damage, or previous alterations, it can never be regained. While new material can exactly copy significant features, material integrity itself can never be re-created. It is important to select a building for rehabilitation that retains its basic physical integrity before rehabilitation.
- **Non-historic surface coverings.** Some historic buildings have been covered with non-historic surface coverings that obscure the building underneath. In these cases, it will be necessary to remove the covering to make sure that there is enough historic building material remaining that the building still qualifies as historic.
- **Multiple buildings.** Farms, mills, and other historic properties often have more than one building. For properties with multiple buildings that were functionally related historically, the rehabilitation certification decision will be based on the effect of the overall rehabilitation on the entire property, and not on each structure or individual component.
- **Moved buildings.** Moving a historic building can jeopardize its listing in the National Register of Historic Places, and special procedures must be followed to ensure its continued listing. Likewise, moving a building into or within a historic district may jeopardize its ability to contribute to the significance of the district. If a building will be moved as part of the rehabilitation project, consult with the SHPO as soon as possible.
- **Demolition.** Projects that involve demolition require careful planning to ensure approval whether whole buildings will be demolished or only parts of a structure.

Last updated: May 28, 2024

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SUBJECTS

Historic Preservation (https://www.nps.gov/subjects/historicpreservation)

National Register of Historic Places (https://www.nps.gov/subjects/nationalregister)

ORGANIZATIONS

Cultural Resources Partnerships and Science Directorate (https://www.nps.gov/orgs/1345)

Technical Preservation Services (https://www.nps.gov/orgs/1739)

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 7

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 15.3

PLEASE NOTE

The Historic Preservation Tax Incentives brochure has not been revised to reflect any changes that may be necessary related to Public Law No: 115-97 (December 22, 2017).

Public Law No: 115-97 amends the Internal Revenue Code to reduce tax rates and modify policies, credits, and deductions for individuals and businesses. Section 13402 modifies the 20% Historic Rehabilitation Tax Credit and provides certain transition rules. These and other changes to the Internal Revenue Code may affect a taxpayer's ability to use the 20% tax credit. The law also repeals the10% credit for rehabilitating non-historic buildings. The text of Public Law No: 115-97 is available at www.congress.gov.

Applicants requesting historic preservation certifications by the National Park Service, as well as others interested in the use of these tax credits, are strongly advised to consult an accountant, tax attorney, or other professional tax adviser, legal counsel, or the Internal Revenue Service regarding the changes to the Internal Revenue Code related to Public Law No: 115-97.

Historic Preservation Tax Incentives



National Park Service
U.S. Department of the Interior

Technical Preservation Services

This booklet describes the Federal Historic Preservation Tax Incentives in general terms only. Every effort has been made to present current information as of the date given below. However, the Internal Revenue Code is complex and changes frequently. Furthermore, the provisions of the tax code regarding at-risk rules, passive activity limitation, and alternative minimum tax can affect a taxpayer's ability to use these tax credits. *Readers are strongly advised to consult an accountant, tax attorney, or other professional tax advisor, legal counsel, or the Internal Revenue Service for help in determining whether these incentives apply to their own situations.* For more detailed information, including copies of application forms, regulations, and other program information, contact one of the offices listed on pages 26-29.

Department of the Interior regulations governing the procedures for obtaining historic preservation certifications are more fully explained in Title 36 of the Code of Federal Regulations, Part 67. The Internal Revenue Service regulations governing the tax credits for rehabilitation are contained in Treasury Regulation Section 1.48-12. These sets of regulations take precedence in the event of any inconsistency with this booklet.

Technical Preservation Services
National Park Service
2012

Cover: German Bank, Dubuque, Iowa (1901). After rehabilitation for continued commercial and residential use. Courtesy State Historical Society of Iowa. Photograph: John Zeller.

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Preservation Tax Incentives

Historic buildings are tangible links with the past. They help give a community a sense of identity, stability and orientation. The Federal government encourages the preservation of historic buildings through various means. One of these is the program of Federal tax incentives to support the rehabilitation of historic and older buildings. The Federal Historic Preservation Tax Incentives program is one of the Federal government's most successful and cost-effective community revitalization programs.

The National Park Service administers the program with the Internal Revenue Service in partnership with State Historic Preservation Offices. The tax incentives promote the rehabilitation of historic structures of every period, size, style and type. They are instrumental in preserving the historic places that give cities, towns and rural areas their special character. The tax incentives for preservation attract private investment to the historic cores of cities and towns. They also generate jobs, enhance property values, and augment revenues for State and local governments through increased property, business and income taxes. The Preservation Tax Incentives also help create moderate and low-income housing in historic buildings. Through this program, abandoned or underused schools, warehouses, factories, churches, retail stores, apartments, hotels, houses, and offices throughout the country have been restored to life in a manner that maintains their historic character.



Current tax incentives for preservation, established by the Tax Reform Act of 1986 (PL 99-514; Internal Revenue Code Section 47 [formerly Section 48(g)]) include:

- a 20% tax credit for the *certified rehabilitation* of *certified historic structures*.
- a 10% tax credit for the rehabilitation of *non-historic, non-residential buildings* built before 1936.

From time to time, Congress has increased these credits for limited periods for the rehabilitation of buildings located in areas affected by natural disasters. For more information, see the instructions on IRS Form 3468, Investment Credit, or contact your State Historic Preservation Office.

In all cases the rehabilitation must be a *substantial* one and must involve a *depreciable* building. (These terms will be explained later.)

What Is a Tax Credit?

A tax credit differs from an income tax deduction. An income tax deduction lowers the amount of income subject to taxation. A tax credit, however, lowers the amount of tax owed. In general, a dollar of tax credit reduces the amount of income tax owed by one dollar.

- The 20% rehabilitation tax credit equals 20% of the amount spent in a *certified rehabilitation of a certified historic structure*.
- The 10% rehabilitation tax credit equals 10% of the amount spent to rehabilitate a *non-historic building* built before 1936.

Armstrong Cork Company Plant, Pittsburgh, Pennsylvania (1901-1913). After rehabilitation for retail and housing. Photograph: Charles Uhl.

20% Rehabilitation Tax Credit

The Federal historic preservation tax incentives program (the 20% credit) is jointly administered by the U.S. Department of the Interior and the Department of the Treasury. The National Park Service (NPS) acts on behalf of the Secretary of the Interior, in partnership with the State Historic Preservation Officer (SHPO) in each State. The Internal Revenue Service (IRS) acts on behalf of the Secretary of the Treasury. Certification requests (requests for approval for a taxpayer to receive these benefits) are made to the NPS through the appropriate SHPO. Comments by the SHPO on certification requests are fully considered by the NPS. However, approval of projects undertaken for the 20% tax credit is conveyed *only in writing* by duly authorized officials of the National Park Service. For a description of the roles of the NPS, the IRS and the SHPO, see "Tax Credits: Who Does What?" on pages 14 -15.

The 20% rehabilitation tax credit applies to any project that the Secretary of the Interior designates a *certified rehabilitation* of a *certified historic structure*. The 20% credit is available for properties rehabilitated for commercial, industrial, agricultural, or rental residential purposes, but it is not available for properties used exclusively as the owner's private residence.

What is a "certified historic structure?"

A *certified historic structure* is a building that is listed individually in the National Register of Historic Places —OR— a building that is located in a *registered historic district* and certified by the National Park Service as contributing to the historic significance of that district. The "structure" must be a building—not a bridge, ship, railroad car, or dam. (A *registered historic district* is any district listed in the National Register of Historic Places.

Hanny's Building, Phoenix, Arizona (1947). After rehabilitation of this high-fashion clothing store for restaurant and other commercial use. Photograph: Ryden Architects, Inc.

A State or local historic district may also qualify as a *registered historic district* if the district and the enabling statute are certified by the Secretary of the Interior.)

Obtaining Certified Historic Structure Status

Owners of buildings within historic districts must complete Part 1 of the Historic Preservation Certification Application—Evaluation of Significance. The owner submits this application to the SHPO. The SHPO reviews the application and forwards it to the NPS with a recommendation for approving or denying the request. The NPS then determines whether the building contributes to the historic district. If so, the building then becomes a *certified historic structure*. The NPS bases its decision on the Secretary of the Interior's "Standards for Evaluating Significance within Registered Historic Districts" (see page 23).

Buildings individually listed in the National Register of Historic Places are already certified historic structures. Owners of these buildings need not complete the Part 1 application (unless the listed property has more than one building).

Property owners unsure if their building is listed in the National Register or if it is located in a National Register or certified State or local historic district should contact their SHPO.



What if my building is not yet listed in the National Register?

Owners of buildings that are not yet listed individually in the National Register of Historic Places or located in districts that are not yet registered historic districts may use the Historic Preservation Certification Application, Part 1, to request a *preliminary determination of significance* from the National Park Service. Such a determination may also be obtained for a building located in a registered historic district but that is outside the period or area of significance of the district. A preliminary determination of significance allows NPS to review Part 2 of the application describing the proposed rehabilitation. Preliminary determinations, however, are not binding. They become final only when the building or the historic district is listed in the National Register or when the district documentation is amended to include additional periods or areas of significance. It is the owner's responsibility to obtain such listing through the State Historic Preservation Office in a timely manner.

What is a "certified rehabilitation?"

The National Park Service must approve, or "certify," all rehabilitation projects seeking the 20% rehabilitation tax credit. A *certified rehabilitation* is a rehabilitation of a *certified historic structure* that is approved by the NPS as being consistent with the historic character of the property and, where applicable, the district in which it is located. The NPS assumes that some alteration of the historic building will occur to provide for an efficient use. However, the project must not damage, destroy, or cover materials or features, whether interior or exterior, that help define the building's historic character.

Application Process

Owners seeking certification of rehabilitation work must complete Part 2 of the Historic Preservation Certification Application—Description of Rehabilitation. Long-term lessees may also apply if their remaining lease period is at least 27.5 years for residential property or 39

years for nonresidential property. The owner submits the application to the SHPO. The SHPO provides technical assistance and literature on appropriate rehabilitation treatments, advises owners on their applications, makes site visits when possible, and forwards the application to the NPS, with a recommendation.

The NPS reviews the rehabilitation project for conformance with the "Secretary of the Interior's Standards for Rehabilitation," and issues a certification decision. The entire project is reviewed, including related demolition and new construction, and is certified, or approved, only if the overall rehabilitation project meets the Standards. These Standards appear on pages 24-25. Both the NPS and the IRS strongly encourage owners to apply *before* they start work.



58 B Street, Virginia City, Nevada (1875). Rehabilitated as a bed and breakfast. Courtesy Chris Eichin.

After the rehabilitation work is completed, the owner submits Part 3 of the Historic Preservation Certification Application—Request for Certification of Completed Work to the SHPO. The SHPO forwards the application to the NPS, with a recommendation as to certification. The NPS then evaluates the completed project against the work proposed in the Part 2—Description of Rehabilitation. Only completed projects that meet the Standards for Rehabilitation are approved as "certified rehabilitations" for purposes of the 20% rehabilitation tax credit.

Before



After



Carleton Place (historic name: Simmons Manufacturing Company), St. Paul, Minnesota (1909). Before and after rehabilitation for residential use. Courtesy Hess, Roise and Company.

Processing Fees

The NPS charges a fee for reviewing applications. Fees are charged for the review of proposed work (Part 2) and for review of completed projects (Part 3). The fees are based on the rehabilitation costs. Payment should not be sent until requested by NPS. The NPS will not issue a certification decision until payment has been received. See the NPS website on page 26 for the fee schedule.



Hollywood Bungalow Courts, Los Angeles, California (1921-1925). Rehabilitated as housing for special-needs and low-income residents. Photograph: NPS Files.

IRS Requirements

To be eligible for the 20% rehabilitation tax credit, a project must also meet basic IRS requirements:

- The building must be *depreciable*. That is, it must be used in a trade or business or held for the production of income. It may be used for offices, for commercial, industrial or agricultural enterprises, or for rental housing. It may not serve exclusively as the owner's private residence.

- The rehabilitation must be *substantial*. That is, during a 24-month period selected by the taxpayer, rehabilitation expenditures must exceed the greater of $5,000 or the adjusted basis of the building and its structural components. The adjusted basis is generally the purchase price, minus the cost of land, plus improvements already made, minus depreciation already taken. Once the substantial rehabilitation test is met, the credit may be claimed for all qualified

expenditures incurred before the measuring period, during the measuring period and after the measuring period through the end of the taxable year that the building is placed in service.

- Phased rehabilitations—that is, rehabilitations expected to be completed in two or more distinct stages of development—must also meet the "substantial rehabilitation test." However, for phased rehabilitations, the measuring period is 60 months rather than 24 months. This phase rule is available only if: (1) a set of architectural plans and specifications outlines and describes all rehabilitation phases; (2) the plans are completed before the physical rehabilitation work begins, and (3) it can reasonably be expected that all phases will be completed.

- The property must be placed in service (that is, returned to use). The rehabilitation tax credit is generally allowed in the taxable year the rehabilitated property is placed in service.

- The building must be a *certified historic structure* when placed in service, with the following exception: If the building or the historic district is not listed in the National Register, the owner must have requested that the SHPO nominate the building or the district to the National Register before the building is placed in service. If the building is in a historic district that is listed or may be listed in the National Register, the owner must submit Part 1 of the application before the building is placed in service.

- Qualified rehabilitation expenditures include costs of the work on the historic building, as well as architectural and engineering fees, site survey fees, legal expenses, development fees, and other construction-related costs, if such costs are added to the property basis and are reasonable and related to the services performed. They do not include acquisition or furnishing costs, new additions that expand the building, new building construction, or parking lots, sidewalks, landscaping, or other related facilities.



114 NW Main Street, Rocky Mount, North Carolina (1928).
Photograph: William Ferguson.

Getting your project approved, or "certified"

Tens of thousands of projects have been approved for the historic preservation tax credit. Observing the following points will make approval of your project easier:

» *Apply as soon as possible—preferably before beginning work.* Consult with the SHPO as soon as you can. Read carefully the program application, regulations, and any other information the SHPO supplies. Submit your application early in the project planning. Wait until the project is approved in writing by the NPS before beginning work. Work undertaken prior to approval by the NPS may jeopardize certification. In the case of properties not yet designated certified historic structures, apply before the work is completed and the building is placed in service.

- *Photograph the building inside and outside—before and after the project.* "Before" photographs are especially important. Without them, it may be impossible for the NPS to approve a project.

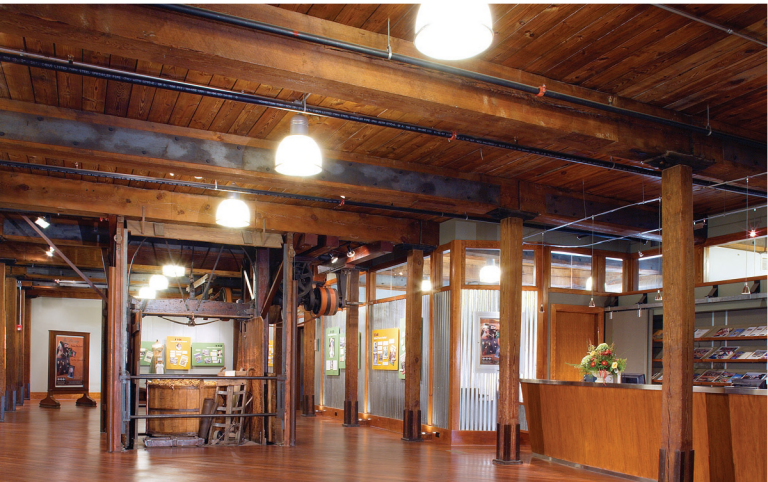
- *Read and follow the "Secretary of the Interior's Standards for Rehabilitation" and the "Guidelines for Rehabilitating Historic Buildings."* If you are unsure how they apply to your building, consult with the SHPO or the NPS.

- *Once you have applied, alert the SHPO and the NPS to any changes in the project.*

Claiming the 20% Rehabilitation Tax Credit

Generally, the tax credit is claimed on IRS form 3468 for the tax year in which the rehabilitated building is placed in service. For phased projects, the tax credit may be claimed before completion of the entire project provided that the substantial rehabilitation test has been met. If a building remains in service throughout the rehabilitation, then the credit may be claimed when the substantial rehabilitation test has been met. In general, unused tax credit can be "carried back" one year and "carried forward" 20 years.

The IRS requires that the NPS certification of completed work (Application Part 3) be filed with the tax return claiming the tax credit. If final certification has not yet



been received when the taxpayer files the tax return claiming the credit, a copy of the first page of the Historic Preservation Certification Application—Part 2 must be filed with the tax return, with proof that the building is a *certified historic structure* or that such status has been requested. The copy of the application filed must show evidence that it has been received by either the SHPO or the NPS (date-stamped receipt or other notice is sufficient). If the taxpayer then fails to receive final certification within 30 months after claiming the credit, the taxpayer must agree to extend the period of assessment. If the NPS denies certification to a rehabilitation project, the credit will be disallowed.

Recapture of the Credit

The owner must hold the building for five full years after completing the rehabilitation, or pay back the credit. If the owner disposes of the building within a year after it is placed in service, 100% of the credit is recaptured. For properties held between one and five years, the tax credit recapture amount is reduced by 20% per year.

The NPS or the SHPO may inspect a rehabilitated property at any time during the five-year period. The NPS may revoke certification if work was not done as described in the Historic Preservation Certification Application, or if unapproved alterations were made for up to five years after certification of the rehabilitation. The NPS will notify the IRS of such revocations.



Prizery/R.J. Reynolds Tobacco Warehouse, South Boston, Virginia (1900). Rehabilitated for commercial use. Photographs: Ian Bradshaw.

Depreciation

Rehabilitated property is depreciated using the straight-line method over 27.5 years for residential property and over 39 years for nonresidential property. The depreciable basis of the rehabilitated building must be reduced by the full amount of the tax credit claimed.

Rehabilitation Tax Credits: Who Does What?

The Federal historic preservation tax incentives program is a partnership among the National Park Service (NPS), the State Historic Preservation Officer (SHPO), and the Internal Revenue Service (IRS). Each plays an important role.

SHPO

- Serves as first point of contact for property owners.
- Provides application forms, regulations, and other program information.
- Maintains complete records of the State's buildings and districts listed in the National Register of Historic Places, as well as State and local districts that may qualify as registered historic districts.
- Assists anyone wishing to list a building or a district in the National Register of Historic Places.
- Provides technical assistance and literature on appropriate rehabilitation treatments.
- Advises owners on their applications and makes site visits on occasion to assist owners.
- Makes certification recommendations to the NPS.

NPS

- Reviews all applications for conformance to the *Secretary of the Interior's Standards for Rehabilitation*.

- Issues all certification decisions (approvals or denials) in writing.
- Transmits copies of all decisions to the IRS.
- Develops and publishes program regulations, the *Secretary of the Interior's Standards for Rehabilitation*, the Historic Preservation Certification Application, and information on rehabilitation treatments.

IRS

- Publishes regulations governing which rehabilitation expenses qualify, the time periods for incurring expenses, the tax consequences of certification decisions by NPS, and all other procedural and legal matters concerning both the 20% and the 10% rehabilitation tax credits.
- Answers public inquiries concerning legal and financial aspects of the Historic Preservation Tax Incentives, and publishes the audit guide, *Market Segment Specialization Program: Rehabilitation Tax Credit*, to assist owners.
- Insures that only parties eligible for the rehabilitation tax credits utilize them.



Odd Fellows Building, Raleigh, North Carolina (c. 1880). Rehabilitated for continued commercial use. Courtesy Empire Properties.

10% Rehabilitation Tax Credit

The 10% rehabilitation tax credit is available for the rehabilitation of *non-historic buildings* placed in service before 1936.

As with the 20% rehabilitation tax credit, the 10% credit applies only to buildings—not to ships, bridges or other structures. The rehabilitation must be substantial, exceeding either $5,000 or the adjusted basis of the property, whichever is greater. And the property must be *depreciable*.

The 10% credit applies only to buildings rehabilitated for *non-residential* uses. Rental housing would thus not qualify. Hotels, however, would qualify. They are considered to be in commercial use, not residential.

A building that was moved after 1935 is ineligible for the 10% rehabilitation credit. (A moved *certified historic structure*, however, can still be eligible for the 20% credit.) Furthermore, projects undertaken for the 10% credit must meet a specific physical test for retention of external walls and internal structural framework:

- at least 50% of the building's external walls existing at the time the rehabilitation began must remain in place as external walls at the work's conclusion, and
- at least 75% of the building's existing external walls must remain in place as either external or internal walls, and
- at least 75% of the building's internal structural framework must remain in place.

Claiming the 10% Rehabilitation Tax Credit

The tax credit must be claimed on IRS form 3468 for the tax year in which the rehabilitated building is placed in service. There is no formal review process for rehabilitations of non-historic buildings.

The 10% or 20% Credit: Which One Applies?

The 10% rehabilitation tax credit applies only to non-historic buildings first placed in service before 1936 and rehabilitated for non-residential uses. The 20% rehabilitation tax credit applies only to *certified historic structures*, and may include buildings built after 1936. The two credits are mutually exclusive.

Buildings listed in the National Register of Historic Places are not eligible for the 10% credit. Buildings located in National Register listed historic districts or certified State or local historic districts are presumed to be historic and are therefore not eligible for the 10% credit. In general, owners of buildings in these historic districts may claim the 10% credit *only* if they file Part 1 of the Historic Preservation Certification Application with the National Park Service before the physical work begins and receive a determination that the building does *not* contribute to the district and is not a certified historic structure.

Other Tax Provisions Affecting Use of Preservation Tax Incentives

A number of provisions in the Internal Revenue Code affect the way in which real estate investments are treated generally. These provisions include the *"at-risk" rules*, the *passive activity limitation*, and the *alternative minimum tax*. What these provisions mean, in practice, is that many taxpayers may not be able to use tax credits earned in a certified rehabilitation project.

A brief discussion of these matters follows. Applicants should seek professional advice concerning the personal financial implications of these provisions.

At-Risk Rules

Under Internal Revenue Code Section 465, a taxpayer may deduct losses and obtain credits from a real estate

Before



investment only to the extent that the taxpayer is "at-risk" for the investment. The amount that a taxpayer is "at-risk" is generally the sum of cash or property contributions to the project plus any borrowed money for which the taxpayer is personally liable, including certain borrowed amounts secured by the property used in the project. In addition, in the case of the activity of holding real property, the amount "at-risk" includes qualified non-recourse financing borrowed from certain financial institutions or government entities.

Passive Activity Limitation

The passive activity limitation provides that losses and credits from "passive" income sources, such as real estate

After



John Harvey House, Detroit, Michigan (1875). (opposite) Before rehabilitation; (above) After rehabilitation as a bed and breakfast. Courtesy: Marilyn Nash-Yazbeck. Photograph: Steven C. Flum, Inc.

limited partnerships, cannot be used to offset tax liability from "active" sources such as salaries. This passive activity limitation does not apply to:

- Most regular corporations.
- Real estate professionals who materially participate in a real property trade or business and who satisfy eligibility requirements regarding the proportion and amount of time spent in such businesses.

For other taxpayers, two exceptions apply: a general exception and a specific exception for certified rehabilitations.

General Passive Loss Rules

Taxpayers with incomes less than $100,000 (generally, adjusted gross income with certain modifications) may take up to $25,000 in losses annually from rental properties. This $25,000 annual limit on losses is reduced for individuals with incomes between $100,000 and $150,000 and eliminated for individuals with incomes over $150,000.

Passive Credit Exemption

Individuals, including limited partners, with modified adjusted gross incomes of less than $200,000 (and, subject to phase out, up to $250,000) investing in a rehabilitation credit project may use the tax credit to offset the tax owed on up to $25,000 of income. Thus, a taxpayer in the 33% tax bracket could use $8,250 of tax credits per year (33% x $25,000 = $8,250).

This $25,000 amount is first reduced by losses allowed under the general "passive loss" rule above for taxpayers with incomes less than $150,000.

Alternative Minimum Tax

For purposes of the rehabilitation tax credit, the alternative minimum tax does not apply to qualified rehabilitation expenditures "properly taken into account for periods after December 31, 2007."

However, for qualified rehabilitation expenditures taken into account for periods before January 1, 2008, taxpayers who are not required to pay tax under the regular tax system may still be liable for tax under the alternative minimum tax laws. Alternative minimum taxable income is computed from regular taxable income with certain adjustments and the addition of all appropriate tax preference items.

Nonrefundable credits, such as the rehabilitation tax credit, may not be used to reduce the alternative minimum tax. If a taxpayer cannot use the tax credit because of the alternative minimum tax, the credit can be carried back or forward.

Rehabilitations Involving Governments and Other Tax-Exempt Entities

Property used by governmental bodies, nonprofit organizations, or other tax-exempt entities is not eligible for the rehabilitation tax credit if the tax-exempt entity enters into a disqualified lease (as the lessee) for more than 50% of the property. A disqualified lease occurs when:

- Part or all of the property was financed directly or indirectly by an obligation in which the interest is tax-exempt under Internal Revenue Code Section 103(a) and such entity (or related entity) participated in such financing; or,
- Under the lease there is a fixed or determinable price for purchase or an option to buy which involves such entity (or related entity); or,
- The lease term is in excess of 20 years; or,
- The lease occurs after a sale or lease of the property and the lessee used the property before the sale or lease.

Other Tax Incentives for Historic Preservation

Other Federal and State tax incentives exist for historic preservation. They may be combined with the rehabilitation tax credit.

Charitable Contributions for Historic Preservation Purposes

Internal Revenue Code Section 170(h) and Department of the Treasury Regulation Section 1.170A-14 provide for income and estate tax deductions for charitable contributions of partial interests in historic property (principally easements). Generally, the IRS considers that a donation of a qualified real property interest to preserve a *historically important land area* or a

certified historic structure meets the test of a charitable contribution for conservation purposes. For purposes of the charitable contribution provisions only, a *certified historic structure* need not be depreciable to qualify, and may include the land area on which it is located.

A facade easement on a building in a registered historic district must preserve the entire exterior of the building (including its front, sides, rear, and height) and must prohibit any change to the exterior of the building that is inconsistent with its historic character. The easement donor must enter into a written agreement with the organization receiving the easement contribution, and must provide additional substantiation requirements. If the deduction claimed is over $10,000, the taxpayer must pay a $500 filing fee. For additional information, see IRS publication 526.

State Tax Incentives

A number of States offer tax incentives for historic preservation. They include tax credits for rehabilitation, tax deductions for easement donations, and property tax abatements or moratoriums. The SHPO will have information on current State programs. Requirements for State incentives may differ from those outlined here.

Tax Credit for Low-Income Housing

The Tax Reform Act of 1986 (IRC Section 42) also established a tax credit for the acquisition and rehabilitation, or new construction of low-income housing. The credit is approximately 9% per year for 10 years for projects not receiving certain Federal subsidies and approximately 4% for 10 years for projects subsidized by tax-exempt bonds or below market Federal loans. The units must be rent restricted and occupied by individuals with incomes below the area median gross income. The law sets a 15-year compliance period. Credits are allocated by State housing credit agencies. The tax credit for low-income housing can be combined with the tax credit for the rehabilitation of certified historic structures.

The Secretary of the Interior's Standards for Evaluating Significance Within Registered Historic Districts

The following Standards govern whether buildings within a historic district contribute to the significance of the district. Owners of buildings that meet these Standards may apply for the 20% rehabilitation tax credit. Buildings within historic districts that meet these Standards *cannot* qualify for the 10% credit.

1. A building contributing to the historic significance of a district is one which by location, design, setting, materials, workmanship, feeling and association adds to the district's sense of time and place and historical development.

2. A building not contributing to the historic significance of a district is one which does not add to the district's sense of time and place and historical development; or one where the location, design, setting, materials, workmanship, feeling and association have been so altered or have so deteriorated that the overall integrity of the building has been irretrievably lost.

3. Ordinarily buildings that have been built within the past 50 years shall not be considered to contribute to the significance of a district unless a strong justification concerning their historical or architectural merit is given or the historical attributes of the district are considered to be less than 50 years old.

The Secretary of the Interior's Standards for Rehabilitation

Rehabilitation projects must meet the following Standards, as interpreted by the National Park Service, to qualify as "certified rehabilitations" eligible for the 20% rehabilitation tax credit. The Standards are applied to projects in a reasonable manner, taking into consideration economic and technical feasibility.

The Standards (36 CFR Part 67) apply to historic buildings of all periods, styles, types, materials, and sizes. They apply to both the exterior and the interior of historic buildings. The Standards also encompass related landscape features and the building's site and environment as well as attached, adjacent, or related new construction.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.



Van Allen and Son Department Store, Clinton, Iowa (1913-1915). Courtesy Community Housing Initiatives, Inc.

For More Information

For more information on tax incentives for historic preservation, contact the NPS, the IRS, or one of the SHPOs listed below. Available information includes:

- NPS publications on appropriate methods to preserve historic buildings. These include *Guidelines for Rehabilitating Historic Buildings*, *Preservation Briefs*, and many others.
- The Historic Preservation Certification Application (a 3-part form: Part 1—Evaluation of Significance; Part 2—Description of Rehabilitation; Part 3—Request for Certification of Completed Work).
- Department of the Interior, National Park Service, regulations on "Historic Preservation Certifications." [36 CFR Part 67].
- Department of the Treasury, Internal Revenue Service, regulations on "Investment Tax Credit for Qualified Rehabilitation Expenditures." [Treasury Regulation Section 1.48-12].
- *Market Segment Specialization Program: Rehabilitation Tax Credit* (available only from the IRS).

National Park Service

Preservation Tax Incentives
Technical Preservation Services
National Park Service
1849 C Street, NW
Washington, DC 20240

tel: 202-513-7270
email: nps_tps@nps.gov
main web: www.nps.gov/tps
tax web: www.nps.gov/tps/tax-incentives.htm

Internal Revenue Service

web: www.nps.gov/tps/tax-incentives/before-apply/irs.htm

Additional IRS website: http://www.irs.gov/Businesses/Small-Businesses-&-Self-Employed/Rehabilitation-Tax-Credit---Real-Estate-Tax-Tips

State Historic Preservation Offices

Contact information for the State Historic Preservation Offices can be found at: **www.ncshpo.org**

PLEASE NOTE

The Historic Preservation Tax Incentives brochure has not been revised to reflect any changes that may be necessary related to Public Law No: 115-97 (December 22, 2017).

Public Law No: 115-97 amends the Internal Revenue Code to reduce tax rates and modify policies, credits, and deductions for individuals and businesses. Section 13402 modifies the 20% Historic Rehabilitation Tax Credit and provides certain transition rules. These and other changes to the Internal Revenue Code may affect a taxpayer's ability to use the 20% tax credit. The law also repeals the10% credit for rehabilitating non-historic buildings. The text of Public Law No: 115-97 is available at www.congress.gov.

Applicants requesting historic preservation certifications by the National Park Service, as well as others interested in the use of these tax credits, are strongly advised to consult an accountant, tax attorney, or other professional tax adviser, legal counsel, or the Internal Revenue Service regarding the changes to the Internal Revenue Code related to Public Law No: 115-97.

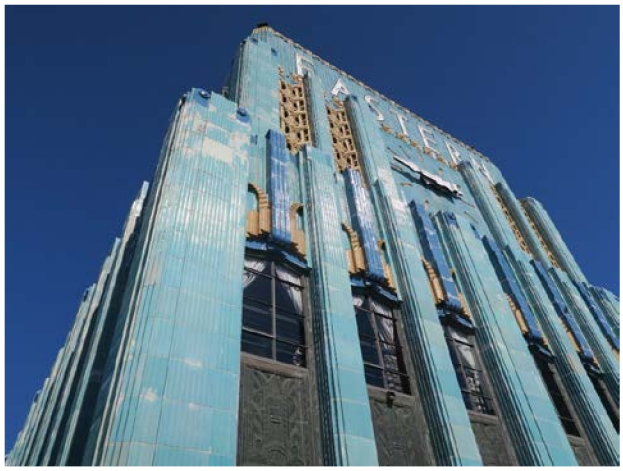
Channel Law Group, LLP

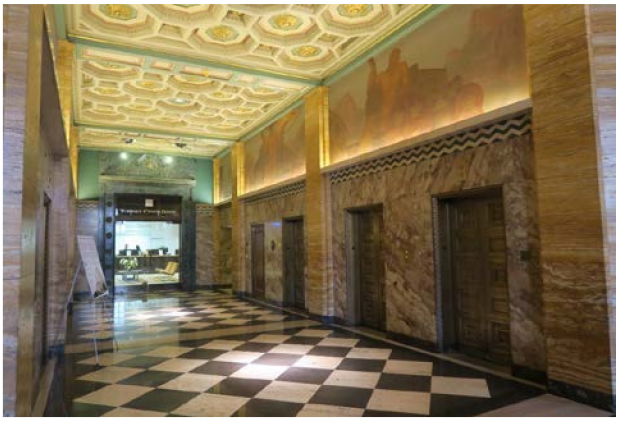
February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 8

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 16



City of Los Angeles Mills Act Program Assessment and Equity Analysis

Prepared for:

City of Los Angeles, Department of City Planning | Office of Historic Resources

Prepared by:

Chattel, Inc. | Historic Preservation Consultants

with

AECOM Technical Services, Inc.

June 2022

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Executive Summary

The City of Los Angeles has the largest Mills Act Historical Property Contract program in California, and it is the most significant financial incentive for historic preservation citywide. November 2021 marked the 25th anniversary of Los Angeles's Mills Act program.

Enabled by state legislation in 1972, the Mills Act offers a unique tool for historic preservation through a revolving 10-year contract between the City and the property owner. Contracts are automatically renewed each year and are transferred to new owners when the property is sold. The program's strength is that it incentivizes – through a property tax abatement – significant investment in historic preservation to retain and protect historic resources. In California, 90 municipalities have adopted the Mills Act.

The City of Los Angeles's Mills Act program was established in 1996 with the retention and preservation of affordable, multi-family housing being a key founding goal. The first year of contracts were recorded in 1997. To qualify, a property must be designated as a Los Angeles Historic-Cultural Monument (HCM) or a contributor to an Historic Preservation Overlay Zone (HPOZ). Each contract specifies rehabilitation and restoration work to be undertaken on a property. As of 2022, Los Angeles has 948 contracts enrolled in the program including single-family, multifamily, commercial, industrial, and recreational properties.

The annual property tax savings for all Mills Act property owners in Los Angeles is over $20,000,000, representing a significant investment in historic preservation by the City, County, and State. These savings are reinvested into the local economy through the hiring of tradespeople, contractors, and preservation professionals to rehabilitate, restore, and maintain the properties in the program. The property tax savings realized by owners represents a small percentage of the City's portion of general levy property taxes collected by the County. The City Council has expressed its intent to limit the City's share of unrealized property tax revenue to $2 million annually; the program has currently exceeded this amount by 10 percent. With property values changing from year to year, especially at time of sale, it is difficult to forecast future unrealized property tax revenue. In addition to the property tax relief provided by the Mills Act program, property owners receive support from the City's Office of Historic Resources, which reviews projects for conformance with the Secretary of the Interior's Standards for Rehabilitation. In this way, the program creates a partnership between the City and property owners, with active input and assistance provided to owners as they restore, rehabilitate, and maintain their properties.

In 2020, Los Angeles City Planning undertook a comprehensive assessment to evaluate the program. LA City Planning contracted with historic preservation consultant Chattel, Inc. and subconsultant economist and planners AECOM to conduct the assessment. The assessment analyzes staffing requirements, revenue streams to support the program, and the allocation of property tax savings among existing contracts to inform a more equitable distribution of program participation across the City. The study identifies operational strengths and challenges, as well as opportunities and goals for the program.

Due to its success over the years, the total number of contracts has expanded beyond the capacity of City staff to properly administer the program. State law has also evolved to require more rigor in program management by municipalities. Furthermore, since the Mills Act program's inception, housing affordability, production of housing, and equity considerations have further increased in importance for the City. The assessment therefore organizes its analysis and recommendations into two primary sections, addressing program sustainability and program equity.

Program Sustainability

The assessment found that existing funding for the program is insufficient to effectively manage the number of contracts and bring the program into complete compliance with state law. As the number of Mills Act contracts continues to grow, there is not enough staff time devoted to fee collection, inspections, and contract

compliance. State law requires that compliance inspections be conducted for each contract every five years; to date, the City has completed approximately 25 percent of inspections required annually.

Program sustainability should be an immediate goal for the City. The program has the potential to generate adequate revenue to support additional staffing through the collection of existing and new fees. The City has an adopted fee for contract maintenance costs that is not currently being collected due to the lack of staffing. A direct assessment can be established with the County Assessor to collect the fee. However, additional staffing is required to implement this process and track the fees.

Existing staffing consists of two staff members who dedicate less than half of their time on the Mills Act program due to other responsibilities, as well as contract staff who perform inspections. Currently, the two staff members balance priorities for the review and processing of new applications; responding day-to-day to contract holders, prospective applicants, general public inquiries; coordinating with contract staff to conduct an annual workshop for applicants; reviewing and processing of projects on Mills Act properties; responding to contract holders on compliance issues; and managing contract staff. This study found that to effectively manage the program at least three full-time staff positions are required, including an administrative staff dedicated to financial management. Other additional staff would handle day-to-day contract management and compliance, outreach, and coordination with contract staff to carry out periodic inspections. Contract staff would continue to be engaged to implement inspections necessary to comply with state law. To ensure compliance with state law, the City should be inspecting a minimum of 200 properties annually based on the existing number of contracts, which will increase as the program expands.

Additionally, costs for processing contract noncompliance and cancellation are currently not recovered and should be included in the City's adopted fee schedule. Recent inspections have determined that approximately 20 percent of properties in the program are not in compliance. Increased staffing and financial resources are needed to address non-compliant properties.

To improve program management, recommendations include creating a comprehensive database system to organize contracts, track compliance, track fee collection, and correspondence; and maintaining close coordination with the County Assessor, City Attorney, and other departments.

Recommendations to address program capacity include a review of the annual threshold on the City's share of unrealized property tax revenue and the manageable number of contracts in the program based on dedicated resources. The City may want to consider eliminating the annual threshold, and instead limit the number of new contracts annually and the contract duration.

The study also looks at strategies to expand participation in the program. While the City has implemented more zoning provisions intended to preserve historic neighborhoods, those regulations do not include eligibility for preservation incentives such as the Mills Act. The report recommends expanding the program eligibility requirements to include National and California Register-listed properties, and eligible historic resources within adopted plans and ordinances that require historic preservation review such as Community Plan Implementation Overlays (CPIOs) and Community Design Overlays (CDOs).

Over the past 10 years, property values have substantially increased in Los Angeles. To address the increase, the report recommends increasing the valuation limits for single-family properties from $1.5 million to $2.5 million, and multi-family properties from $3 million to $10 million. There is also a recommendation to more broadly utilize the Adaptive Reuse Ordinance to incentivize use of the Mills Act for those projects.

Program Equity

A goal of the assessment was to better understand which communities have benefitted the most – and the least – from the Mills Act, in terms of participation and allocation of property tax savings. The City Controller's

Los Angeles Equity Index was used as a framework to analyze the distribution of existing Mills Act contracts in communities facing varying barriers to opportunity, ranging from "low barriers to opportunity" to "high barriers to opportunity." An analysis was also conducted of the distribution of Mills Act financial benefits among existing contracts. Based on the outcome of both analyses, the report provides recommendations for enhancing program access to ensure an equitable distribution of Mills Act benefits across the City.

The largest number of existing Mills Act contracts are for single-family properties located in communities facing low barriers to opportunity. Though this property type represents 71 percent of the program (659 properties), only 25 percent of Mills Act savings went to single-family properties. The remaining 75 percent of program savings went to multi-family and commercial properties located in communities facing both low and high barriers to opportunity.

Multi-family residential properties, excluding condominium buildings, represent 20 percent of the program (185 properties), accounting for 25 percent of Mills Act savings. Commercial properties represent 5 percent of the program (47 properties), accounting for 17 percent of Mills Act savings. Recreational and industrial properties make up the remaining 1 percent of the program (13 properties).

Condominium properties represent only 3 percent of the program (26 properties), but 33 percent of Mills Act savings went to this property type. 90 percent of total savings for condominiums occurred in areas facing low barriers to opportunity.

The analysis shows that existing Mills Act contracts are disproportionately benefitting property owners in communities with lower barriers to opportunity. Eighty-three percent of Mills Act savings went to properties located in communities facing lower barriers to opportunity, whereas 17 percent of savings went to properties located in communities with medium to high barriers to opportunity. In addition, 50 percent of Mills Act savings went to Mills Act properties located in Downtown, which has the highest concentration of Adaptive Reuse Ordinance (ARO) multi-family rental, condominium, and commercial properties, such as hotels. Of the top 10 Mills Act contracts with the largest amount of savings, eight properties were ARO projects, including six condominium properties and two commercial properties. The remaining two properties that were not ARO projects included a condominium and a multi-family residential rental property.

Since the program's inception, the retention and preservation of affordable, multi-family housing has been a key founding goal, and there are a high number of properties potentially eligible for the Mills Act located in communities facing high barriers to opportunity. To better reintegrate this concept into the program and achieve a more equitable distribution of program benefits, the report outlines an approach that prioritizes new Mills Act applications from multi-family properties and ARO projects that include affordable or rent-stabilized housing in communities facing higher barriers to opportunity. The assessment further suggests that safeguards against displacement and a policy of no net loss of affordable, multi-family rental housing need to be incorporated into the program. Through a concerted effort to prioritize expanding opportunity and access, the program may achieve more equitable outcomes in historic preservation and housing.

Consistent with equity approaches used across multiple disciplines and fields, the report develops a series of equity-based recommendations using procedural, distributional, and structural equity objectives. These recommendations include: strategic outreach targeting high priority areas to educate prospective applicants about the Mills Act program; prioritizing at least half of new applications to meet high priority criteria; and ensuring that displacement does not happen as a result of program participation.

Future Direction

The 25th anniversary of Los Angeles's Mills Act program offers an opportunity to reflect on the current status of the program and to define future goals. During the program's first quarter century, many local leaders and community members have worked hard to build a strong program, which has become the most robust in California. The goal of this assessment is to provide direction for the City as it seeks to establish a more sustainable and accessible program.

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Introduction

In advance of the 25th anniversary of the Mills Act program in Los Angeles, Los Angeles City Planning commissioned an assessment to evaluate its Mills Act Historical Property Contract program in consideration of program sustainability and equity. To address these issues and provide for long term sustainability of the program, the City may implement the policy recommendations included in this report.

Enabled by state legislation in 1972, the City of Los Angeles's Mills Act program was established in 1996 with the retention and preservation of affordable, multi-family housing as a key founding goal. The Mills Act program represents the most significant financial incentive for historic preservation in Los Angeles. By incentivizing private investment in historic preservation, the Mills Act encourages the long-term preservation of properties embodying the City's architectural, social, and cultural heritage. For owners of qualifying properties, the program offers a potential, significant reduction in property taxes that are then re-invested in historic properties and the economy.

The Mills Act in Los Angeles

Managed by Los Angeles City Planning's Office of Historic Resources (OHR), the Mills Act is implemented through a 10-year contract that automatically renews annually and transfers with the sale of a property. By entering into the contract with the City, program participants may realize a significant reduction in property taxes intended to offset costs for the rehabilitation, restoration, and maintenance of their properties. Each contract specifies rehabilitation and restoration work to be undertaken on a property. To be eligible to apply for the program, a property must be designated as a Los Angeles Historic-Cultural Monument (HCM) or Historic Preservation Overlay Zone (HPOZ) contributor and meet a minimum of three out of five Priority Consideration Criteria: Necessity, Uniqueness, Investment, Affordability, and Employment. The program also limits pre-contract assessed property values at $1.5 million for single-family residential properties and $3 million for multi-family residential, commercial, and industrial properties. An exemption to these limits requires approval from the Cultural Heritage Commission. However, the valuation limits do not apply to properties located in Greater Downtown Los Angeles and the Figueroa Corridor Economic Strategy areas and the Hollywood Boulevard Commercial and Entertainment National Register Historic District.

Applications for the Mills Act program are accepted on an annual basis and undergo a rigorous review process. Staff determinations of ineligibility are appealable to the Cultural Heritage Commission. Successful applications result in approval of a contract by the City Council that is recorded on title with the Los Angeles County Registrar-Recorder/County Clerk. The first year of contracts were recorded in 1997. As of 2022, Los Angeles has 948 contracts enrolled in the program consisting of single-family residential, multifamily residential, commercial, industrial, and recreational properties, including 2,568 separate condominium units.

Work performed on properties with Mills Act contracts is subject to review by the OHR for conformance with the Secretary of the Interior's Standards for Rehabilitation. Under state law, municipalities are required to perform periodic compliance inspections of properties with Mills Act contracts at least every five years.

Mills Act Program History	
1994	City Council introduced a motion to create Mills Act Historical Property Contract program
1996	City Council adopted an ordinance codified in Los Angeles Administrative Code Division 19, Chapter 14. The Program is managed by the Department of Cultural Affairs and the Cultural Heritage Commission. The Mills Act ordinance included the following: ▪ Qualifying applications must meet a minimum of three out of five Priority Consideration Criteria for Necessity, Uniqueness, Investment, Affordability, and Employment; ▪ A property valuation limit of $500,000 for single-family properties, and $1,500,000 for multi-family residential, commercial, or industrial properties, unless an exemption is granted by the Cultural Heritage Commission; ▪ Two areas exempt from the property valuation thresholds: Hollywood Boulevard Commercial and Entertainment National Register Historic District, and Greater Downtown Los Angeles (consisting of the Central City Community Plan Area) and the Figueroa Corridor Economic Strategy Area; and ▪ An annual not-to-exceed threshold of $500,000 in unrealized City property tax revenue.
1997	First year of contracts recorded in the Mills Act program.
1999	City Council amended the Mills Act ordinance, increasing the annual property tax revenue loss cap to $1,000,000. Other recommendations not adopted included: ▪ Exempting Adaptive Reuse Ordinance projects from the calculation of unrealized annual property tax revenue loss, and ▪ Expanding the eligibility to encompass National Register- and California Register-listed properties.
2004	Management of the program moved to the Department of City Planning from the Department of Cultural Affairs
2008	City Council amended the Mills Act ordinance, to increase the property valuation threshold to $1,500,000 for single-family properties and to $3,000,000 for multi-family, commercial and industrial properties.
2011	California legislature passed Assembly Bill 654 that amended the state-enabling Mills Act legislation to include: ▪ Required property inspections before contract approval and every five years thereafter; ▪ Elimination of the requirement for property owners to notify the State Office of Historic Preservation that a new contract was recorded; ▪ Allowance of local governments with Mills Act programs to collect fees that shall not exceed the reasonable cost of providing contract administration services; and ▪ Clarification on the process for contract cancellation.
2012	City Council amended the Mills Act ordinance, increasing the City's annual property tax revenue loss cap to $2,000,000.
2014	The City's Mills Act contract was updated to enable collection of contract administration fees.
2019	The Priority Consideration Criterion for affordability was expanded to require mixed-use and multi-family properties with more than 20 units covenant affordable dwelling units for low- and moderate-income households per current U.S. Department of Housing and Urban Development criteria for affordable housing.

In 2019, the annual property tax savings for all Mills Act property owners in Los Angeles was over $20,000,000. The property tax savings realized by owners represents a small percentage of the City's portion of general levy property taxes collected by the County of Los Angeles, which was approximately $1.6 billion in 2019. The City Council has expressed their intent to limit the City's share of unrealized property tax revenue to $2 million annually; the program has currently exceeded this amount by 10 percent. Considering the economic benefits of the program for historic preservation, the City's revenue loss under the Mills Act program is minimal in relation to the investment in historic properties.

While the success of Los Angeles's Mills Act program has allowed it to grow exponentially, it has also exceeded the capacity of staffing resources to manage it effectively. State-mandated periodic inspections of properties, as well as review and approval of new applications, fee collection, management of existing contracts, and handling communication with contract holders and the general public, all create considerable demands on staff time – an issue commonly found across municipalities with Mills Act programs in California.

To assess the Mills Act program, the City contracted with historic preservation consultant Chattel, Inc. and subconsultant economist and planners AECOM to perform the following tasks:

1. Assess the sustainability of the program, given the number of existing contracts and new applications/contracts received each year as well as the allocation of staff and contract staff resources;
2. Review the allocation of tax dollars to the program and determine which communities benefit the most and least to enhance program access and equity;
3. Prepare recommendations related to potential program changes including staffing, contract duration and renewals, ordinance amendments, and policy/implementation revisions; and
4. Develop a methodology for collecting contract maintenance fees and other recommendations for streamlining fee collection.

Assessment Methodology

The intention of the assessment was to develop program goals, strategies, and recommendations that are data-driven and evidence-based, and are the result of comprehensive literature review, data collection and analysis, close coordination with OHR staff, and outreach, interviews, and data gathering from other cities with Mills Act programs throughout California.

As part of the research phase, sources of data that track Mills Act properties were identified, including OHR program tracking spreadsheets, Los Angeles City Planning (LACP) case information from the Planning Case Tracking System (PCTS), and parcel data from the Zoning Information and Map Access System (ZIMAS). The City's General Plan including the Framework, Housing, and Conservation Elements was also reviewed. Mills Act property tax assessments for 2019 were obtained from the Los Angeles County Assessor's office. Other data sources consulted included:

- City of Los Angeles Mills Act contracts, 1997 to present
- City of Los Angeles Mills Act inspection and enforcement reports
- LACP fee studies from 2016 and 2018, as well as corresponding fee schedules and reports
- City of Los Angeles budgets for fiscal years 2019-2020 and 2020-2021
- Mills Act contract cancellation proceedings for the City of Redondo Beach and the City of Palo Alto
- Mills Act ordinances from San Diego, Long Beach, Pasadena, Orange, Oakland, West Hollywood, and Monterey County

Furthermore, consultants interviewed and contacted a wide range of stakeholders including:

- State Office of Historic Preservation Mills Act/Certified Local Governments Coordinator
- OHR managers, including LACP principal and senior planners, and Mills Act program managers
- LACP Administrative staff
- Los Angeles County Assessor's Office staff
- Local preservation advocacy groups, such as the Los Angeles Conservancy and Hollywood Heritage
- Three property owners with Mills Act contracts, including one property management company, and two for-profit developers
- One for-profit developer without a Mills Act contract, and two non-profit developers without Mills Act contracts

Consultants also sent a questionnaire to all California municipalities with Mills Act programs. Among the 78 questionnaires distributed to cities, a total of 30 were completed and returned to the consultant team.

In addition, consultants conducted a review of the City's stated goals for equity and inclusion. In order to assess the current levels of equity and access for the Mills Act program, the consultant team evaluated whether the program participation and savings distribution in 2019 reflect the City's stated goals for equity and inclusion in the context of housing goals. This analysis also considered how the Mills Act program benefits owners as well as tenants of multi-family properties.

The equity analysis included developing focus areas where there are existing and eligible Mills Act properties that fall within the geographies of communities facing varying barriers to opportunity and access to resources. This study informed recommendations on prioritizing where future Mills Act applications should be focused to expand equity in the program.

For purposes of this study, "communities" have been defined in terms of geography, such as Community Plan Area (CPA), Council District (CD), and Historic Preservation Overlay Zone (HPOZ). Communities can also be defined by those with "more barriers" and "fewer barriers" to opportunity and resources. Higher opportunity areas have a dense concentration of place-based characteristics linked to critical life outcomes, such as educational attainment, earnings from employment, health and life expectancy, and economic mobility. This metric allowed the consultant team to identify which communities benefit the most and least from the City's Mills Act program.

In addition, the Los Angeles Equity Index and census tracts were used for the purposes of understanding spatial relationships between equity-based indicators and the use of the Mills Act. The Los Angeles Equity Index was developed by the City Controller to characterize and address disparities and barriers to opportunity.

Project Limitations

While research and outreach conducted for this study was comprehensive, several data limitations were encountered in the course of research, generally due to budget and time constraints. The following data sources are not presently reflected in this study:

- Racial equity analysis using current Census Tract data. Socioeconomic and demographic data on race and income levels of existing Mills Act property owners is not and has not been collected since the inception of the program. Therefore, geography and equity-based groups are used as a proxy for demographic data.
- Review of gentrification and displacement data; analysis of data to understand local dynamics of neighborhood change.
- Program-wide interviews or surveys of existing Mills Act property owners and the public at-large.

- Inclusion of properties identified as potentially eligible for designation through SurveyLA in the equity analysis.
- Historical data on Mills Act contract savings, demographic trends, and neighborhood trends.
- Assessor data on last owner change to study the length of ownership.

Program Sustainability

Based on the analysis conducted for this study, the key starting point for building a more sustainable Mills Act program in Los Angeles is establishing a comprehensive system for collecting and tracking fees. Under state law, cities can set and collect contract maintenance fees to recover staffing and administrative costs. By creating a closer nexus with this state-level guidance, the City's program could become more economically sustainable.

The City's share of unrealized tax revenues due to the Mills Act program is relatively small when compared to the corresponding investment in historic preservation. Nonetheless, the current total of over $2 million of the City's share of unrealized property tax revenue is substantial enough to warrant consideration of feasible steps to collect fees, better staff and support the program, and to facilitate and enforce contract compliance.

Currently, the City does not have a system in place for collecting contract maintenance fees once a contract is recorded. In 2014, the Mills Act contract was updated to enable collection of this fee. Contracts recorded prior to 2014 do not have maintenance fee-enabling provisions. The program also lacks a comprehensive fiscal data management system to track fee collection.

New contract application processing fees are the only program fees currently collected that offset the City's costs of administering those services. Funding for the remainder of the program's services, including periodic inspections, is supported by the City's General Fund. Currently, fees do not exist for other program services, such as enforcement.

Los Angeles's Mills Act program is based on a rigorous approach that requires property owners to propose preservation-related scopes of work that justify a public subsidy through a potential reduction in property taxes and staff-level review of projects on both the interior and exterior. However, the City's approach is labor intensive for staff to provide consistent review of new applications and the existing 948 Mills Act contracts. The thoroughness of review that the City applies is to avoid the appearance of the unrealized property tax revenue as a gift of public funds to property owners. Existing staffing consists of two staff members who dedicate less than half of their time to the Mills Act program due to other responsibilities, as well as contract staff who perform inspections.

State law mandates municipalities to conduct periodic inspections of the interior and exterior of all properties with Mills Act contracts prior to a new contract being awarded and every five years thereafter to ensure compliance. The program does not currently have a comprehensive tracking system for compliance and does not have sufficient dedicated resources to meet the state legislation requirements.

Due to the success of the program, the number of contracts has exceeded the capacity for City staff to manage them effectively. The number of contracts has grown exponentially over the past two decades with no increase in staffing or resources. At the same time, the City has expanded the use of zoning tools to promote historic preservation without providing increased financial incentives for those areas.

There are also challenges to managing the program effectively, that include the collection, management, and tracking of data, as well as maintaining regular communication with contract holders.

Throughout California, administration of Mills Act programs generally requires more resources than municipalities can typically provide. Statewide concerns for Mills Act program sustainability include such issues as municipal revenue loss, fee collection, staff training, coordination between municipal departments on program oversight, public awareness, as well as a lack of geographic and demographic diversity among program participants.

The goals, strategies, and recommendations to build a more sustainable Mills Act program in Los Angeles are outlined below.

Goals	Recommended Strategies
GOAL 1: Improve Fiscal Sustainability	▪ Establish system for fee collection and tracking ▪ Expand program fees
GOAL 2: Facilitate Compliance with State Law and Mills Act Ordinance	▪ Expand enforcement policies ▪ Facilitate contract compliance
GOAL 3: Expand Program Staffing	▪ Provide additional staffing to effectively manage the program
GOAL 4: Refine Program Capacity	▪ Establish a sustainable, manageable number of contracts ▪ Address program's fiscal capacity ▪ Expand program eligibility
GOAL 5: Address Program Management	▪ Effectively manage data and expand communication

GOAL 1: IMPROVE FISCAL SUSTAINABILITY

The following two strategies outline a program-wide approach for collecting and tracking contract maintenance fees and additional fees to support the program's fiscal sustainability. This approach—tailored to the scale and complexity of Los Angeles's Mills Act program—is designed to improve fee collection and facilitate transparency in reporting the cost of program services.

The City Council approved new Mills Act fees in 2017, inclusive of contract processing and maintenance fees, which were updated in 2021. However, contract maintenance fees have not been collected due to the lack of a comprehensive system in place to collect them. Currently, the General Fund subsidizes the costs of administering the program, including approximately 50 periodic inspections each year since 2015. For example, in FY 2019-20 and FY 2020-21, $70,000 of General Fund allocations funded contract staff to perform periodic inspections of existing Mills Act contracts. Collecting contract maintenance fees can generate revenue to directly support inspections, administration and staffing of the Mills Act program, and establishing a dedicated Mills Act account would be an important tool for tracking program fees.

Strategy 1: Establish System for Fee Collection and Tracking

There is not a structure in place for collecting contract maintenance fees and the fiscal management system for the program is insufficient to track data on collected Mills Act fees. The current process is a decentralized system for fee tracking that involves multiple administrative staff coordinating with OHR staff to reconcile the total number of new applications for which fees were collected and manually tracked.

In 2012, the state legislature updated California Government Code Section 50281.1, as related to historical property contracts to allow cities with Mills Act programs to provide contract language to collect fees to support and administer their programs. As noted in this update, any legislative body approving a Mills Act contract

> …may require that the property owner, as a condition to enter into the contract, pay a fee that shall not exceed the reasonable cost of providing the service pursuant to this article for which the fee is charged.

Prior to these legislative changes in 2012, no clauses describing or allowing for fee collection were included in the contract language. In 2014, the City's contract language was updated to reflect the change in state law; however, pre-2014 contracts do not have language allowing for fee collection.

The City's financial policies call for a clear and accurate tracking of program revenues and transparency in reporting this information to the public. Given the program's scale, scope, and complexity, a comprehensive fiscal management system would facilitate ease of collection, management, tracking, and transparency.

Recommendation 1: Establish a direct assessment with the Los Angeles County Auditor-Controller to collect contract maintenance fees.

The City has the ability to establish a direct assessment with the Los Angeles County Auditor-Controller to collect contract maintenance fees on property tax bills on behalf of the City. Direct assessments would enable a consistent program-wide approach to fee collection. The current contract maintenance fee is $2,693 every five years. Translating this fee amount into five annual installments would result in an annual assessment of $538.60 on each property with a contract. However, the City should explore assessing condominium properties separately from other property types, based on the number of units on the property. Collecting the contract maintenance fees would support efforts of performing inspections which is an important aspect of the program that helps the City comply with state law. As a starting point, contract maintenance fees can be collected for post-2014 contracts.

Recommendation 2: Create a dedicated Mills Act account to ensure fee revenue is directly supporting the program.

To date, the City has mostly relied on the General Fund to cover costs of administering the program, and fees collected are deposited into a general case processing fund for the Department of City Planning. A separate account could be established to track revenue and fee collection and ensure that fees are directly supporting the Mills Act program. Options for creating a dedicated account might include:

- A special fund or an enterprise fund to enable separate accounting and financial reporting separate from all other Department of City Planning activities. An example is the Cannabis Regulation Special Revenue Trust Fund.
- Maintain two separate accounts in the case processing fund to collect, track, and manage contract processing fees for new applications; and an account to collect, track, manage fees for existing contracts.

Recommendation 3: Amend pre-2014 Mills Act contracts to enable fee collection under state law and current City ordinance.

Contracts executed between 1997 and 2013 do not include contract provisions for fee collection. In 2014, fee collection enabling language was added to the contracts. For consistency, it is recommended that enabling language establishing fee collection be added to pre-2014 Mills Act contracts, either through amendments or newly drafted contracts.

Based on the approved fee amount of $538.60 per property, per year and 948 properties under contract, the potential revenue stream would generate $510,593 annually. Of the surveyed municipalities utilizing periodic inspections and/or contract maintenance fees, two municipalities reported that they collect fees annually; one municipality collects annually and then every five years; one municipality collects every five years; and two municipalities collect during corresponding inspection years.

Strategy 2: Expand Program Fees

Because historic preservation is a broadly shared public benefit, fees for Mills Act applications and general historic preservation-related programs are not typically set at a level to achieve 100% cost recovery: some level of subsidy is maintained to achieve desired outcomes for the City as well as property owners.

The newest City development fee schedule adopted by the City Council in 2021 set fee levels for Mills Act services at either 75%, 85%, or 100% of full cost recovery. The fee schedule recommends Mills Act Valuation Exemptions, Mills Act Appeals to the Commission, and Contract maintenance fees at 100% cost recovery.

2021 Fee Schedule

Service	Fee	Fee Cost Recovery %
Contract Processing Fees – Currently Collected		
Application Fee	**$678**	85%
Contract Execution Fee	**$2,845**	75%
Valuation Exemption Fee	**$3,091**	100%
Appeal of Staff Determination to the Cultural Heritage Commission	**$2,387**	100%
Contract Maintenance Fees – To Be Collected		
Mills Act Inspection (once every 5 years)	**$2,693**	100%

LACP fees for historic preservation are comparatively lower than those of other municipalities, including the City of San Jose and City and County San Francisco. Of the surveyed municipalities, 10 municipalities reported having no cost recovery, seven municipalities reported partial cost recovery, and four municipalities reported full cost recovery. Two of three municipalities with the largest programs surveyed reported having partial cost recovery. The four municipalities that reported full cost recovery have comparably smaller programs. Of the surveyed municipalities, one municipality collects an enforcement fee, and one municipality includes a project review deposit as part of its fees.

The cost of administering the program could be covered through the collection of fees. The table below provides an estimate of the potential annual revenue for the program, including an additional fee for contract non-compliance. Currently, the City collects only the Contract Processing Fees listed in the table below.

Estimated Annual Mills Act Program Revenue

Service	2021 Fee	Assumptions	Estimated Revenue
Contract Processing Fees			
Application Processing Fee	$678	65 applications	$44,070
Contract Execution Fee	$2,845	30 contracts	$71,125
Valuation Exemption Fee	$3,091	5 applications	$15,455
Appeal of Staff Determination to Cultural Heritage Commission	$2,387	5 appeals	$11,935
Subtotal			*$142,585*
Contract Maintenance Fees			
Contract maintenance fee	$538 annually	948 contracts	$510,024
Total Estimated Mills Act Revenue			***$652,609***
Additional Potential Contract Enforcement Fees			
Non-Compliance fee	$4,500	10 properties	$45,000
Cancellation fee– based on the City's share of the 12.5% of current fair market value penalty	$74,402	1 property	$74,402

Recommendation 4: Develop additional fee to recover administrative costs for contract noncompliance.

Overseeing enforcement of the contracts for non-compliant properties utilizes staff resources that are not currently accounted for in any of the adopted fees. Under the Mills Act ordinance, the City can pursue cancellation of a contract for noncompliant properties. While the cancellation of a contract incurs a penalty fee, the funds are intended to reimburse the governmental agencies that lost property tax revenue under the contract.

Recovering costs associated with oversight of non-compliant properties and in many cases code enforcement follow-up is a similar issue among municipalities surveyed with the largest Mills Act programs. The following municipalities collect or will collect fees to recover costs of staff time devoted to enforcement or compliance processing:

- City of San Diego: $756 for enforcement of Mills Act agreement when remedies for violations are sought and as part of an enforcement action
- City of Long Beach: $1,000 noncompliance fee assessment only on properties that remain in noncompliance after requests to bring into compliance at partial cost recovery

The City may want to consider expanding the contract maintenance fee to include the periodic inspection fee and a compliance processing fee. However, this means that compliant properties would be burdened with funding the effort to bring noncompliant properties into compliance. A deposit system to collect fees for non-compliant properties was also explored. A deposit system would allow the City to collect a fee and charge against it for the staff time used to enforce the contract. Of the surveyed municipalities, nine municipalities use a fee system, two municipalities use a deposit system, four municipalities use both a fee and deposit system, and nine municipalities have no fee system in place.

The report recommends following the City of Long Beach model to develop a noncompliance fee to cover staff time necessary to enforce compliance.

Recommendation 5: Refine existing fee schedule to address variable costs associated with the periodic inspections of different property types.

Estimates of costs associated with conducting Mills Act periodic inspections do not accurately capture full costs of service or time spent conducting inspections, which are currently completed by contract staff. It was noted in the contract staff questionnaire that "budgets allotted by the City per property tend to fall short of the cost to consultants" to perform inspections and associated work. Contract staff that perform inspections described the need to exceed allocated budgets as a necessary tradeoff to producing high quality work for the City, and that if contractors strictly kept to the per-inspection allowance, quality diminishes.

Explore adopting a two-tier fee structure for inspections to account for more complex properties and address different property types:

- Single-family residential and multi-family residential properties with four units or less
- Multi-family residential properties with five or more units, and other property types

GOAL 2: FACILITATE COMPLIANCE WITH STATE LAW AND MILLS ACT ORDINANCE

Under state law, California Government Code Sec. 50280 through 50290, the City is required to determine owner compliance with the Mills Act contract. The following subsections outline recommendations for updates to City policies on enforcement, conducting regular periodic inspections, establishing Mills Act compliance and noncompliance protocols and procedures, and Mills Act cancellation protocols and procedures for compliance with state law.

- Due to limited funding and staffing, over the last five years, the City has completed 249 periodic inspections of 948 contracts, equating to 26% of the program. Compliance with state law to inspect each property every five years requires 189 inspections conducted annually. However, as the total number of contracts increases annually, the required number of inspections increases, as well.
- Of the 249 properties inspected, 51% were found compliant, and 49% were found to be in some degree of noncompliance. Of the partial or noncompliant properties, 13 properties remain habitually noncompliant, including 8 non-responsive owners.
- Some self-reporting is used to determine owner compliance with Mills Act contracts
- The Mills Act ordinance addresses only cancellation of a contract and does not address noncompliance. There is an opportunity to strengthen compliance-related provisions and cross-reference those with City enforcement provisions under the Los Angeles Building Code and housing code.

With 948 existing contracts and new contracts approved each year, meeting these requirements is onerous for the City, and necessitates additional fiscal and staffing support. In addition, habitual noncompliance should be vigorously pursued with the goal of contract cancellation. The cancellation fee provided in the Mills Act ordinance provides, "the cancellation fee shall be paid to the County Auditor and shall be allocated…to each jurisdiction in the tax rate area in which the property is located." The City would receive its pro-rata share of the cancellation fee upon contract cancellation.

Strategy 1: Expand Enforcement Policies

The Mills Act ordinance describes required provisions for Mills Act contract cancellation:

> The contract shall state that the City may cancel the contract if it determines that the owner has breached any of the conditions of the contract or has allowed the property to deteriorate to the point that it no longer meets the standards for a HCM or HPOZ Contributing Structure, and that the City may also cancel the contract if the City determines that the owner has failed to restore or rehabilitate the property in the manner specified in the contract.

The Mills Act ordinance includes language regarding the owner's "commitment and obligation to preserve and, when necessary, restore and rehabilitate the property to conform to the rules and regulations of the Office of Historic Preservation (OHP), the Secretary of the Interior's Standards for Rehabilitation, and the State Historical Building Code."The ordinance also includes requirements that owners shall pay "the state cancellation fee of twelve and one-half percent (12.5%) of the full value of the property" upon contract cancellation. However, the Mills Act ordinance only codifies cancellation and does not include provisions for remediation and bringing properties into compliance.

Recommendation 6: Amend the Mills Act ordinance to include additional contract compliance and enforcement provisions, and utilize the Los Angeles Municipal Code for contract enforcement.

There is an opportunity for the City to amend the Mills Act ordinance and contract to add language that addresses compliance and noncompliance through reference to building code enforcement code sections for historical buildings and structures identified in Los Angeles Municipal Code Sections 91.8101.2 and 91.8119.4 and Chapter XVI of the Los Angeles Housing Code. These regulations provide for enforcement of penalties for unpermitted work and the preservation of historical properties.

Adapting existing mechanisms, procedures, and protocols in place with the Los Angeles Department of Building and Safety and the Los Angeles Housing Department would facilitate the process of owner compliance with Mills Act contract obligations, and as necessary provide for increased enforcement.

Strategy 2: Facilitate Contract Compliance

Of 30 surveyed municipalities, one-third use self-reporting from property owners to conduct inspections, including the use of mail-out questionnaires. Half of the municipalities have staff conducting inspections, while two use contract staff to conduct inspections. Six municipalities reported they do not conduct inspections, including one municipality where contracts require inspections, but low staffing limits the ability to do inspections. Eight municipalities conduct inspections of the exterior from the public right-of-way only, seven municipalities inspect exterior only outside of the public right-of-way, and eight municipalities inspect both the exterior and interior of the property. One municipality performs a mix of all three inspection types, though interiors are only reviewed when interior elements were identified in the contract.

Of the two municipalities with the largest number of Mills Act contracts, one municipality inspects both the exterior and interior of the property and one municipality inspects the exterior only. Of 30 surveyed municipalities, one-third do not conduct periodic inspections with any regular frequency, or at all. Seven municipalities conduct periodic inspections every two years, and six municipalities conduct them annually. One municipality conducts inspections annually in the first 10 years of the contract and then every 5 years thereafter.

Of the surveyed municipalities, one municipality "always" found properties in partial compliance or noncompliance, five municipalities "somewhat often" found properties in partial compliance or noncompliance, ten municipalities marked "not very often," and three municipalities "never" found properties in partial compliance or noncompliance. Of the three surveyed municipalities with the largest programs, two municipalities found properties "somewhat often" in partial compliance or noncompliance, while one municipality saw partial compliance or noncompliance "not very often." Noted by 18 municipalities, the most common reason for partial or noncompliance is not following the rehabilitation plan. Five municipalities marked noncompliant code issues and inappropriate alterations as other reasons for partial or noncompliance.

Consultants found that neither self-reporting nor annual periodic inspections are necessary for effective program management. Rather, continuing to attempt quinquennial inspections of existing Mills Act contracts would be most efficient.

The process of conducting periodic inspections includes the enforcement of contract compliance. Recent inspections for Los Angeles contracts have included contract years 2008, 2009, 2010 and 2011. These years were chosen to cover properties that were at or near the initial 10-year point in the contract. Of the 249 properties inspected, about half were found compliant, and about half were initially found to be in some degree noncompliant with their contracts. This includes 127 properties (51% of 249) found compliant, 82 properties (33% of 249) found partially compliant, and 40 properties (16% of 249) found noncompliant. Of these 40 properties, 27 were ultimately brought into compliance and 13 remain noncompliant.

Recommendation 7: Establish Mills Act compliance and noncompliance protocols and procedures that document and track compliance and follow-up correspondence.

Currently, the City relies on a mix of voluntary owner self-reporting and staff follow-up to process compliance after an inspection report has been issued. The current process unfolds as follows:

- Periodic inspection reports are sent to property owners
- Owners are given 30 days to contact OHR to discuss a plan to bring property into compliance
- Owner either works with OHR on a plan, submits a memo, or does not respond

Currently, contract staff that conducts inspections has no role in follow-up after the inspection reports are sent to owners. Follow-up with partial or noncompliant properties among the surveyed municipalities includes various levels of communication with property owners, ranging from correction letters being sent to in-person meetings and direct outreach by staff. Some municipalities have property owners establish revised rehabilitation plans or timelines to ensure compliance. Depending on the severity of the issue, one municipality has staff report to code enforcement. Of the surveyed municipalities, 12 municipalities are not sure how often property owners correct issues of partial or noncompliance. Nine municipalities found that property owners correct issues very often and six municipalities found issues were corrected somewhat often. One municipality with a large program found property owners do not correct issues of partial or noncompliance very often.

The City of Los Angeles does not currently have a comprehensive system for tracking compliance. Of surveyed municipalities, 12 municipalities responded that compliance is tracked but there is no coordination between the building department, planning department, or similar agencies. Only four municipalities responded that compliance is tracked and there is coordination. The three municipalities with the largest programs all track compliance but do not have interdepartmental coordination. However, it was a recurring recommendation that municipalities involve other parties in enforcing compliance. One municipality sends notice of violations through

the City Attorney office while another may have the Code Compliance Division enforce the contract with the assistance of the City Prosecutor in severe cases. The most used mechanism to enforce compliance is threat of cancellation of contract, followed by code enforcement, and the State cancellation fee as a last option.

The City's Home-Sharing Ordinance identifies the following enforcement procedures that could be adapted to address Mills Act noncompliance and enforcement:

> *A Host, operator, Hosting Platform and/or property owner may all be determined responsible and assessed fees for different enforcement actions, as described in the Ordinance. If violations subject to the specific fine amounts in paragraph (g)(4)(i) and (ii) of the Ordinance are observed, the City may initially provide a warning or notice of violation before Citations and fines are assessed. Notices will include contact information and provide information on how any decisions may be contested. Additional questions regarding enforcement can be directed to planning.home-sharing.enforcement@lacity.org. In most cases, a notice will provide time to rectify the violation - by either removing the Listing or successfully registering for Home-Sharing through the Online Registration Portal. The Director may, at any time, require the modification, discontinuance, or revocation of any Home-Sharing registration in the manner prescribed in LAMC Section 12.22 A.32(c)(4).*

There is an opportunity to institute a diligent and rigorous approach to bring noncompliant properties into compliance. This should include attempting all forms of communication with property owners, for example, at minimum every month. A Mills Act compliance communication protocol can be explored that documents and tracks compliance with follow-up correspondence. Responses to a City contractor questionnaire expressed preference that all official follow-up notices, such as inspections report letters, between property owner and staff remain between City and owner directly to maintain clarity and avoid confusion.

Recommendation 8: Pursue cancellation of habitually noncompliant properties due to non-responsive owners.

Consultants recommend that if after six months of attempted communication an owner remains non-responsive to any inquiries and/or not diligently acting to cure the breach or default, the City declare the property in default under the terms of their Mills Act contract and pursue cancellation.

A total of 40 properties, or 16% of 249 inspected properties, were found noncompliant. As of January 2021:

- 13 properties were brought into compliance
- 14 properties are working on compliance
- 13 remain noncompliant, including 8 non-responsive owners

The Mills Act contract describes Enforcement of Agreement to include City noticing for owner to cure breach of contract or default, and that

> if such a violation is not corrected to the reasonable satisfaction of the City within thirty (30) days thereafter, or if not corrected within such a reasonable time as may be required to cure the breach or default if said breach or default cannot be cured within thirty (30) days (provided that acts to cure the breach or default must be commenced within thirty (30) days and must thereafter be diligently pursued to completion by Owner…

Then the City may declare a default under the terms of the contract, and

may bring any action necessary to specifically enforce the obligations of Owner pursuant to the terms of this Agreement…

Therefore, "any action necessary to specifically enforce the obligations" such as pursuing cancellation is warranted. To date, there have been no Mills Act contract cancellations fully realized in California. As such, there have been no examples of Mills Act contract cancellation fees of 12.5% of the current fair market value of the property applied, nor any municipality receiving their pro rata share under state law.

In 2007, the City of Los Angeles had a potential Mills Act contract cancellation at the Laurelwood Apartments in Studio City. The owner had failed to complete the rehabilitation work outlined in the contract, and the City pursued compliance under the terms of the contract. The case for cancellation was heard before the Cultural Heritage Commission and the City Council's Planning and Land Use Management Committee. Ultimately, the property was brought into compliance with the contract before cancellation of the contract occurred. The City of Palo Alto and the City of Redondo Beach each had a Mills Act property that underwent contract cancellation proceedings, both of which resulted in non-renewal rather than cancellation.

There is an opportunity for enforcement of Mills Act contract obligations by pursuing Mills Act contract cancellation for properties declared in default or in breach of contract. This should particularly be done for noncompliant properties that remain habitually noncompliant and/or where owners are non-responsive. City may consider sharing a list of properties with impending cancellation to the County Assessor for potential suspension of Mills Act reassessment.

GOAL 3: EXPAND PROGRAM STAFFING

Despite having over 900 contracts, the City does not have full-time staff solely dedicated to the Mills Act program. The program's reach, combined with the administrative requirements for managing it, prove that additional staffing is urgently needed to effectively manage the program and comply with the state law requiring municipalities to conduct periodic compliance inspections.

In interviews with other municipalities throughout the state, the biggest challenge identified by nearly half of respondents is very limited resources to manage Mills Act programs. As the number of contracts increases, cities are faced with chronic shortages in staff and staff time devoted to processing new applications, fee collection, inspections, project review, compliance, and outreach.

This section contains a more detailed analysis of staff time required for services, current staffing, proposed staffing, and job descriptions. To summarize, the findings are:

- The yearly budget allocations are insufficient to adequately staff the program
- Limited periodic inspections have been performed, based upon minimal allocations from the General Fund, in an attempt to meet the City's obligations under state law
- Additional staff is required for the program to run effectively and bring the program into compliance with state law

Strategy 1: Provide Additional Staffing to Effectively Manage the Program

There is not enough staff to effectively manage the Mills Act program. The following analysis provides a conceptual blueprint to be utilized as the basis for a revenue plan and can be reviewed and updated as needed.

In consultation with OHR, a detailed list of program tasks was developed, including the number of hours required to complete each task on an annual basis to effectively manage the program. The table below provides an informed

estimate of the required number of hours to effectively manage the program. Currently, the program is managed by two employees who spend less than half of their time given their additional responsibilities, and utilizes contract staff to conduct inspections. Below is a list of annual services and an estimated number of hours necessary to manage the program effectively, in compliance with state law. For more detailed information, see Appendix E.

Estimated Annual Required Mills Act Staffing Hours

Service	Assumptions	Hours
Contract Processing		
Application Processing	65 applications	1,566
Pre-contract Approval Inspections	40 properties	600
Valuation Exemption Application Processing	5 applications	130
Appeal of Staff Determination to Cultural Heritage Commission	5 appeals	75
Contract Execution	25 contracts	256
Subtotal		*2,627*
Contract Maintenance		
Periodic Inspections Field Work	189 properties	1,512
Periodic Inspections Management, Oversight, and Follow Up	189 properties	3,322
Subtotal		*4,834*
Activities with No Fee		
Education and Outreach		476
Contracting and Contract Staff Administration		56
Contract Enforcement	37 noncompliant properties and four cancellations	958
General Administration		1,889
Subtotal		*3,379*
Total Estimated Required Annual Staffing Hours		***10,840***

Given that one full-time staff member's time equates to approximately 2,000 hours per year, current staffing is insufficient to cover the requirements for managing the Mills Act program.

Analysis of potential revenue for the program, as outlined under Goal 1, indicates that it would have a positive net revenue stream that could fund additional staff to effectively manage the program without assistance from the General Fund.

Additional staff is integral to efficient and compliant administration of the program. Increasing OHR Mills Act staff capacity would focus City efforts to stabilize the program, and strategize and implement a comprehensive approach to expand equity in program participation. With collections of contract maintenance fees resolved through direct assessment, the City should address the need to increase staff.

Based on the assumption that contract staff continue to carry out inspections, the estimates in the above table demonstrate that three full-time staff, including historic preservation and administrative positions, are necessary for management of the program. If City staff assumed all inspection responsibilities, the program would need five full-time staff.

Recommendation 9: Expand staffing to include 1 full-time Architect, 1 full-time City Planning Associate/Assistant, and 1 full-time Management Analyst, utilizing program revenue.

The following provides an outline of Consultant's understanding of an OHR staffing structure necessary for program sustainability. Included are an Architect, a City Planning Associate/Planning Assistant, and Administrative staff.

Architect: This staff person would be the Historical Property Contracts Manager for the City and manager of the program. The Architect reviews and approves all matters pertaining to the program, and as such, the Architect has a role in managing all duties listed in the job descriptions below. Currently, this role is filled by Lambert Giessinger, Architect, who spends less than 50% of his time managing the program, given his additional responsibilities.

City Planning Associate / Planning Assistant: This staff person, who reports to the Architect, coordinates the annual workshop, prepares materials for the yearly application cycle, reviews and processes new applications, processes appeal and exemption cases, responds to inquiries from existing contract holders and the general public, and reviews projects for potential and existing Mills Act properties. Currently, this role is filled by Melissa Jones, City Planning Associate, who spends less than 50% of her time managing the program, given her additional responsibilities.

Additional staff are needed to carry out the above-mentioned tasks as well as the following:

- Address noncompliant properties
- Prepare for enforcement hearings as necessary to process contract cancellations
- Process notices of non-renewal
- Prepare notices for direct assessment and amendments to pre-2014 contracts
- Coordinate outreach with HPOZ planners, Neighborhood Councils, Council offices and others
- Coordinate with SurveyLA and Community Plan Area staff to identify pipeline properties potentially eligible for the Mills Act program, including Community Plan Implementation Overlay (CPIO) and Community Design Overlay (CDO) contributors, etc.
- Update Mills Act application forms, instruction sheets, guidelines, and website language, as necessary

Administrative Staff – Management Analyst: The program is currently minimally supported by an administrative staff person who processes fees and creates case files. Additional staff at the level of Management Analyst would provide necessary support to the Architect and City Planning Associates / Assistants in administration of the program, including fiscal and administrative tracking, coordination with County Assessor and County Treasurer and Tax Collector to track revenue, coordinate correspondence with owners, regular updates to databases and running financial analysis reports, manage logistics of inspections, coordinate Mills Act related tasks with various City departments and Council Districts, and manage both the physical documents and digital data related to the program.

Examples of tasks for which administrative staff are needed include:

- Establish direct assessment with the Los Angeles County Treasurer and Tax Collector
- Track Mills Act revenue from direct assessments and fees
- Manage and update a contract database system
- Maintain Mills Act contract files and correspondence, and scanning as necessary

- Administer the dedicated Mills Act account
- Handling mass mailing and communication
- Coordinate procurement of contract staff

If additional City staff are not able to be procured, dependence on contract staff will need to be increased in order to perform all Mills Act services necessary to effectively manage the program and be in compliance with state law. Consistent with other municipalities, some Mills Act services are not provided by City staff. However, no California Mills Act program is fully managed by contract staff. Currently, contract staff is hired on a per project basis for a limited duration. To facilitate the use of contract staff and expand the scope of services, the City may consider multi-year contracts and/or retain multiple consultants.

GOAL 4: REFINE PROGRAM CAPACITY

The program has exceeded its capacity in terms of the number of contracts and the staffing required to effectively manage the program. While the Mills Act is consistently seen as one of the most popular incentives a municipality can offer to property owners to invest in historic resources, exceeding program capacity is common among surveyed municipalities. Since its inception, the program has grown exponentially and state law has expanded requirements without a commensurate increase in City staff to track and manage program activities.

Strategy 1: Establish a Sustainable, Manageable Number of Contracts

The City of Los Angeles has the greatest number of Mills Act contracts of any municipality in California. Consultants considered input from surveyed municipalities on establishing program limits in both the total number of Mills Act contracts that should be maintained for the foreseeable future, estimated to be five years, and in review of the General Plan 2021-2029 Housing Element policies providing greater consistency.

While several municipalities limit the total number of properties that apply or are granted contracts in any given year, Consultants are not aware of any municipality that limits the total number of Mills Act contracts. Of surveyed municipalities, 13 municipalities have greater than 50 active Mills Act contracts, seven municipalities have greater than 100 active Mills Act contracts, and only three municipalities exceed 200 active Mills Act contracts: City of San Diego (1,557 including condominium units), City of Pasadena (360), and City of Orange (340). Twenty-seven municipalities receive fewer than 15 applications each year, and three municipalities exceed that number: City of San Diego (50), City of Pasadena (30), and City of Long Beach (20). Several municipalities described program limits in application review, including applications reviewed in property type categories with caps by category in the City of Long Beach, and limits to the annual number of recorded single-family (20) and non-single-family (6) Mills Act contracts in the City of Pasadena.

Recommendation 10: Enact a cap of 1,500 Mills Act contracts.

As the program reaches a total of 1,000 contracts (which includes one contract for each condominium property representing a total of 2,568 separate condominium units), there is a serious concern for program sustainability. In 2019, the program had 930 contracts with an additional 18 contracts recorded in 2020 and 2021. Thus, the City currently has a total number of 948 contracts representing 3,520 properties. Based upon the assumption that additional staff is procured, the long-term sustainability of the program may be improved if a cap of 1,500 properties having Mills Act contracts is enacted.

Recommendation 11: Record 25 contracts per year to align with the General Plan Housing Element goal.

To align with the General Plan Housing Element objective, establish an overall goal to record on average 25 new contracts per year.

Recommendation 12: Revise contract term limits to be 20 years for new contracts and not renew existing contracts older than 10 years.

The City could amend the Mills Act ordinance to provide a 20-year contract term limit upon recordation. Annual renewals would occur for 10 years with the second 10 years as the non-renewal or "sunset" period. The cap on the total number of Mills Act contracts would work in concert with limiting contract terms to a total of 20 years by reducing the number of existing contracts in the program over the next 10 years. As existing contracts wind down, this would free up capacity for new applications to meet the program's overall historic preservation and equity goals.

Of surveyed municipalities, there were only 0-2 examples of Mills Act contracts terminated either by property owner or by municipality. City of San Diego was an outlier with 17 property owners having submitted documentation to not renew their contracts, likely because they no longer were receiving a Mills Act benefit to offset the costs of a contract maintenance fee. City of Long Beach is planning to begin non-renewal on Mills Act contracts that have completed work plans and no further work to complete yet are currently receiving a Mills Act benefit. Of 30 surveyed municipalities, 11 municipalities noted that reasons for notices of non-renewal include owners either receiving lower than expected or no Mills Act benefit. Other municipalities noted chronic code compliance issues as a cause for non-renewal.

To reduce the number of contracts and therefore reduce program administration, the City may consider opportunities such as sunsetting contracts that have completed substantial work on their property. It is important that the City work with property owners to determine a mutually beneficial ending to any Mills Act contract that is in compliance and that do not have an additional, necessary Mills Act scope of work. The City will need to address the need for enforcement of non-compliant properties prior to potential non-renewal.

Strategy 2: Address Program's Fiscal Capacity

Recommendation 13: Update the Mills Act ordinance to eliminate the annual threshold of unrealized property tax revenue.

In order to provide for immediate program sustainability, the Mills Act ordinance needs to be amended to eliminate the annual threshold of unrealized property tax revenue. City unrealized revenue from loss of property taxes not collected has exceeded the $2,000,000 annual threshold. In 2019, the City total unrealized revenue from loss of property taxes not collected due to executed Mills Act contracts was $2,184,589.

In 1996, the program established a not-to-exceed threshold of $500,000 in unrealized City revenue from loss of property tax revenue not collected due to executed Mills Act contracts (unrealized property tax revenue). In 1999, the Mills Act ordinance was amended to increase the threshold to $1,000,000. In 2012, the Mills Act ordinance was amended to increase the threshold to $2,000,000.

Most municipalities do not have an annual program-wide threshold of unrealized property tax revenue, but rather have an annual threshold of unrealized property tax revenue based on new contracts recorded each year.

Three municipalities in particular limit the total amount of unrealized property tax revenue from all new contracts, one municipality with a limit in the amount of unrealized property tax revenue from a single contract. City of San Diego's annual threshold of unrealized property tax revenue is at $200,000 projected for new contracts. City of Oakland's annual threshold of unrealized property tax revenue is at $25,000 for new contracts. City of Pasadena's

annual threshold of unrealized property tax revenue is at $75,000 for all new contracts and $25,000 from a single new contract.

With elimination of the annual threshold of unrealized property tax revenue, reports should be made annually to the Cultural Heritage Commission, the Mayor, and City Council on the projected unrealized property tax revenue anticipated by new contracts, to allow for fiscal oversight of the program by the City's policymakers. Close monitoring of the annual threshold of unrealized property tax revenue would be possible with coordination with the County Assessor's office.

Recommendation 14: Increase pre-contract assessed value limit for single-family dwellings from $1,500,000 to $2,500,000.

Property values have increased substantially over the last ten years. To address this change, the pre-contract assessed value limits for single-family residential properties should be increased. The pre-contract assessed value limits are currently $1,500,000 for single-family residential properties, and $3,000,000 for multi-family residential, commercial, or industrial properties. The pre-contract assessed value limits were last updated in 2008, when the Mills Act ordinance was amended to increase the pre-contract assessed value limits for single-family dwellings from $500,000 to $1,500,000. In 2007, the median home value in the City was $562,307. Today the median home value in the City is $913,754, which represents a 63% increase over 2007 home values. An increase in the assessed value limit from $1.5 million to $2.5 million would represent a corresponding (66.7%) increase based on the rise in property values.

Recommendation 15: Separate pre-contract assessed value limits for multi-family buildings from commercial and industrial buildings, and increase pre-contract assessed value limits for multi-family buildings to $10,000,000.

The City should consider separating pre-contract assessed value limits for multi-family residential properties from commercial and industrial properties. The pre-contract assessed value limits for commercial and industrial buildings should remain unchanged. Based on Consultant's data analysis, commercial and industrial buildings that are often under long-term ownership do not see a significant benefit from the program. In 2008, the assessed values for multi-family residential, commercial, and industrial properties were increased from $1,500,000 to $3,000,000. Since multi-family property values have appreciated significantly since 2008, it appears necessary to increase this valuation limit in order to allow for the inclusion of larger properties that may be a significant source of affordable housing.

Recommendation 16: Eliminate the current valuation exemption areas of Hollywood and Greater Downtown Los Angeles, and apply the exemption from property valuation limits to Adaptive Reuse Ordinance prcjects citywide.

The Adaptive Reuse Ordinance (ARO) properties in greater downtown Los Angeles represent approximately $750,000 of the annual threshold of unrealized property tax revenue, including $438,000 for AROs in exemption areas, and $300,000 for those outside of exemption areas. It is widely held that the ARO has helped transform the greater downtown Los Angeles by creating a vibrant 24-hour community with residential and mixed-use projects utilizing rehabilitated historic buildings. ARO projects consist of both rental apartments and condominiums, and new projects have built on the success of the first ARO projects. Data gathering and analysis found that of the top 10 Mills Act contracts with the largest amount of savings, eight properties are ARO projects, including six condominium buildings and two commercial properties.

The ARO is currently being updated to become citywide. Eliminating the current valuation exemption areas could expand the use of the Mills Act to ARO projects citywide. In the past, the City had considered mechanisms to manage unrealized property tax revenue from the Mills Act. In 1999, when the ARO was first adopted, the City Council considered exempting ARO projects from the fiscal revenue loss cap under the Mills Act. However, the City Council did not adopt this proposed recommendation. Expanding access to the Mills Act for ARO properties would increase interest in the development of ARO projects and result in twofold benefits to the city: creation of additional housing units and preservation of historic buildings.

Strategy 3: Expand Program Eligibility

Several surveyed municipalities have broader eligibility requirements, as compared to Los Angeles's program. Generally, within these surveyed municipalities, a property must be listed or found eligible for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), or a local register to be eligible for the Mills Act (City of Claremont, City of Orange, City of Gilroy, City of Ontario, City of Pasadena, City of Sunnyvale). Some surveyed municipalities even allow property owners to apply for a Mills Act contract without being designated, and include properties identified as eligible for designation in previous historic inventories (City of San Dimas, City of Tustin). Two municipalities restrict the Mills Act program to only residential property types (City of Claremont, City of Tustin).

Recommendation 17: *Revise the eligibility requirements to include National and California Register-listed properties, SurveyLA-identified eligible properties, and CPA-, CPIO-, CDO- identified properties.*

If the City expanded its eligibility requirements to include National Register-listed and California Register-listed properties, SurveyLA-identified eligible properties, and Community Plan Area-, Community Plan Implementation Overlay-, and Community Design Overlay- identified properties, the financial benefits of the program would extend to a broader reach of communities. Regulations placed on the development of properties identified through survey or within types of planning overlays can be severe and cost prohibitive without access to historic preservation-based financial incentives such as the Mills Act. Consideration for expanding the program's eligibility requirements would allow for a balance of regulations and incentives to benefit historic preservation in the City.

GOAL 5: ADDRESS PROGRAM MANAGEMENT

Strategy 1: Effectively Manage Data and Expand Communication

To manage the program, OHR currently uses a spreadsheet listing all active Mills Act contracts and their associated information. Separately, a hard copy file for each Mills Act contract, as well as an electronic filing system, maintains and keeps track of properties in the program. However, there is an opportunity for real time tracking of Mills Act compliance, notifications, and correspondence between the City and property owners.

Recommendation 18: *Create a database system to track individual contracts, contract compliance status, inspections, correspondence with contract holders, fee collection, covenanted affordable units, annual assessment valuations, and ownership email addresses and phone numbers.*

Recommendation 19: *Maintain a list of Mills Act properties on City Planning's website.*

Currently, there is no database system that has been implemented for tracking responses on compliance follow-up, which come in the form of owners communicating with staff regarding an inspection report or consultation. Currently, owner compliance plans received are saved in a physical or electronic file. OHR currently uses the Planning Case Tracking System (PCTS) to create cases and track the savings and the City's lost revenue per property. PCTS is not used to manage properties in the program, track compliance follow-up, or run reports.

Prior to 2004, when the program was under the Department of Cultural Affairs, a FileMaker Pro database was used to manage the program. When the program moved to the Department of City Planning, some of the FileMaker Pro data was transferred to PCTS. Digitized records and a centralized database system of all records and related files would benefit management of the program, and would make application processing and administration more efficient. As mentioned previously, this could include tracking Mills Act revenue through fee collection in real time.

Of the surveyed municipalities, ten municipalities track data using a regularly updated spreadsheet, six municipalities use a non-regularly updated spreadsheet, five municipalities use a digital database system managed by the municipality, and five municipalities use building permit review to manage their program. At least eight municipalities do not track data to monitor compliance. The three municipalities with the largest programs all track Mills Act data with a regularly updated spreadsheet, and one municipality uses a digital database system to manage their program.

To more effectively manage the program, OHR should collect, manage, and track data digitally. A database system will allow program administrators to record communication, notifications, compliance timeframes, and updated owner information. The effective management of this data will also make it easier to run reports and share this information publicly.

Recommendation 20: Communicate annually with all Mills Act program participants to confirm email addresses and contact information.

Consultants received background information that changes in ownership pose challenges for administration of the program, particularly tracking contact information for condominiums. Often, homeowners association board representation or property management companies change after Mills Act contract execution. Additionally, companies that own or manage multi-family buildings can also be challenging to contact as they may be owned by non-local entities without obvious means to contact them.

Program Equity

The equity analysis looks at property tax savings as well as the distribution of existing Mills Act contracts and properties potentially eligible for the program between communities of more barriers and fewer barriers to opportunity based on the Los Angeles Equity Index. Developed by the Los Angeles City Controller's Office for the purposes of mapping existing disparities and barriers to opportunity in the City of Los Angeles, the Equity Index is comprised of four indicators at the census tract level that are central to the issues of equity and opportunity: education, access to resources, environment, and socioeconomic. The Equity Index is measured between 0 and 10, based upon a score for each of the four indicators, where a lower score means more barriers to opportunity, and a higher score means less barriers to opportunity.

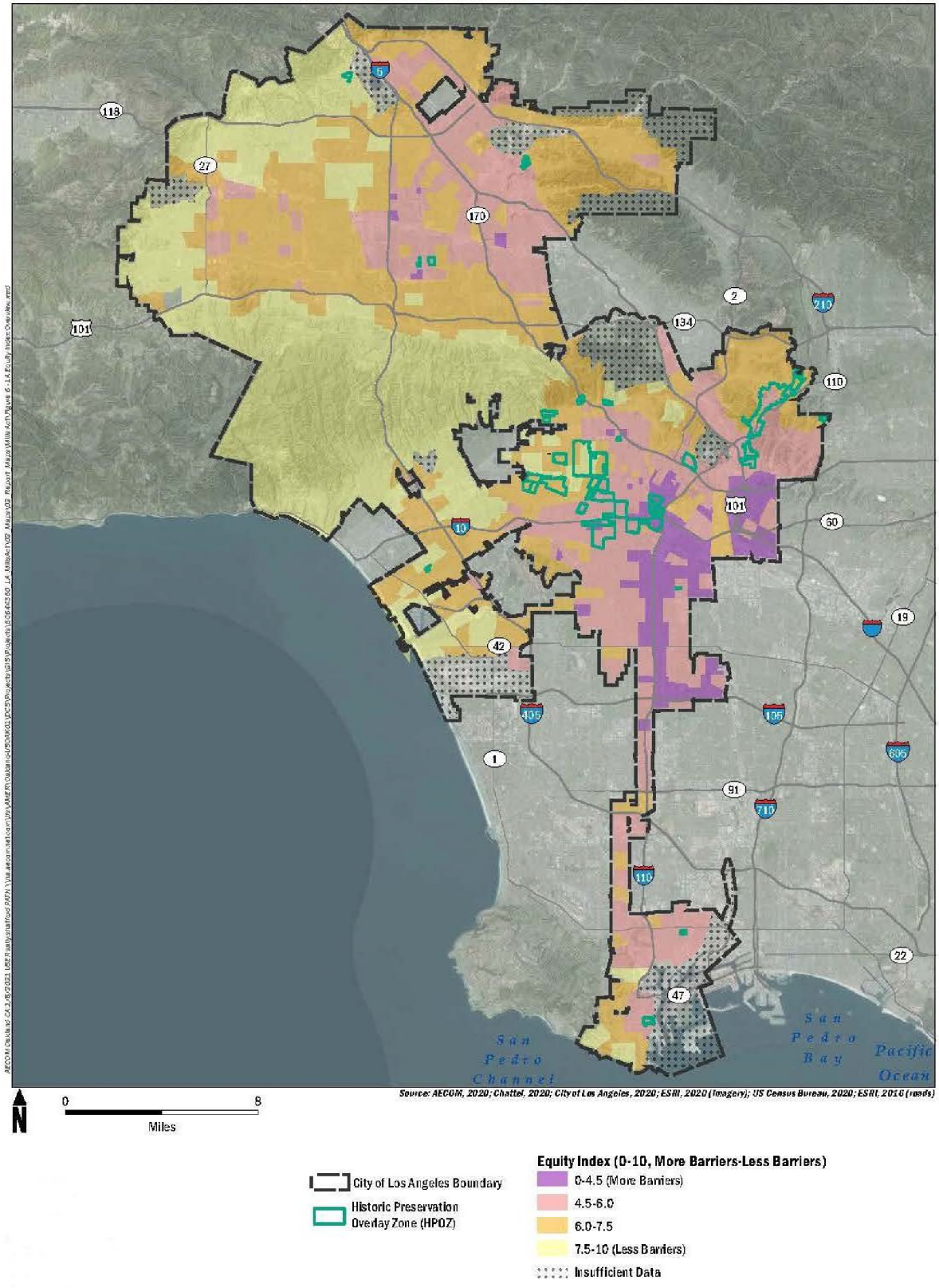
This section provides an analysis of equity and property tax savings that informs goals, strategies, and recommendations for equitable program outcomes.

Barriers to Opportunity: Communities have been defined by those with "more barriers" and "fewer barriers" to opportunity and resources, as explored and studied under the Los Angeles Equity Index. This spectrum helps identify those communities that benefit the most and least from the Mills Act in Los Angeles.

Equity: As defined by the City of Los Angeles General Plan Framework Element (2001), "Equity means that public resources are invested on the basis of priority community needs. Decisions concerning the location and level of public investment necessary to meet citywide needs should be made in ways that do not unfairly impact any one single community." This definition emphasizes prioritizing public investment based on community need, not just fair and equal distribution.

Rent-Stabilized Properties or Units: Rent-stabilized properties or units are those properties or units covered under the 1978 Rent Stabilization Ordinance (RSO) built before October 1, 1978, including apartment; condominium; townhome; duplex; two or more single family dwelling units on the same parcel; rooms in a hotel, motel, rooming house, or boarding house occupied by the same tenant for 30 or more consecutive days; residential unit(s) attached to a commercial building.

Los Angeles Equity Index Map

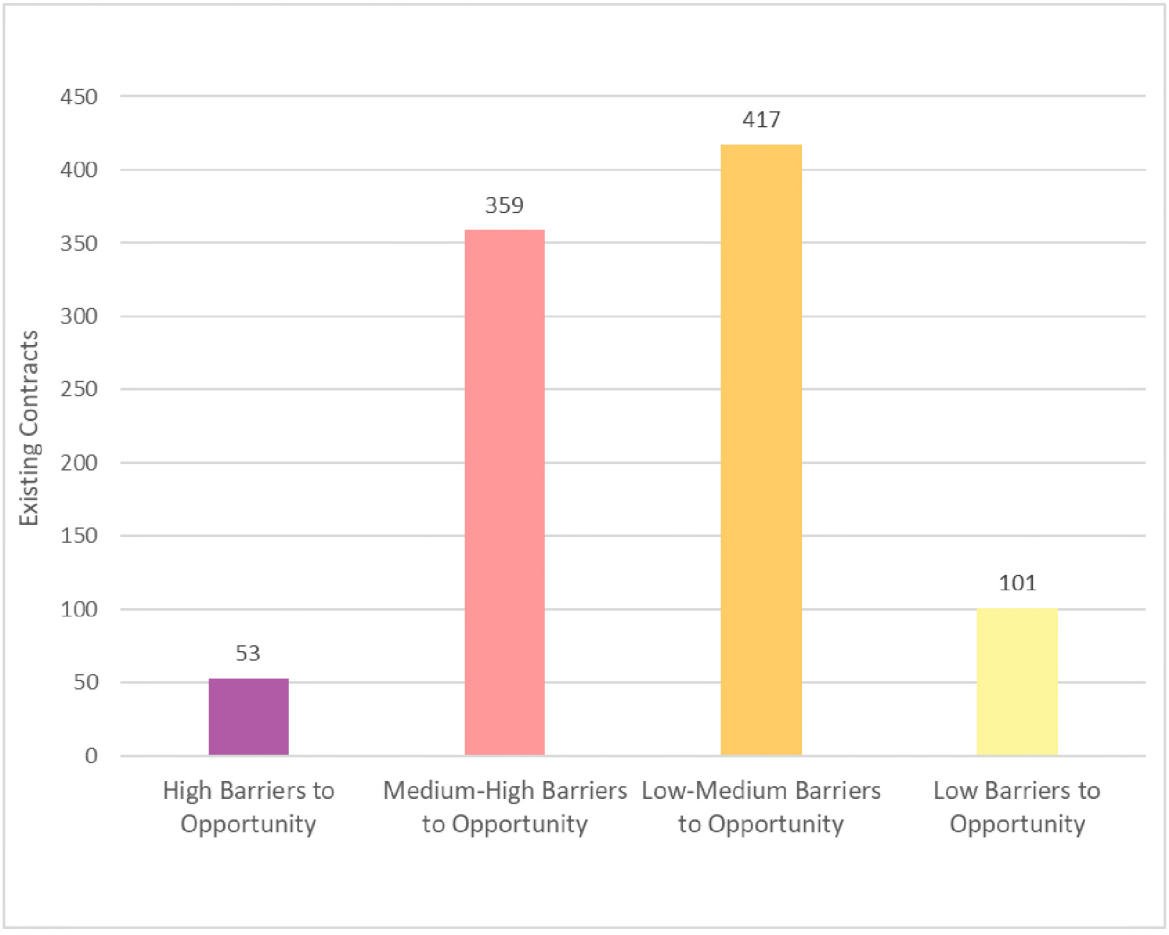


Source: AECOM, 2021

Program Participation

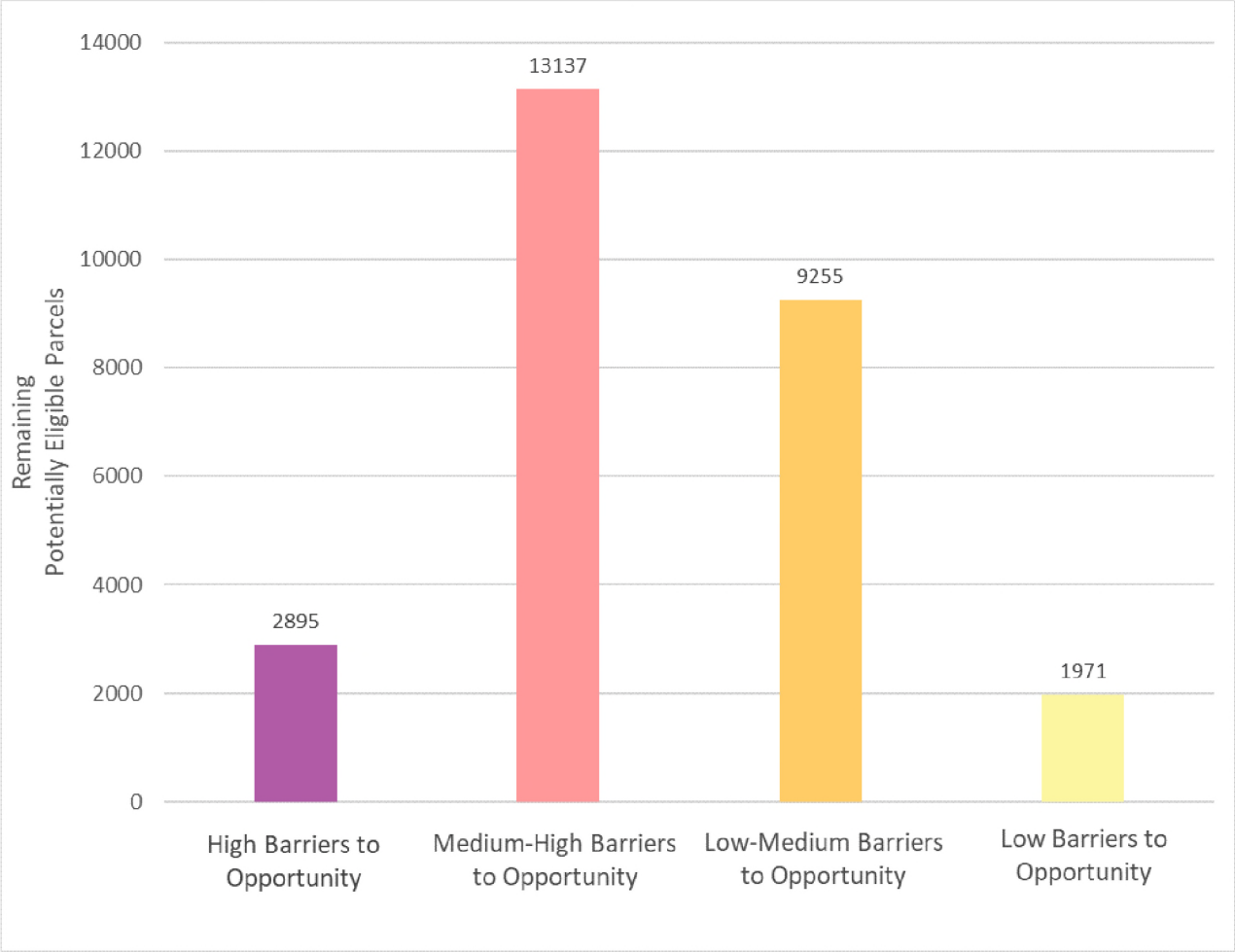
To provide a baseline understanding of how existing and potentially eligible Mills Act properties are distributed among communities facing varying barriers to opportunity, Consultants assessed the existing citywide Mills Act parcels by equity index. The finding was that the vast majority fall within the medium barriers to opportunity equity index categories, with a slight skew toward the low-medium barriers to opportunity category, suggesting that existing Mills Act contracts are more often benefitting property owners in communities that are already facing lower barriers to opportunity and are located in higher opportunity areas. In assessing remaining parcels eligible for the Mills Act, Consultants found that while a vast majority also fall within the medium barriers to opportunity equity index categories, this skews moderately towards the medium-high barriers to opportunity category and about twice as many eligible parcels fall within the high barrier category than in the low barrier category.

Existing Mills Act Contracts by Equity Index



Source: AECOM, 2021

Remaining Potentially Eligible Mills Act Parcels by Equity Index



Source: AECOM, 2021

Existing contracts and potentially eligible properties were also evaluated within four organizational frameworks: Community Plan Areas (CPA), Council District (CD) boundaries as of 2021, Historic Preservation Overlay Zones (HPOZ), and property type. A summary table of selected findings and identified equity priority implementation areas per organizational framework is included below:

Equity Organizational Frameworks and Analysis

Organizational Framework	Selected Findings[1]	Equity Priority Implementation Areas
Community Plan Area ▪ Most effective spatial framework for equity analysis due to reflecting clear relationships between Equity Index, Mills Act participation rates, and remaining eligible Mills Act parcels ▪ Planning-focused boundaries	▪ CPAs with the highest number of existing contracts have relatively low participation rates, indicating that overall Mills Act eligibility is disproportionately concentrated within just a few CPAs, rather than evenly distributed throughout the City. ▪ Existing Mills Act contracts in CPAs with higher participation rates are generally in high opportunity areas. ▪ Equity Index scores of existing contracts are relatively consistent within CPAs, indicating that CPAs will be useful for identifying and prioritizing focus areas for remaining eligible parcels. ▪ If the Mills Act program focuses on CPAs with over 100 eligible parcels, it will de facto prioritize areas with barriers to opportunity.	▪ Northeast Los Angeles CPA ▪ South Los Angeles CPA ▪ Westlake CPA ▪ West Adams – Baldwin Hills – Leimert CPA ▪ Silver Lake – Echo Park – Elysian Valley CPA ▪ Wilshire CPA ▪ San Pedro CPA
Council District ▪ Less effective spatial framework for equity analysis due to size and diversity ▪ Boundaries have been redefined as of 2022 ▪ Have dedicated staff and resources for outreach and constituent services	▪ Overall Mills Act eligibility is disproportionately concentrated within just a few CDs, rather than evenly distributed throughout the City. ▪ Existing Mills Act contracts in CDs with the highest participation rates are predominantly located in high opportunity areas. ▪ CD1, CD4, and CD10 collectively account for 75% of City eligible parcels, primarily due to concentrations of HPOZs. ▪ CDs are too large and diverse as a spatial framework to use as focus areas without further criteria, though Council offices can help implement equity goals by increasing awareness and access in high priority areas.	▪ CD1 ▪ CD10 ▪ CD9 ▪ CD15 ▪ CD4 ▪ CD9 ▪ CD14

[1] See Appendix F for full text including all key findings.

Historic Preservation Overlay Zone ▪ Most effective as a framework for assessing relationship between Mills Act participation and equity in concentrated areas of Mills Act eligibility ▪ HPOZ planners can target specific HPOZs to close participation gaps	▪ Mills Act contracts are more evenly distributed across HPOZs than they are across CPAs or CDs. ▪ Most HPOZs with low participation rates are relatively new and participation can be expected to rise over time. ▪ There is no discernible correlation between HPOZ participation rate and equity index score of existing contracts. ▪ All eligible HPOZ parcels located in communities facing high barriers to opportunity are in HPOZs with 600+ parcels. ▪ Within each HPOZ, equity index scores of eligible parcels are relatively consistent, indicating that HPOZs may be useful for identifying focus areas for program prioritization.	▪ Highland Park – Garvanza ▪ Lincoln Heights ▪ Pico Union ▪ Jefferson Park ▪ Angelino Heights ▪ Adams – Normandie ▪ University Park ▪ Harvard Heights
Property Type ▪ Non-spatial framework ▪ Most effective as a framework for refining prioritization of eligible Mills Act parcels	▪ Single-family residences comprise the majority of existing Mills Act contracts, about three times the number of multi-family residence Mills Act contracts. ▪ Single-family properties have the largest number and proportion of existing Mills Act contracts located in communities facing low barriers to opportunity. ▪ Multi-family properties have a relatively high number and proportion of remaining eligible parcels located in communities facing high barriers to opportunity, suggesting that prioritizing eligible multi-family parcels may help advance equity in the program.	N/A

The assessment found that the existing contracts in the program are located in communities of fewer barriers to opportunity and experience more tax savings or benefit per Mills Act contract.

In order to increase equity within the Mills Act program, the City must prioritize new applications from communities of more barriers to opportunity.

In 2020, Mayor Eric Garcetti issued Executive Directive No. 27, which focused on achieving racial equity and inclusion in City government and at the center of City policymaking.

In 2021, the City Planning Commission Equity Day was held. Takeaways included expanding collaboration among City departments, implementing transformative versus reactionary planning, and addressing gentrification with anti-displacement strategies. Consultants met with the LACP Equity team. Takeaways from the discussion included refining a definition of equity that is more expansive of people beyond geography and being clear about Program limitations. Collaboration among City departments could be instructive, particularly in viewing historic preservation as an important tool in the solutions toolkit to addressing the City housing affordability crisis. According to the City's 2001 General Plan Framework Element, equity means that public resources are invested based on priority community needs, which includes historic preservation.

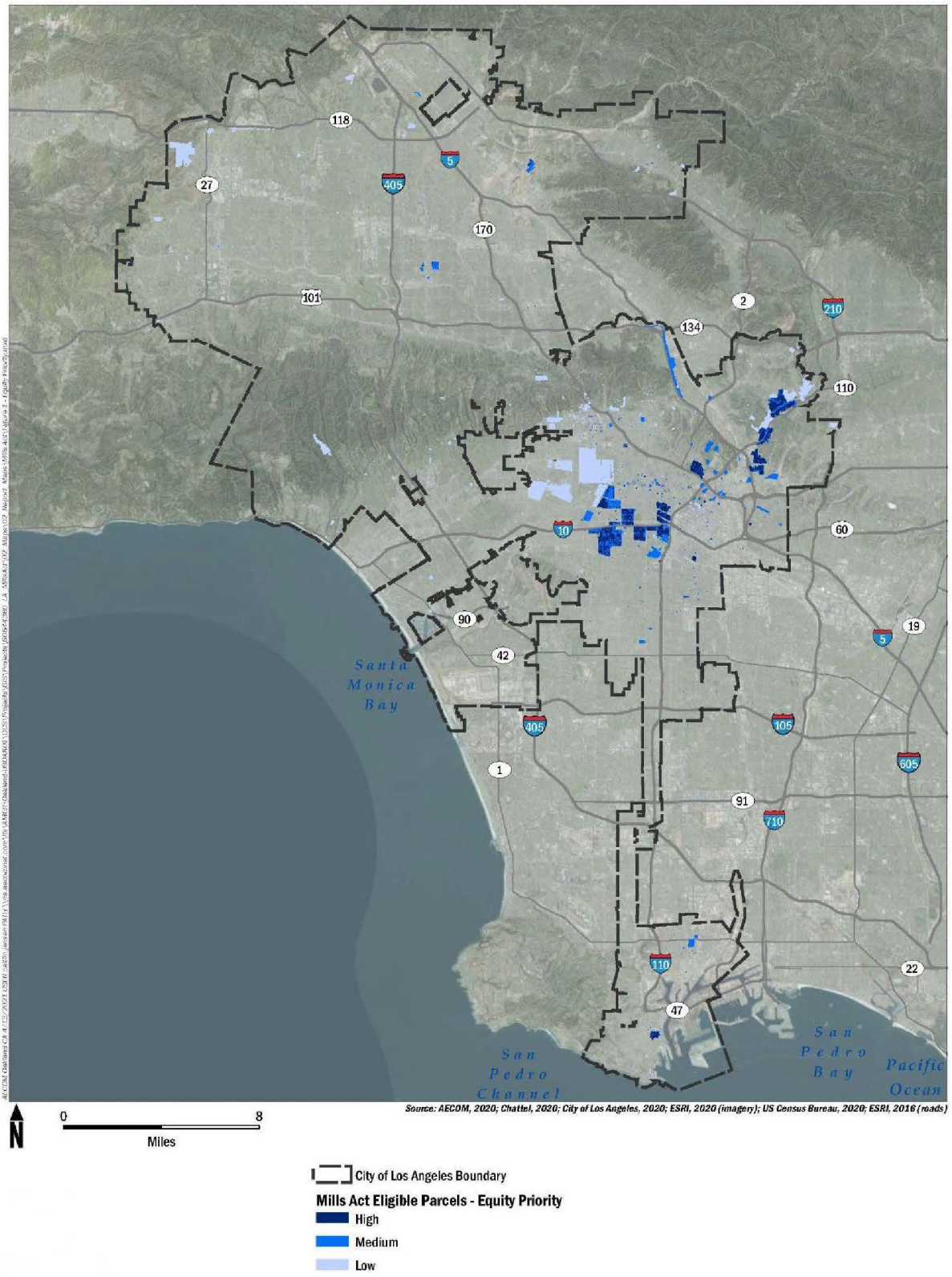
To identify the equity priority implementation areas listed above, Consultants conducted a GIS spatial analysis to select remaining eligible Mills Act parcels based on the following criteria, thus identifying general focus areas of communities facing the highest barriers to equitable outcomes. Prioritization of eligible Mills Act parcels to expand equity is based on the following criteria:

Prioritization Criteria of Potentially Eligible Mills Act Parcels to Expand Equity

High Priority	High or medium-high barriers to opportunity per the Equity Index and multi-family residence property type
Medium Priority	High or medium-high barriers to opportunity per the Equity Index and property type other than multi-family residence (example: single-family, commercial, industrial, recreational, or N/A)
Low Priority	Low or medium-low barriers to opportunity per the Equity Index

The following map provides an overview of equity prioritization for potentially eligible Mills Act parcels citywide. Darker blue colors identify potentially eligible Mills Act parcels with priority based on the described criteria. For scaled maps of equity prioritization of potentially eligible Mills Act parcels, see Appendix F.

Equity Prioritization Map of Potentially Eligible Mills Act Parcels Citywide



Source: AECOM, 2021

In addition to identifying the equity priority implementation areas for use in the program, this report describes recommendations for the City to advance broad equity objectives to promote a more equitable process and program, which are incorporated in goals and strategies sections below.

Distribution of Property Tax Savings

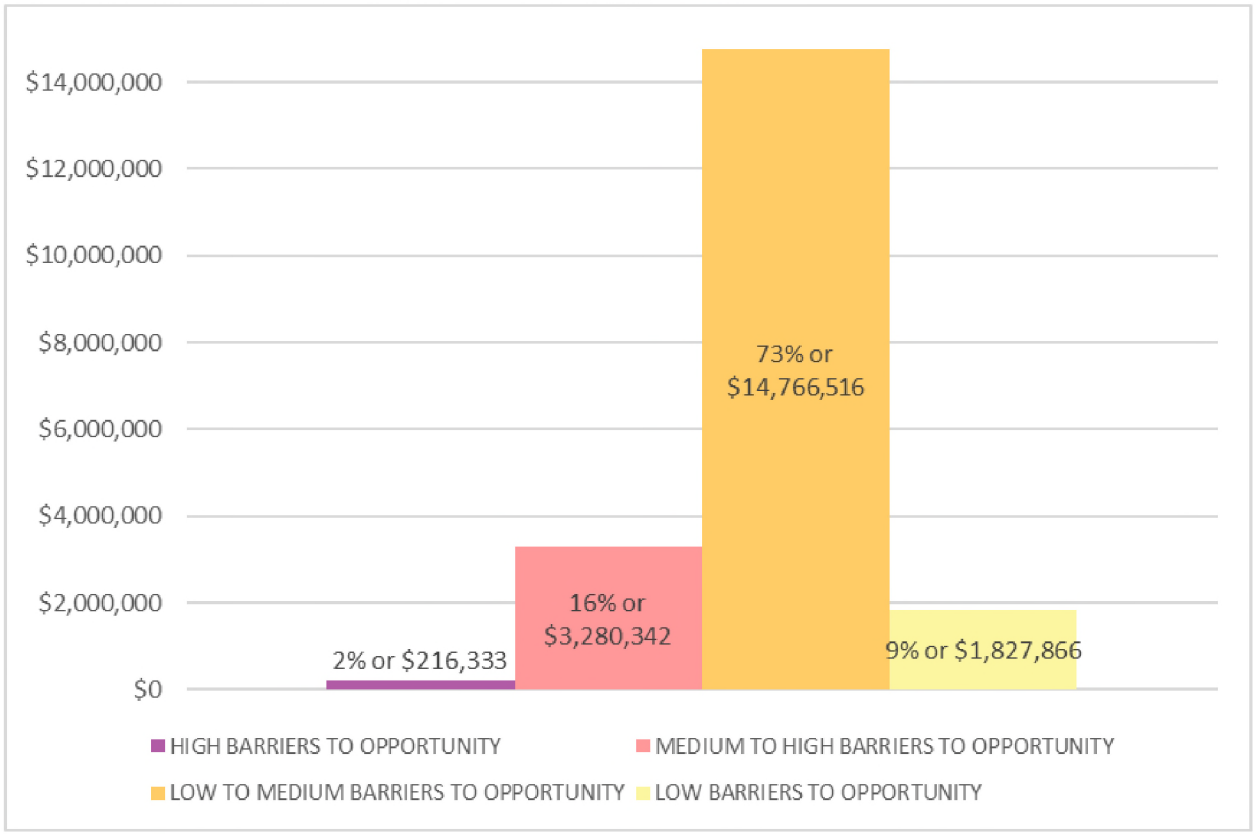
The primary goals of the savings analysis were to:

1. Provide analysis of the 2019 tax savings for all existing Mills Act contracts within organizational frameworks.
2. Compare total savings of existing Mills Act contracts within each of the four Equity Index categories using organizational frameworks.

The potential for property tax savings for property owners is the primary benefit of the program. This benefit is meant to offset costs of rehabilitating and maintaining historic properties. However, any reduction in property taxes for property owners is unrealized property tax revenue for public agencies. To understand exactly how much savings was realized by program property owners and property tax revenue unrealized by the City in 2019, Consultants retrieved data from the County and performed in-depth analysis of property tax data associated with Mills Act properties.

It was determined that a majority of tax savings are being realized by properties located within communities facing lower barriers to opportunity. Key findings from this analysis are summarized:

Total Mills Act Contract Savings in 2019 by Equity Index



The report analyzes property tax savings data within four organizational frameworks similar to the Equity Analysis: Community Plan Areas, Council Districts, Historic Preservation Overlay Zones, and property type. A summary of selected findings by organizational framework is included below.

Property Tax Savings Organizational Frameworks and Analysis

Organizational Framework	Selected Findings
Citywide Findings	▪ In 2019, the City total unrealized property tax revenue from the program was $2,184,589. ▪ Consultant analysis conservatively represents ARO contribution to total unrealized property tax revenue at approximately $750,000 of the annual threshold. ▪ 55.7% of all Mills Act contracts are within communities facing low or low to medium barriers to opportunity, and 44.3% are within communities facing high or medium to high barriers to opportunity. ▪ The amount of 2019 savings by Equity Index score was skewed, with 82.6% of savings occurring within communities facing low or low to medium barriers to opportunity, and 17.4% within communities facing high or medium to high barriers to opportunity. ▪ Mills Act contracts located within communities facing low to medium barriers to opportunity account for 44.5% of the program, yet experienced 73.5% of all savings in 2019.

Properties with No Savings	▪ 50% of the properties that received less than $415[2] in savings in 2019 were Mills Act contracts that were recorded before 2002.
	▪ There are Mills Act contracts as recent as 2018 that received no savings in 2019.
	  ▪ Of Mills Act contracts recorded in the past 10 years (recent Mills Act contracts), 21 contracts did not receive savings.
	  ▪ Majority of the 21 recent Mills Act contracts that received no savings in 2019 were commercial properties.
	▪ 51% of all commercial properties in the program experienced no savings in 2019.
	▪ 36% of commercial properties with recent Mills Act contracts received no savings in 2019.

Community Plan Area	▪ The Central City CPA experienced 46% of all savings in 2019 ($9,331,848); however, it contains only 7% (65) of the City's total Mills Act contracts. Also, a majority (83.1%) of all Mills Act contracts in this CPA are located within communities facing low to medium barriers to opportunity. ▪ Areas that have high concentrations of properties with higher property value experience more savings, which is one reason why Central City CPA experienced almost half of all savings in 2019. ▪ The Wilshire CPA contains the highest number of Mills Act contracts, with 275 (30% of the Program); however, it only experienced 15% of the total savings in 2019. ▪ CPAs that have existing Mills Act contracts located in communities facing high barriers to opportunity include South Los Angeles, West Adams-Baldwin Hills-Leimert, Westlake, and Boyle Heights.

[2] The previous contract maintenance fee was $415 annually, to be collected every five years totaling $2,075. The current fee is $539, to be collected every five years totaling $2,693.

	▪ In most cases, Mills Act contracts located in communities facing higher barriers to opportunity receive less savings than Mills Act contracts within communities facing lower barriers.
Council District	▪ The Council District (CD) with the most Mills Act contracts is CD 10 with 209, while CD 6 does not have any. ▪ Of the 209 Mills Act contracts in CD 10, 201 Mills Act contracts are located within communities facing high and medium to high barriers to opportunity. Similarly, of the 164 Mills Act contracts in CD 1, 135 are located within communities facing high and medium to high barriers to opportunity. However, these Mills Act contracts did not experience a large amount of savings in 2019 as compared to other CDs. ▪ CD 14 contains 94 Mills Act contracts yet experienced $10,036,450 total savings in 2019. Only 11 of these Mills Act contracts were located within communities facing medium to high barriers to opportunity. The remainder are located in communities facing low to medium barriers to opportunity. ▪ CD 14 experienced 50% of the total program savings in 2019. This was primarily due to the large property values and condominium property types within this district. ▪ CDs that have a majority of Mills Act contracts in communities facing high or medium to high barriers to opportunity are (in order of number of contracts) CD 10, 1, 13, 8, and 15.

Historic Preservation Overlay Zone (HPOZ)	▪ Mills Act contracts within HPOZs only include SFR, MFR, and commercial property types.
	▪ The HPOZs that experienced the most savings in 2019 were typically HPOZs that had the most contracts located in communities facing lower barriers to opportunity. The exception to this was Lafayette Square HPOZ, which had the fourth greatest amount of savings in 2019, and nearly all Mills Act contracts are within communities facing medium to high barriers to opportunity.
	▪ Only three districts – Windsor Square, South Carthay, and Hancock Park – experienced 39% of all savings from contracts within HPOZs. None of these HPOZs contain Mills Act contracts within communities facing high barriers to opportunity.
	▪ 62% of total savings in HPOZs was experienced by Mills Act contracts within communities facing lower barriers to opportunity. In contrast, 48% of total savings in non-HPOZ properties was experienced by Mills Act contracts within communities facing lower barriers to opportunity. This implies that:
	  ▪ Mills Act contracts within HPOZs that are within communities facing higher barriers to opportunity have neither high property value or a substantial difference between the enrolled and trended base value; and
	  ▪ Mills Act contracts outside of HPOZs that are within communities facing higher barriers to opportunity have a higher rate of high property value or larger difference between the enrolled and trended base value.

Property Type	▪ 71% of the program is made up of single-family residences (SFR) (659 contracts); however, this property type received only 25% of total savings in 2019 ($5,041,608). ▪ Condominiums account for 33% of the total savings in 2019 ($6,634,413; however, only 3% of the program is made up of this property type (26 Mills Act contracts). ▪ Multi-family residential (MFR) and commercial property types experienced larger total savings due to higher property values. ▪ Top 10 properties that experienced the most savings in 2019 consisted of 8 condominiums, 1 commercial, and 1 MFR property. ▪ Although there are many more SFRs with Mills Act contracts, this property type received less total savings in 2019 than condominium properties. ▪ A majority of existing Mills Act contracts that are condominium, SFR, MFR, commercial, and recreational properties are located in communities facing low or low to medium barriers to opportunity; whereas half of the industrial properties are located in areas of medium to high or high barriers to opportunity. ▪ Similarly, only industrial property types experienced more tax savings in communities facing higher barriers to opportunity; however, they only make up 1% of the program (10 Mills Act contracts) and .7% of total savings in 2019 ($143,093). ▪ 90% of total savings for condominiums occurred in areas of low barriers to opportunity. ▪ Average aggregate savings for condominium property types was $255,170 in 2019; for commercial was $69,057, for MFR was $27,077, and for SFR was $7,650.

The 2019 savings analysis provided in-depth information that demonstrates the program currently benefits communities facing lower barriers to opportunity and that a majority of savings is experienced by a small percentage of Mills Act contract holders. To increase benefits in communities facing higher barriers to opportunity, the City should implement a prioritization of recording new Mills Act contracts in these areas with property types that can provide the largest benefit to residents in such communities. Multi-family residential property types would be ideal candidates for new Mills Act contracts because the rehabilitation required by the program would serve people living in the community and these property types typically experience higher average savings.

In refining a definition of equity, LACP appears to focus on consideration for "people beyond geography." While implementation of the equity priority areas will be geography-based, recommendations that follow seek to be responsive to the LACP Equity team by addressing potential program and policy changes aimed to lessen barriers and open opportunities for communities facing higher barriers to opportunity.

Decisions concerning the location and level of public investment necessary to meet citywide needs should be made in ways that do not unfairly impact any one single community. Consistent with equity approaches to planning across multiple disciplines and fields, an equity framework was adapted for this study that defines equity using three objectives: procedural, distributional, and structural. These three objectives provide a broad framework for applying goals, strategies, and recommendations by understanding different types of outcomes to be achieved through the program. Each objective allows recommendations to be organized in a way that can support specific goals and strategies to achieve a more equitable program.

- **Procedural Equity** seeks to ensure a fair and inclusive process in both program development and implementation. This includes creating more avenues for participation and involvement, particularly in locations where there are higher barriers to opportunity. Procedural equity is intended to result in changes

to participation, and as such cannot be measured using quantifiable metrics, but rather assesses end results.

- **Distributional Equity** seeks to ensure resources, benefits, and burdens are distributed fairly while prioritizing those with the highest barriers to opportunity. Distributional equity is intended to result in changes to distribution. More than procedural equity and structural equity, distributional equity can be measured using numerical metrics such as demographic information in participation and dollar amounts invested.
- **Structural Equity** seeks to ensure that past harms are corrected to prevent future negative consequences. This requires institutionalizing processes for transparency and accountability, and a reconsideration of the overall structure of the program and its current outcomes. Like procedural equity, structural equity is intended to result in changes to participation, and as such cannot be measured using quantifiable metrics.

Since the inception of the program, housing affordability, production of housing and equity considerations have increased in importance for the City and its residents. Los Angeles is a majority renter city, as renters make up approximately 63% of the housing market. The program could be further expanded as a tool to help address equity by ensuring more equitable distribution of the Mills Act benefits citywide.

The goals, strategies, and recommendations to build a more equitable Mills Act program in Los Angeles are outlined below.

Goals	Strategies
Procedural and Structural Equity	
GOAL 1: Retain and Preserve Affordable Multi-Family Housing	▪ Prioritize Multi-Family Properties and ARO Projects with Affordable Housing ▪ Implement tenant anti-displacement safeguard measures
Distributional Equity	
GOAL 2: Expand Mills Act Benefit in Areas Facing Higher Barriers to Opportunity	▪ Prioritize new contracts in areas facing higher barriers to opportunity ▪ Prioritize outreach to underserved areas ▪ Lessen barriers to program participation

GOAL 1:
RETAIN AND PRESERVE AFFORDABLE MULTI-FAMILY HOUSING

One of the founding goals of the City of Los Angeles Mills Act program was for this incentive to assist with the retention and preservation of affordable, multi-family housing. In 1996, the City Council action stated, "Retention of older residential structures of real historic significance not only helps to conserve irreplaceable resources, it can also serve to maintain affordability" and particularly retention of historic resources like homes and apartment buildings to maintain rents "affordable to a majority of the City's residents."

Under the General Plan 2021-2029 Housing Element, the Mills Act program was identified as an implementing program to meet housing production and preservation goals. Specifically, the objective outlined in the Housing

Element is to "preserve quality rental and ownership housing for households of all income levels and special needs." To achieve this objective, the policy direction is to "provide incentives for the preservation of historic residential structures" such as the Mills Act program with a goal of recording 25 new contracts annually.

Since the program's inception, housing affordability, production of housing and equity considerations have increased in importance for the City and its residents. The program could be further expanded as a tool to help address equity across the City and its residents through ensuring equitable distribution of Mills Act contracts.

The Mills Act program is a historic preservation incentive under housing policy intended to meet particular needs of property owners, particularly as it applies to Adaptive Reuse Ordinance (ARO) and Rent Stabilization Ordinance (RSO) properties.[3] To consider equity in the use of the Mills Act program, greater priority must be placed on property owners of, and by extension renters in, eligible historic resources in communities facing higher barriers to opportunity. The program already supports projects that convert commercial and industrial properties to housing. However, there are no ARO provisions for housing affordability. In addition, the program could be enhanced to better support, incentivize, and work in tandem with housing goals to create, preserve, and maintain affordable rental and ownership housing stock.

A view of the program through an equity lens requires critical thought and is a balancing act. This study defines Mills Act benefit in three ways: direct, ancillary, and residual. A direct benefit is the potential for property tax savings that enable property owners with Mills Act contracts to reinvest in restoration and rehabilitation of their historic property. There are several ancillary benefits to reinvestment in a historic property, such as infrastructure upgrades that improve resident living conditions, and exterior work improving property values of the surrounding community. However, the reinvestment may have impacts on at-risk communities susceptible to displacement. Thus, it is pivotal that equity-based City policy addresses anti-displacement safeguards. The residual benefits include stabilizing property value on transfer to future owners, especially lenders in foreclosure actions and a parent in gifting to a child or grandchild.

The program can be one of several tools to address housing equity, however, it is not a panacea to address equity in city planning. Through concerted efforts to prioritize expanding opportunity and access, the program may achieve more equitable outcomes in historic preservation and housing.

Strategy 1: Prioritize Multi-Family Properties and ARO Projects with Affordable Housing

Recommendation #21: Codify prioritization of applications from multi-family properties and ARO prcjects with affordable housing components in high barriers to opportunity areas.

Recommendation #22: Track the retention of rental units at affordable rates.

Recommendation #23: Contractually require no net loss of affordable rental units.

The Mills Act ordinance provides "The City Council further finds that such preservation will assist in maintaining the City's existing stock of affordable housing, thereby providing a social and economic benefit to the citizens of Los Angeles." There is an opportunity to better integrate the key, founding goal to retain and preserve affordable, multi-family housing by specifically identifying multi-family residential property types through a Mills Act ordinance

[3] The RSO covers the following properties built before October 1, 1978: apartment; condominium; townhome; duplex; two or more single-family dwelling units on the same parcel; rooms in a hotel, motel, rooming house or boarding house occupied by the same tenant for 30 or more consecutive days; and residential unit(s) attached to a commercial building.

amendment. To ensure equity, the City should prioritize Mills Act applications from multi-family properties and ARO projects with affordable housing components in high barriers to opportunity areas (equity priority areas).

As part of their Mills Act application materials, one municipality surveyed (City of Santa Monica) requires a rent roll for multi-family residential buildings. Application and review of the City of Los Angeles's affordability requirement would help to ensure that housing stock in multi-family properties remains affordable. Provisions for no net loss would safeguard against displacement as buildings are rehabilitated.

Strategy 2: Implement Anti-Displacement Safeguard Measures

In its program administration, the City could contractually require and ensure that displacement does not happen as a result of program participation. Equity considerations for policy impacts resulting in displacement have increased in importance for the City and its residents. The program must further expand its tools to safeguard against and prevent these future unintended consequences for City residents as a result of the program.

In parallel with prioritization and recordation of Mills Act contracts for multi-family residential properties either under RSO or with affordable housing covenants, the City may consider adopting an explicit anti-displacement approach by contractually requiring through the Mills Act ordinance that no net loss of affordable rental units can occur, and that removal of existing RSO rental units are grounds for Mills Act cancellation. Similar policy language used to promote housing security and stability during local emergencies can be found as a result of the COVID-19 pandemic (see LAMC Sec. 49.99.4, Prohibition on Removal of Occupied Residential Units). Additionally, the City can explore adding a requirement for tenant retention and habitability plans as part of the Mills Act scope of work, as typically required by the housing department.

Recommendation #24: Require the preparation of a tenant retention and tenant habitability plan as part of the contract.

GOAL 2:
EXPAND MILLS ACT BENEFIT IN AREAS FACING HIGHER BARRIERS TO OPPORTUNITY

There is an opportunity for the City to better integrate the founding goal for the retention and preservation of affordable, multi-family housing into the administration of the program. This includes expanding and refining the existing program Priority Consideration Criteria for Affordability that states, "The residential or mixed-use project will result in the preservation or addition of safe and affordable dwelling units for low- and moderate-income households."

Strategy 1: Prioritize New Contracts in Areas Facing Higher Barriers to Opportunity

Prioritizing contracts in areas of higher barriers to opportunity would increase the amount of public benefit and help neighborhoods rehabilitate historic resources. Communities facing higher barriers to opportunity contain many historic resources that have been locally designated and are eligible to apply. Access could also be expanded through increasing program eligibility to include historic resources designated at national and state levels, or identified as an eligible historic resource through survey. Education and outreach to these areas is essential to increasing the amount of applications that are submitted to become a part of the program.

Recommendation #25: Add new Priority Consideration Criteria for properties in high barriers to opportunity areas.

Consultants found that while the current Affordability Priority Consideration Criterion ensures public benefit, application of the Affordability requirement proved ambiguous. There is an opportunity for the Affordability definition to be clarified to better align with HUD or local standards. This can be done in coordination with the housing department to expand and align the Affordability requirement to include affordable RSO properties; define the percentage of median income standard; define objectives to meet the City's housing goals, such as percentage of affordable units per the General Plan Housing Element; provide City oversight of annual affordability; require applicants to retain those units at affordable rates with no net loss of the number of units; and track the usage of the Affordability Priority Consideration Criterion.

To meet the City's housing goals, development of the Affordability requirement should be coordinated with other City departments, including developing the specific percentage of affordable units and consideration for a proper enforcement procedure. In addition, there is opportunity to work with the ARO Update team to include housing affordability provisions.

Recommendation #26: Establish an annual application goal to encourage participation in areas facing higher barriers to opportunity.

Performance metrics would help identify a specific goal number of Mills Act contracts for equity priority parcels and will allow the City to track whether it is meeting that goal annually. Tracking is important to ensure long-term program assessment and whether other methods need to be incorporated to further increase the number of equity priority properties.

The City should ensure that recorded contracts in an application cycle meet equity priority criteria, and explore other percentages as necessary to meet City goals.

In addition, the City should identify performance metrics for the number of equity priority parcels the City would like to place under Mills Act contract annually and track these over time.

Recommendation #27: Collect socio-demographic data as part of the application to assess equity among applicants

The City does not currently record socio-demographic data of property owners in the program. Collecting this data would help provide a clearer understanding of who is benefiting from the program more than others and by how much. To better incorporate LACP equity goals, collection of socio-demographic data could be developed with the LACP Equity team. Setting up a procedure to collect data will help guide metrics for outreach in the future.

Strategy 2: Prioritize Outreach to Underserved Areas

The City can help ensure equity in administration of the program by providing more education about the program and expanding opportunities for Mills Act benefits in areas facing higher barriers to opportunity. By actively prioritizing and admitting new Mills Act contracts in these areas, the City would advance the program toward improving access and opportunity in areas that experience a disproportionate lack of Mills Act benefit today. Ensuring that the public benefit from the program is more fairly distributed throughout communities in Los Angeles would achieve a more equitable outcome in the future of the program.

Development of a strategic outreach plan would benefit increasing equity in the program. This could utilize a targeted program for marketing and support that shifts focus to priority areas annually or every three years, for example. As described earlier, Consultants identified equity priority implementation areas where resources should

be concentrated. At the Historic Preservation Overlay Zone level, Highland Park-Garvanza, Lincoln Heights, Pico-Union, Jefferson Park, Angelino Heights, Adams-Normandie, University Park, and Harvard Heights were all identified. At the Council District level, CD1, CD10, CD9, CD15, CD4, CD9, and CD14 were identified. There is an opportunity to explore partnerships with HPOZ planners and Council District staff at these locations to outreach to eligible Mills Act parcels with high or medium-high barriers to opportunity, as well as stakeholder partners like the Los Angeles Conservancy, Highland Park Heritage Trust, and West Adams Heritage Association.

Recommendation #28: Prepare and implement a strategic outreach plan that provides education, access, and multilingual support to equity priority implementation areas.

Recommendation #29: Identify dedicated equity-related funding sources.

The City may explore alternative funding sources used to support equity, such as allocations in Council District budgets, to help provide the funding necessary to do the proper outreach in communities with high barriers to opportunity. The City may take advantage of the opportunity to work with Council Districts to expand its outreach efforts to reach those who would not typically be aware of the program and its benefits, particularly in equity priority areas.

A multilingual and accessible outreach program (printed, online, in-person resources) is important to help educate eligible property owners about the local designation process and benefits of entering into a Mills Act contract and implement a strategic outreach plan. This outreach may be assisted by HPOZ planners, who can provide crucial technical assistance for owners of HPOZ contributors in equity priority implementation areas.

To ensure the civic engagement and outreach process is equitable, it is important for outreach materials to be accessible. This includes identifying key languages for translation in equity priority implementation areas and making materials easily accessible in a variety of formats, both physically and digitally. Based on responses from the municipality survey, educational brochures were the most popular method of outreach to eligible property owners, though some municipalities work with local realtors, send periodic postcards, lead regular workshops, or solicit applications from likely prospects during permit applications.

Strategy 3: Lessen Barriers to Program Participation

Recommendation #30: Reduce or eliminate application fees for properties located in equity priority areas.

Recommendation #31: Exempt citywide equity priority properties from the assessed valuation limits.

Reducing or eliminating application fees for property owners in equity priority areas would potentially help drive an increase in applications from those in areas of higher barriers to opportunity. As noted in the municipality survey, this may be a challenge if the number of applications rises without adequate staffing needed to manage them. Exempting citywide equity priority properties from current assessed value limits would remove the barrier of applying for an exemption from the valuation limits.

Recommendation #32: Provide for program assessments every five years to ensure program goals and efficacy are being met.

Since ongoing program assessments are necessary to evaluate current policies and program efficacy, the City may consider providing for program assessment updates every five years. This is consistent with the Statewide Historic Preservation Plan completed by the California Office of Historic Preservation every five years as required by the National Park Service and is also similar to the City General Plan updates directed by state law to be completed every 10 years.

Key Personnel

This study was prepared by Chattel, Inc., in conjunction with AECOM. Chattel, Inc. is a full-service historic preservation consulting firm with a practice extending throughout the western United States. The firm represents governmental agencies and private ventures, successfully balancing project goals with historic preservation regulations without sacrificing principles on either side. Comprised of professionals meeting the Secretary of the Interior's Professional Qualifications Standards in history, architecture, architectural history, and historic architecture, the firm offers a range of professional consulting services. Areas of specialty include historical resources evaluations, preparation of historic context statements, design guidelines, *Secretary of the Interior's Standards* project review and consultation, as well as project impacts analysis pursuant to the California Environmental Quality Act (CEQA). The firm also specializes in consultation on federal, state, and local historic preservation statutes and regulations. This assessment was prepared by President Robert Chattel, AIA, historic architect; Senior Associate Nels Youngborg, architectural historian; Associate III Aleli Balaguer, planner; and Associate II Alvin-Christian Nuval, planner, with editorial assistance by Principal Associate Christine di Iorio, AICP, planner and architectural historian.

Chattel partnered with AECOM, a Los Angeles-based multi-national planning, design, engineering, consultant, and construction management firm with a worldwide presence. AECOM Principal Andrew Kaplan, economist, and Rachel Lindt, AICP, and Aryeh Cohen, planners, conducted the Equity Analysis and consulted in preparation of this study.

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Appendix A:
2019 List of Mills Act Properties

Order Number	Address	MA Year	HPOZ Name	HCM Number	HCM Name	Designation Type	DCP Case Number	MA Contract Number	Exemption Separate	Exemption Area	Council District Number	CPA	Zoning	RSO Inventory	Adaptive Reuse Incentive Area	Property Use Type	APN	2019 Enrolled Value	2019 Trended Value	2019 Enrolled minus Trended	2019 CLA Unrealized Revenue	2019 CLA MA Savings	2019 Percentage of Savings	Percentage of Savings Category	Equity Index Score	Equity Index Category
1	1411 CARROLL AVE	1997	ANGELINO HEIGHTS	190	Residence and Carriage House	HCM and HPOZ	CHC-1997-52403-MA	972038305	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	No	No	Single-family	5405012005	$374,000	$443,403	-$69,403	-$77	$708	15.65%	Low	5.82	Medium to High Barriers
2	364 S CLOVERDALE AVE E	1997	MIRACLE MILE	427	Apartment Building	HCM and HPOZ	CHC-1997-52406-MA	972038301	N/A	N/A	4	Wilshire	[Q]R4-1	Yes	No	Multi-family	5508002025	$3,724,000	$6,365,545	-$2,641,545	-$2,930	$26,944	41.50%	Moderate	7.13	Low to Medium Barriers
3	6689 W EMMET TER	1997	Whitley Heights	N/A	N/A	HPOZ	CHC-1997-52405-MA	972011914	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5575008009	$518,029	$518,029	$0	$0	$0	0.00%	No Savings	6.79	Low to Medium Barriers
4	5601 N FIGUEROA ST	1997	Highland Park - Garvanza	575	Security Trust and Savings Bank	HCM and HPOZ	CHC-1997-52401-MA	972038619	N/A	N/A	1	Northeast Los Angeles	[Q]C4-2D-HPOZ	No	No	Commercial	5468033905	$291,116	$291,116	$0	$0	$0	0.00%	No Savings	5.77	Medium to High Barriers
5	11833 W LAURELWOOD DR	1997	N/A	228	Laurelwood Apartments	HCM	CHC-1997-52407-MA	972038302	N/A	N/A	2	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	[Q]RD1.5-1VL	Yes	No	Multi-family	2369027010, 2369027012	$3,043,000	$5,188,351	-$2,145,351	-$2,379	$21,883	41.35%	Moderate	7.96	Low Barriers
6	12404 W ROCHEDALE LN E	1997	N/A	633	Haas House	HCM	CHC-1997-52408-MA	972038304	N/A	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494011012	$469,000	$1,171,133	-$702,133	-$779	$7,162	59.95%	High	8.83	Low Barriers
7	4163 W SEA VIEW LN	1997	Highland Park - Garvanza	611	Minister Residence	HCM and HPOZ	CHC-1997-52402-MAEX	972038303	Yes	N/A	1	Northeast Los Angeles	R1-1	No	No	Single-family	5471007014	$451,000	$1,030,795	-$579,795	-$643	$5,914	56.25%	High	6.8	Low to Medium Barriers
8	4234 W SEA VIEW LN	1997	Highland Park - Garvanza	612	Birtcher - Share Residenc	HCM and HPOZ	CHC-1997-52404-MA	972011913	N/A	N/A	1	Northeast Los Angeles	R1-1	No	No	Single-family	5471002008	$348,000	$983,722	-$635,722	-$705	$6,484	64.62%	High	6.8	Low to Medium Barriers
9	2074 N WATSONIA TER E	1997	Whitley Heights	603	Villa Vallambrosa	HCM and HPOZ	CHC-1997-52400-MA	972011915	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575017016, 5575017018, 5575017021	$598,000	$1,253,269	-$655,269	-$727	$6,684	52.28%	High	6.79	Low to Medium Barriers
10	1720 N WHITLEY AVE E	1997	N/A	448	Whitley Court	HCM	CHC-1997-52409-MA	972038300	N/A	N/A	13	Hollywood	[Q]R5-2	No	No	Commercial	5547008012	$1,296,761	$1,296,761	$0	$0	$0	0.00%	No Savings	5.83	Medium to High Barriers
11	103 4TH ST W	1998	N/A	288	Barclay Hotel	HCM	CHC-1998-52818-MA	982326023	N/A	Downtown Los Angeles	14	Central City	[Q]C4-4D	Yes	Yes	Commercial	5149020012	$16,600,000	$21,420,000	-$4,820,000	-$5,346	$49,164	22.50%	Low	6.49	Low to Medium Barriers
12	607 S BURNSIDE AVE E	1998	N/A	423	Apartment Building	HCM	CHC-1998-52815-MA	9823226024	N/A	N/A	4	Wilshire	[Q]R4-1	Yes	No	Multi-family	5508012010-5508012011	$1,635,941	$1,635,941	$0	$0	$0	0.00%	No Savings	7.61	Low Barriers
13	430 S CLOVERDALE AVE E	1998	MIRACLE MILE NORTH	428	Villa Cintra	HCM and HPOZ	CHC-1998-52801-MA	982326025	N/A	N/A	4	Wilshire	[Q]R4-1	Yes	No	Multi-family	5508005019	$1,997,835	$1,997,835	$0	$0	$0	0.00%	No Savings	7.13	Low to Medium Barriers
14	6289 W DEL VALLE DR	1998	Carthay Circle	N/A	N/A	HPOZ	CHC-1998-52811-MA	982326026	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088016017	$467,000	$694,097	-$227,097	-$252	$2,316	32.72%	Moderate	7.35	Low to Medium Barriers
15	1101 N DOUGLAS ST E	1998	Angelino Heights	217	Residence	HCM and HPOZ	CHC-1998-52800-MA	982326029	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Single-family	5405003001	$725,525	$725,525	$0	$0	$0	0.00%	No Savings	5.82	Medium to High Barriers
16	938 S FIGUEROA ST	1998	N/A	196	Variety Arts	HCM	CHC-1998-52807-MA	982329223	N/A	Downtown Los Angeles	14	Central City	C2-4D	No	Yes	Recreational	5138002019	$6,132,195	$6,132,195	$0	$0	$0	0.00%	No Savings	6.76	Low to Medium Barriers
17	4211 N GLENALBYN DR	1998	Highland Park - Garvanza	392	Treehaven Guest House and	HCM and HPOZ	CHC-1998-52802-MA	982326028	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	Yes	No	Multi-family	5465016017	$610,000	$1,490,267	-$880,267	-$976	$8,979	59.07%	High	6.27	Low to Medium Barriers
18	2001 N HOLLY HILL TER	1998	Whitley Heights	N/A	N/A	HPOZ	CHC-1998-52803-MA	982326027	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575004007	$577,030	$577,030	$0	$0	$0	0.00%	No Savings	6.79	Low to Medium Barriers
19	1207 W KIPLING AVE E	1998	N/A	383	Residence	HCM	CHC-1998-52813-MA	982326034	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5691011017	$241,000	$790,500	-$549,500	-$609	$5,605	69.51%	High	7.46	Low to Medium Barriers

Order Number	Address	MA Year	HPOZ Name	HCM Number	HCM Name	Designation Type	DCP Case Number	MA Contract Number	Exemption Separate	Exemption Area	Council District Number	CPA	Zoning	RSO Inventory	Adaptive Reuse Incentive Area	Property Use Type	APN	2019 Enrolled Value	2019 Trended Value	2019 Enrolled minus Trended	2019 CLA Unrealized Revenue	2019 CLA MA Savings	2019 Percentage of Savings	Percentage of Savings Category	Equity Index Score	Equity Index Category
20	4912 W MARATHON ST	1998	Melrose Hill	N/A	N/A	HPOZ	CHC-1998-52805-MA	982326033	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535029028	$275,486	$275,486	$0	$0	$0	0.00%	No Savings	4.91	Medium to High Barriers
21	617 S OLIVE ST	1998	N/A	195	James Oviatt Building	HCM	CHC-1998-52819-MAEX	982329222	N/A	Downtown Los Angeles	14	Central City	C2-4D	No	Yes	Commercial	5144004015	$11,774,974	$11,774,974	$0	$0	$0	0.00%	No Savings	6.79	Low to Medium Barriers
22	2342 S SCARFF ST	1998	University Park	455	Margaret T. and Bettie Mead	HCM and HPOZ	CHC-1998-52808-MA	982326032	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124023018	$228,850	$228,850	$0	$0	$0	0.00%	No Savings	3.62	High Barriers
23	4318 W VICTORIA PARK PL E	1998	N/A	654	Craftsman Mansion	HCM	CHC-1998-52817-MA	982326031	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R2-1-O	No	No	Single-family	5082014016	$294,029	$294,029	$0	$0	$0	0.00%	No Savings	5.61	Medium to High Barriers
24	6248 W WARNER DR	1998	Carthay Circle	N/A	N/A	HPOZ	CHC-1998-52812-MA	982326030	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088016011	$489,000	$1,437,695	-$948,695	-$1,052	$9,677	65.99%	High	7.35	Low to Medium Barriers
25	2058 N WATSONIA TER E	1998	Whitley Heights	N/A	N/A	HPOZ	CHC-1998-52806-MA	982329221	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575017025	$815,000	$882,155	-$67,155	-$74	$685	7.61%	Low	6.79	Low to Medium Barriers
26	595 N WILCOX AVE E	1998	Hancock Park	618	McDonnell Residenc	HCM and HPOZ	CHC-1998-52804-MA	98878680	N/A	N/A	4	Wilshire	RE9-1-HPOZ	No	No	Single-family	5523004003	$609,817	$609,817	$0	$0	$0	0.00%	No Savings	7.7	Low Barriers
27	103 S WILTON DR E	1998	N/A	650	Mortensen House	HCM	CHC-1998-52814-MA	982326038	N/A	N/A	4	Wilshire	R1-1	No	No	Single-family	5516015001	$492,000	$1,347,564	-$855,564	-$949	$8,727	63.49%	High	6.46	Low to Medium Barriers
28	132 S WILTON PL E	1998	N/A	649	Cora B. Henderson House	HCM	CHC-1998-52816-MA	982326037	N/A	N/A	4	Wilshire	R1-1	No	No	Single-family	5516017009	$503,000	$1,225,289	-$722,289	-$801	$7,367	58.95%	High	6.46	Low to Medium Barriers
29	215 S WILTON PL E	1998	N/A	568	Thomas A. Churchill Sr.	HCM	CHC-1998-52809-MA	982326036	N/A	N/A	4	Wilshire	R1-1	No	No	Single-family	5516010015	$466,223	$466,223	$0	$0	$0	0.00%	No Savings	6.46	Low to Medium Barriers
30	2731 N WOODSHIRE DR E	1998	N/A	648	Withers Residence	HCM	CHC-1998-52810-MA	982326035	N/A	N/A	4	Hollywood	R1-1	No	No	Single-family	5582016004	$391,000	$841,799	-$450,799	-$500	$4,598	53.55%	High	7.4	Low to Medium Barriers
31	1007 W 24TH ST E	1999	University Park	273	Durfee House	HCM and HPOZ	CHC-1999-53110-MA	992347231	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124007005	$433,000	$593,722	-$160,722	-$178	$1,639	27.07%	Moderate	4.33	High Barriers
32	3726 W ADAMS BLVD	1999	N/A	479	Dr. Grandville MacGowa	HCM	CHC-1999-53121-MA	992347233	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R3-1-O	No	No	Single-family	5051002024	$1,721,607	$1,721,607	$0	$0	$0	0.00%	No Savings	4.36	High Barriers
33	3820 W ADAMS BLVD EA	1999	N/A	591	Denker Estate	HCM	CHC-1999-53115-MA	992347234	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R3-1-O	No	No	Single-family	5051003003	$491,432	$491,432	$0	$0	$0	0.00%	No Savings	4.36	High Barriers
34	1046 S ALFRED ST	1999	South Carthay	N/A	N/A	HPOZ	CHC-1999-53114-MA	992347235	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087006020	$665,000	$930,524	-$265,524	-$294	$2,708	28.53%	Moderate	7.19	Low to Medium Barriers
35	1215 S ALFRED ST E	1999	South Carthay	N/A	N/A	HPOZ	CHC-1999-53101-MA	992347237	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087003011	$689,560	$689,560	$0	$0	$0	0.00%	No Savings	7.19	Low to Medium Barriers
36	1219 S ALFRED ST E	1999	South Carthay	N/A	N/A	HPOZ	CHC-1999-53100-MA	992347236	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087003011-5087003012	$1,469,560	$1,662,616	-$193,056	-$214	$1,969	11.61%	Low	7.19	Low to Medium Barriers
37	1333 S ALVARADO TER	1999	Pico - Union	85	Gilbert Residence	HCM and HPOZ	CHC-1999-53108-MA	992347258	N/A	N/A	1	Westlake	RD1.5-1-HPOZ	Yes	No	Multi-family	5135004015	$412,000	$462,352	-$50,352	-$56	$514	10.89%	Low	4.17	High Barriers
38	1433 W CARROLL AVE E	1999	Angelino Heights	N/A	N/A	HPOZ	CHC-1999-53107-MAEX	992347238	Yes	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	No	No	Single-family	5405012013	$388,000	$394,768	-$6,768	-$8	$69	1.71%	Low	5.82	Medium to High Barriers
39	6219 W COMMODORE SLOAT DR E	1999	Carthay Circle	N/A	N/A	HPOZ	CHC-1999-53113-MA	992347239	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5088005047	$393,619	$393,619	$0	$0	$0	0.00%	No Savings	7.35	Low to Medium Barriers

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40	1051 S CRESCENT HEIGHTS BLVD E	1999	South Carthay	N/A	N/A	HPOZ	CHC-1999-53105-MA	992347240	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087013025	$411,010	$411,010	$0	$0	$0	0.00%	No Savings	7.19	Low to Medium Barriers
41	6230 W DEL VALLE DR E	1999	Carthay Circle	N/A	N/A	HPOZ	CHC-1999-53112-MA	992347241	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088017005	$398,000	$1,295,639	-$897,639	-$996	$9,156	69.28%	High	7.35	Low to Medium Barriers
42	22049 W DEVONSHIRE ST E	1999	N/A	645	Harvester Farms	HCM	CHC-1999-53109-MA	992347242	N/A	N/A	12	Chatsworth - Porter Ranch	R1-1	No	No	Single-family	2723019138	$437,991	$437,991	$0	$0	$0	0.00%	No Savings	7.65	Low Barriers
43	5029 E ECHO ST E	1999	Highland Park - Garvanza	494	Kelman Residence and	HCM and HPOZ	CHC-1999-53102-MA	992347243	N/A	N/A	1	Northeast Los Angeles	R3-1-HPOZ	No	No	Single-family	5468005028	$297,101	$297,101	$0	$0	$0	0.00%	No Savings	5.48	Medium to High Barriers
44	815 W ELYRIA DR	1999	N/A	483	J.B. Merrill House	HCM	CHC-1999-53106-MAEX	992347244	Yes	N/A	1	Northeast Los Angeles	R1-1	No	No	Single-family	5464011004	$417,000	$964,818	-$547,818	-$608	$5,588	56.78%	High	6.82	Low to Medium Barriers
45	1329 N GENESEE AVE E	1999	Spaulding Square	N/A	N/A	HPOZ	CHC-1999-53125-MA	992347245	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5551029007	$500,000	$1,706,256	-$1,206,256	-$1,338	$12,304	70.70%	High	7.01	Low to Medium Barriers
46	2263 HARVARD BLVD S	1999	N/A	95	Rindge - Frederick Hastings House	HCM	CHC-1999-53117-MA	992347246	N/A	N/A	8	South Los Angeles	RD2-1-CPIO	No	No	Single-family	5058018025	$972,110	$972,110	$0	$0	$0	0.00%	No Savings	4.65	Medium to High Barriers
47	4920 W MARATHON ST E	1999	Melrose Hill	N/A	N/A	HPOZ	CHC-1999-53119-MA	992347247	N/A	N/A	13	Hollywood	R1-1-HPOZ	Yes	No	Multi-family	5535029026	$489,000	$584,210	-$95,210	-$106	$971	16.30%	Low	4.91	Medium to High Barriers
48	1443 N ORANGE GROVE AVE E	1999	Spaulding Square	N/A	N/A	HPOZ	CHC-1999-53126-MA	992347248	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5551026022	$471,000	$1,253,002	-$782,002	-$867	$7,976	62.41%	High	7.01	Low to Medium Barriers
49	930 1/2 S SERRANO AVE E	1999	N/A	646	Villa Serano	HCM	CHC-1999-53111-MA	992347249	N/A	N/A	10	Wilshire	R4-1	Yes	No	Multi-family	5093016001	$1,972,670	$1,972,670	$0	$0	$0	0.00%	No Savings	5.04	Medium to High Barriers
50	639 S SPRING ST	1999	N/A	671	Barclay's Bank	HCM	CHC-1999-53123-MA	992347250	N/A	N/A	14	Central City	C5-4D	No	No	Commercial	5144002152	$2,226,480	$2,226,480	$0	$0	$0	0.00%	No Savings	6.39	Low to Medium Barriers
51	8707 W ST IVES DR	1999	N/A	668	Hillside House by Carl Maston	HCM	CHC-1999-53120-MA	992347251	N/A	N/A	4	Hollywood	RE15-1-H	No	No	Single-family	5560003010	$388,000	$913,481	-$525,481	-$583	$5,360	57.53%	High	8.18	Low Barriers
52	27 ST JAMES PARK	1999	University Park	434	Colonel John E. Stearns Residence	HCM and HPOZ	CHC-1999-53103-MA	992347252	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124023042	$724,000	$1,344,263	-$620,263	-$688	$6,327	46.14%	Moderate	3.62	High Barriers
53	11005 W STRATHMORE DR	1999	N/A	351	Strathmore Apartment	HCM	CHC-1999-53122-MA	992347253	N/A	N/A	5	Westwood	[Q]R4-1VL	Yes	No	Condominium	4363015038-4363015041	$1,128,000	$3,154,068	-$2,026,068	-$2,247	$20,666	64.24%	High	6.1	Low to Medium Barriers
54	4973 N SYCAMORE AL	1999	Highland Park - Garvanza	371	Tustin House and	HCM and HPOZ	CHC-1999-53104-MA	992347254	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5467015007	$363,000	$445,152	-$82,152	-$91	$838	18.45%	Low	6.8	Low to Medium Barriers
55	2639 S VAN BUREN PL E	1999	Adams - Normandie	672	Percy H. Clark Residenc	HCM and HPOZ	CHC-1999-53118-MA	992347255	N/A	N/A	8	South Los Angeles	R2-1-O-HPOZ	No	No	Single-family	5054011013	$267,000	$279,778	-$12,778	-$14	$130	4.57%	Low	5.16	Medium to High Barriers
56	2657 S VAN BUREN PL E	1999	Adams - Normandie	678	The Furlong House	HCM and HPOZ	CHC-1999-53116-MA	992347256	N/A	N/A	8	South Los Angeles	R2-1-O-HPOZ	No	No	Single-family	5054011019	$279,000	$300,259	-$21,259	-$24	$217	7.08%	Low	5.16	Medium to High Barriers
57	2062 N WATSONIA TER	1999	Whitley Heights	N/A	N/A	HPOZ	CHC-1999-53127-MA	992347257	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575017016	$1,060,883	$1,716,152	-$655,269	-$727	$6,684	38.18%	Moderate	6.79	Low to Medium Barriers
58	1625 W 23RD ST	2000	Adams - Normandie	N/A	N/A	HPOZ	CHC-2000-53512-MA	001898827	N/A	N/A	8	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5054001014	$279,000	$687,662	-$408,662	-$453	$4,168	59.43%	High	4.61	Medium to High Barriers
59	1676 W 23RD ST E	2000	Adams - Normandie	N/A	N/A	HPOZ	CHC-2000-53508-MA	001898828	N/A	N/A	8	South Los Angeles	RD1.5-1-HPOZ	No	No	Single-family	5054002011	$244,000	$283,090	-$39,090	-$43	$399	13.81%	Low	4.61	Medium to High Barriers
60	1644 W 25TH ST E	2000	Adams - Normandie	N/A	N/A	HPOZ	CHC-2000-53509-MA	001898829	N/A	N/A	8	South Los Angeles	R2-1-HPOZ	No	No	Multi-family	5054004023, 5054004033	$199,000	$714,613	-$515,613	-$572	$5,259	72.15%	High	4.61	Medium to High Barriers
61	1656 W 25TH ST	2000	Adams - Normandie	780	Bernays House	HCM and HPOZ	CHC-2000-53511-MA	001898830	N/A	N/A	8	South Los Angeles	RD1.5-1-HPOZ	No	No	Single-family	5054004025	$382,000	$714,613	-$332,613	-$369	$3,393	46.54%	Moderate	4.61	Medium to High Barriers

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62	1057 S ALFRED ST	2000	South Carthay	N/A	N/A	HPOZ	CHC-2000-53513-MA	001898831	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087001013	$647,000	$1,918,475	-$1,271,475	-$1,410	$12,969	66.28%	High	7.19	Low to Medium Barriers
63	1139 S CRESCENT HEIGHTS BLVD E	2000	South Carthay	N/A	N/A	HPOZ	CHC-2000-53506-MA	001898832	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087014022	$481,000	$1,494,338	-$1,013,338	-$1,124	$10,336	67.81%	High	7.19	Low to Medium Barriers
64	6245 W DEL VALLE DR E	2000	Carthay Circle	N/A	N/A	HPOZ	CHC-2000-53502-MA	001898833	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088016026	$448,000	$694,914	-$246,914	-$274	$2,519	35.53%	Moderate	7.35	Low to Medium Barriers
65	6285 W DEL VALLE DR E	2000	Carthay Circle	N/A	N/A	HPOZ	CHC-2000-53503-MA	001898834	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088016018	$448,000	$642,001	-$194,001	-$215	$1,979	30.22%	Moderate	7.35	Low to Medium Barriers
66	6286 W DEL VALLE DR E	2000	Carthay Circle	N/A	N/A	HPOZ	CHC-2000-53501-MA	001898835	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088017015	$374,000	$615,488	-$241,488	-$268	$2,463	39.24%	Moderate	7.35	Low to Medium Barriers
67	1818 S GRAMERCY PL E	2000	N/A	599	Julius Bierlich Residence	HCM	CHC-2000-53514-MA	001898836	N/A	N/A	10	South Los Angeles	[Q]R4-1	No	No	Single-family	5073016003	$227,292	$227,292	$0	$0	$0	0.00%	No Savings	4.68	Medium to High Barriers
68	990 N HANLEY AVE E	2000	N/A	680	Mutual Housing Associatio	HCM	CHC-2000-53505-MAEX	001898837	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4493021001	$836,000	$2,059,834	-$1,223,834	-$1,357	$12,483	59.41%	High	8.22	Low Barriers
69	6505 W HAYES DR	2000	Carthay Circle	N/A	N/A	HPOZ	CHC-2000-53516-MA	001898838	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5088009016	$441,000	$916,209	-$475,209	-$527	$4,847	51.87%	High	7.35	Low to Medium Barriers
70	6412 W OLYMPIC BLVD	2000	South Carthay	N/A	N/A	HPOZ	CHC-2000-53504-MA	001898839	N/A	N/A	5	Wilshire	[Q]R3-1-O	Yes	No	Multi-family	5087013016	$688,621	$688,621	$0	$0	$0	0.00%	No Savings	7.19	Low to Medium Barriers
71	6416 W OLYMPIC BLVD	2000	South Carthay	N/A	N/A	HPOZ	CHC-2000-53500-MA	001898840	N/A	N/A	5	Wilshire	[Q]R3-1-O	Yes	No	Multi-family	5087013015	$688,621	$688,621	$0	$0	$0	0.00%	No Savings	7.19	Low to Medium Barriers
72	150 S POINSETTIA PL	2000	Miracle Mile North	N/A	N/A	HPOZ	CHC-2000-53515-MA	001898841	N/A	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512021023	$562,000	$685,574	-$123,574	-$137	$1,260	18.02%	Low	7.3	Low to Medium Barriers
73	2346 S PORTLAND ST	2000	University Park	N/A	N/A	HPOZ	CHC-2000-53507-MA	001898842	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	Yes	No	Single-family	5124012020	$426,000	$692,635	-$266,635	-$296	$2,720	38.50%	Moderate	4.33	High Barriers
74	1635 N WOODS DR E	2000	N/A	670	Stahl House -	HCM	CHC-2000-53510-MA	001898843	N/A	N/A	4	Hollywood	RE9-1	No	No	Single-family	5556031003	$243,473	$243,473	$0	$0	$0	0.00%	No Savings	8.21	Low Barriers
75	2901 W 15TH ST	2001	Harvard Heights	N/A	N/A	HPOZ	CHC-2001-53812-MA	C-102264	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074004017	$286,258	$286,258	$0	$0	$0	0.00%	No Savings	4.72	Medium to High Barriers
76	1657 W 25TH ST	2001	Adams - Normandie	N/A	N/A	HPOZ	CHC-2001-53829-MA	C-102248	N/A	N/A	8	South Los Angeles	RD1.5-1-HPOZ	No	No	Single-family	5054003012	$336,000	$862,491	-$526,491	-$584	$5,370	61.04%	High	4.61	Medium to High Barriers
77	315 W 9TH ST	2001	N/A	346	Coast Federal Savings Building	HCM	CHC-2001-53841-MAEX	C-102247	Yes	N/A	14	Central City	[Q]R5-4D	No	No	Commercial	5144018049	$16,448,207	$16,448,207	$0	$0	$0	0.00%	No Savings	6.79	Low to Medium Barriers
78	1077 S ALFRED ST	2001	South Carthay	N/A	N/A	HPOZ	CHC-2001-53817-MA	C-102249	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087001017	$624,000	$2,016,294	-$1,392,294	-$1,544	$14,201	69.05%	High	7.19	Low to Medium Barriers
79	1206 S ALFRED ST	2001	South Carthay	N/A	N/A	HPOZ	CHC-2001-53832-MA	C-102250	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087004017	$828,000	$994,180	-$166,180	-$184	$1,695	16.72%	Low	7.19	Low to Medium Barriers
80	1210 S ALFRED ST	2001	South Carthay	N/A	N/A	HPOZ	CHC-2001-53809-MA	C-102251	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087004016	$828,000	$1,190,578	-$362,578	-$402	$3,698	30.45%	Moderate	7.19	Low to Medium Barriers
81	1220 S ALFRED ST	2001	South Carthay	N/A	N/A	HPOZ	CHC-2001-53803-MA	C-102252	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087004014	$810,000	$1,628,255	-$818,255	-$908	$8,346	50.25%	High	7.19	Low to Medium Barriers
82	1132 S ALVIRA ST	2001	South Carthay	N/A	N/A	HPOZ	CHC-2001-53816-MA	C-102253	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087014007	$448,000	$466,145	-$18,145	-$20	$185	3.89%	Low	7.19	Low to Medium Barriers

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83	1344 W CARROLL AVE	2001	Angelino Heights	79	Residence	HCM and HPOZ	CHC-2001-53819-MA	C-102254	N/A	N/A	1	Silver Lake - Echo Park -	R2-1VL-HPOZ	Yes	No	Single-family	5405016026	$386,000	$1,101,208	-$715,208	-$793	$7,295	64.95%	High	5.98	Medium to High Barriers
84	1354 W CARROLL AVE	2001	Angelino Heights	N/A	N/A	HPOZ	CHC-2001-53828-MA	C-102255	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	Yes	No	Multi-family	5405016024	$520,044	$520,044	$0	$0	$0	0.00%	No Savings	5.98	Medium to High Barriers
85	1401 W CARROLL AVE	2001	Angelino Heights	N/A	N/A	HPOZ	CHC-2001-53824-MA	C-102256	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	Yes	No	Multi-family	5405012001	$542,920	$542,920	$0	$0	$0	0.00%	No Savings	5.82	Medium to High Barriers
86	1422 W CARROLL AVE	2001	Angelino Heights	N/A	N/A	HPOZ	CHC-2001-5	C-102257	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	No	No	Single-family	5405013010	$335,000	$399,959	-$64,959	-$72	$663	16.24%	Low	5.82	Medium to High Barriers
87	1446 W CARROLL AVE	2001	Angelino Heights	N/A	N/A	HPOZ	CHC-2001-53842-MA	C-102258	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	No	No	Single-family	5405013020	$315,000	$316,879	-$1,879	-$2	$19	0.59%	No Savings	5.82	Medium to High Barriers
88	2531 N CATALINA ST	2001	N/A	689	Philip Chandler House	HCM	CHC-2001-53804-MA	C-102259	N/A	N/A	4	Hollywood	RE11-1	No	No	Single-family	5588010006	$347,856	$347,856	$0	$0	$0	0.00%	No Savings	7.43	Low to Medium Barriers
89	6436 W COMMODORE SLOAT DR	2001	Carthay Circle	N/A	N/A	HPOZ	CHC-2001-53840-MA	C-102260	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5088009002	$568,000	$716,452	-$148,452	-$165	$1,514	20.72%	Low	7.35	Low to Medium Barriers
90	1543 N CURSON AVE	2001	N/A	702	Hewitt Residence	HCM	CHC-2001-53834-MA	C-102261	N/A	N/A	4	Hollywood	R1-1	No	No	Single-family	5550006004	$426,000	$590,557	-$164,557	-$183	$1,678	27.86%	Moderate	7.01	Low to Medium Barriers
91	6200 W DEL VALLE DR	2001	Carthay Circle	N/A	N/A	HPOZ	CHC-2001-53805-MA	C-102262	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088017001	$468,000	$526,998	-$58,998	-$65	$602	11.20%	Low	7.35	Low to Medium Barriers
92	6239 W DEL VALLE DR	2001	Carthay Circle	N/A	N/A	HPOZ	CHC-2001-53806-MA	C-102263	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088016027	$416,974	$416,974	$0	$0	$0	0.00%	No Savings	7.35	Low to Medium Barriers
93	4201 GLENALBYN DR	2001	Highland Park - Garvanza	395	H. Stanley Bent House (including 11/4/1988 Carriage House and Front Fountain)	HCM and HPOZ	CHC-2001-53818-MA	C-102265	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	Yes	No	Multi-family	5465016001	$502,000	$793,417	-$291,417	-$323	$2,972	36.73%	Moderate	6.27	Low to Medium Barriers
94	1522 S HOBART BLVD	2001	Harvard Heights	N/A	N/A	HPOZ	CHC-2001-53815-MA	C-102267	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074009027	$448,000	$975,842	-$527,842	-$585	$5,384	54.09%	High	5.22	Medium to High Barriers
95	792 E KENSINGTON RD	2001	Angelino Heights	N/A	N/A	HPOZ	CHC-2001-53827-MA	C-102268	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Multi-family	5405022020	$501,186	$501,186	$0	$0	$0	0.00%	No Savings	5.98	Medium to High Barriers
96	801 E KENSINGTON RD	2001	Angelino Heights	827	Arthur B. Benton Residence	HCM and HPOZ	CHC-2001-53822-MA	C-102270	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Single-family	5405020009	$466,234	$466,234	$0	$0	$0	0.00%	No Savings	5.98	Medium to High Barriers
97	1048 W KENSINGTON RD	2001	Angelino Heights	824	Mary E. Stilson Residence	HCM and HPOZ	CHC-2001-53826-MA	C-102271	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5404022015	$1,046,000	$1,856,400	-$810,400	-$899	$8,266	43.65%	Moderate	5.82	Medium to High Barriers
98	1220 S LA JOLLA AVE	2001	South Carthay	N/A	N/A	HPOZ	CHC-2001-53837-MA	C-102272	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087010015	$737,161	$737,161	$0	$0	$0	0.00%	No Savings	7.19	Low to Medium Barriers
99	1226 S LA JOLLA AVE	2001	South Carthay	N/A	N/A	HPOZ	CHC-2001-53838-MA	C-102273	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087010016	$764,000	$857,747	-$93,747	-$104	$956	10.93%	Low	7.19	Low to Medium Barriers
100	6760 W MILNER RD	2001	Whitley Heights	N/A	N/A	HPOZ	CHC-2001-53831-MA	C-102274	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575013023	$381,000	$851,238	-$470,238	-$522	$4,796	55.24%	High	6.79	Low to Medium Barriers
101	4237 W NEWDALE DR	2001	N/A	690	Elliot House	HCM	CHC-2001-53800-	C-102275	Yes	N/A	4	Hollywood	R1-1	No	No	Single-family	5591013039	$321,000	$735,886	-$414,886	-$460	$4,232	56.38%	High	7.45	Low to Medium Barriers
102	1301 N OGDEN DR	2001	Spaulding Square	N/A	N/A	HPOZ	CHC-2001-53823-MA	C-102276	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5551028001	$403,000	$1,173,642	-$770,642	-$855	$7,861	65.66%	High	7.01	Low to Medium Barriers
103	6551 W OLYMPIC PL	2001	South Carthay	N/A	N/A	HPOZ	CHC-2001-53801-MA	C-102277	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087007018	$509,000	$625,374	-$116,374	-$129	$1,187	18.61%	Low	7.19	Low to Medium Barriers

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104	1120 S ORLANDO AVE	2001	South Carthay	N/A	N/A	HPOZ	CHC-2001-53836-MA	C-102278	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087009016	$410,000	$1,521,762	-$1,111,762	-$1,233	$11,340	73.06%	High	7.19	Low to Medium Barriers
105	1651 S OXFORD AVE	2001	Harvard Heights	N/A	N/A	HPOZ	CHC-2001-53835-MA	C-102279	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074014009	$299,000	$893,061	-$594,061	-$659	$6,059	66.52%	High	4.68	Medium to High Barriers
106	13401 W RIVERSIDE DR	2001	N/A	683	Chase Knolls Garden Apartments	HCM	CHC-2001-53839-MAEX	C-102280	Yes	N/A	2	Van Nuys - North Sherman Oaks	[Q]RD1.5-1	Yes	No	Multi-family	2359019004	$49,410,000	$71,231,292	-$21,821,292	-$24,202	$222,577	30.63%	Moderate	6.96	Low to Medium Barriers
107	6135 W SAN VICENTE BLVD	2001	Carthay Circle	N/A	N/A	HPOZ	CHC-2001-53814-MA	C-102281	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088004051	$433,000	$641,618	-$208,618	-$231	$2,128	32.51%	Moderate	7.35	Low to Medium Barriers
108	2343 S SCARFF ST	2001	University Park	N/A	N/A	HPOZ	CHC-2001-53833-MA	C-102282	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5124012021	$2,935,500	$4,918,823	-$1,983,323	-$2,200	$20,230	40.32%	Moderate	4.33	High Barriers
109	947 N STONEHILL LN	2001	N/A	698	Sherwood House	HCM	CHC-2001-53813-MAEX	C-102283	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4493022019	$476,000	$1,033,349	-$557,349	-$618	$5,685	53.94%	High	8.22	Low Barriers
110	53081/2 VILLAGE GRN	2001	N/A	174	Village Green	HCM	CHC-2001-53808-MA	C-102284	N/A	N/A	8	West Adams - Baldwin Hills - Leimert	RD4-1	Yes	No	Multi-family	5025009	$83,000	$119,649	-$36,649	-$41	$374	30.63%	Moderate	7.29	Low to Medium Barriers
111	1620 S VIRGINIA RD	2001	La Fayette Square	N/A	N/A	HPOZ	CHC-2001-53802-MA	C-102285	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071005030	$493,019	$1,880,599	-$1,387,580	-$1,539	$14,153	73.78%	High	5.49	Medium to High Barriers
112	6221 W WARNER DR	2001	Carthay Circle	N/A	N/A	HPOZ	CHC-2001-53810-MAEX	C-102286	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088015017	$515,000	$878,344	-$363,344	-$403	$3,706	41.37%	Moderate	7.35	Low to Medium Barriers
113	6227 W WARNER DR	2001	Carthay Circle	N/A	N/A	HPOZ	CHC-2001-53811-MA	C-102287	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088015016	$258,848	$258,848	$0	$0	$0	0.00%	No Savings	7.35	Low to Medium Barriers
114	1650 S WELLINGTON RD	2001	La Fayette Square	N/A	N/A	HPOZ	CHC-2001-53807-MA	C-102288	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071004023	$409,000	$993,511	-$584,511	-$648	$5,962	58.83%	High	5.49	Medium to High Barriers
115	6501 W WHITWORTH DR	2001	South Carthay	N/A	N/A	HPOZ	CHC-2001-53830-MAEX	C-102289	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087008001	$651,000	$1,847,044	-$1,196,044	-$1,327	$12,200	64.75%	High	7.19	Low to Medium Barriers
116	1866 W 14TH ST	2002	Pico - Union	244	Residence	HCM and HPOZ	CHC-2002-54317-MAEX	C-104051	Yes	N/A	1	Westlake	RD1.5-1-HPOZ	No	No	Single-family	5135007001	$291,335	$291,335	$0	$0	$0	0.00%	No Savings	4.17	High Barriers
117	315 E 8TH ST	2002	N/A	712	Textile Center Building	HCM	CHC-2002-54328-MAEX	C-104102	Yes	N/A	14	Central City	M2-2D	No	No	Condominium	5145003023-5145003086	$12,729,350	$31,927,109	-$19,197,759	-$21,292	$195,817	60.13%	High	5.06	Medium to High Barriers
118	3923 W 9TH ST E	2002	Wilshire Park	707	Weber House	HCM and HPOZ	CHC-2002-54318-MAEX	C-104052	Yes	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092014002	$344,000	$1,428,000	-$1,084,000	-$1,202	$11,057	75.91%	Very High	5.2	Medium to High Barriers
119	1150 S ALFRED ST	2002	South Carthay	N/A	N/A	HPOZ	CHC-2002-54300-MA	C-104053	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087005017	$432,000	$1,548,400	-$1,116,400	-$1,238	$11,387	72.10%	High	7.19	Low to Medium Barriers
120	1317 S ALVARADO TER	2002	Pico - Union	83	Boyle - Barmore Residenc	HCM and HPOZ	CHC-2002-54307-MA	C-104054	N/A	N/A	1	Westlake	RD1.5-1-HPOZ	No	No	Industrial	5135004009	$552,227	$552,227	$0	$0	$0	0.00%	No Savings	4.17	High Barriers
121	1325 S ALVARADO TER	2002	Pico - Union	84	Cohn Residence	HCM and HPOZ	CHC-2002-54319-MA	C-104055	N/A	N/A	1	Westlake	RD1.5-1-HPOZ	No	No	Single-family	5135004010	$450,255	$450,255	$0	$0	$0	0.00%	No Savings	4.17	High Barriers
122	623 N AVENUE 54	2002	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2002-54314-MA	C-104056	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	No	No	Single-family	5469027015	$155,325	$155,325	$0	$0	$0	0.00%	No Savings	6.5	Low to Medium Barriers
123	2720 N BELDEN DR	2002	N/A	715	Lehman House	HCM	CHC-2002-54320-	C-104057	Yes	N/A	4	Hollywood	R1-1	No	No	Single-family	5582017001	$344,000	$1,068,474	-$724,474	-$804	$7,390	67.80%	High	7.4	Low to Medium Barriers
124	1648 S BUCKINGHAM RD	2002	La Fayette Square	N/A	N/A	HPOZ	CHC-2002-54303-MA	C-104058	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071008067	$495,000	$589,306	-$94,306	-$105	$962	16.00%	Low	5.49	Medium to High Barriers
125	600 S BURNSIDE AVE	2002	N/A	701	Burnside Manor	HCM	CHC-2002-54311-MA	C-104059	N/A	N/A	4	Wilshire	[Q]R4-1	Yes	No	Multi-family	5508011014	$3,057,000	$4,040,427	-$983,427	-$1,091	$10,031	24.34%	Low	7.61	Low Barriers

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126	1041 S CRESCENT HEIGHTS BLVD	2002	South Carthay	N/A	N/A	HPOZ	CHC-2002-54309-MA	C-104060	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087013023	$469,000	$794,581	-$325,581	-$361	$3,321	40.98%	Moderate	7.19	Low to Medium Barriers
127	1335 N GENESEE AVE	2002	Spaulding Square	N/A	N/A	HPOZ	CHC-2002-54312-MA	C-104061	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5551029008	$486,000	$1,393,203	-$907,203	-$1,006	$9,253	65.12%	High	7.01	Low to Medium Barriers
128	112 N HARVARD BLVD	2002	N/A	684	Heart House	HCM	CHC-2002-54306-MA	C-104062	N/A	N/A	10	Wilshire	R1-1	No	No	Single-family	5517017019	$336,000	$1,208,805	-$872,805	-$968	$8,903	72.20%	High	5.51	Medium to High Barriers
129	666 S LA FAYETTE PARK PL E	2002	N/A	238	Granada Shopper & Studios Building	HCM	CHC-2002-54321-MA	C-104063	N/A	N/A	1	Westlake	C2-2	No	No	Commercial	5141011015	$3,299,676	$3,299,676	$0	$0	$0	0.00%	No Savings	4.46	High Barriers
130	1040 S LA JOLLA AVE	2002	South Carthay	N/A	N/A	HPOZ	CHC-2002-54304-MAEX	C-104064	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087012023	$394,000	$920,388	-$526,388	-$584	$5,369	57.19%	High	7.19	Low to Medium Barriers
131	710 S LOS ANGELES ST E	2002	N/A	710	M.J. Connell Buildings 1, 2, 3 & 7	HCM	CHC-2002-54324-MAEX	C-104103	Yes	Downtown Los Angeles	14	Central City	M2-2D	No	Yes	Commercial	5145002002	$35,718,350	$35,718,350	$0	$0	$0	0.00%	No Savings	5.06	Medium to High Barriers
132	824 S LOS ANGELES ST	2002	N/A	709	Gray Building	HCM	CHC-2002-54326-MAEX	C-104104	Yes	Downtown Los Angeles	14	Central City	M2-2D	No	Yes	Industrial	5145013012	$5,216,307	$5,216,307	$0	$0	$0	0.00%	No Savings	5.06	Medium to High Barriers
133	910 S LOS ANGELES ST	2002	N/A	708	Gerry Building	HCM	CHC-2002-54325-MAEX	C-104105	Yes	Downtown Los Angeles	14	Central City	M2-2D	No	Yes	Industrial	5145016055	$15,384,844	$15,384,844	$0	$0	$0	0.00%	No Savings	6.76	Low to Medium Barriers
134	400 S MAIN ST	2002	N/A	728	San Fernando	HCM	CHC-2002-54331-	C-104201	Yes	N/A	14	Central City	[Q]C4-2D	No	Yes	Multi-family	5148008001	$21,900,000	$39,752,851	-$17,852,851	-$19,800	$182,099	44.91%	Moderate	6.49	Low to Medium Barriers
135	401 S MAIN ST	2002	N/A	271	Farmers and Merchant	HCM	CHC-2002-54322-MA	C-104200	N/A	N/A	14	Central City	[Q]C4-4D	No	Yes	Commercial	5149022013-5149022014	$6,808,459	$9,072,067	-$2,263,608	-$2,511	$23,089	24.95%	Low	6.49	Low to Medium Barriers
136	411 S MAIN ST	2002	N/A	729	Hellman Building	HCM	CHC-2002-54329-MA	C-104197	N/A	N/A	14	Central City	[Q]C4-4D	No	Yes	Multi-family	5149022012	$1,602,006	$1,602,006	$0	$0	$0	0.00%	No Savings	6.49	Low to Medium Barriers
137	600 S MAIN ST	2002	N/A	104	Coles P.E. Buffet / Pacific Electric Building	HCM	CHC-2002-54323-MAEX	C-104065	Yes	N/A	14	Central City	C2-2D	No	Yes	Multi-family	5148021015	$82,809,000	$113,702,394	-$30,893,394	-$34,264	$315,113	27.17%	Moderate	6.49	Low to Medium Barriers
138	210 S MARTEL AVE	2002	Miracle Mile North	N/A	N/A	HPOZ	CHC-2002-54310-MA	C-104066	N/A	N/A	5	Wilshire	R3-1-HPOZ	Yes	No	Multi-family	5512016014	$550,438	$550,438	$0	$0	$0	0.00%	No Savings	7.3	Low to Medium Barriers
139	6458 W OLYMPIC BLVD	2002	South Carthay	N/A	N/A	HPOZ	CHC-2002-54301-MA	C-104067	N/A	N/A	5	Wilshire	[Q]R3-1-O-HPOZ	Yes	No	Multi-family	5087012002	$1,161,679	$1,161,679	$0	$0	$0	0.00%	No Savings	7.19	Low to Medium Barriers
140	6612 W OLYMPIC BLVD	2002	South Carthay	N/A	N/A	HPOZ	CHC-2002-54302-MA	C-104068	N/A	N/A	5	Wilshire	[Q]R3-1-O	Yes	No	Multi-family	5087006003	$2,276,012	$2,276,012	$0	$0	$0	0.00%	No Savings	7.19	Low to Medium Barriers
141	206 S POINSETTIA PL	2002	Miracle Mile North	N/A	N/A	HPOZ	CHC-2002-54315-MA	C-104069	N/A	N/A	5	Wilshire	R3-1-HPOZ	Yes	No	Multi-family	5512022021	$1,048,000	$1,187,468	-$139,468	-$155	$1,423	11.74%	Low	7.3	Low to Medium Barriers
142	743 S SANTEE ST	2002	N/A	711	M.J. Connell Building 4, 5, & 6	HCM	CHC-2002-54327-MAEX	C-104106	Yes	Downtown Los Angeles	14	Central City	M2-2D	No	Yes	Condominium	5145029001-5145029045	$33,531,886	$65,403,103	-$31,871,217	-$35,348	$325,086	48.73%	Moderate	5.06	Medium to High Barriers
143	1439 N SPAULDING AVE	2002	Spaulding Square	N/A	N/A	HPOZ	CHC-2002-54308-MA	C-104070	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5551023008	$496,000	$832,675	-$336,675	-$373	$3,434	40.43%	Moderate	7.01	Low to Medium Barriers
144	408 S SPRING ST	2002	N/A	730	Continental Building	HCM	CHC-2002-54330-MAEX	C-104199	Yes	Downtown Los Angeles	14	Central City	[Q]C4-4D	No	Yes	Multi-family	5149023011	$74,671	$74,671	$0	$0	$0	0.00%	No Savings	6.49	Low to Medium Barriers

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145	410 S SPRING ST	2002	N/A	729	Hellman Building	HCM	CHC-2002-54332-MA	C-104198	N/A	Downtown Los Angeles	14	Central City	[Q]C4-4D	No	Yes	Multi-family	5149023013	$2,398,824	$2,398,824	$0	$0	$0	0.00%	No Savings	6.49	Low to Medium Barriers
146	4967 N SYCAMORE TER	2002	Highland Park - Garvanza	372	Mary P. Field House and	HCM and HPOZ	CHC-2002-54316-MA	C-104071	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Single-family	5467015008	$423,388	$423,388	$0	$0	$0	0.00%	No Savings	6.8	Low to Medium Barriers
147	2059 N WATSONIA TER	2002	Whitley Heights	N/A	N/A	HPOZ	CHC-2002-54305-MA	C-104072	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575017039	$680,690	$680,690	$0	$0	$0	0.00%	No Savings	6.79	Low to Medium Barriers
148	6746 W WEDGEWOOD PL	2002	Whitley Heights	N/A	N/A	HPOZ	CHC-2002-54313-MAEX	C-104073	Yes	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575017027	$627,000	$1,743,215	-$1,116,215	-$1,238	$11,385	64.03%	High	6.79	Low to Medium Barriers
149	2160 W 20TH ST	2003	Western Heights	761	Kissam House	HCM and HPOZ	CHC-2003-60924-MAEX	C-106036	Yes	N/A	10	Central City	R1-1-0-HPOZ	No	No	Single-family	5073030020	$586,000	$878,970	-$292,970	-$325	$2,988	33.33%	Moderate	4.71	Medium to High Barriers
150	131 W 5TH ST	2003	N/A	772	King Edward Building	HCM	CHC-2003-60938-MAEX	C-106035	Yes	Downtown Los Angeles	14	Central City	[Q]C4-4D	Yes	Yes	Condominium	5149023	$38,655,958	$97,351,226	-$58,695,268	-$65,098	$598,692	60.29%	High	6.49	Low to Medium Barriers
151	5274 E ALDAMA ST	2003	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2003-60919-MA	C-106037	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	No	No	Single-family	5469023005	$326,000	$485,175	-$159,175	-$177	$1,624	32.81%	Moderate	5.69	Medium to High Barriers
152	5686 ASH ST	2003	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2003-60911-MA	C-106038	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Multi-family	5469036027	$334,000	$390,664	-$56,664	-$63	$578	14.50%	Low	5.77	Medium to High Barriers
153	369 N AVENUE 53	2003	Highland Park - Garvanza	554	La Paloma	HCM and HPOZ	CHC-2003-60927-MA	C-106039	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	No	No	Single-family	5469020007	$522,000	$624,581	-$102,581	-$114	$1,046	16.42%	Low	5.69	Medium to High Barriers
154	901 S BROADWAY	2003	N/A	765	Blackstone's Department Store	HCM	CHC-2003-60943-MAEX	C-106040	Yes	Downtown Los Angeles	14	Central City	C2-4D	No	Yes	Multi-family	5139003002	$13,566,518	$13,566,518	$0	$0	$0	0.00%	No Savings	6.76	Low to Medium Barriers
155	1660 S BUCKINGHAM RD	2003	La Fayette Square	N/A	N/A	HPOZ	CHC-2003-60918-MA	C-16041	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071008069	$341,000	$521,012	-$180,012	-$200	$1,836	34.55%	Moderate	5.49	Medium to High Barriers
156	5261 N COLLEGE VIEW AVE	2003	N/A	752	Hanson Puthoff House	HCM	CHC-2003-60931-MA	C-106042	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5682014027	$349,000	$396,290	-$47,290	-$52	$482	11.93%	Low	7.46	Low to Medium Barriers
157	1950 W COLORADO BLVD	2003	N/A	734	Bell Commercial Block	HCM	CHC-2003-60905-MA	C-106043	N/A	N/A	14	Northeast Los Angeles	[Q]C4-1XL	No	No	Commercial	5686006005-5686006006	$1,079,301	$1,079,301	$0	$0	$0	0.00%	No Savings	7.06	Low to Medium Barriers
158	6535 W COMMODORE SLOAT DR	2003	Carthay Circle	N/A	N/A	HPOZ	CHC-2003-60912-MAEX	C-106044	Yes	N/A	5	Wilshire	R2-1-O-HPOZ	No	No	Single-family	5088010030	$426,000	$804,966	-$378,966	-$420	$3,865	47.08%	Moderate	7.35	Low to Medium Barriers
159	6434 E CRESCENT ST	2003	Highland Park - Garvanza	528	Dr. Franklin S. Whaley Residence	HCM and HPOZ	CHC-2003-60923-MA	C-106045	N/A	N/A	14	Northeast Los Angeles	RD2-1	No	No	Single-family	5493017013	$232,000	$364,174	-$132,174	-$147	$1,348	36.29%	Moderate	6.08	Low to Medium Barriers
160	571 CYPRESS AVE	2003	N/A	735	Jeffries House	HCM	CHC-2003-60917-MA	C-106046	N/A	N/A	1	Northeast Los Angeles	R1-1-CDO	Yes	No	Single-family	5446006026	$296,000	$670,335	-$374,335	-$415	$3,818	55.84%	High	5.01	Medium to High Barriers
161	12367 W DEERBROOK LN	2003	N/A	721	Stoleroff House	HCM	CHC-2003-60910-MAEX	C-106047	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494007021	$487,000	$766,941	-$279,941	-$310	$2,855	36.50%	Moderate	8.22	Low Barriers
162	6298 DEL VALLE DR	2003	Carthay Circle	N/A	N/A	HPOZ	CHC-2003-60913-	C-106048	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088017017	$539,000	$1,837,590	-$1,298,590	-$1,440	$13,246	70.67%	High	7.35	Low to Medium Barriers
163	612 S FLOWER ST	2003	N/A	766	General Petroleum Building	HCM	CHC-2003-60932-MAEX	C-106049	Yes	N/A	14	Central City	C2-4D	No	No	Multi-family	5144005124	$76,100,000	$114,850,458	-$38,750,458	-$42,978	$395,255	33.74%	Moderate	6.79	Low to Medium Barriers

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164	5121 W FRANKLIN AVE	2003	N/A	762	Sowden House	HCM	CHC-2003-60904-MAEX	C-106050	Yes	N/A	4	Hollywood	RE9-1	No	No	Single-family	5589008019	$1,157,000	$4,791,960	-$3,634,960	-$4,032	$37,077	75.86%	Very High	7.69	Low Barriers
165	417 N GRACE AVE	2003	N/A	773	El Cabrillo Apartments	HCM	CHC-2003-60909-MAEX	C-106051	Yes	N/A	13	Hollywood	[Q]R4-2	Yes	No	Condominium	5547006018-5547006027	$2,207,000	$7,076,850	-$4,869,850	-$5,401	$49,672	68.81%	High	5.83	Medium to High Barriers
166	816 S GRAND AVE	2003	N/A	748	South Park Loft Building	HCM	CHC-2003-60933-MAEX	C-106052	Yes	Downtown Los Angeles	14	Central City	C2-4D	No	Yes	Multi-family	5144019023	$14,200,000	$18,600,822	-$4,400,822	-$4,881	$44,888	23.66%	Low	6.79	Low to Medium Barriers
167	413 S HILL ST	2003	N/A	177	Subway Terminal Building	HCM	CHC-2003-60941-MAEX	C-106053	Yes	N/A	14	Central City	C2-4D	No	Yes	Condominium	5149027016-5149027020	$67,357,340	$73,237,340	-$5,880,000	-$6,521	$59,976	8.03%	Low	5.75	Medium to High Barriers
168	1746 S HOBART BLVD	2003	Harvard Heights	N/A	N/A	HPOZ	CHC-2003-60922-MA	C-106054	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074020004	$373,000	$402,475	-$29,475	-$33	$301	7.32%	Low	5.22	Medium to High Barriers
169	644 S KELTON AVE	2003	N/A	365	Kelton Apartments	HCM	CHC-2003-60907-MA	C-106055	N/A	N/A	5	Westwood	[Q]R4-1VL	Yes	No	Single-family	4363014006	$319,792	$319,792	$0	$0	$0	0.00%	No Savings	6.12	Low to Medium Barriers
170	1121 W MARION AVE	2003	Angelino Heights	739	J.M. Haff 4-Plex	HCM and HPOZ	CHC-2003-60916-MA	C-106056	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405023006	$727,000	$923,519	-$196,519	-$218	$2,004	21.28%	Low	5.98	Medium to High Barriers
171	4960 W MELROSE HL	2003	Melrose Hill	N/A	N/A	HPOZ	CHC-2003-60920-MA	C-106057	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535028007	$336,000	$376,951	-$40,951	-$45	$418	10.86%	Low	4.91	Medium to High Barriers
172	2323 MICHELTORENA ST	2003	N/A	124	Tierman House	HCM	CHC-2003-60934-MAEX	C-106058	Yes	N/A	4	Silver Lake - Echo Park - Elysian Valley	R1-1VL	No	No	Single-family	5432030005	$349,000	$715,258	-$366,258	-$406	$3,736	51.21%	High	7.88	Low Barriers
173	501 S PLYMOUTH BLVD	2003	Windsor Square	756	Henry W. O'Melveny House	HCM and HPOZ	CHC-2003-60942-MAEX	C-106059	Yes	N/A	4	Wilshire	RE11-1-HPOZ	No	No	Single-family	5505023015	$1,994,000	$8,679,016	-$6,685,016	-$7,414	$68,187	77.03%	Very High	7.89	Low Barriers
174	570 N ROSSMORE AVE	2003	Hancock Park	768	Ravenswood Apartments	HCM and HPOZ	CHC-2003-60935-MAEX	C-106060	Yes	N/A	4	Wilshire	R4-2-HPOZ	Yes	No	Multi-family	5523014033	$18,300,000	$31,270,881	-$12,970,881	-$14,386	$132,303	41.48%	Moderate	7.7	Low Barriers
175	4260 SEA VIEW LN	2003	N/A	614	Wolford House	HCM	CHC-2003-60921-MA	C-106061	N/A	N/A	1	Northeast Los Angeles	R1-1	No	No	Single-family	5471002017	$245,000	$601,405	-$356,405	-$395	$3,635	59.26%	High	6.8	Low to Medium Barriers
176	500 S SPRING ST	2003	N/A	741	Security Building	HCM	CHC-2003-60936-MAEX	C-106062	Yes	N/A	14	Central City	C2-4D	No	Yes	Multi-family	5149036004	$12,170,436	$12,170,436	$0	$0	$0	0.00%	No Savings	6.49	Low to Medium Barriers
177	812 S SPRING ST	2003	N/A	737	Gans Brothers Building	HCM	CHC-2003-60937-MAEX	C-106063	Yes	N/A	14	Central City	C2-4D	No	No	Condominium	5144016069-5144016076	$2,348,000	$5,671,881	-$3,323,881	-$3,686	$33,904	58.60%	High	6.39	Low to Medium Barriers
178	539 N SYCAMORE AVE	2003	La Fayette Square	733	The Garrick	HCM and HPOZ	CHC-2003-60925-MA	C-106064	N/A	N/A	5	Hollywood	RD1.5-1XL	Yes	No	Multi-family	5525020013	$1,402,000	$2,362,668	-$960,668	-$1,065	$9,799	40.66%	Moderate	7.14	Low to Medium Barriers
179	1729 S VICTORIA AVE	2003	La Fayette Square	N/A	N/A	HPOZ	CHC-2003-60939-MAEX	C-106065	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071003004	$535,000	$958,882	-$423,882	-$470	$4,324	44.21%	Moderate	5.49	Medium to High Barriers
180	1821 S VICTORIA AVE	2003	La Fayette Square	N/A	N/A	HPOZ	CHC-2003-60902-MAEX	C-106066	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071003009	$675,000	$828,020	-$153,020	-$170	$1,561	18.48%	Low	5.49	Medium to High Barriers
181	1674 S VIRGINIA RD	2003	La Fayette Square	N/A	N/A	HPOZ	CHC-2003-60940-MA	C-106067	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071005038	$519,326	$519,326	$0	$0	$0	0.00%	No Savings	5.49	Medium to High Barriers

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182	1674 S WELLINGTON RD	2003	La Fayette Square	N/A	N/A	HPOZ	CHC-2003-60926-MA	C-106068	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071004027	$302,000	$607,846	-$305,846	-$339	$3,120	50.32%	High	5.49	Medium to High Barriers
183	1929 N WHITLEY AVE	2003	Whitley Heights	842	Ojai Apartments	HCM and HPOZ	CHC-2003-60900-MAEX	C-106069	Yes	N/A	4	Hollywood	[Q]R4-1VL	No	No	Multi-family	5575006013	$4,349,483	$4,349,483	$0	$0	$0	0.00%	No Savings	6.79	Low to Medium Barriers
184	9038 W WONDERLAND PARK AVE	2003	N/A	669	Bailey House - Case Study House #21	HCM	CHC-2003-60901-MAEX	C-106070	Yes	N/A	4	Bel Air - Beverly Crest	RE15-1-H	No	No	Single-family	5564024022	$815,000	$3,751,027	-$2,936,027	-$3,256	$29,947	78.27%	Very High	8.37	Low Barriers
185	3437 N ADINA DR	2004	N/A	759	Gerst Residence	HCM	CHC-2004-6653-MAEX	C-107747	Yes	N/A	4	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	RE15-1-H	No	No	Single-family	2427001013	$430,000	$1,146,285	-$716,285	-$794	$7,306	62.49%	High	7.63	Low Barriers
186	1226 S ALFRED ST	2004	South Carthay	N/A	N/A	HPOZ	CHC-2004-2995-MA	C-107745	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087004013	$677,000	$1,825,340	-$1,148,340	-$1,274	$11,713	62.91%	High	7.19	Low to Medium Barriers
187	1815 S ARDMORE AVE	2004	Harvard Heights	N/A	N/A	HPOZ	CHC-2004-7978-MA	C-107734	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074024005	$323,000	$946,763	-$623,763	-$692	$6,362	65.88%	High	5.22	Medium to High Barriers
188	320 W AVENUE 43	2004	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2004-3092-MA	C-107740	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	Yes	No	Multi-family	5465016008	$314,000	$524,805	-$210,805	-$234	$2,150	40.17%	Moderate	6.27	Low to Medium Barriers
189	534 N AVENUE 54	2004	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2004-6652-MAEX	C-107720	Yes	N/A	1	Northeast Los Angeles	R1-1-HPOZ	No	No	Single-family	5469022003	$265,000	$669,769	-$404,769	-$449	$4,129	60.43%	High	5.69	Medium to High Barriers
190	6135 W BARROWS DR	2004	Carthay Circle	N/A	N/A	HPOZ	CHC-2004-7976-MA	C-107738	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088017034	$471,000	$1,870,993	-$1,399,993	-$1,553	$14,280	74.83%	High	7.35	Low to Medium Barriers
191	3500 S BEETHOVEN ST	2004	Gregory Ain Mar Vista Tract	N/A	N/A	HPOZ	CHC-2004-6657-MAEX	C-107728	Yes	N/A	11	Palms - Mar Vista - Del Rey	R1-1-HPOZ	No	No	Single-family	4245007001	$344,000	$1,199,164	-$855,164	-$948	$8,723	71.31%	High	7.34	Low to Medium Barriers
192	3526 BEETHOVEN ST	2004	Gregory Ain Mar Vista Tract	N/A	N/A	HPOZ	CHC-2004-7982-MA	C-107742	N/A	N/A	11	Palms - Mar Vista - Del Rey	R1V2-HPOZ	No	No	Single-family	4245007005	$344,000	$474,492	-$130,492	-$145	$1,331	27.50%	Moderate	7.34	Low to Medium Barriers
193	661 N BROOKTREE RD	2004	N/A	694	Emmons House	HCM	CHC-2004-6658-MAEX	C-107743	Yes	N/A	11	Brentwood - Pacific Palisades	RE11-1	No	No	Single-family	4409027011	$812,000	$1,042,454	-$230,454	-$256	$2,351	22.11%	Low	8.73	Low Barriers
194	1321 W CARROLL AVE	2004	Angelino Heights	176	Residence	HCM and HPOZ	CHC-2004-6650-MAEX	C-107724	Yes	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	Yes	No	Multi-family	5405017026	$684,000	$1,273,449	-$589,449	-$654	$6,012	46.29%	Moderate	5.98	Medium to High Barriers
195	12436 W DEERBROOK LN	2004	N/A	720	Arens House	HCM	CHC-2004-6659-MAEX	C-107726	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494009019	$501,000	$1,013,089	-$512,089	-$568	$5,223	50.55%	High	8.83	Low Barriers
196	6216 W DEL VALLE DR	2004	Carthay Circle	N/A	N/A	HPOZ	CHC-2004-6729-MAEX	C-107735	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088017003	$397,000	$936,785	-$539,785	-$599	$5,506	57.62%	High	7.35	Low to Medium Barriers
197	4219 N FIGUEROA ST	2004	Highland Park - Garvanza	778	Murdock Residence	HCM and HPOZ	CHC-2004-7981-MA	C-107715	N/A	N/A	1	Northeast Los Angeles	[Q]C2-1VL	No	No	Single-family	5467001001	$299,513	$299,513	$0	$0	$0	0.00%	No Savings	5.32	Medium to High Barriers
198	800 S FLOWER ST	2004	N/A	789	Southern California Gas Company	HCM	CHC-2004-7980-MA	C-107725	N/A	N/A	14	Central City	C2-4D	No	Yes	Multi-family	5144020040	$54,817,000	$79,375,673	-$24,558,673	-$27,238	$250,498	30.94%	Moderate	6.79	Low to Medium Barriers
199	907 N HANLEY AVE	2004	N/A	682	Schott House	HCM	CHC-2004-6660-MAEX	C-107749	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494021015	$562,000	$974,215	-$412,215	-$457	$4,205	42.31%	Moderate	8.83	Low Barriers
200	1919 S HARVARD BLVD	2004	Harvard Heights	818	J.R. Dennison House	HCM and HPOZ	CHC-2004-7975-MA	C-107713	N/A	N/A	10	South Los Angeles	[Q]R4-1-HPOZ	No	No	Single-family	5074032011	$620,000	$731,885	-$111,885	-$124	$1,141	15.29%	Low	4.71	Medium to High Barriers

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201	2400 W HILL DR W	2004	N/A	760	Case Residence	HCM	CHC-2004-7998-MA	C-107731	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5682016013	$342,000	$1,004,063	-$662,063	-$734	$6,753	65.94%	High	7.46	Low to Medium Barriers
202	2501 W HILL DR W	2004	N/A	758	Keran Residence	HCM	CHC-2004-7999-MA	C-107714	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5682001038	$365,000	$620,005	-$255,005	-$283	$2,601	41.13%	Moderate	7.46	Low to Medium Barriers
203	5230 W HOLLYWOOD BLVD	2004	N/A	714	Don Carlos Apartment	HCM	CHC-2004-7987-MA	C-107737	N/A	N/A	13	Hollywood	C2-1D	Yes	No	Commercial	5544016011	$2,629,159	$2,629,159	$0	$0	$0	0.00%	No Savings	5.71	Medium to High Barriers
204	1442 W KELLAM AVE	2004	Angelino Heights	321	Eastlake Inn	HCM and HPOZ	CHC-2004-7986-MA	C-107719	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	No	No	Single-family	5405012019	$523,000	$1,238,578	-$715,578	-$794	$7,299	57.77%	High	5.82	Medium to High Barriers
205	4958 W MARATHON ST	2004	Melrose Hill	N/A	N/A	HPOZ	CHC-2004-7985-MA	C-107748	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535029019	$261,000	$815,703	-$554,703	-$615	$5,658	68.00%	High	4.91	Medium to High Barriers
206	840 N MELROSE HILL	2004	Melrose Hill	N/A	N/A	HPOZ	CHC-2004-7983-MA	C-107741	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535026022	$329,000	$1,254,600	-$925,600	-$1,027	$9,441	73.78%	High	4.91	Medium to High Barriers
207	4940 W MELROSE HILL	2004	Melrose Hill	777	Weave Residence	HCM and HPOZ	CHC-2004-7992-MA	C-107732	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535028028	$388,000	$1,176,648	-$788,648	-$875	$8,044	67.02%	High	4.91	Medium to High Barriers
208	814 MELROSE HILL	2004	Melrose Hill	N/A	N/A	HPOZ	CHC-2004-2993-MA	C-107717	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535026017	$299,000	$384,039	-$85,039	-$94	$867	22.14%	Low	4.91	Medium to High Barriers
209	5329 N MOUNT ROYAL DR N	2004	N/A	771	J.L. Hodge Residence	HCM	CHC-2004-7991-MA	C-107730	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5669005019	$388,000	$463,776	-$75,776	-$84	$773	16.34%	Low	7.46	Low to Medium Barriers
210	14501 W MULHOLLAND DR	2004	N/A	718	Ward House	HCM	CHC-2004-7990-MA	C-107729	N/A	N/A	4	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	RE40-1-H	No	No	Single-family	2275028005-2275028007	$1,374,779	$2,193,727	-$818,948	-$908	$8,353	37.33%	Moderate	7.98	Low Barriers
211	2650 OLYMPIC BLVD E	2004	N/A	788	Sears, Roebuck &	HCM	CHC-2004-6651-MAEX	C-107716	Yes	N/A	14	Boyle Heights	C2-1-RIO-CUGU	No	No	Industrial	5169010006	$13,165,039	$13,165,039	$0	$0	$0	0.00%	No Savings	4.01	High Barriers
212	2430 W RIDGEVIEW AVE	2004	N/A	738	Alfred W. and Grace D. Hare Residence	HCM	CHC-2004-6661-MAEX	C-107744	Yes	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5685029020	$321,000	$830,972	-$509,972	-$566	$5,202	61.37%	High	7.42	Low to Medium Barriers
213	878 N ROME DR	2004	N/A	691	Carl C. Warden Residence	HCM	CHC-2004-7989-MA	C-107733	N/A	N/A	1	Northeast Los Angeles	R1-1	No	No	Single-family	5464011017	$421,000	$445,265	-$24,265	-$27	$248	5.45%	Low	6.82	Low to Medium Barriers
214	121 S ROSELAWN PL	2004	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2004-7988-MA	C-107739	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Multi-family	5468025019	$419,000	$503,439	-$84,439	-$94	$861	16.77%	Low	5.48	Medium to High Barriers
215	4746 N TOLAND WAY	2004	N/A	781	Mills Cottage	HCM	CHC-2004-7997-MA	C-107736	N/A	N/A	1	Northeast Los Angeles	R1-1	Yes	No	Single-family	5474031018	$238,000	$925,955	-$687,955	-$763	$7,017	74.30%	High	6.43	Low to Medium Barriers
216	1244 S VAN NESS AVE	2004	Country Club Park	677	Horatio Cogswell House	HCM and HPOZ	CHC-2004-7996-MA	C-107693	N/A	N/A	10	Wilshire	RE9-1-O	No	No	Single-family	5081023023	$749,000	$1,675,781	-$926,781	-$1,028	$9,453	55.30%	High	5.61	Medium to High Barriers
217	1475 WALLACE AVE	2004	Angelino Heights	N/A	N/A	HPOZ	CHC-2004-7995-MA	C-107746	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD3-1VL-HPOZ	No	No	Single-family	5405008026	$202,000	$447,911	-$245,911	-$273	$2,508	54.90%	High	5.82	Medium to High Barriers
218	2064 N WATSONIA TER	2004	Whitley Heights	N/A	N/A	HPOZ	CHC-2004-6654-MAEX	C-107723	Yes	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575017012	$519,000	$1,026,334	-$507,334	-$563	$5,175	49.43%	Moderate	6.79	Low to Medium Barriers
219	1830 S WELLINGTON RD	2004	La Fayette Square	N/A	N/A	HPOZ	CHC-2004-2994-MA	C-107718	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071003025	$373,000	$629,039	-$256,039	-$284	$2,612	40.70%	Moderate	5.49	Medium to High Barriers
220	1120 S WESTCHESTER PL	2004	Country Club Park	660	Rosenheim Mansion	HCM and HPOZ	CHC-2004-6656-MAEX	C-107722	Yes	N/A	10	Wilshire	R1-1-O	No	No	Industrial	5081019016	$1,414,000	$3,447,650	-$2,033,650	-$2,256	$20,743	58.99%	High	5.17	Medium to High Barriers
221	1317 S WESTLAKE AVE	2004	Pico - Union	719	E.A.K. Hackett House	HCM and HPOZ	CHC-2004-7993-MA	C-107727	N/A	N/A	1	Westlake	RD1.5-1-HPOZ	Yes	No	Multi-family	5135002007	$441,423	$441,423	$0	$0	$0	0.00%	No Savings	4.17	High Barriers

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222	1728 S WESTMORELAND BLVD	2004	Harvard Heights	N/A	N/A	HPOZ	CHC-2004-6655-MAEX	C-107721	Yes	N/A	10	South Los Angeles	R2-1-HPOZ	Yes	No	Multi-family	5074018013	$478,000	$688,114	-$210,114	-$233	$2,143	30.53%	Moderate	4.68	Medium to High Barriers
223	1201 W 27TH ST	2005	N/A	819	Vista Magnolia Court	HCM	CHC-2005-5998-MAEX	C-109363	Yes	N/A	9	South Los Angeles	RD1.5-1-O	Yes	No	Multi-family	5055026030	$2,904,000	$3,501,519	-$597,519	-$663	$6,095	17.06%	Low	6.53	Low to Medium Barriers
224	1215 S ALVIRA ST	2005	South Carthay	N/A	N/A	HPOZ	CHC-2005-5323-MAEX	C-109335	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087010008	$445,000	$1,373,266	-$928,266	-$1,030	$9,468	67.60%	High	7.19	Low to Medium Barriers
225	1750 ARGYLE AVE N	2005	N/A	567	Little Country	HCM	CHC-2005-5717-MA	C-109336	N/A	N/A	13	Hollywood	C4-2D-SN	No	Yes	Commercial	5546031005	$11,312,608	$11,312,608	$0	$0	$0	0.00%	No Savings	6.13	Low to Medium Barriers
226	326 N AVENUE 54	2005	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2005-5668-MA	C-109337	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5469020028	$243,000	$593,533	-$350,533	-$389	$3,575	59.06%	High	5.69	Medium to High Barriers
227	604 N AVENUE 54	2005	Highland Park -	N/A	N/A	HPOZ	CHC-2005-5359-MA	C-109338	N/A	N/A	1	Northeast Los Angeles	R2-1-HPOZ	No	No	Single-family	5478019006	$242,000	$512,308	-$270,308	-$300	$2,757	52.76%	High	6.5	Low to Medium Barriers
228	849 S BROADWAY	2005	N/A	294	Eastern Columbia Building	HCM	CHC-2005-5670-MA	C-109339	N/A	N/A	14	Central City	[Q]C5-4D-CDO-SN	No	Yes	Condominium	5144017040-5144017190	$37,329,396	$128,543,342	-$91,213,946	-$101,165	$930,382	70.96%	High	6.39	Low to Medium Barriers
229	1661 S BUCKINGHAM RD	2005	La Fayette Square	N/A	N/A	HPOZ	CHC-2005-6597-MA	C-109340	N/A	N/A	10	West Adams - Baldwin Hills -	R1-1-HPOZ	No	No	Single-family	5071009084	$444,180	$444,180	$0	$0	$0	0.00%	No Savings	5.49	Medium to High Barriers
230	1808 S BUCKINGHAM RD	2005	La Fayette Square	N/A	N/A	HPOZ	CHC-2005-5246-MAEX	C-109341	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071007082	$387,000	$1,938,000	-$1,551,000	-$1,720	$15,820	80.03%	Very High	5.49	Medium to High Barriers
231	1870 S BUCKINGHAM RD	2005	La Fayette Square	N/A	N/A	HPOZ	CHC-2005-5667-MAEX	C-109342	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071007092	$345,000	$1,310,904	-$965,904	-$1,071	$9,852	73.68%	High	5.49	Medium to High Barriers
232	1845 N COURTNEY AVE	2005	N/A	822	Hellman House	HCM	CHC-2005-6749-MAEX	C-109343	Yes	N/A	4	Hollywood	R1-1	No	No	Single-family	5551009024	$523,000	$1,516,717	-$993,717	-$1,102	$10,136	65.52%	High	7.37	Low to Medium Barriers
233	1220 S CRESCENT HEIGHTS BLVD	2005	South Carthay	N/A	N/A	HPOZ	CHC-2005-5587-MA	C-109344	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087016025	$507,000	$910,717	-$403,717	-$448	$4,118	44.33%	Moderate	7.19	Low to Medium Barriers
234	1049 S ELDEN AVE	2005	N/A	794	Carolyn Bumiller-Hickey	HCM	CHC-2005-5675-MAEX	C-109345	Yes	N/A	1	Wilshire	R4-1	No	No	Single-family	5076008027	$635,000	$912,870	-$277,870	-$308	$2,834	30.44%	Moderate	4.83	Medium to High Barriers
235	6626 W FRANKLIN AVE	2005	N/A	799	Chateau Des Fleurs	HCM	CHC-2005-5584-MA	C-109346	N/A	N/A	13	Hollywood	[Q]R4-2	Yes	No	Multi-family	5547004022	$6,319,000	$8,447,084	-$2,128,084	-$2,360	$21,706	25.19%	Moderate	6.42	Low to Medium Barriers
236	150 S FULLER AVE	2005	Miracle Mile North	N/A	N/A	HPOZ	CHC-2005-5243-MA	C-109347	N/A	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512018024	$470,000	$803,137	-$333,137	-$369	$3,398	41.48%	Moderate	7.3	Low to Medium Barriers
237	1429 N GENESEE AVE	2005	Spaulding Square	N/A	N/A	HPOZ	CHC-2005-5293-MAEX	C-109348	Yes	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5551024006	$590,000	$1,280,799	-$690,799	-$766	$7,046	53.94%	High	7.01	Low to Medium Barriers
238	4200 N GLENALBYN DR	2005	Highland Park - Garvanza	394	Ernest Bent / Florence Bent Halstead House and Grounds	HCM and HPOZ	CHC-2005-5299-MAEX	C-109349	Yes	N/A	1	Northeast Los Angeles	R1-1-HPOZ	Yes	No	Single-family	5465015017	$404,000	$1,257,385	-$853,385	-$946	$8,705	67.87%	High	6.27	Low to Medium Barriers
239	1659 S HOBART BLVD	2005	Harvard Heights	N/A	N/A	HPOZ	CHC-2005-5288-MAEX	C-109351	Yes	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074018021	$388,000	$728,572	-$340,572	-$378	$3,474	46.75%	Moderate	4.68	Medium to High Barriers
240	1720 S HOBART BLVD	2005	Harvard Heights	N/A	N/A	HPOZ	CHC-2005-5285-MAEX	C-109352	Yes	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074021011	$254,000	$807,210	-$553,210	-$614	$5,643	68.53%	High	5.22	Medium to High Barriers
241	1800 S HOBART BLVD	2005	Harvard Heights	N/A	N/A	HPOZ	CHC-2005-5248-MAEX	C-109353	Yes	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074020005	$336,000	$861,590	-$525,590	-$583	$5,361	61.00%	High	5.22	Medium to High Barriers

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242	1810 S HOBART BLVD	2005	Harvard Heights	N/A	N/A	HPOZ	CHC-2005-5798-MAEX	C-109331	Yes	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074020007	$269,000	$547,830	-$278,830	-$309	$2,844	50.90%	High	5.22	Medium to High Barriers
243	709 N HOLLAND AVE	2005	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2005-5611-MA	C-109332	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	No	No	Single-family	5469003004	$256,000	$755,482	-$499,482	-$554	$5,095	66.11%	High	6.5	Low to Medium Barriers
244	6300 W HOLLYWOOD BLVD	2005	N/A	664	Heart House	HCM	CHC-2005-5690-MA	C-109333	N/A	Hollywood	13	Hollywood	C4-2D-SN	Yes	Yes	Condominium	5546009050-5546009153	$43,093,009	$112,727,321	-$69,634,312	-$77,231	$710,270	61.77%	High	6.48	Low to Medium Barriers
245	5701 E HUB ST	2005	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2005-5240-MA	C-109334	N/A	N/A	1	Northeast Los Angeles	R2-1-HPOZ	Yes	No	Multi-family	5484013013	$429,000	$522,559	-$93,559	-$104	$954	17.90%	Low	6.01	Low to Medium Barriers
246	1347 W KELLAM AVE	2005	Angelino Heights	221	Residence and Carriage House	HCM and HPOZ	CHC-2005-5321-MA	C-109364	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Single-family	5405018018	$739,000	$1,253,292	-$514,292	-$570	$5,246	41.04%	Moderate	5.98	Medium to High Barriers
247	914 W KENSINGTON RD W	2005	Angelino Heights	N/A	N/A	HPOZ	CHC-2005-5269-MA	C-109365	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405003021	$1,153,000	$2,468,400	-$1,315,400	-$1,459	$13,417	53.29%	High	5.82	Medium to High Barriers
248	935 W KENSINGTON RD	2005	Angelino Heights	N/A	N/A	HPOZ	CHC-2005-5289-MA	C-109366	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	No	No	Single-family	5405009026	$432,000	$777,698	-$345,698	-$383	$3,526	44.45%	Moderate	5.82	Medium to High Barriers
249	1570 N LABAIG AVE	2005	N/A	801	The Courtyard Apartments	HCM	CHC-2005-5318-MA	C-109367	N/A	N/A	13	Hollywood	[Q]R4-1VL	Yes	No	Single-family	5545007041	$697,000	$2,175,476	-$1,478,476	-$1,640	$15,080	67.96%	High	6.13	Low to Medium Barriers
250	215 S MANHATTAN PL	2005	N/A	792	B.H. Hiss House	HCM	CHC-2005-5736-MA	C-109368	N/A	N/A	4	Wilshire	R4-1	Yes	No	Multi-family	5516024003	$1,091,000	$1,305,790	-$214,790	-$238	$2,191	16.45%	Low	6.46	Low to Medium Barriers
251	4907 W MARATHON ST	2005	Melrose Hill	N/A	N/A	HPOZ	CHC-2005-5270-MAEX	C-109369	Yes	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535026014	$366,000	$969,000	-$603,000	-$669	$6,151	62.23%	High	4.91	Medium to High Barriers
252	6758 W MILNER RD	2005	Whitley Heights	N/A	N/A	HPOZ	CHC-2005-5593-MAEX	C-109370	Yes	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575013024	$411,000	$663,599	-$252,599	-$280	$2,577	38.07%	Moderate	6.79	Low to Medium Barriers
253	6411 N MONTEREY RD	2005	N/A	736	Monterey Trailer Park	HCM	CHC-2005-5364-MA	C-109371	N/A	N/A	14	Northeast Los Angeles	R1-1	Yes	No	Multi-family	5312003029	$1,919,661	$1,919,661	$0	$0	$0	0.00%	No Savings	6.66	Low to Medium Barriers
254	2418 9th AVE	2005	West Adams Terrace	N/A	N/A	HPOZ	CHC-2005-5278-MA	C-109362	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5059014005	$209,000	$749,700	-$540,700	-$600	$5,515	72.12%	High	4.36	High Barriers
255	1775 N ORANGE DR	2005	N/A	816	Nirvana Apartments	HCM	CHC-2005-5604-MA	C-109372	N/A	N/A	13	Hollywood	[Q]R4-1VL	Yes	No	Multi-family	5548003014	$7,444,000	$7,692,419	-$248,419	-$276	$2,534	3.23%	Low	6.78	Low to Medium Barriers
256	1903 N ORCHID AVE	2005	N/A	821	Las Orchidias	HCM	CHC-2005-5234-MAEX	C-109354	Yes	N/A	4	Hollywood	R2-1XL	Yes	No	Multi-family	5549017018	$3,134,462	$3,134,462	$0	$0	$0	0.00%	No Savings	7.36	Low to Medium Barriers
257	1931 S PARK GROVE AVE	2005	University Park	N/A	N/A	HPOZ	CHC-2005-5244-MA	C-109355	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Multi-family	5124019007	$395,000	$631,872	-$236,872	-$263	$2,416	37.49%	Moderate	4.33	High Barriers
258	2647 S RAYMOND AVE	2005	Adams - Normandie	N/A	N/A	HPOZ	CHC-2005-5271-MAEX	C-109356	Yes	N/A	8	South Los Angeles	RD2-1-O-HPOZ	No	No	Single-family	5054010010	$256,000	$663,507	-$407,507	-$452	$4,157	61.42%	High	5.16	Medium to High Barriers
259	1422 W RIDGE WAY	2005	Angelino Heights	N/A	N/A	HPOZ	CHC-2005-5585-MAEX	C-109357	Yes	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5405010020	$409,000	$997,978	-$588,978	-$653	$6,008	59.02%	High	5.82	Medium to High Barriers
260	900 S HOBART BLVD	2005	N/A	815	The French	HCM	CHC-2005-[illegible]	C-109350	Yes	N/A	10	Wilshire	R4-1	Yes	No	Condominium	5093016052-5093016061	$2,310,000	$6,153,137	-$3,843,137	-$4,262	$39,200	62.46%	High	5.04	Medium to High Barriers

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261	1700 W SUNSET BLVD	2005	N/A	652	Jensens Recreation Center and Electric Roof Sign	HCM	CHC-2005-5603-MAEX	C-109358	Yes	N/A	13	Silver Lake - Echo Park - Elysian Valley	[Q]C2-1L	Yes	No	Commercial	5404017020	$7,951,000	$7,951,000	$0	$0	$0	0.00%	No Savings	5.82	Medium to High Barriers
262	1626 S VIRGINIA RD	2005	La Fayette Square	N/A	N/A	HPOZ	CHC-2005-5358-MAEX	C-109359	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071005031	$371,600	$1,519,517	-$1,147,917	-$1,273	$11,709	75.54%	Very High	5.49	Medium to High Barriers
263	1735 N WHITLEY AVE	2005	N/A	817	La Leyenda Apartment	HCM	CHC-2005-5233-MA	C-109360	N/A	N/A	13	Hollywood	[Q]R5-2	Yes	No	Multi-family	5547004035	$8,704,000	$11,246,128	-$2,542,128	-$2,819	$25,930	22.60%	Low	6.42	Low to Medium Barriers
264	5209 WILSHIRE BLVD	2005	N/A	813	Security-First National	HCM	CHC-2005-5594-MAEX	C-109361	Yes	N/A	4	Wilshire	[Q]C4-2-CDO	No	No	Commercial	5507023017	$1,743,000	$3,503,048	-$1,760,048	-$1,952	$17,952	50.24%	High	7.89	Low Barriers
265	2528 S 12TH AVE	2006	West Adams Terrace	N/A	N/A	HPOZ	CHC-2006-6431-MAEX	C-111108	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5059008007	$284,000	$813,743	-$529,743	-$588	$5,403	65.10%	High	4.6	Medium to High Barriers
266	2294 W 20TH ST	2006	Western Heights	N/A	N/A	HPOZ	CHC-2006-6434-MAEX	C-111031	Yes	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073027020	$344,000	$761,999	-$417,999	-$464	$4,264	54.86%	High	4.71	Medium to High Barriers
267	2233 W 21ST ST	2006	Western Heights	N/A	N/A	HPOZ	CHC-2006-6444-MAEX	C-111032	Yes	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073030015	$369,000	$720,114	-$351,114	-$389	$3,581	48.76%	Moderate	4.71	Medium to High Barriers
268	1020 W 22ND ST	2006	University Park	N/A	N/A	HPOZ	CHC-2006-6130-MA	C-110983	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	Yes	No	Single-family	5124006017	$397,000	$730,360	-$333,360	-$370	$3,400	45.64%	Moderate	4.33	High Barriers
269	2532 S 5TH AVE	2006	West Adams	417	Gordon L. McDonou	HCM and HPOZ	CHC-2006-6454-	C-111034	Yes	N/A	10	West Adams - Baldwin Hills -	RD2-1-O-HPOZ	No	No	Single-family	5059023018	$329,000	$1,055,901	-$726,901	-$806	$7,414	68.84%	High	4.36	High Barriers
270	3919 W 8TH ST	2006	N/A	847	Richardson Apartments	HCM	CHC-2006-5486-MAEX	C-111033	Yes	N/A	4	Wilshire	R4-1	Yes	No	Multi-family	5092028018	$2,824,000	$3,555,390	-$731,390	-$811	$7,460	20.57%	Low	5.85	Medium to High Barriers
271	5301 E ABBOTT PL	2006	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2006-6221-MAEX	C-111028	Yes	N/A	1	Northeast Los Angeles	R1-1-HPOZ	No	No	Single-family	5469022046-5469022047	$327,000	$1,238,997	-$911,997	-$1,011	$9,302	73.61%	High	5.69	Medium to High Barriers
272	6887 W ALTA LOMA TER	2006	N/A	846	B.A.G. Fuller Residence	HCM	CHC-2006-6318-MAEX	C-111024	Yes	N/A	4	Hollywood	R2-1XL	No	No	Single-family	5549027025	$635,000	$1,761,030	-$1,126,030	-$1,249	$11,486	63.94%	High	7.36	Low to Medium Barriers
273	1063 S ALVIRA ST	2006	South Carthay	N/A	N/A	HPOZ	CHC-2006-6204-	C-111023	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087012008	$398,000	$1,515,397	-$1,117,397	-$1,239	$11,397	73.74%	High	7.19	Low to Medium Barriers
274	1249 S ALVIRA ST	2006	South Carthay	N/A	N/A	HPOZ	CHC-2006-6445-	C-110987	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087010001	$378,000	$1,566,851	-$1,188,851	-$1,319	$12,126	75.88%	Very High	7.19	Low to Medium Barriers
275	211 S AVENUE 52 AVE S	2006	Highland Park - Garvanza	539	J.E. Maxwell Residence	HCM and HPOZ	CHC-2006-6222-MA	C-111022	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Multi-family	5468016031	$376,000	$687,249	-$311,249	-$345	$3,175	45.29%	Moderate	5.48	Medium to High Barriers
276	116 N AVENUE 53	2006	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2006-6455-MA	C-111036	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Multi-family	5468017022	$353,000	$675,099	-$322,099	-$357	$3,285	47.71%	Moderate	5.48	Medium to High Barriers
277	206 N AVENUE 54	2006	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2006-6433-MA	C-111025	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Single-family	5468019012	$340,000	$741,152	-$401,152	-$445	$4,092	54.13%	High	5.48	Medium to High Barriers
278	136 S AVENUE 56 AVE S	2006	Highland Park -	N/A	N/A	HPOZ	CHC-2006-6043-MA	C-110984	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5468025010	$187,000	$460,174	-$273,174	-$303	$2,786	59.36%	High	5.48	Medium to High Barriers
279	1976 S BONSALLO AVE	2006	University Park	N/A	N/A	HPOZ	CHC-2006-6226-MA	C-110998	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124033012	$288,000	$581,896	-$293,896	-$326	$2,998	50.51%	High	3.62	High Barriers
280	2121 S BONSALLO AVE	2006	University Park	560	Wright House	HCM and HPOZ	CHC-2006-6453-MAEX	C-110997	Yes	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124031020	$498,000	$936,097	-$438,097	-$486	$4,469	46.80%	Moderate	3.62	High Barriers

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281	2122 S BONSALLO AVE	2006	University Park	500	John B. Kane Residence	HCM and HPOZ	CHC-2006-6441-MA	C-110996	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124031026	$176,000	$429,295	-$253,295	-$281	$2,584	59.00%	High	3.62	High Barriers
282	1649 S BUCKINGHAM RD	2006	La Fayette Square	N/A	N/A	HPOZ	CHC-2006-6212-MA	C-111009	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071009083	$475,000	$504,401	-$29,401	-$33	$300	5.83%	Low	5.49	Medium to High Barriers
283	1675 S BUCKINGHAM RD	2006	La Fayette Square	N/A	N/A	HPOZ	CHC-2012-1680-MA	C-121443	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071009086	$486,000	$1,064,243	-$578,243	-$641	$5,898	54.33%	High	5.49	Medium to High Barriers
284	1417 W CALUMET AVE	2006	Angelino Heights	N/A	N/A	HPOZ	CHC-2006-8517-MAEX	C-111017	Yes	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	No	No	Single-family	5405013007	$424,000	$912,985	-$488,985	-$542	$4,988	53.56%	High	5.82	Medium to High Barriers
285	10633 N COMMERCE AVE	2006	N/A	841	Weatherwolde Castle	HCM	CHC-2006-6206-MAEX	C-111010	Yes	N/A	7	Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon	R1-1-RFA	No	No	Single-family	2566008034	$342,000	$796,281	-$454,281	-$504	$4,634	57.05%	High	6.04	Low to Medium Barriers
286	1357 S CONSTANCE ST	2006	Pico - Union	N/A	N/A	HPOZ	CHC-2006-6317-MA	C-110986	N/A	N/A	1	Westlake	RD1.5-1-HPOZ	Yes	No	Multi-family	5135020017	$718,000	$753,479	-$35,479	-$39	$362	4.71%	Low	3.95	High Barriers
287	12401 W DEERBROOK LN	2006	N/A	797	Hamma House	HCM	CHC-2006-6583-MAEX	C-111013	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494007022	$568,000	$1,808,888	-$1,240,888	-$1,376	$12,657	68.60%	High	8.22	Low Barriers
288	12412 W DEERBROOK LN	2006	N/A	722	Volk House	HCM	CHC-2006-6313-MAEX	C-111014	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494009022	$424,000	$1,632,672	-$1,208,672	-$1,341	$12,328	74.03%	High	8.83	Low Barriers
289	6130 W DEL VALLE DR	2006	Carthay Circle	N/A	N/A	HPOZ	CHC-2006-4032-MAEX	C-111021	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088003058	$426,000	$1,095,461	-$669,461	-$742	$6,829	61.11%	High	7.35	Low to Medium Barriers
290	6220 W DEL VALLE DR	2006	Carthay Circle	N/A	N/A	HPOZ	CHC-2006-6457-MAEX	C-110985	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088017004	$546,000	$1,277,373	-$731,373	-$811	$7,460	57.26%	High	7.35	Low to Medium Barriers
291	779 N EAST KENSINGTON RD	2006	Angelino Heights	N/A	N/A	HPOZ	CHC-2006-6214-MAEX	C-111004	Yes	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5405019014	$357,000	$732,859	-$375,859	-$417	$3,834	51.29%	High	5.98	Medium to High Barriers
292	1530 N EASTERLY TER	2006	N/A	856	Skinner House	HCM	CHC-2006-6311-MAEX	C-111030	Yes	N/A	13	Silver Lake - Echo Park - Elysian Valley	R1-1VL	No	No	Single-family	5424008020	$383,000	$1,379,877	-$996,877	-$1,106	$10,168	72.24%	High	7.02	Low to Medium Barriers
293	5536 E ECHO ST	2006	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2006-6456-MA	C-111029	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Multi-family	5468027009	$309,000	$707,405	-$398,405	-$442	$4,064	56.32%	High	5.48	Medium to High Barriers
294	689 N ELKINS RD	2006	N/A	834	Gustav R. Rich House	HCM	CHC-2006-6987-MAEX	C-111027	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4426033011	$1,140,000	$4,073,905	-$2,933,905	-$3,254	$29,926	72.02%	High	8.83	Low Barriers
295	535 S GRAMERCY PL	2006	N/A	853	La Marquise	HCM	CHC-2006-6312-MA	C-111026	N/A	N/A	4	Wilshire	R4-2	Yes	No	Multi-family	5504026005	$4,577,000	$5,140,720	-$563,720	-$625	$5,750	10.97%	Low	5.93	Medium to High Barriers
296	2036 N GRIFFITH PARK BLVD	2006	N/A	831	Luby and Anastasia Bubeshko Apartments	HCM	CHC-2006-6426-MA	C-111011	N/A	N/A	4	Silver Lake - Echo Park - Elysian Valley	RD2-1VL	Yes	No	Multi-family	5431004022-5431004024	$1,228,000	$3,123,909	-$1,895,909	-$2,103	$19,338	60.69%	High	7.88	Low Barriers
297	8530 W HEDGES PL	2006	N/A	852	Wolff Residence	HCM	CHC-2006-6706-MA	C-111012	N/A	N/A	4	Hollywood	R1-1	No	No	Multi-family	5559022017	$814,000	$6,535,106	-$5,721,106	-$6,345	$58,355	87.54%	Very High	8.21	Low Barriers
298	5670 W HOLLY OAK DR	2006	N/A	840	Amsalem A. Ernst	HCM	CHC-2006-6216-	C-111035	Yes	N/A	4	Hollywood	RE11-1D	No	No	Single-family	5587007058	$510,000	$1,727,064	-$1,217,064	-$1,350	$12,414	70.47%	High	7.69	Low Barriers
299	2690 N HOLLYRIDGE DR	2006	N/A	833	Grier House	HCM	CHC-2006-6450-MAEX	C-110992	Yes	N/A	4	Hollywood	R1-1	No	No	Single-family	5580015006	$367,000	$999,030	-$632,030	-$701	$6,447	63.26%	High	7.4	Low to Medium Barriers
300	2025 N KENILWORTH AVE	2006	N/A	837	Droste House	HCM	CHC-2006-3578-MA	C-111005	N/A	N/A	4	Silver Lake - Echo Park - Elysian Valley	R1-1VL	No	No	Single-family	5431021023	$349,000	$476,645	-$127,645	-$142	$1,302	26.78%	Moderate	7.88	Low Barriers

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301	836 E KENSINGTON RD E	2006	Angelino Heights	N/A	N/A	HPOZ	CHC-2006-5950-MA	C-111003	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5405021050	$428,000	$666,041	-$238,041	-$264	$2,428	35.74%	Moderate	5.98	Medium to High Barriers
302	1244 S LA JOLLA AVE	2006	South Carthay	N/A	N/A	HPOZ	CHC-2006-6423-MA	C-111001	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087010019	$871,000	$1,578,581	-$707,581	-$785	$7,217	44.82%	Moderate	7.19	Low to Medium Barriers
303	2049 N LAS PALMAS AVE	2006	Whitley Heights	N/A	N/A	HPOZ	CHC-2006-6439-MA	C-111016	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Multi-family	5575022010	$486,000	$1,489,200	-$1,003,200	-$1,113	$10,233	67.37%	High	7.36	Low to Medium Barriers
304	1215 S ORLANDO AVE	2006	South Carthay	N/A	N/A	HPOZ	CHC-2006-6440-MA	C-111015	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087004007	$764,000	$1,837,904	-$1,073,904	-$1,191	$10,954	58.43%	High	7.19	Low to Medium Barriers
305	545 S PLYMOUTH BLVD	2006	Windsor Square	835	Petitfils-Boos Residenc	HCM and HPOZ	CHC-2006-6083-MAEX	C-111020	Yes	N/A	4	Wilshire	RE11-1-HPOZ	No	No	Single-family	5505023005	$1,583,000	$5,140,269	-$3,557,269	-$3,945	$36,284	69.20%	High	7.89	Low Barriers
306	2318 S PORTLAND ST	2006	University Park	N/A	N/A	HPOZ	CHC-2006-6452-MA	C-111002	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5124012010	$353,246	$353,246	$0	$0	$0	0.00%	No Savings	4.33	High Barriers
307	1750 N SERRANO AVE	2006	N/A	616	The Trianon and Neon	HCM	CHC-2006-6451-MAEX	C-111000	Yes	N/A	13	Hollywood	R3-1	Yes	No	Multi-family	5544008019	$4,943,000	$7,396,167	-$2,453,167	-$2,721	$25,022	33.17%	Moderate	6.01	Low to Medium Barriers
308	2055 W SILVER LAKE DR	2006	N/A	704	John R. Hunt House	HCM	CHC-2006-7107-MA	C-111019	N/A	N/A	4	Silver Lake - Echo Park - Elysian Valley	R1-1VL	No	No	Single-family	5431019001	$624,000	$2,427,600	-$1,803,600	-$2,000	$18,397	74.30%	High	7.88	Low Barriers
309	946 N STONEHILL LN	2006	N/A	723	Wurtele House	HCM	CHC-2006-5065-MAEX	C-110994	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494007011	$501,000	$1,093,870	-$592,870	-$658	$6,047	54.20%	High	8.22	Low Barriers
310	1918 N TAMARIND AVE	2006	N/A	687	Tornburg House	HCM	CHC-2006-6424-MA	C-111007	N/A	N/A	4	Hollywood	RD1.5-1XL	No	No	Single-family	5586014056	$398,682	$398,682	$0	$0	$0	0.00%	No Savings	6.85	Low to Medium Barriers
311	1651 S VIRGINIA RD	2006	La Fayette Square	N/A	N/A	HPOZ	CHC-2006-5727-MAEX	C-111006	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071008053	$395,000	$1,149,592	-$754,592	-$837	$7,697	65.64%	High	5.49	Medium to High Barriers
312	1668 S VIRGINIA RD	2006	La Fayette Square	N/A	N/A	HPOZ	CHC-2006-6060-MAEX	C-111008	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071005037	$414,000	$1,387,378	-$973,378	-$1,080	$9,928	70.16%	High	5.49	Medium to High Barriers
313	1753 S VIRGINIA RD	2006	La Fayette Square	N/A	N/A	HPOZ	CHC-2006-6061-MAEX	C-110993	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071007062	$558,000	$1,500,696	-$942,696	-$1,046	$9,615	62.82%	High	5.49	Medium to High Barriers
314	924 W 20TH ST	2007	University Park	N/A	N/A	HPOZ	CHC-2007-3503-MAEX	C-112928	Yes	N/A	1	South Los Angeles	RD1.5-1-HPOZ	No	No	Single-family	5124015015	$299,000	$804,691	-$505,691	-$561	$5,158	62.84%	High	4.33	High Barriers
315	2297 SW 21ST ST	2007	Western Heights	N/A	N/A	HPOZ	CHC-2007-3446-MAEX	C-112925	Yes	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073027027	$310,000	$673,366	-$363,366	-$403	$3,706	53.96%	High	4.71	Medium to High Barriers
316	1006 SW 23RD	2007	University Park	N/A	N/A	HPOZ	CHC-2007-4197-MA	C-112923	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	Yes	No	Single-family	5124007007	$416,000	$848,965	-$432,965	-$480	$4,416	51.00%	High	4.33	High Barriers
317	2171 SW 24TH ST	2007	West Adams Terrace	N/A	N/A	HPOZ	CHC-2007-3863-MAEX	C-112888	Yes	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5058007015	$269,000	$732,622	-$463,622	-$514	$4,729	63.28%	High	4.66	Medium to High Barriers
318	2266 W 25TH ST	2007	West Adams Terrace	N/A	N/A	HPOZ	CHC-2007-3792-MAEX	C-112897	Yes	N/A	10	South Los Angeles	[Q]R4-1-O-HPOZ	No	No	Single-family	5058004005	$269,000	$1,050,907	-$781,907	-$867	$7,975	74.40%	High	4.66	Medium to High Barriers
319	2331 S 5TH AVE	2007	West Adams Terrace	N/A	N/A	HPOZ	CHC-2007-3842-MAEX	C-112896	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	RD2-1-O-HPOZ	No	No	Single-family	5059021004	$299,000	$749,727	-$450,727	-$500	$4,597	60.12%	High	4.36	High Barriers
320	523 W 6TH ST	2007	N/A	398	Pacific Mutual Building	HCM	CHC-2007-3856-MA	C-112929	N/A	N/A	14	Central City	C2-4D	No	No	Commercial	5149030002	$138,800,000	$212,241,600	-$73,441,600	-$81,453	$749,104	34.60%	Moderate	6.79	Low to Medium Barriers
321	811 7TH ST	2007	N/A	125	Fine Arts Building	HCM	CHC-2007-3858-MA	C-112927	N/A	Downtown Los Angeles	14	Central City	C2-4D	No	Yes	Commercial	5144008008	$31,300,000	$44,607,150	-$13,307,150	-$14,759	$135,733	29.83%	Moderate	6.79	Low to Medium Barriers
322	2425 S 9TH AVE	2007	West Adams Terrace	N/A	N/A	HPOZ	CHC-2007-3359-MA	C-112931	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	Yes	Single-family	5059013004	$299,000	$978,845	-$679,845	-$754	$6,934	69.45%	High	4.36	High Barriers
323	5610 E ALDAMA	2007	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2007-3498-MAEX	C-112899	Yes	N/A	1	Northeast Los Angeles	R2-1-HPOZ	Yes	No	Single-family	5469034007	$532,000	$739,084	-$207,084	-$230	$2,112	28.02%	Moderate	5.77	Medium to High Barriers

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324	1062 S ALFRED ST	2007	South Carthay	N/A	N/A	HPOZ	CHC-2007-3839-MA	C-112956	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087006017	$795,000	$2,346,000	-$1,551,000	-$1,720	$15,820	66.11%	High	7.19	Low to Medium Barriers
325	181 S ALTA VISTA BLVD	2007	Miracle Mile North	444	Octavious W. Morgan Residence	HCM and HPOZ	CHC-2007-3788-MAEX	C-112924	Yes	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512021001	$654,000	$3,078,016	-$2,424,016	-$2,688	$24,725	78.75%	Very High	7.3	Low to Medium Barriers
326	1227 ALVIRA ST	2007	South Carthay	N/A	N/A	HPOZ	CHC-2007-3437-MA	C-112934	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087010005	$463,000	$1,495,000	-$1,032,000	-$1,145	$10,526	69.03%	High	7.19	Low to Medium Barriers
327	217 E AVENUE 38	2007	Highland Park -	N/A	N/A	HPOZ	CHC-2007-3542-MA	C-112889	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5451003022	$237,000	$468,575	-$231,575	-$257	$2,362	49.42%	Moderate	5.32	Medium to High Barriers
328	517 E AVENUE 39	2007	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2007-3509-MA	C-112900	N/A	N/A	1	Northeast Los Angeles	[Q]R1-1D-HPOZ	No	No	Single-family	5207016006	$160,000	$551,266	-$391,266	-$434	$3,991	70.98%	High	5.95	Medium to High Barriers
329	546 N AVENUE 54	2007	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2007-3348-MA	C-112902	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	Yes	No	Multi-family	5469022001	$468,000	$780,968	-$312,968	-$347	$3,192	40.07%	Moderate	5.69	Medium to High Barriers
330	415 N AVENUE 56 AVE	2007	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2007-3565-MA	C-112886	N/A	N/A	1	Northeast Los Angeles	R2-1-HPOZ	No	No	Single-family	5469034015	$254,000	$759,531	-$505,531	-$561	$5,156	66.56%	High	5.77	Medium to High Barriers
331	915 N AVENUE 57	2007	N/A	877	Wilkins House	HCM	CHC-2007-3545-MA	C-112890	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5478036005	$206,000	$317,822	-$111,822	-$124	$1,141	35.18%	Moderate	6.29	Low to Medium Barriers
332	6175 W BARROWS DR	2007	Carthay Circle	N/A	N/A	HPOZ	CHC-2007-3845-MAEX	C-112933	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088017026	$370,000	$1,086,938	-$716,938	-$795	$7,313	65.96%	High	7.35	Low to Medium Barriers
333	1251 W BELLEVUE AVE	2007	Angelino Heights	N/A	N/A	HPOZ	CHC-2007-3658-MA	C-112901	N/A	N/A	1	Silver Lake - Echo Park -	RD2-1VL-HPOZ	Yes	No	Multi-family	5405024024-5405024025	$422,000	$1,271,312	-$849,312	-$942	$8,663	66.81%	High	5.98	Medium to High Barriers
334	151 N BERENDO ST	2007	N/A	809	Franklin T Briles	HCM	CHC-2007-3409-MA	C-112898	N/A	N/A	13	Wilshire	R3-1	No	No	Multi-family	5518024020	$472,000	$1,357,174	-$885,174	-$982	$9,029	65.22%	High	5.1	Medium to High Barriers
335	424 S BROADWAY	2007	N/A	881	Judson Rives Building	HCM	CHC-2007-3604-MA	C-112938	N/A	N/A	14	Central City	[Q]C4-4D-CDO-SN	No	Yes	Commercial	5149024009	$10,331,678	$10,331,678	$0	$0	$0	0.00%	No Savings	6.39	Low to Medium Barriers
336	1642 S BUCKINGHAM RD	2007	La Fayette Square	N/A	N/A	HPOZ	CHC-2007-3898-MAEX	C-112952	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071008066	$350,000	$1,245,462	-$895,462	-$993	$9,134	71.90%	High	5.49	Medium to High Barriers
337	12256 CANNA RD	2007	N/A	886	Gould-Laftra House	HCM	CHC-2007-3362-MAEX	C-112891	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4493025004	$969,000	$3,839,424	-$2,870,424	-$3,184	$29,278	74.76%	High	8.24	Low Barriers
338	130 N CATALINA ST	2007	N/A	861	Monsignor O'Brien House	HCM	CHC-2007-3793-MA	C-112932	N/A	N/A	13	Wilshire	R3-1	No	No	Single-family	5518024004	$418,000	$1,133,176	-$715,176	-$793	$7,295	63.11%	High	5.1	Medium to High Barriers
339	2342 W COVE AVE	2007	N/A	868	O'Neill Duplex No. 1	HCM	CHC-2007-3663-MA	C-112935	N/A	N/A	13	Silver Lake - Echo Park - Elysian Valley	R1-1VL	Yes	No	Multi-family	5422005034	$472,000	$1,470,070	-$998,070	-$1,107	$10,180	67.89%	High	7.02	Low to Medium Barriers
340	1102 S CRESCENT HEIGHTS BLVD	2007	South Carthay	N/A	N/A	HPOZ	CHC-2007-3421-MA	C-112944	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087017029	$570,000	$1,367,965	-$797,965	-$885	$8,139	58.33%	High	7.19	Low to Medium Barriers
341	1123 S CRESCENT HEIGHTS BLVD	2007	South Carthay	N/A	N/A	HPOZ	CHC-2007-3993-MA	C-112908	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087014019	$507,000	$1,280,796	-$773,796	-$858	$7,893	60.42%	High	7.19	Low to Medium Barriers
342	1128 S CRESCENT HEIGHTS BLVD	2007	South Carthay	N/A	N/A	HPOZ	CHC-2007-3419-MA	C-112907	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087017024	$764,000	$1,373,644	-$609,644	-$676	$6,218	44.38%	Moderate	7.19	Low to Medium Barriers
343	6244 DEL VALLE DR	2007	Carthay Circle	N/A	N/A	HPOZ	CHC-2007-3609-	C-112909	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088017007	$370,000	$1,201,037	-$831,037	-$922	$8,477	69.19%	High	7.35	Low to Medium Barriers
344	5552 E ECHO ST	2007	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2007-3361-MA	C-112941	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5468027005	$295,000	$674,395	-$379,395	-$421	$3,870	56.26%	High	5.48	Medium to High Barriers
345	644 FIGUEROA ST S	2007	N/A	348	Fire Station No. 28	HCM	CHC-2007-3846-MA	C-112943	N/A	N/A	14	Central City	C2-4D	No	No	Commercial	5144008019	$12,010,474	$12,010,474	$0	$0	$0	0.00%	No Savings	6.79	Low to Medium Barriers
346	4665 N FIGUEROA ST	2007	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2007-3547-MA	C-112903	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5467010007	$628,000	$1,560,150	-$932,150	-$1,034	$9,508	59.75%	High	6.8	Low to Medium Barriers
347	2622 N GLENDOWER AVE	2007	N/A	812	Wirin House	HCM	CHC-2007-3426-MA	C-112942	N/A	N/A	4	Hollywood	RE11-1	No	No	Single-family	5588023032	$681,000	$4,869,807	-$4,188,807	-$4,646	$42,726	86.02%	Very High	7.43	Low to Medium Barriers

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348	1716 S HOBART BLVD	2007	Harvard Heights	N/A	N/A	HPOZ	CHC-2007-3508-MAEX	C-112937	Yes	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074021010	$351,000	$649,766	-$298,766	-$331	$3,047	45.98%	Moderate	5.22	Medium to High Barriers
349	5500 W HOLLYWOOD BLVD	2007	N/A	336	Hollywood Western Building	HCM	CHC-2007-3778-MA	C-112940	N/A	N/A	13	Hollywood	[Q]R5-2	No	No	Commercial	5544025032	$10,809,360	$10,809,360	$0	$0	$0	0.00%	No Savings	5.61	Medium to High Barriers
350	7046 W HOLLYWOOD BLVD	2007	N/A	876	Hollywood Professional	HCM	CHC-2007-3596-MA	C-112936	N/A	N/A	13	Hollywood	C4-2D-SN	No	No	Commercial	5548007010-5548007012	$13,100,000	$19,340,816	-$6,240,816	-$6,922	$63,656	32.27%	Moderate	6.78	Low to Medium Barriers
351	2905 S HOOVER ST	2007	N/A	880	N/A	HCM	CHC-2007-3397-MA	VERIFY CONTRACT EXISTS WITH OHR	N/A	N/A	9	South Los Angeles	R3-1-O	No	No	Single-family	5055029003	N/A	N/A	#VALUE!	#VALUE!	#VALUE!	#VALUE!	N/A	5.22	Medium to High Barriers
352	1850 E INDUSTRIAL ST	2007	N/A	888	National Biscuit Company Building	HCM	CHC-2007-4002-MA	C-112886	N/A	N/A	14	Central City North	M3-1	No	No	Condominium	5164021015-5164021118	$33,549,000	$85,978,013	-$52,429,013	-$58,149	$534,776	60.98%	High	7.04	Low to Medium Barriers
353	6861 W IRIS CIR	2007	Whitley Heights	N/A	N/A	HPOZ	CHC-2007-3796-	C-112911	Yes	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5576002036	$1,079,301	$1,887,000	-$807,699	-$896	$8,239	42.80%	Moderate	6.79	Low to Medium Barriers
354	1841 S KELTON AVE	2007	N/A	747	Siple House	HCM	CHC-2007-3544-MA	C-112922	N/A	N/A	5	West Los Angeles	R3-1-O	Yes	No	Multi-family	4323007039	$688,000	$1,246,077	-$558,077	-$619	$5,692	44.79%	Moderate	7.5	Low to Medium Barriers
355	1851 S KELTON	2007	N/A	754	First Presbyterian Church of Los Angeles	HCM	CHC-2007-3831-MA	C-112921	N/A	N/A	5	West Los Angeles	R3-1-O	No	No	Single-family	4323007037	$764,000	$1,853,111	-$1,089,111	-$1,208	$11,109	58.77%	High	7.5	Low to Medium Barriers
356	1078 W KENSINGTON RD	2007	Angelino Heights	N/A	N/A	HPOZ	CHC-2007-3468-MA	C-112948	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5404022005	$898,000	$1,749,300	-$851,300	-$944	$8,683	48.67%	Moderate	5.82	Medium to High Barriers
357	14135 W KITTRIDGE ST	2007	Van Nuys	N/A	N/A	HPOZ	CHC-2007-3834-MA	C-112951	N/A	N/A	2	Van Nuys - North Sherman Oaks	R1-1-HPOZ	No	No	Multi-family	2237009020	$364,655	$634,736	-$270,081	-$300	$2,755	42.55%	Moderate	5.27	Medium to High Barriers
358	1143 S LA JOLLA AVE	2007	South Carthay	N/A	N/A	HPOZ	CHC-2007-3873-	C-112910	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087009009	$460,000	$1,310,810	-$850,810	-$944	$8,678	64.91%	High	7.19	Low to Medium Barriers
359	2014 N LAS PALMAS AVE	2007	Whitley Heights	N/A	N/A	HPOZ	CHC-2007-3867-MAEX	C-112946	Yes	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575011021	$652,000	$814,445	-$162,445	-$180	$1,657	19.95%	Low	6.79	Low to Medium Barriers
360	5100 LONGFELLOW ST	2007	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2007-3844-MA	C-112939	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5468009009	$202,000	$546,466	-$344,466	-$382	$3,514	63.04%	High	5.17	Medium to High Barriers
361	558 S MAIN ST	2007	N/A	806	Kerckoff Building and Annex	HCM	CHC-2007-3683-MA	C-112950	N/A	N/A	14	Central City	C2-2D	No	No	Multi-family	5148020012	$34,936,000	$70,121,940	-$35,185,940	-$39,024	$358,897	50.18%	High	6.49	Low to Medium Barriers
362	761 MCCARTHY VISTA	2007	Carthay Circle	N/A	N/A	HPOZ	CHC-2007-3879-MAEX	C-112947	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088012003	$407,000	$1,318,284	-$911,284	-$1,011	$9,295	69.13%	High	7.35	Low to Medium Barriers
363	3892 S OLMSTED AVE	2007	N/A	864	Life Magazine / Leimert Park	HCM	CHC-2007-3399-MA	C-112953	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1	No	No	Single-family	5033019001-5033019002	$226,000	$600,264	-$374,264	-$415	$3,817	62.35%	High	6.1	Low to Medium Barriers
364	854 S OXFORD AVE	2007	N/A	875	Val D'Amour Apartments	HCM	CHC-2007-3688-MAEX	C-112949	Yes	N/A	10	Wilshire	R4-2	Yes	No	Multi-family	5093010002	$6,916,850	$6,916,850	$0	$0	$0	0.00%	No Savings	5.9	Medium to High Barriers
365	2111 PARK GROVE AVE	2007	University Park	N/A	N/A	HPOZ	CHC-2007-3408-MA	C-112945	N/A	N/A	1	South Los Angeles	[Q]RD2-1XL-O-HPOZ	No	No	Single-family	5124022010	$706,000	$2,702,349	-$1,996,349	-$2,214	$20,363	73.87%	High	4.33	High Barriers
366	12420 W ROCHEDALE LN	2007	N/A	862	Miller House	HCM	CHC-2007-3567-MAEX	C-112905	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494010033	$492,000	$1,923,101	-$1,431,101	-$1,587	$14,597	74.42%	High	8.83	Low Barriers

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367	12434 W ROCHEDALE LN	2007	N/A	635	Weckler Houe	HCM	CHC-2007-3892-MAEX	C-112917	Yes	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494010031	$469,000	$1,771,535	-$1,302,535	-$1,445	$13,286	73.53%	High	8.83	Low Barriers
368	6058 W SCENIC AVE	2007	N/A	874	Garber House	HCM	CHC-2007-3680-MA	C-112916	N/A	N/A	4	Hollywood	[Q]R3-1XL	Yes	No	Multi-family	5586009002	$502,000	$1,037,127	-$535,127	-$594	$5,458	51.60%	High	6.85	Low to Medium Barriers
369	810 SPRING ST S	2007	N/A	871	810 South Spring Street	HCM	CHC-2007-3662-MA	C-112915	N/A	N/A	14	Central City	C2-4D	No	No	Multi-family	5144016044	$25,800,000	$46,607,951	-$20,807,951	-$23,078	$212,241	44.64%	Moderate	6.39	Low to Medium Barriers
370	100 N SYCAMORE	2007	N/A	858	One Hundred Sycamore	HCM	CHC-2007-3570-MAEX	C-112904	Yes	N/A	5	Wilshire	[Q]R3-1	Yes	Yes	Multi-family	5513004014	$2,522,000	$3,490,548	-$968,548	-$1,074	$9,879	27.75%	Moderate	7.32	Low to Medium Barriers
371	1936 TOBERMAN ST	2007	University Park	N/A	N/A	HPOZ	CHC-2007-3840-MA	C-112913	N/A	N/A	1	South Los Angeles	Multiple	Yes	No	Multi-family	5124016013	$409,000	$585,010	-$176,010	-$195	$1,795	30.09%	Moderate	4.33	High Barriers
372	2322 S TOBERMAN ST	2007	University Park	N/A	N/A	HPOZ	CHC-2007-3452-MA	C-112954	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124010008	$198,000	$484,821	-$286,821	-$318	$2,926	59.16%	High	4.33	High Barriers
373	1700 S VICTORIA AVE	2007	La Fayette Square	N/A	N/A	HPOZ	CHC-2007-3851-	C-112893	Yes	N/A	10	West Adams - Baldwin Hills -	R1-1-HPOZ	No	No	Single-family	5071002029	$630,000	$1,286,312	-$656,312	-$728	$6,694	51.02%	High	5.49	Medium to High Barriers
374	1716 S VICTORIA AVE	2007	La Fayette Square	N/A	N/A	HPOZ	CHC-2007-3901-	C-112912	Yes	N/A	10	West Adams - Baldwin Hills -	R1-1-HPOZ	No	No	Single-family	5071002031	$385,000	$1,302,211	-$917,211	-$1,017	$9,356	70.43%	High	5.49	Medium to High Barriers
375	1740 S VICTORIA AVE	2007	La Fayette Square	N/A	N/A	HPOZ	CHC-2007-4196-MAEX	C-112955	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071002035	$505,000	$2,177,700	-$1,672,700	-$1,855	$17,062	76.81%	Very High	5.49	Medium to High Barriers
376	4311 W VICTORIA PARK DR	2007	N/A	885	Holmes Shannon House	HCM	CHC-2007-3598-MAEX	C-112895	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R2-1-O	No	No	Single-family	5082015015	$536,000	$1,837,591	-$1,301,591	-$1,444	$13,276	70.83%	High	5.61	Medium to High Barriers
377	6132 W WARNER DR	2007	Carthay Circle	N/A	N/A	HPOZ	CHC-2007-3459-MAEX	C-112914	Yes	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088003046	$1,426,000	$1,764,675	-$338,675	-$376	$3,454	19.19%	Low	7.35	Low to Medium Barriers
378	1705 WELLINGTON RD	2007	La Fayette Square	N/A	N/A	HPOZ	CHC-2007-3343-MAEX	C-112892	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071006016	$576,000	$1,786,115	-$1,210,115	-$1,342	$12,343	67.75%	High	5.49	Medium to High Barriers
379	1809 S WESTMORELAND BLVD	2007	Harvard Heights	N/A	N/A	HPOZ	CHC-2007-3456-MA	C-112930	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074016020	$474,196	$474,196	$0	$0	$0	0.00%	No Savings	4.68	Medium to High Barriers
380	1760 N WILCOX AVE	2007	N/A	867	Mayfair Apartments and Rooftop Neon Sign	HCM	CHC-2007-3789-MA	C-112926	N/A	N/A	13	Hollywood	C4-2D-SN	Yes	No	Multi-family	5546006014	$6,881,000	$9,046,880	-$2,165,880	-$2,402	$22,092	23.94%	Low	5.83	Medium to High Barriers
381	3780 W WILSHIRE BLVD	2007	N/A	118	Pellissier Building and Wiltern Theater	HCM	CHC-2007-3891-MAEX	C-112894	Yes	N/A	10	Wilshire	C4-2	No	No	Commercial	5093006030	$30,266,417	$30,266,417	$0	$0	$0	0.00%	No Savings	5.9	Medium to High Barriers
382	126 S WINDSOR BLVD	2007	Windsor Square	N/A	N/A	HPOZ	CHC-2007-3655-MAEX	C-112906	Yes	N/A	4	Wilshire	RE9-1-HPOZ	No	No	Single-family	5516004024	$889,000	$4,563,194	-$3,674,194	-$4,075	$37,477	80.52%	Very High	6.46	Low to Medium Barriers
383	2881 W 15TH ST	2008	Harvard Heights	N/A	N/A	HPOZ	CHC-2008-2983-MA	C-114965	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074004021	$448,000	$839,545	-$391,545	-$434	$3,994	46.64%	Moderate	4.72	Medium to High Barriers
384	2129 W 20TH ST	2008	Western Heights	N/A	N/A	HPOZ	CHC-2008-2923-MA	C-114966	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073030053	$411,000	$933,804	-$522,804	-$580	$5,333	55.99%	High	4.71	Medium to High Barriers
385	2361 W 20TH ST	2008	Western Heights	N/A	N/A	HPOZ	CHC-2008-2950-MA	C-115000	N/A	N/A	10	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5073025006	$222,000	$364,170	-$142,170	-$158	$1,450	39.04%	Moderate	4.71	Medium to High Barriers
386	2379 W 21ST ST	2008	Western Heights	N/A	N/A	HPOZ	CHC-2008-2959-MA	C-114980	N/A	N/A	10	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5073026010	$220,000	$601,624	-$381,624	-$423	$3,893	63.43%	High	4.71	Medium to High Barriers
387	108 W 2ND ST	2008	N/A	873	Higgins-Building	HCM	CHC-2008-3029-MA	C-115007	N/A	N/A	14	Central City	C4-4D	No	No	Condominium	5149006010-5149006152	$34,622,000	$75,001,157	-$40,379,157	-$44,784	$411,867	53.84%	High	6.49	Low to Medium Barriers

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388	210 W 7TH ST	2008	N/A	898	Van Nuys Building	HCM	CHC-2008-3099-MA	C-114963	N/A	N/A	14	Central City	C5-4D	No	Yes	Multi-family	5144015033	$26,100,000	$26,560,068	-$460,068	-$510	$4,693	1.73%	Low	6.39	Low to Medium Barriers
389	727 W 7TH ST	2008	N/A	355	Roosevelt Building	HCM	CHC-2008-482-MA	C-114947	N/A	N/A	14	Central City	C2-4D	No	Yes	Condominium	5144029010-5144029232	$66,280,000	$142,126,395	-$75,846,395	-$84,121	$773,633	53.37%	High	6.39	Low to Medium Barriers
390	2523 S 7TH AVE	2008	West Adams Terrace	N/A	N/A	HPOZ	CHC-2008-3027-MA	C-114956	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-O-HPOZ	No	Yes	Single-family	5059016021	$269,000	$684,139	-$415,139	-$460	$4,234	60.68%	High	4.36	High Barriers
391	182 S ALTA VISTA BLVD	2008	Miracle Mile North	N/A	N/A	HPOZ	CHC-2008-3214-MAEX	C-114967	Yes	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512024017	$480,000	$1,930,727	-$1,450,727	-$1,609	$14,797	75.14%	Very High	7.3	Low to Medium Barriers
392	2801 S ARLINGTON AVE	2008	Jefferson Park	865	Joseph L. Starr Farmhouse	HCM and HPOZ	CHC-2008-3133-MA	C-114968	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	RD3-1-O	No	No	Single-family	5052010019	$289,000	$353,239	-$64,239	-$71	$655	18.19%	Low	5.4	Medium to High Barriers
393	5696 E ASH ST	2008	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2008-2996-MA	C-114981	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Single-family	5469036013	$395,000	$753,589	-$358,589	-$398	$3,658	47.58%	Moderate	5.77	Medium to High Barriers
394	3268 N BENNETT DR	2008	N/A	917	Roland E. Hill House	HCM	CHC-2008-3287-MAEX	C-115005	Yes	N/A	4	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	R1-1	No	No	Single-family	2429013014	$456,000	$1,891,640	-$1,435,640	-$1,592	$14,644	75.89%	Very High	7.63	Low Barriers
395	756 S BROADWAY	2008	N/A	899	Charles C. Chapman	HCM	CHC-2008-3967-MA	C-114948	N/A	N/A	14	Central City	[Q]C5-4D-CDO-SN	No	No	Condominium	5144015056-5144015225	$17,915,779	$17,915,779	$0	$0	$0	0.00%	No Savings	6.39	Low to Medium Barriers
396	3820 N BUENA PARK DR	2008	N/A	918	Lydecker Hilltop House	HCM	CHC-2008-3243-MA	C-114990	N/A	N/A	2	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	R1-1	No	No	Single-family	2369029010	$416,700	$1,237,636	-$820,936	-$910	$8,374	66.33%	High	7.96	Low Barriers
397	2193 CAMBRIDGE ST	2008	Harvard Heights	N/A	N/A	HPOZ	CHC-2008-2980-MA	C-114982	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074010015	$448,000	$677,051	-$229,051	-$254	$2,336	33.83%	Moderate	4.72	Medium to High Barriers
398	3340 COUNTRY CLUB DR	2008	Country Club Park	420	Milbank - McFie Estate	HCM and HPOZ	CHC-2008-3036-MAEX	C-114991	Yes	N/A	10	Wilshire	RE9-1-O-HPOZ	No	No	Single-family	5081023036	$1,927,000	$5,039,682	-$3,112,682	-$3,452	$31,749	61.76%	High	5.61	Medium to High Barriers
399	1133 S CRESCENT BLVD	2008	South Carthay	N/A	N/A	HPOZ	CHC-2008-2945-MA	C-114983	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087014021	$507,000	$1,249,556	-$742,556	-$824	$7,574	59.43%	High	7.19	Low to Medium Barriers
400	4791 W CROMWELL AVE	2008	N/A	913	Blackburn Residence	HCM	CHC-2008-3138-MAEX	C-114984	Yes	N/A	4	Hollywood	RE11-1	No	No	Single-family	5588017002	$711,000	$2,504,503	-$1,793,503	-$1,989	$18,294	71.61%	High	7.43	Low to Medium Barriers
401	12410 W DEERBROOK LN	2008	N/A	634	Kalmick House	HCM	CHC-2008-3341-MA	C-114954	N/A	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494008010	$539,000	$1,650,335	-$1,111,335	-$1,233	$11,336	67.34%	High	8.83	Low Barriers
402	920 N DOUGLAS ST	2008	Angelino Heights	N/A	N/A	HPOZ	CHC-2008-3192-MA	C-114992	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5405018020	$307,000	$819,702	-$512,702	-$569	$5,230	62.55%	High	5.98	Medium to High Barriers
403	933 N EAST EDGEWARE RD	2008	Angelino Heights	N/A	N/A	HPOZ	CHC-2008-2818-MA	C-114994	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405018002	$634,000	$728,386	-$94,386	-$105	$963	12.96%	Low	5.98	Medium to High Barriers
404	945 N EAST EDGEWARE RD	2008	Angelino Heights	218	Residence	HCM and HPOZ	CHC-2008-3285-MA	C-114985	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5405018023	$439,000	$584,246	-$145,246	-$161	$1,482	24.86%	Low	5.98	Medium to High Barriers
405	4324 GLENALBYN DR	2008	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2008-2817-MA	C-114962	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5465014008	$421,000	$1,082,430	-$661,430	-$734	$6,747	61.11%	High	6.8	Low to Medium Barriers

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406	5338 E GRANADA ST	2008	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2008-2816-MA	C-114970	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	Yes	No	Multi-family	5469020001	$322,000	$629,769	-$307,769	-$341	$3,139	48.87%	Moderate	5.69	Medium to High Barriers
407	609 S GRAND AVE	2008	N/A	786	Powers Apartment #3	HCM	CHC-2008-3058-MA	C-114996	N/A	N/A	14	Central City	C2-4D	No	No	Multi-family	5144005125	$23,800,000	$39,193,101	-$15,393,101	-$17,072	$157,010	39.28%	Moderate	6.79	Low to Medium Barriers
408	1471 N HAVENHURST DR	2008	N/A	435	Andalusia Apartments	HCM	CHC-2008-3096-MA	C-114949	N/A	N/A	4	Hollywood	R2-1XL	Yes	No	Condominium	5554018037-5554018068	$4,261,000	$10,215,629	-$5,954,629	-$6,604	$60,737	58.29%	High	8.21	Low Barriers
409	543 N HIGHLAND AVE	2008	Hancock Park	N/A	N/A	HPOZ	CHC-2008-2929-MA	C-114995	N/A	N/A	5	Hollywood	R1-1-HPOZ	No	No	Single-family	5524026002	$500,000	$1,526,424	-$1,026,424	-$1,138	$10,470	67.24%	High	7.14	Low to Medium Barriers
410	2431 W HILL DR	2008	N/A	890	Waite Residence	HCM	CHC-2008-3174-MA	C-114986	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5682001037	$384,000	$1,290,096	-$906,096	-$1,005	$9,242	70.23%	High	7.46	Low to Medium Barriers
411	2640 N HURON ST	2008	N/A	404	Los Angeles Railway Huron Substation	HCM	CHC-2008-3246-MA	C-114987	N/A	N/A	1	Northeast Los Angeles	[Q]C2-1VL-CDO	No	No	Commercial	5446010009	$559,000	$1,023,386	-$464,386	-$515	$4,737	45.38%	Moderate	4.81	Medium to High Barriers
412	414 S IRVING BLVD	2008	Windsor Square	N/A	N/A	HPOZ	CHC-2008-3200-MA	C-114988	N/A	N/A	4	Wilshire	RE11-1-HPOZ	No	No	Single-family	5504012015	$1,061,000	$4,587,978	-$3,526,978	-$3,912	$35,975	76.87%	Very High	6.83	Low to Medium Barriers
413	5663 E IRVINGTON PL	2008	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2008-3229-MA	C-114989	N/A	N/A	1	Northeast Los Angeles	R2-1-HPOZ	No	No	Single-family	5478032015	$224,000	$460,788	-$236,788	-$263	$2,415	51.39%	High	5.77	Medium to High Barriers
414	730 N KENSINGTON RD	2008	Angelino Heights	N/A	N/A	HPOZ	CHC-2008-2820-MA	C-114971	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405023018	$911,000	$1,030,300	-$119,300	-$132	$1,217	11.58%	Low	5.98	Medium to High Barriers
415	865 E KENSINGTON RD	2008	Angelino Heights	N/A	N/A	HPOZ	CHC-2008-2815-MA	C-114972	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5405020021	$432,000	$1,257,529	-$825,529	-$916	$8,420	65.65%	High	5.98	Medium to High Barriers
416	1855 N KINGSLEY DR	2008	N/A	832	Casa Laguna	HCM	CHC-2008-3101-MAEX	C-114951	Yes	N/A	14	Hollywood	R3-1	Yes	No	Multi-family	5544010017	$3,513,000	$6,457,849	-$2,944,849	-$3,266	$30,037	45.60%	Moderate	6.24	Low to Medium Barriers
417	1203 W KIPLING AVE	2008	N/A	383	Residence	HCM	CHC-2008-3048-MA	C-114973	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5691011018	$162,000	$198,942	-$36,942	-$41	$377	18.57%	Low	7.46	Low to Medium Barriers
418	618 S LUCERNE BLVD S	2008	Windsor Square	N/A	N/A	HPOZ	CHC-2008-2981-MAEX	C-114974	Yes	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5505022004	$932,305	$2,438,845	-$1,506,540	-$1,671	$15,367	61.77%	High	7.89	Low Barriers
419	944 N MALTMAN AVE	2008	N/A	844	Purviance Residence	HCM	CHC-2008-3140-MA	C-114997	N/A	N/A	13	Silver Lake - Echo Park - Elysian Valley	RD2-1VL	Yes	No	Single-family	5427022020	$602,000	$1,142,163	-$540,163	-$599	$5,510	47.29%	Moderate	6.85	Low to Medium Barriers
420	137 N MARTEL AVE	2008	Miracle Mile North	N/A	N/A	HPOZ	CHC-2008-3224-MA	C-114975	N/A	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512011011	$424,000	$1,302,300	-$878,300	-$974	$8,959	67.44%	High	7.3	Low to Medium Barriers
421	938 N MARTEL AVE	2008	N/A	783	Covert Cottages Bungalow Court	HCM	CHC-2008-3179-MA	C-114998	N/A	N/A	5	Hollywood	R3-1XL	Yes	No	Multi-family	5531020003	$1,284,000	$2,119,490	-$835,490	-$927	$8,522	39.42%	Moderate	7.22	Low to Medium Barriers
422	3501 S MEIER ST	2008	Gregory Ain Mar Vista Tract	N/A	N/A	HPOZ	CHC-2008-2947-MA	C-114950	N/A	N/A	11	Palms - Mar Vista - Del Rey	R1-1-HPOZ	No	No	Single-family	4246001020	$523,000	$1,501,299	-$978,299	-$1,085	$9,979	65.16%	High	7.34	Low to Medium Barriers
423	808 N MELROSE HL	2008	Melrose Hill	N/A	N/A	HPOZ	CHC-2008-3028-MA	C-114976	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535026016	$366,000	$1,281,120	-$915,120	-$1,015	$9,334	71.43%	High	4.91	Medium to High Barriers
424	6708 W MILNER RD	2008	Whitley Heights	N/A	N/A	HPOZ	CHC-2008-2921-MA	C-114977	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575013012	$724,000	$1,435,073	-$711,073	-$789	$7,253	49.55%	Moderate	6.79	Low to Medium Barriers
425	6518 W MOORE DR	2008	Carthay Circle	N/A	N/A	HPOZ	CHC-2008-2971-MA	C-114978	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088007011	$411,000	$940,252	-$529,252	-$587	$5,398	56.29%	High	7.35	Low to Medium Barriers
426	511 S MUIRFIELD RD	2008	Hancock Park	N/A	N/A	HPOZ	CHC-2008-2975-	C-115006	Yes	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5505008016	$1,360,000	$5,146,233	-$3,786,233	-$4,199	$38,620	73.57%	High	7.89	Low Barriers
427	500 S NORTON AVE	2008	Windsor Square	N/A	N/A	HPOZ	CHC-2008-3220-MA	C-114979	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5504016001	$430,000	$1,501,299	-$1,071,299	-$1,188	$10,927	71.36%	High	6.83	Low to Medium Barriers
428	1137 S ORLANDO AVE	2008	South Carthay	N/A	N/A	HPOZ	CHC-2008-2926-MA	C-114952	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087005008	$500,000	$572,173	-$72,173	-$80	$736	12.61%	Low	7.19	Low to Medium Barriers
429	1955 S PARK GROVE AVE	2008	University Park	N/A	N/A	HPOZ	CHC-2008-3223-MA	C-114953	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124019022	$355,000	$657,417	-$302,417	-$335	$3,085	46.00%	Moderate	4.33	High Barriers

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430	535 S PLYMOUTH BLVD	2008	Windsor Square	N/A	N/A	HPOZ	CHC-2008-3230-MAEX	C-115004	Yes	N/A	4	Wilshire	RE11-1-HPOZ	No	No	Single-family	5505023004	$1,681,000	$3,933,794	-$2,252,794	-$2,499	$22,978	57.27%	High	7.89	Low Barriers
431	2188 N PONET DR	2008	N/A	915	Victor Rossetti Residence	HCM	CHC-2008-3244-MAEX	C-115003	Yes	N/A	4	Hollywood	RE11-1	No	No	Single-family	5587026032	$3,303,000	$11,673,287	-$8,370,287	-$9,283	$85,377	71.70%	High	7.69	Low Barriers
432	1715 ROOSEVELT	2008	Harvard Heights	N/A	N/A	HPOZ	CHC-2008-2821-MA	C-114964	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074025004	$314,000	$704,182	-$390,182	-$433	$3,980	55.41%	High	5.22	Medium to High Barriers
433	116 N ROSSMORE AVE	2008	Hancock Park	N/A	N/A	HPOZ	CHC-2008-3191-MAEX	C-114955	Yes	N/A	4	Wilshire	RE11-1-HPOZ	No	No	Single-family	5515011020	$992,000	$4,023,502	-$3,031,502	-$3,362	$30,921	75.34%	Very High	7.89	Low Barriers
434	2422 N SILVER RIDGE AVE	2008	N/A	895	How House	HCM	CHC-2008-3063-MAEX	C-114998	Yes	N/A	13	Silver Lake - Echo Park - Elysian Valley	R2-1VL	No	No	Single-family	5440024001	$511,000	$2,601,000	-$2,090,000	-$2,318	$21,318	80.35%	Very High	7.17	Low to Medium Barriers
435	7764 W TORREYSON DR	2008	N/A	896	Harpel House #1	HCM	CHC-2008-3288-	C-115002	Yes	N/A	4	Hollywood	RE40-1-H	No	No	Single-family	5570014015	$742,361	$3,321,662	-$2,579,301	-$2,861	$26,309	77.65%	Very High	7.75	Low Barriers
436	128 S VAN NESS AVE	2008	Windsor Square	N/A	N/A	HPOZ	CHC-2008-2814-	C-114957	Yes	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5516011006	$747,000	$2,207,808	-$1,460,808	-$1,620	$14,900	66.17%	High	6.46	Low to Medium Barriers
437	1669 S VIRGINIA RD	2008	La Fayette Square	N/A	N/A	HPOZ	CHC-2008-2955-MA	C-114958	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071008056	$356,000	$1,192,321	-$836,321	-$928	$8,530	70.14%	High	5.49	Medium to High Barriers
438	1459 N WALLACE AVE	2008	Angelino Heights	N/A	N/A	HPOZ	CHC-2008-3221-MA	C-114959	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD3-1VL-HPOZ	Yes	No	Multi-family	5405008022	$549,000	$994,975	-$445,975	-$495	$4,549	44.82%	Moderate	5.82	Medium to High Barriers
439	6738 WEDGEWOOD PL	2008	Whitley Heights	N/A	N/A	HPOZ	CHC-2008-2961-MA	C-114960	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575017009	$497,000	$751,858	-$254,858	-$283	$2,600	33.90%	Moderate	6.79	Low to Medium Barriers
440	929 N WEST KENSINGTON RD	2008	Angelino Heights	N/A	N/A	HPOZ	CHC-2008-2982-MA	C-114969	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	Yes	No	Multi-family	5405009024	$818,000	$1,200,555	-$382,555	-$424	$3,902	31.86%	Moderate	5.82	Medium to High Barriers
441	1262 S WESTWOOD BLVD	2008	N/A	919	UCLAN-Crest Theater	HCM	CHC-2008-3684-MAEX	C-115001	Yes	N/A	5	Westwood	C4-1VL-POD	No	No	Recreational	4325005934	$2,590,000	$4,264,000	-$1,674,000	-$1,857	$17,075	39.26%	Moderate	6.87	Low to Medium Barriers
442	212 S WILTON PL	2008	N/A	925	212 South Wilton Place Residence	HCM	CHC-2008-3100-MAEX	C-114961	Yes	N/A	4	Wilshire	R1-1	No	No	Single-family	5516016019	$632,000	$2,180,246	-$1,548,246	-$1,717	$15,792	71.01%	High	6.46	Low to Medium Barriers
443	2527 S 12TH AVE	2009	West Adams Terrace	N/A	N/A	HPOZ	CHC-2009-2245-MA	C-116505	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5059007009	$299,000	$787,217	-$488,217	-$541	$4,980	62.02%	High	4.6	Medium to High Barriers
444	2892 W 15TH ST	2009	Harvard Heights	N/A	N/A	HPOZ	CHC-2009-2278-MA	C-116506	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074010004	$448,000	$1,020,000	-$572,000	-$634	$5,834	56.08%	High	4.72	Medium to High Barriers
445	2301 W 21ST ST	2009	Western Heights	N/A	N/A	HPOZ	CHC-2009-2294-MA	C-116495	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073027026	$322,000	$813,851	-$491,851	-$546	$5,017	60.44%	High	4.71	Medium to High Barriers
446	1222 W 22ND ST	2009	University Park	N/A	N/A	HPOZ	CHC-2009-2307-MA	C-116496	N/A	N/A	8	South Los Angeles	RD2-1-HPOZ	No	No	Single-family	5055019026	$180,000	$253,340	-$73,340	-$81	$748	28.95%	Moderate	4.42	High Barriers
447	2286 W 23RD ST	2009	West Adams Terrace	N/A	N/A	HPOZ	CHC-2009-2271-MA	C-116497	N/A	N/A	10	South Los Angeles	[Q]R4-1-O-HPOZ	No	No	Single-family	5058007005	$366,000	$927,270	-$561,270	-$622	$5,725	60.53%	High	4.66	Medium to High Barriers
448	2195 W 24TH ST	2009	West Adams Terrace	N/A	N/A	HPOZ	CHC-2009-2357-MA	C-116514	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5058007018	$426,000	$1,102,547	-$676,547	-$750	$6,901	61.36%	High	4.66	Medium to High Barriers

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449	3511 W 25TH ST	2009	West Adams	N/A	N/A	HPOZ	CHC-2009-2248-MA	C-116513	N/A	N/A	10	West Adams - Baldwin Hills -	RD2-1-O-HPOZ	Yes	No	Multi-family	5059021010	$577,196	$577,196	$0	$0	$0	0.00%	No Savings	4.36	High Barriers
450	966 S 3RD AVE	2009	Wilshire Park	N/A	N/A	HPOZ	CHC-2009-2253-MA	C-116498	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092020006	$329,000	$1,444,852	-$1,115,852	-$1,238	$11,382	77.23%	Very High	5.56	Medium to High Barriers
451	2410 4TH AVE	2009	West Adams	N/A	N/A	HPOZ	CHC-2009-1991-MA	C-116500	N/A	N/A	10	West Adams - Baldwin Hills -	RD2-1-O-HPOZ	No	No	Single-family	5059025017	$336,000	$865,799	-$529,799	-$588	$5,404	61.19%	High	4.36	High Barriers
452	2535 S 4TH AVE	2009	West Adams Terrace	N/A	N/A	HPOZ	CHC-2009-2273-MA	C-116501	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	RD2-1-O-HPOZ	Yes	No	Multi-family	5059023006	$346,000	$822,080	-$476,080	-$528	$4,856	57.91%	High	4.36	High Barriers
453	1546 S 5TH AVE	2009	N/A	924	Bigford Residence	HCM	CHC-2009-2291-MA	C-116502	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	RD1.5-1-O	No	No	Single-family	5072024017	$317,000	$619,284	-$302,284	-$335	$3,083	48.81%	Moderate	5.06	Medium to High Barriers
454	2503 S 5TH AVE	2009	West Adams Terrace	N/A	N/A	HPOZ	CHC-2009-2000-MA	C-116503	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	RD2-1-O-HPOZ	Yes	No	Multi-family	5059020001	$380,000	$810,696	-$430,696	-$478	$4,393	53.13%	High	4.36	High Barriers
455	6268 W DEL VALLE DR	2009	Carthay Circle	N/A	N/A	HPOZ	CHC-2009-2247-MA	C-116515	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	Yes	No	Single-family	5088017011	$366,000	$1,605,660	-$1,239,660	-$1,375	$12,645	77.21%	Very High	7.35	Low to Medium Barriers
456	606 E SANTA CLARA AVE	2009	N/A	926	Kinney-Tabor House	HCM	CHC-2009-2272-MA	C-116547	N/A	N/A	11	Venice	RD1.5-1	No	No	Single-family	4239029017	$971,000	$1,031,109	-$60,109	-$67	$613	5.83%	Low	7.04	Low to Medium Barriers
457	217 E 8TH ST	2009	N/A	930	Garment Capitol Building	HCM	CHC-2009-2286-MA	C-116504	N/A	N/A	14	Central City	M2-2D	No	No	Commercial	5145003089	$15,300,000	$17,384,040	-$2,084,040	-$2,311	$21,257	11.99%	Low	5.06	Medium to High Barriers
458	1201 S ALVIRA ST	2009	South Carthay	N/A	N/A	HPOZ	CHC-2009-1990-MA	C-116516	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087010010	$418,000	$1,356,422	-$938,422	-$1,041	$9,572	69.18%	High	7.19	Low to Medium Barriers
459	721 E AMOROSO PL	2009	N/A	927	Sturdevant Bungalow	HCM	CHC-2009-2279-MA	C-116535	N/A	N/A	11	Venice	R2-1	No	No	Single-family	4241026022	$538,000	$1,297,084	-$759,084	-$842	$7,743	58.52%	High	8.14	Low Barriers
460	136 S AVENUE 52	2009	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2009-2303-MA	C-116534	N/A	N/A	1	Northeast Los Angeles	[Q]C4-2D-HPOZ	No	No	Single-family	5468005036	$256,635	$256,635	$0	$0	$0	0.00%	No Savings	5.48	Medium to High Barriers
461	132 N AVENUE 57	2009	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2009-2346-MA	C-116494	N/A	N/A	1	Northeast Los Angeles	[Q]C4-2D-HPOZ	Yes	No	Multi-family	5468033009	$548,051	$548,051	$0	$0	$0	0.00%	No Savings	5.77	Medium to High Barriers
462	322 N AVENUE 59	2009	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2009-2258-MA	C-116536	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Single-family	5484021014	$502,000	$824,182	-$322,182	-$357	$3,286	39.09%	Moderate	5.77	Medium to High Barriers
463	1217 W BELLEVUE AVE	2009	Angelino Heights	N/A	N/A	HPOZ	CHC-2009-2284-MA	C-116546	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5405027017	$365,000	$731,884	-$366,884	-$407	$3,742	50.13%	High	5.98	Medium to High Barriers
464	2124 S BONSALLO AVE	2009	University Park	497	Charles Clifford Gibbons Residenc	HCM and HPOZ	CHC-2009-2261-MA	C-116528	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124031025	$306,000	$330,931	-$24,931	-$28	$254	7.53%	Low	3.62	High Barriers
465	567 N BOYLSTON ST	2009	Angelino Heights	N/A	N/A	HPOZ	CHC-2009-2264-MA	C-116524	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405026005	$574,000	$776,830	-$202,830	-$225	$2,069	26.11%	Moderate	5.98	Medium to High Barriers
466	1757 S BUCKINGHAM RD	2009	La Fayette Square	N/A	N/A	HPOZ	CHC-2009-2276-MA	C-116521	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071010031	$463,000	$1,494,521	-$1,031,521	-$1,144	$10,522	69.02%	High	5.49	Medium to High Barriers
467	1815 S BUCKINGHAM RD	2009	La Fayette Square	N/A	N/A	HPOZ	CHC-2009-2858-MA	C-116522	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071011022	$486,000	$988,201	-$502,201	-$557	$5,122	50.82%	High	5.49	Medium to High Barriers
468	1452 W CALUMET AVE	2009	Angelino Heights	N/A	N/A	HPOZ	CHC-2009-1979-MA	C-116532	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405014021	$621,000	$1,010,402	-$389,402	-$432	$3,972	38.54%	Moderate	5.82	Medium to High Barriers
469	2331 W COVE AVE	2009	N/A	922	Edward A. "Tink"	HCM	CHC-2009-2275-MA	C-116531	N/A	N/A	13	Silver Lake - Echo Park -	R1-1VL	No	No	Single-family	5422006010	$456,000	$2,093,362	-$1,637,362	-$1,816	$16,701	78.22%	Very High	7.02	Low to Medium Barriers

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470	200 E CULVER BLVD	2009	N/A	955	Dickinson and Gillespie Building	HCM	CHC-2009-2244-MA	C-116530	N/A	N/A	11	Westchester - Playa del Rey	[Q]C4-1VL	No	No	Commercial	4116012011	$2,884,862	$2,884,862	$0	$0	$0	0.00%	No Savings	7.87	Low Barriers
471	6127 W DEL VALLE DR	2009	Carthay Circle	N/A	N/A	HPOZ	CHC-2009-2910-MA	C-116527	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088003048	$542,000	$1,412,987	-$870,987	-$966	$8,884	61.64%	High	7.35	Low to Medium Barriers
472	1281 S DUNSMUIR AVE	2009	N/A	954	Dunsmuir Flats	HCM	CHC-2009-2293-MA	C-116499	N/A	N/A	10	Wilshire	R3-1-O	Yes	No	Multi-family	5085015023	$817,000	$1,904,233	-$1,087,233	-$1,206	$11,090	57.10%	High	6.48	Low to Medium Barriers
473	724 N EAST EDGEWARE RD	2009	Angelino Heights	206	Residence	HCM and HPOZ	CHC-2009-1993-MA	C-116466	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405024014	$742,000	$993,982	-$251,982	-$279	$2,570	25.35%	Moderate	5.98	Medium to High Barriers
474	812 N EAST KENSINGTON RD	2009	Angelino Heights	N/A	N/A	HPOZ	CHC-2009-1999-MA	C-116472	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Single-family	5405021066	$516,000	$1,288,369	-$772,369	-$857	$7,878	59.95%	High	5.98	Medium to High Barriers
475	843 N EAST KENSINGTON RD	2009	Angelino Heights	N/A	N/A	HPOZ	CHC-2009-2002-MA	C-116473	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405020017	$611,000	$1,208,806	-$597,806	-$663	$6,098	49.45%	Moderate	5.98	Medium to High Barriers
476	855 N EAST KENSINGTON RD	2009	Angelino Heights	N/A	N/A	HPOZ	CHC-2009-2285-MA	C-116474	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5405020020	$399,000	$1,151,722	-$752,722	-$835	$7,678	65.36%	High	5.98	Medium to High Barriers
477	5027 N EL VERANO AVE	2009	N/A	931	Castle Crag	HCM	CHC-2009-2257-MA	C-116463	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5682029007	$378,000	$821,485	-$443,485	-$492	$4,524	53.99%	High	7.42	Low to Medium Barriers
478	849 S GRAND AVE	2009	N/A	299	Embassy Auditorium and	HCM	CHC-2009-2256-MA	C-116523	N/A	N/A	14	Central City	[Q]R5-4D	No	No	Multi-family	5144020011-5144020012	$24,610,247	$24,610,247	$0	$0	$0	0.00%	No Savings	6.79	Low to Medium Barriers
479	860 N HANLEY AVE	2009	N/A	695	Gross House	HCM	CHC-2009-2300-MA	C-116512	N/A	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	Yes	Single-family	4494009015	$406,000	$764,671	-$358,671	-$398	$3,658	46.91%	Moderate	8.83	Low Barriers
480	1749 N HARVARD BLVD	2009	N/A	769	Toberman House	HCM	CHC-2009-1987-MA	C-116511	N/A	N/A	13	Hollywood	R3-1	Yes	No	Single-family	5544008012	$561,000	$874,686	-$313,686	-$348	$3,200	35.86%	Moderate	6.01	Low to Medium Barriers
481	1909 S HARVARD BLVD	2009	Harvard Heights	N/A	N/A	HPOZ	CHC-2009-1998-MA	C-116508	N/A	N/A	10	South Los Angeles	[Q]R4-1-HPOZ	No	No	Single-family	5074032010	$672,000	$1,326,510	-$654,510	-$726	$6,676	49.34%	Moderate	4.71	Medium to High Barriers
482	2057 S HARVARD BLVD	2009	Harvard Heights	N/A	N/A	HPOZ	CHC-2009-1997-MA	C-116507	N/A	N/A	10	South Los Angeles	[Q]R4-1-HPOZ	No	No	Single-family	5074032016	$751,000	$1,094,611	-$343,611	-$381	$3,505	31.39%	Moderate	4.71	Medium to High Barriers
483	1861 N HEATHER CT	2009	N/A	948	Sinay House	HCM	CHC-2009-2322-MA	C-116468	N/A	N/A	4	Bel Air - Beverly Crest	RE15-1-H	No	No	Single-family	4352001036	$530,000	$2,318,989	-$1,788,989	-$1,984	$18,248	77.15%	Very High	8.37	Low Barriers
484	1817 N HILLCREST RD	2009	N/A	956	Villa Bonita	HCM	CHC-2009-1989-MA	C-116469	N/A	N/A	4	Hollywood	[Q]R4-1VL	Yes	No	Multi-family	5549018027	$4,287,000	$6,685,610	-$2,398,610	-$2,660	$24,466	35.88%	Moderate	7.36	Low to Medium Barriers
485	6381 W HOLLYWOOD BLVD	2009	N/A	334	Security Trust and Savings Building	HCM	CHC-2009-2260-MA	C-116470	N/A	N/A	13	Hollywood	C4-2D-SN	No	No	Commercial	5546005029	$20,594,037	$20,594,037	$0	$0	$0	0.00%	No Savings	5.83	Medium to High Barriers
486	604 IRVING BLVD S	2009	Windsor Square	N/A	N/A	HPOZ	CHC-2009-2290-MA	C-116471	N/A	N/A	4	Wilshire	RE15-1-HPOZ	No	Yes	Single-family	5504009022	$964,000	$1,725,668	-$761,668	-$845	$7,769	44.14%	Moderate	6.83	Low to Medium Barriers
487	1116 S LA JOLLA AVE	2009	South Carthay	N/A	N/A	HPOZ	CHC-2009-2315-MA	C-116517	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087011018	$366,000	$854,230	-$488,230	-$541	$4,980	57.15%	High	7.19	Low to Medium Barriers
488	221 S MANHATTAN PL	2009	Wilshire Park	805	J.A. Howsley House	HCM and HPOZ	CHC-2009-2316-MA	C-116509	N/A	N/A	4	Wilshire	R4-1	No	No	Single-family	5516024004	$381,480	$1,033,651	-$652,171	-$723	$6,652	63.09%	High	6.46	Low to Medium Barriers
489	4327 N MARMION WAY	2009	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2009-2281-MA	C-116467	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Multi-family	5465014007	$250,000	$611,297	-$361,297	-$401	$3,685	59.10%	High	6.8	Low to Medium Barriers
490	6606 W MARYLAND DR	2009	N/A	923	Kennedy Solow House	HCM	CHC-2009-2277-MA	C-116465	N/A	N/A	5	Wilshire	R1-1-O	No	No	Single-family	5510015033	$498,000	$2,113,232	-$1,615,232	-$1,791	$16,475	76.43%	Very High	7.89	Low Barriers
491	526 N MCCADDEN PL	2009	Hancock Park	N/A	N/A	HPOZ	CHC-2009-2252-MA	C-116510	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5524024005	$448,000	$1,258,092	-$810,092	-$898	$8,263	64.39%	High	7.14	Low to Medium Barriers
492	4946 W MELROSE HiLL ST	2009	Melrose Hill	N/A	N/A	HPOZ	CHC-2009-2263-MA	C-116464	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535028009	$347,000	$1,452,921	-$1,105,921	-$1,227	$11,280	76.12%	Very High	4.91	Medium to High Barriers

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493	12556 N MIDDLECOFF PL	2009	N/A	933	Kramer House	HCM	CHC-2009-1984-MA	C-116545	N/A	N/A	12	Granada Hills - Knollwood	RA-1	No	No	Single-family	2605004016	$505,000	$1,100,149	-$595,149	-$660	$6,071	54.10%	High	7.63	Low Barriers
494	6707 W MILNER RD	2009	Whitley Heights	N/A	N/A	HPOZ	CHC-2009-2283-MA	C-116529	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575017022	$598,000	$1,371,776	-$773,776	-$858	$7,893	56.41%	High	6.79	Low to Medium Barriers
495	6726 W MILNER RD	2009	Whitley Heights	N/A	N/A	HPOZ	CHC-2009-2287-MA	C-116541	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575013010	$523,000	$1,923,699	-$1,400,699	-$1,554	$14,287	72.81%	High	6.79	Low to Medium Barriers
496	3508 S MOORE ST	2009	Gregory Ain Mar Vista Tract	N/A	N/A	HPOZ	CHC-2009-2325-MA	C-116533	N/A	N/A	11	Palms - Mar Vista - Del Rey	R1-1-HPOZ	No	No	Single-family	4246001002	$463,000	$1,501,299	-$1,038,299	-$1,152	$10,591	69.16%	High	7.34	Low to Medium Barriers
497	6164 E MOUNT ANGELUS DR	2009	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2009-2270-MA	C-116542	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	No	No	Single-family	5484033023	$236,000	$760,416	-$524,416	-$582	$5,349	68.96%	High	6.01	Low to Medium Barriers
498	102 N NORTON AVE	2009	Windsor Square	N/A	N/A	HPOZ	CHC-2009-2288-	C-116538	Yes	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5516007011	$575,000	$2,113,600	-$1,538,600	-$1,706	$15,694	72.80%	High	6.46	Low to Medium Barriers
499	244 S NORTON AVE	2009	Windsor Square	N/A	N/A	HPOZ	CHC-2009-2314-MAEX	C-116537	Yes	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5516009008	$667,000	$2,695,139	-$2,028,139	-$2,249	$20,687	75.25%	Very High	6.46	Low to Medium Barriers
500	102 N OCEAN WAY	2009	N/A	594	Bradbury House	HCM	CHC-2009-1992-MA	C-116544	N/A	N/A	11	Brentwood - Pacific Palisades	R1-1-O	No	No	Single-family	4410006019-4410006020	$2,083,000	$11,885,000	-$9,802,000	-$10,871	$99,980	82.47%	Very High	8.73	Low Barriers
501	649 S OLIVE ST	2009	N/A	354	Giannini - Bank of	HCM	CHC-2009-2262-MA	C-116540	N/A	N/A	14	Central City	C2-4D	No	No	Multi-family	5144004034	$55,370,000	$81,458,443	-$26,088,443	-$28,934	$266,102	32.03%	Moderate	6.79	Low to Medium Barriers
502	407 N ORANGE DR	2009	N/A	929	Oliver Flats	HCM	CHC-2009-2309-MA	C-116526	N/A	N/A	5	Wilshire	R2-1	Yes	No	Multi-family	5525030012	$665,000	$2,074,752	-$1,409,752	-$1,564	$14,379	67.95%	High	7.32	Low to Medium Barriers
503	6215 W SAN VICENTE BLVD	2009	Carthay Circle	N/A	N/A	HPOZ	CHC-2009-2001-MA	C-116520	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088017020	$407,000	$1,363,179	-$956,179	-$1,060	$9,753	70.14%	High	7.35	Low to Medium Barriers
504	1463 W SCOTT AVE	2009	N/A	938	Scott Avenue Court	HCM	CHC-2009-2255-MA	C-116543	N/A	N/A	13	Silver Lake - Echo Park - Elysian Valley	RD2-1VL	Yes	No	Multi-family	5406003018	$1,330,000	$1,499,473	-$169,473	-$188	$1,729	11.30%	Low	6.23	Low to Medium Barriers
505	756 S SPRING ST	2009	N/A	957	Great Republic Life	HCM	CHC-2009-2326-MA	C-116539	N/A	N/A	14	Central City	C2-4D	No	No	Condominium	5144015229-5144015239	$16,514,182	$16,514,182	$0	$0	$0	0.00%	No Savings	6.39	Low to Medium Barriers
506	4754 N VANALDEN AVE	2009	N/A	952	Kaye Residenc	HCM	CHC-2009-1988-MA	C-116525	N/A	N/A	3	Encino - Tarzana	RA-1	No	No	Single-family	2176033001	$531,000	$1,479,577	-$948,577	-$1,052	$9,675	64.11%	High	8.48	Low Barriers
507	2424 W WILSHIRE BLVD	2009	N/A	934	Park Wilshire Building	HCM	CHC-2009-2267-MAEX	C-116519	Yes	N/A	1	Westlake	C4-2	Yes	No	Multi-family	5141004003, 5141004012	$20,750,000	$26,412,674	-$5,662,674	-$6,280	$57,759	21.44%	Low	5.12	Medium to High Barriers
508	7128 W WOODROW WILSON DR	2009	N/A	932	Clarence G. Badger Residenc e	HCM	CHC-2009-2292-MA	C-116518	N/A	N/A	4	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	R1-1	No	No	Single-family	2428001036	$523,000	$1,715,083	-$1,192,083	-$1,322	$12,159	69.51%	High	7.63	Low Barriers
509	2179 W 20TH ST	2010	Western Heights	N/A	N/A	HPOZ	CHC-2010-1527-MA	C-118100	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073030060	$406,000	$597,848	-$191,848	-$213	$1,957	32.09%	Moderate	4.71	Medium to High Barriers
510	2137 W 21ST ST	2010	Western Heights	N/A	N/A	HPOZ	CHC-2010-1617-MA	C-118101	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073030068	$644,000	$802,959	-$158,959	-$176	$1,621	19.80%	Low	4.71	Medium to High Barriers
511	2367 W 21ST ST	2010	Western Heights	N/A	N/A	HPOZ	CHC-2010-1538-MA	C-118102	N/A	N/A	10	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5073026008	$232,000	$411,031	-$179,031	-$199	$1,826	43.56%	Moderate	4.71	Medium to High Barriers
512	1459 W 29TH ST	2010	Adams - Normandie	N/A	N/A	HPOZ	CHC-2010-1622-MA	C-118103	N/A	N/A	8	South Los Angeles	R2-1-O-HPOZ	Yes	No	Multi-family	5054033022	$535,000	$737,983	-$202,983	-$225	$2,070	27.51%	Moderate	5.03	Medium to High Barriers

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513	2427 S 4TH AVE	2010	West Adams Terrace	N/A	N/A	HPOZ	CHC-2010-1804-MA	C-118099	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	RD2-1-O-HPOZ	Yes	No	Multi-family	5059022009	$561,000	$1,015,394	-$454,394	-$504	$4,635	44.75%	Moderate	4.36	High Barriers
514	1140 W ADAMS BLVD	2010	University Park	295	A.E. Kelly Residenc	HCM and HPOZ	CHC-2010-1528-MA	C-118104	N/A	N/A	9	South Los Angeles	R4-1L-O	No	No	Single-family	5055025020	$962,000	$1,291,225	-$329,225	-$365	$3,358	25.50%	Moderate	6.53	Low to Medium Barriers
515	5437 E ALDAMA ST	2010	Highland Park -	N/A	N/A	HPOZ	CHC-2010-1805-MA	C-118105	N/A	N/A	1	Northeast Los Angeles	R2-1-HPOZ	No	No	Single-family	5478019001	$154,000	$488,791	-$334,791	-$371	$3,415	68.49%	High	6.5	Low to Medium Barriers
516	1345 S ALVARADO TER	2010	Pico - Union	86	Powers Residenc e	HCM and HPOZ	CHC-2010-1478-MA	C-118106	N/A	N/A	1	Westlake	RD1.5-1-HPOZ	No	No	Single-family	5135004013	$466,322	$466,322	$0	$0	$0	0.00%	No Savings	4.17	High Barriers
517	1127 S ALVIRA ST	2010	South Carthay	N/A	N/A	HPOZ	CHC-2010-1624-MA	C-118107	N/A	N/A	11	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087011009	$448,000	$1,682,404	-$1,234,404	-$1,369	$12,591	73.37%	High	7.19	Low to Medium Barriers
518	253 S BROADWAY	2010	N/A	544	Irvine - Byrne Building	HCM	CHC-2010-1651-MA	C-118108	N/A	N/A	14	Central City	C2-4D	No	Yes	Condominium	5149009026-5149090266	$10,314,438	$21,053,847	-$10,739,409	-$11,911	$109,542	51.01%	High	6.39	Low to Medium Barriers
519	743 S BRONSON AVE	2010	Wilshire Park	N/A	N/A	HPOZ	CHC-2010-1635-MA	C-118109	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092001018	$463,000	$1,381,196	-$918,196	-$1,018	$9,366	66.48%	High	6.49	Low to Medium Barriers
520	1615 S BUCKINGHAM RD	2010	La Fayette Square	N/A	N/A	HPOZ	CHC-2010-1486-MA	C-118110	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071009077	$456,000	$961,586	-$505,586	-$561	$5,157	52.58%	High	5.49	Medium to High Barriers
521	1620 S BUCKINGHAM RD	2010	La Fayette Square	N/A	N/A	HPOZ	CHC-2010-1728-MA	C-118111	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071008062	$396,000	$1,084,218	-$688,218	-$763	$7,020	63.48%	High	5.49	Medium to High Barriers
522	1701 S BUCKINGHAM RD	2010	La Fayette Square	N/A	N/A	HPOZ	CHC-2010-1620-MA	C-118112	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071010024	$500,000	$1,651,826	-$1,151,826	-$1,277	$11,749	69.73%	High	5.49	Medium to High Barriers
523	1820 S BUCKINGHAM RD	2010	La Fayette Square	N/A	N/A	HPOZ	CHC-2010-1822-MA	C-118113	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071007084	$334,000	$809,998	-$475,998	-$528	$4,855	58.77%	High	5.49	Medium to High Barriers
524	2175 W CAMBRIDGE ST	2010	Harvard Heights	991	Lucy E. Wheeler Res.	HCM and HPOZ	CHC-2010-1646-MA	C-118114	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074010018	$448,000	$873,759	-$425,759	-$472	$4,343	48.73%	Moderate	4.72	Medium to High Barriers
525	6132 W DEL VALLE DR	2010	Carthay Circle	N/A	N/A	HPOZ	CHC-2010-1599-MA	C-118115	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088003059	$486,000	$1,471,860	-$985,860	-$1,093	$10,056	66.98%	High	7.35	Low to Medium Barriers
526	445 S DETROIT ST	2010	N/A	438	Apartment s	HCM	CHC-2010-1514-MA	C-118116	N/A	N/A	4	Wilshire	[Q]R4-1	Yes	No	Multi-family	5508005004	$468,007	$468,007	$0	$0	$0	0.00%	No Savings	7.13	Low to Medium Barriers
527	1843 N DILLON ST	2010	N/A	967	Lipetz House	HCM	CHC-2010-1550-MA	C-118117	N/A	N/A	13	Silver Lake - Echo Park - Elysian Valley	R1-1VL	No	No	Single-family	5431028007	$337,000	$1,286,308	-$949,308	-$1,053	$9,683	73.80%	High	7.05	Low to Medium Barriers
528	710 N EAST EDGEWARE RD	2010	Angelino Heights	N/A	N/A	HPOZ	CHC-2010-1708-MA	C-118118	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Multi-family	5405024012	$507,000	$564,103	-$57,103	-$63	$582	10.12%	Low	5.98	Medium to High Barriers
529	137 N FORMOSA AVE	2010	Miracle Mile North	N/A	N/A	HPOZ	CHC-2010-1606-MA	C-118119	N/A	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512023029	$421,000	$702,670	-$281,670	-$312	$2,873	40.09%	Moderate	7.3	Low to Medium Barriers
530	1910 S HARVARD BLVD	2010	Harvard Heights	963	Linda Scott Residenc e	HCM and HPOZ	CHC-2010-1517-MA	C-118120	N/A	N/A	10	South Los Angeles	RD2-1-HPOZ	No	No	Single-family	5074031002	$411,000	$1,428,000	-$1,017,000	-$1,128	$10,373	71.22%	High	4.71	Medium to High Barriers
531	4427 N HOMER ST	2010	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2010-1707-MA	C-118121	N/A	N/A	1	Northeast Los Angeles	RD5-1-HPOZ	No	No	Single-family	5303002051	$187,000	$635,341	-$448,341	-$497	$4,573	70.57%	High	5.32	Medium to High Barriers
532	6850 W IRIS CIR	2010	Whitley Heights	N/A	N/A	HPOZ	CHC-2010-1618-MA	C-118122	N/A	N/A	4	Hollywood	RD1.5-1XL-HPOZ	No	No	Single-family	5576002013	$275,000	$746,540	-$471,540	-$523	$4,810	63.16%	High	6.79	Low to Medium Barriers
533	525 S IRVING BLVD	2010	Windsor Square	N/A	N/A	HPOZ	CHC-2010-1650-MA	C-118123	N/A	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5504007009	$1,076,000	$5,293,800	-$4,217,800	-$4,678	$43,022	79.67%	Very High	6.83	Low to Medium Barriers
534	12734 N JIMENO AVE	2010	Balboa Highlands	N/A	N/A	HPOZ	CHC-2010-1626-MA	C-118124	N/A	N/A	12	Granada Hills - Knollwood	RE11-1	No	No	Single-family	2602021008	$325,000	$826,976	-$501,976	-$557	$5,120	60.70%	High	7.91	Low Barriers
535	12740 N JIMENO AVE	2010	Balboa Highlands	N/A	N/A	HPOZ	CHC-2010-1688-MA	C-118125	N/A	N/A	12	Granada Hills - Knollwood	RE11-1	No	No	Single-family	2602021007	$325,000	$837,710	-$512,710	-$569	$5,230	61.20%	High	7.91	Low Barriers

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536	418 S JUNE ST	2010	Hancock Park	N/A	N/A	HPOZ	CHC-2010-2441-MAEX	C-118126	Yes	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5505002009	$896,000	$2,583,607	-$1,687,607	-$1,872	$17,214	65.32%	High	7.89	Low Barriers
537	1054 S LA JOLLA AVE	2010	South Carthay	N/A	N/A	HPOZ	CHC-2010-1487-MA	C-118127	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087012026	$598,000	$1,296,002	-$698,002	-$774	$7,120	53.86%	High	7.19	Low to Medium Barriers
538	1110 S LA JOLLA AVE	2010	South Carthay	N/A	N/A	HPOZ	CHC-2010-1793-MA	C-118128	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087011017	$475,000	$1,226,552	-$751,552	-$834	$7,666	61.27%	High	7.19	Low to Medium Barriers
539	617 N LAS PALMAS AVE	2010	Hancock Park	N/A	N/A	HPOZ	CHC-2010-1515-MA	C-118129	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5524019014	$530,000	$1,620,004	-$1,090,004	-$1,209	$11,118	67.28%	High	7.14	Low to Medium Barriers
540	17125 W LISETTE ST	2010	Balboa Highlands	N/A	N/A	HPOZ	CHC-2010-1796-MA	C-118130	N/A	N/A	12	Granada Hills - Knollwood	RE11-1	Yes	No	Single-family	2602015003	$325,000	$379,342	-$54,342	-$60	$554	14.33%	Low	7.8	Low Barriers
541	17154 W LISETTE ST	2010	Balboa Highlands	N/A	N/A	HPOZ	CHC-2010-1539-MA	C-118131	N/A	N/A	12	Granada Hills - Knollwood	RE11-1	No	No	Single-family	2602018002	$325,000	$694,711	-$369,711	-$410	$3,771	53.22%	High	7.91	Low Barriers
542	4315 N MARMION WAY	2010	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2010-1530-MA	C-118132	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Multi-family	5465014004	$527,000	$595,923	-$68,923	-$76	$703	11.57%	Low	6.8	Low to Medium Barriers
543	2508 W MAYBERRY ST	2010	N/A	971	Villa Palombo-Togneri	HCM	CHC-2010-1795-MA	C-118133	N/A	N/A	13	Silver Lake - Echo Park - Elysian Valley	R2-1VL	No	No	Single-family	5424005014	$423,000	$1,716,150	-$1,293,150	-$1,434	$13,190	75.35%	Very High	7.02	Low to Medium Barriers
544	302 N MESA RD	2010	N/A	983	Barsha House	HCM	CHC-2010-1537-MA	C-118134	N/A	N/A	11	Brentwood - Pacific Palisades	R1-1	No	No	Single-family	4410022003	$812,000	$2,531,867	-$1,719,867	-$1,907	$17,543	67.93%	High	8.73	Low Barriers
545	6747 W MILNER RD	2010	Whitley Heights	N/A	N/A	HPOZ	CHC-2010-1609-MA	C-118135	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575013036	$373,000	$870,381	-$497,381	-$552	$5,073	57.15%	High	6.79	Low to Medium Barriers
546	120 N NORTON AVE	2010	Windsor Square	N/A	N/A	HPOZ	CHC-2010-1806-MA	C-118136	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5516007014	$589,000	$1,915,660	-$1,326,660	-$1,471	$13,532	69.25%	High	6.46	Low to Medium Barriers
547	856 S NORTON AVE	2010	Wilshire Park	N/A	N/A	HPOZ	CHC-2010-1632-MA	C-118137	N/A	N/A	4	Wilshire	R2-1-HPOZ	No	No	Single-family	5092015030	$321,000	$1,020,713	-$699,713	-$776	$7,137	68.55%	High	5.56	Medium to High Barriers
548	77 N PATRICIAN WAY	2010	N/A	951	The James S. Real Studio	HCM	CHC-2010-1513-MA	C-118138	N/A	N/A	14	Northeast Los Angeles	R1-1-CA	No	No	Single-family	5708007025	$265,000	$981,237	-$716,237	-$794	$7,306	72.99%	High	7.46	Low to Medium Barriers
549	123 N PLYMOUTH BLVD	2010	Windsor Square	N/A	N/A	HPOZ	CHC-2010-1484-MA	C-118139	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5515028020	$462,000	$826,680	-$364,680	-$404	$3,720	44.11%	Moderate	7.89	Low Barriers
550	340 S PLYMOUTH BLVD	2010	Windsor Square	N/A	N/A	HPOZ	CHC-2010-1526-MAEX	C-118140	Yes	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5505026002	$1,081,000	$4,339,596	-$3,258,596	-$3,614	$33,238	75.09%	Very High	6.83	Low to Medium Barriers
551	434 S PLYMOUTH BLVD	2010	Windsor Square	N/A	N/A	HPOZ	CHC-2010-1519-MA	C-118141	N/A	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5505027003	$1,281,000	$1,543,405	-$262,405	-$291	$2,677	17.00%	Low	6.83	Low to Medium Barriers
552	2090 N REDCLIFF ST	2010	N/A	965	"Wilson House"	HCM	CHC-2010-1601-MA	C-118142	N/A	N/A	4	Silver Lake - Echo Park - Elysian Valley	R1-1VL	No	No	Single-family	5431015009	$451,000	$2,278,613	-$1,827,613	-$2,027	$18,642	80.21%	Very High	7.88	Low Barriers
553	5300 W RODEO RD	2010	N/A	174	"The Village Green"	HCM	CHC-2010-1652-MAEX	C-118143	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	RD4-1	Yes	No	Condominium	5025007009-5025013034	$107,685,437	$172,194,748	-$64,509,311	-$71,547	$657,995	37.46%	Moderate	7.29	Low to Medium Barriers
554	400 S ROSSMORE AVE	2010	Hancock Park	N/A	N/A	HPOZ	CHC-2010-1488-MAEX	C-118144	Yes	N/A	4	Wilshire	RE11-1-HPOZ	No	No	Single-family	5505016001	$1,448,000	$4,142,313	-$2,694,313	-$2,988	$27,482	65.04%	High	7.89	Low Barriers
555	2309 S SCARFF ST	2010	University Park	409	Dennis Burkhalter Res.	HCM and HPOZ	CHC-2010-1518-MA	C-118145	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5124012007	$517,000	$765,366	-$248,366	-$275	$2,533	32.45%	Moderate	4.33	High Barriers

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556	257 S SPRING ST	2010	N/A	966	Douglas Building	HCM	CHC-2010-1551-MA	C-118146	N/A	N/A	14	Central City	[Q]C4-4D	No	No	Condominium	5149008036-51490080386	$10,320,839	$29,504,170	-$19,183,331	-$21,276	$195,670	65.02%	High	6.39	Low to Medium Barriers
557	1999 N SYCAMORE AVE	2010	N/A	921	Yamashiro	HCM	CHC-2010-1621-MA	C-118147	N/A	N/A	4	Hollywood	R3-1D	Yes	No	Multi-family	5549017016	$17,302,000	$40,856,508	-$23,554,508	-$26,124	$240,256	57.65%	High	7.36	Low to Medium Barriers
558	1355 S UNION AVE	2010	Pico - Union	N/A	N/A	HPOZ	CHC-2010-1619-MA	C-118148	N/A	N/A	1	Westlake	RD1.5-1-HPOZ	Yes	No	Multi-family	5135021024	$215,000	$510,000	-$295,000	-$327	$3,009	57.84%	High	3.95	High Barriers
559	1359 S UNION AVE	2010	Pico - Union	N/A	N/A	HPOZ	CHC-2010-1623-MA	C-118149	N/A	N/A	1	Westlake	RD1.5-1-HPOZ	No	No	Multi-family	5135021025	$249,000	$573,539	-$324,539	-$360	$3,310	56.59%	High	3.95	High Barriers
560	2123 N VALENTINE ST	2010	N/A	964	Ross House	HCM	CHC-2010-1648-MA	C-118150	N/A	N/A	13	Silver Lake - Echo Park - Elysian Valley	RD1.5-1VL	No	No	Single-family	5420036019	$359,000	$1,152,287	-$793,287	-$880	$8,092	68.84%	High	6.46	Low to Medium Barriers
561	6624 W WHITLEY TER	2010	Whitley Heights	N/A	N/A	HPOZ	CHC-2010-1807-MA	C-118151	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575009004	$512,000	$1,040,239	-$528,239	-$586	$5,388	50.78%	High	6.79	Low to Medium Barriers
562	1010 W 21ST ST	2011	University Park	N/A	N/A	HPOZ	CHC-2011-1506-MA	C-119765	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124005022	$463,000	$874,258	-$411,258	-$456	$4,195	47.04%	Moderate	4.33	High Barriers
563	2261 W 21ST ST	2011	Western Heights	N/A	N/A	HPOZ	CHC-2011-1570-MA	C-119766	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073027033	$348,000	$980,220	-$632,220	-$701	$6,449	64.50%	High	4.71	Medium to High Barriers
564	2533 S 4TH AVE	2011	West Adams Terrace	N/A	N/A	HPOZ	CHC-2011-1505-MA	C-119764	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	RD2-1-O-HPOZ	No	No	Single-family	5059023007	$373,000	$653,066	-$280,066	-$311	$2,857	42.88%	Moderate	4.36	High Barriers
565	1037 S ALFRED ST	2011	South Carthay	N/A	N/A	HPOZ	CHC-2011-1510-MA	C-119768	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5087001008	$629,000	$1,165,944	-$536,944	-$596	$5,477	46.05%	Moderate	7.19	Low to Medium Barriers
566	1816 S ARDMORE AVE	2011	Harvard Heights	N/A	N/A	HPOZ	CHC-2011-1511-MA	C-119769	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	Yes	No	Single-family	5074026014	$437,000	$915,552	-$478,552	-$531	$4,881	52.27%	High	5.22	Medium to High Barriers
567	1051 N AVENUE 64	2011	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2011-1509-MA	C-119767	N/A	N/A	14	Northeast Los Angeles	R1-1-HPOZ	No	No	Single-family	5486030001	$288,000	$887,834	-$599,834	-$665	$6,118	67.56%	High	6.82	Low to Medium Barriers
568	844 S BRONSON AVE	2011	Wilshire Park	N/A	N/A	HPOZ	CHC-2011-1512-MA	C-119770	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092005019	$478,000	$834,822	-$356,822	-$396	$3,640	42.74%	Moderate	5.56	Medium to High Barriers
569	580 N CAHUENGA BLVD	2011	Hancock Park	N/A	N/A	HPOZ	CHC-2011-1513-MA	C-119771	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5523008020	$441,000	$1,347,564	-$906,564	-$1,005	$9,247	67.27%	High	7.7	Low Barriers
570	1443 W CALUMET AVE	2011	Angelino Heights	N/A	N/A	HPOZ	CHC-2011-1569-MA	C-119772	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	No	No	Single-family	5405013017	$298,000	$472,029	-$174,029	-$193	$1,775	36.87%	Moderate	5.82	Medium to High Barriers
571	19950 W COLLIER ST	2011	N/A	974	Van Dekker House	HCM	CHC-2011-1515-MA	C-119773	N/A	N/A	3	Canoga Park - Winnetka - Woodland Hills - West Hills	RA-1	No	No	Single-family	2164005014-2164005015	$586,000	$850,106	-$264,106	-$293	$2,694	31.07%	Moderate	7.17	Low to Medium Barriers
572	1412 S COURTLAND AVE	2011	Pico - Union	N/A	N/A	HPOZ	CHC-2011-1514-MA	C-119774	N/A	N/A	1	Westlake	RD1.5-1-HPOZ	Yes	No	Multi-family	5135008004	$434,000	$501,193	-$67,193	-$75	$685	13.41%	Low	4.17	High Barriers
573	6101 W DEL VALLE DR	2011	Carthay Circle	N/A	N/A	HPOZ	CHC-2011-1568-MA	C-119775	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088003053	$471,000	$1,096,680	-$625,680	-$694	$6,382	57.05%	High	7.35	Low to Medium Barriers
574	6221 W DEL VALLE DR	2011	Carthay Circle	N/A	N/A	HPOZ	CHC-2011-1516-MA	C-119776	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088016030	$392,000	$1,675,845	-$1,283,845	-$1,424	$13,095	76.61%	Very High	7.35	Low to Medium Barriers
575	971 E ELKHART PL	2011	N/A	1008	Lincoln Place Apartments	HCM	CHC-2011-1566-MAEX	C-119878	Yes	N/A	11	Venice	[Q]RD1.5-1XL	Yes	No	Multi-family	4243001036-4243003048, 4243002066-4243002068,	$193,574,149	$271,740,247	-$78,166,098	-$86,693	$797,294	28.77%	Moderate	7.47	Low to Medium Barriers
576	2071 W ESCARPA DR	2011	N/A	989	Coons House	HCM	CHC-2011-1517-MA	C-119777	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5685023015	$356,000	$569,444	-$213,444	-$237	$2,177	37.48%	Moderate	7.25	Low to Medium Barriers
577	7001 W FRANKLIN AVE	2011	N/A	406	Magic Castle	HCM	CHC-2011-1565-MA	C-119778	N/A	N/A	4	Hollywood	[Q]R5-1VL	Yes	No	Recreational	5549017011	$824,176	$824,176	$0	$0	$0	0.00%	No Savings	7.36	Low to Medium Barriers

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578	1309 GENESEE AVE N	2011	Spaulding Square	N/A	N/A	HPOZ	CHC-2011-1518-MA	C-119779	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	Yes	Single-family	5551029003	$517,639	$849,905	-$332,266	-$369	$3,389	39.09%	Moderate	7.01	Low to Medium Barriers
579	1210 S GRAMERCY PL	2011	Country Club Park	N/A	N/A	HPOZ	CHC-2011-1519-MA	C-119780	N/A	N/A	10	Wilshire	RE9-1	No	No	Single-family	5081028006	$546,000	$597,958	-$51,958	-$58	$530	8.69%	Low	5.61	Medium to High Barriers
580	2455 S GRAMERCY PARK	2011	West Adams Terrace	N/A	N/A	HPOZ	CHC-2011-1537-MA	C-119781	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5058011018	$374,000	$739,401	-$365,401	-$405	$3,727	49.42%	Moderate	4.66	Medium to High Barriers
581	714 S HILL ST	2011	N/A	984	Spreckles Building	HCM	CHC-2011-1549-MA	C-119782	N/A	N/A	14	Central City	C5-4D	No	No	Industrial	5144014043	$10,246,468	$10,246,468	$0	$0	$0	0.00%	No Savings	6.79	Low to Medium Barriers
582	7077 W HILLSIDE AVE	2011	N/A	994	Arensberg-Stendahl Home Gallery	HCM	CHC-2011-1538-MA	C-119783	N/A	N/A	4	Hollywood	R2-1XL	No	Yes	Single-family	5572019018	$1,647,000	$2,393,430	-$746,430	-$828	$7,614	31.19%	Moderate	7.37	Low to Medium Barriers
583	870 S LUCERNE BLVD	2011	Windsor Village	N/A	N/A	HPOZ	CHC-2011-1536-MA	C-119787	N/A	N/A	4	Wilshire	[Q]R3-1	No	No	Multi-family	5090029020	$873,000	$1,145,573	-$272,573	-$302	$2,780	23.79%	Low	6.49	Low to Medium Barriers
584	5470 W LOS FELIZ BLVD	2011	N/A	997	Clifford E. Clinton Residence	HCM	CHC-2011-1552-MA	C-119786	N/A	N/A	4	Hollywood	RE9-1	No	No	Single-family	5587023001	$755,000	$1,486,931	-$731,931	-$812	$7,466	49.22%	Moderate	7.69	Low Barriers
585	139 N MANSFIELD AVE	2011	N/A	999	Marsh Duplex	HCM	CHC-2011-1533-MA	C-119788	N/A	N/A	5	Wilshire	R2-1	Yes	No	Multi-family	5513005026	$743,000	$2,221,927	-$1,478,927	-$1,640	$15,085	66.56%	High	7.32	Low to Medium Barriers
586	6764 W MILNER RD	2011	Whitley Heights	N/A	N/A	HPOZ	CHC-2011-1531-MA	C-119790	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575013022	$243,000	$922,188	-$679,188	-$753	$6,928	73.65%	High	6.79	Low to Medium Barriers
587	5333 E MONTE VISTA BLVD	2011	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2011-1530-MA	C-119791	N/A	N/A	1	Northeast Los Angeles	R2-1-HPOZ	No	No	Multi-family	5469020020	$348,000	$941,562	-$593,562	-$658	$6,054	63.04%	High	5.69	Medium to High Barriers
588	126 N NORTON AVE	2011	Windsor Square	N/A	N/A	HPOZ	CHC-2011-1528-MA	C-119792	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5516007015	$533,000	$1,926,372	-$1,393,372	-$1,545	$14,212	72.33%	High	6.46	Low to Medium Barriers
589	1424 N OGDEN DR	2011	Spaulding Square	N/A	N/A	HPOZ	CHC-2011-1522-MA	C-119793	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5551024017	$403,000	$1,379,417	-$976,417	-$1,083	$9,959	70.78%	High	7.01	Low to Medium Barriers
590	8431 N PINELAKE DR	2011	N/A	992	T.R. Craig Residence "Pepperg ate Ranch"	HCM	CHC-2011-1521-MA	C-119794	N/A	N/A	12	Chatsworth - Porter Ranch	RE11-1	No	No	Single-family	2005015013	$649,000	$921,550	-$272,550	-$302	$2,780	29.58%	Moderate	7.97	Low Barriers
591	924 S SERRANO AVE	2011	N/A	928	Chateau Alpine	HCM	CHC-2011-1572-MA	C-119795	N/A	N/A	10	Wilshire	R4-1	Yes	No	Multi-family	5093016002	$764,000	$1,355,229	-$591,229	-$656	$6,031	43.63%	Moderate	5.04	Medium to High Barriers
592	4000 N SUNNYSLOPE AVE	2011	N/A	828	Harry J. Wolff House	HCM	CHC-2011-1575-MA	C-119796	N/A	N/A	4	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	R1-1	No	Yes	Single-family	2373019006	$441,000	$1,711,485	-$1,270,485	-$1,409	$12,959	74.23%	High	8.62	Low Barriers
593	1668 S VICTORIA AVE	2011	La Fayette Square	N/A	N/A	HPOZ	CHC-2011-1574-MA	C-119797	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071001020	$435,000	$780,976	-$345,976	-$384	$3,529	44.30%	Moderate	5.49	Medium to High Barriers
594	6129 W WARNER DR	2011	Carthay Circle	N/A	N/A	HPOZ	CHC-2011-1564-MA	C-119798	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088002041	$515,000	$1,062,361	-$547,361	-$607	$5,583	51.52%	High	7.35	Low to Medium Barriers
595	1802 S WELLINGTON RD	2011	La Fayette Square	N/A	N/A	HPOZ	CHC-2011-1573-MA	C-119799	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071003021	$377,000	$1,428,000	-$1,051,000	-$1,166	$10,720	73.60%	High	5.49	Medium to High Barriers
596	919 N WEST KENSINGTON RD	2011	Angelino Heights	N/A	N/A	HPOZ	CHC-2011-1544-MA	C-119784	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	No	No	Single-family	5405009020	$523,000	$917,672	-$394,672	-$438	$4,026	43.01%	Moderate	5.82	Medium to High Barriers
597	1128 N WEST KENSINGTON RD	2011	Angelino Heights	N/A	N/A	HPOZ	CHC-2011-1548-MA	C-119785	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5404023008	$396,000	$746,521	-$350,521	-$389	$3,575	46.95%	Moderate	5.82	Medium to High Barriers
598	1130 S WILTON PL	2011	Country Club Park	N/A	N/A	HPOZ	CHC-2011-1576-MA	C-119800	N/A	N/A	10	Wilshire	R1-1	No	No	Single-family	5081026005	$336,000	$1,194,432	-$858,432	-$952	$8,756	71.87%	High	5.61	Medium to High Barriers

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599	445 S WINDSOR BLVD	2011	Windsor Square	N/A	N/A	HPOZ	CHC-2011-1559-MA-MAEX	C-119801	Yes	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5505027011	$1,131,000	$2,498,148	-$1,367,148	-$1,516	$13,945	54.73%	High	6.83	Low to Medium Barriers
600	2360 W 20TH ST	2012	WESTERN HEIGHTS	N/A	N/A	HPOZ	CHC-2012-1632-MA	C-121433	N/A	N/A	10	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5073026006	$258,000	$489,254	-$231,254	-$256	$2,359	47.27%	Moderate	4.71	Medium to High Barriers
601	2388 W 21ST ST	2012	WESTERN HEIGHTS	N/A	N/A	HPOZ	CHC-2012-1587-MA	C-121434	N/A	N/A	10	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5073026013	$249,000	$528,929	-$279,929	-$310	$2,855	52.92%	High	4.71	Medium to High Barriers
602	2217 W 30TH ST	2012	JEFFERSON PARK	N/A	N/A	HPOZ	CHC-2012-1671-MA	C-121435	N/A	N/A	10	South Los Angeles	R1-1-O	No	No	Single-family	5052021018	$155,000	$220,776	-$65,776	-$73	$671	29.79%	Moderate	5.75	Medium to High Barriers
603	315 W 5TH ST	2012	N/A	1019	Metropolitan Building	HCM	CHC-2012-1565-MA	C-121436	N/A	N/A	14	Central City	[Q]C2-4D-CDO	No	No	Commercial	5149026001	$12,017,871	$12,017,871	$0	$0	$0	0.00%	No Savings	6.39	Low to Medium Barriers
604	1160 S ALVIRA ST	2012	SOUTH CARTHAY	N/A	N/A	HPOZ	CHC-2012-1657-MA	C-121438	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087014012	$523,000	$1,632,000	-$1,109,000	-$1,230	$11,312	67.95%	High	7.19	Low to Medium Barriers
605	1233 S ALVIRA ST	2012	SOUTH CARTHAY	N/A	N/A	HPOZ	CHC-2012-1656-MA	C-121437	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087010004	$397,000	$823,800	-$426,800	-$473	$4,353	51.81%	High	7.19	Low to Medium Barriers
606	134 N AVENUE 54	2012	Highland Park -	N/A	N/A	HPOZ	CHC-2012-1641-MA	C-121439	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5468020012	$196,000	$315,895	-$119,895	-$133	$1,223	37.95%	Moderate	5.48	Medium to High Barriers
607	5685 E BALTIMORE ST	2012	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2012-1581-MA	C-121440	N/A	N/A	1	Northeast Los Angeles	R2-1-HPOZ	No	No	Single-family	5478034019	$219,000	$524,805	-$305,805	-$339	$3,119	58.27%	High	5.77	Medium to High Barriers
608	212 N BEACHWOOD DR	2012	WINDSOR SQUARE	N/A	N/A	HPOZ	CHC-2012-1560-MA	C-121441	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5515028008	$471,000	$1,258,296	-$787,296	-$873	$8,030	62.57%	High	7.89	Low Barriers
609	927 S BROADWAY	2012	N/A	523	United Artists Theater Building	HCM	CHC-2012-1492-MA	C-121442	N/A	N/A	14	Central City	[Q]C2-4D-CDO	No	No	Commercial	5139003005	$76,300,000	$104,043,591	-$27,743,591	-$30,770	$282,985	26.67%	Moderate	6.76	Low to Medium Barriers
610	1671 S BUCKINGHAM RD	2012	La Fayette Square	N/A	N/A	HPOZ	CHC-2006-6059-MAEX	C-111018	Yes	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071009086	$486,000	$1,064,243	-$578,243	-$641	$5,898	54.33%	High	5.49	Medium to High Barriers
611	2520 N EASTLAKE AVE	2012	LINCOLN HEIGHTS	N/A	N/A	HPOZ	CHC-2012-1654-MA	C-121444	N/A	N/A	1	Northeast Los Angeles	[Q]RD3-1D-HPOZ	Yes	No	Single-family	5208008001	$604,400	$604,400	$0	$0	$0	0.00%	No Savings	5.37	Medium to High Barriers
612	6673 W EMMET TER	2012	Whitley Heights	N/A	N/A	HPOZ	CHC-2012-1677-MA	C-121445	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575008006	$355,000	$815,431	-$460,431	-$511	$4,696	56.46%	High	6.79	Low to Medium Barriers
613	7960 W FAREHOLM DR	2012	N/A	1006	Kun Residenc	HCM	CHC-2012-1591-MA	C-121446	N/A	N/A	4	Hollywood	R1-1	No	No	Single-family	5551003020	$1,113,000	$3,663,129	-$2,550,129	-$2,828	$26,011	69.62%	High	7.75	Low Barriers
614	4755 N FIGUEROA ST	2012	Highland Park - Garvanza	105	N/A	HCM and HPOZ	CHC-2012-1643-MA	C-121447	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Multi-family	5467017006	$312,719	$312,719	$0	$0	$0	0.00%	No Savings	6.8	Low to Medium Barriers
615	1050 S GRAMERCY DR	2012	Country Club Park	N/A	N/A	HPOZ	CHC-2012-1611-MA	C-121448	N/A	N/A	10	Wilshire	R1-1	No	No	Single-family	5081030013	$450,000	$1,377,000	-$927,000	-$1,028	$9,455	67.32%	High	5.61	Medium to High Barriers
616	2101 S GRAMERCY PL	2012	WESTERN HEIGHTS	N/A	N/A	HPOZ	CHC-2012-1496-MA	C-121449	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	Yes	No	Single-family	5073027040	$520,000	$576,183	-$56,183	-$62	$573	9.75%	Low	4.71	Medium to High Barriers
617	3320 N GRIFFIN AVE	2012	N/A	1017	Young-Gribling Residenc	HCM	CHC-2012-1681-MA	C-121450	N/A	N/A	1	Northeast Los Angeles	[Q]R1-1D	No	No	Single-family	5207023003	$176,000	$333,712	-$157,712	-$175	$1,609	47.26%	Moderate	5.95	Medium to High Barriers
618	900 S HILL ST	2012	N/A	1001	May Company Garage	HCM	CHC-2012-1614-MA	C-121451	N/A	N/A	14	Central City	[Q]R5-4D	No	No	Commercial	5139003001	$12,300,000	$18,314,751	-$6,014,751	-$6,671	$61,350	32.84%	Moderate	6.76	Low to Medium Barriers
619	628 N JUNE ST	2012	HANCOCK PARK	N/A	N/A	HPOZ	CHC-2012-1626-MA	C-121452	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5523001004	$598,000	$1,482,023	-$884,023	-$980	$9,017	59.65%	High	7.7	Low Barriers
620	1100 S LA JOLLA AVE	2012	SOUTH CARTHAY	N/A	N/A	HPOZ	CHC-2012-1809-MA	C-121453	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087011015	$433,000	$1,604,622	-$1,171,622	-$1,299	$11,951	73.02%	High	7.19	Low to Medium Barriers

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621	1137 S LA JOLLA AVE	2012	SOUTH CARTHAY	N/A	N/A	HPOZ	CHC-2012-1558-MA	C-121454	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087009010	$396,000	$895,570	-$499,570	-$554	$5,096	55.78%	High	7.19	Low to Medium Barriers
622	1142 S LA JOLLA AVE	2012	SOUTH CARTHAY	N/A	N/A	HPOZ	CHC-2012-1586-MA	C-121455	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087011023	$475,000	$1,871,115	-$1,396,115	-$1,548	$14,240	74.61%	High	7.19	Low to Medium Barriers
623	17142 W LISETTE ST	2012	Balboa Highlands	N/A	N/A	HPOZ	CHC-2012-1494-MA	C-121456	N/A	N/A	12	Granada Hills - Knollwood	RE11-1	No	No	Single-family	2602018004	$325,000	$499,019	-$174,019	-$193	$1,775	34.87%	Moderate	7.91	Low Barriers
624	6235 E MOUNT ANGELUS DR	2012	Highland Park -	N/A	N/A	HPOZ	CHC-2012-1642-MA	C-121457	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	No	No	Single-family	5484029001	$181,000	$395,214	-$214,214	-$238	$2,185	54.20%	High	6.01	Low to Medium Barriers
625	886 S NORTON AVE	2012	WILSHIRE PARK	N/A	N/A	HPOZ	CHC-2012-1619-MA	C-121458	N/A	N/A	4	Wilshire	R2-1-HPOZ	No	No	Single-family	5092015036	$317,000	$1,163,803	-$846,803	-$939	$8,637	72.76%	High	5.56	Medium to High Barriers
626	2120 S OAK ST	2012	UNIVERSITY PARK	N/A	N/A	HPOZ	CHC-2012-1623-MA	C-121459	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124022007	$507,000	$1,032,890	-$525,890	-$583	$5,364	50.91%	High	4.33	High Barriers
627	6501 W OLYMPIC PL	2012	SOUTH CARTHAY	N/A	N/A	HPOZ	CHC-2012-1630-MA	C-121460	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087007009	$465,000	$1,092,762	-$627,762	-$696	$6,403	57.45%	High	7.19	Low to Medium Barriers
628	6533 W OLYMPIC PL	2012	SOUTH CARTHAY	N/A	N/A	HPOZ	CHC-2012-1588-MA	C-121461	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087007015	$459,000	$1,383,942	-$924,942	-$1,026	$9,434	66.83%	High	7.19	Low to Medium Barriers
629	6579 E PICKWICK ST	2012	Highland Park -	N/A	N/A	HPOZ	CHC-2012-1644-MA	C-121462	N/A	N/A	14	Northeast Los Angeles	R1-1	No	No	Single-family	5716008039	$409,000	$948,857	-$539,857	-$599	$5,507	56.90%	High	6.91	Low to Medium Barriers
630	1417 W RIDGE WAY	2012	Angelino Heights	N/A	N/A	HPOZ	CHC-2012-1629-MA	C-121463	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	Yes	No	Multi-family	5405009007	$597,000	$960,827	-$363,827	-$404	$3,711	37.87%	Moderate	5.82	Medium to High Barriers
631	103 N RIDGEWOOD PL	2012	N/A	1018	Thorsen Residenc	HCM	CHC-2012-1640-MA	C-121464	N/A	N/A	4	Wilshire	R1-1	No	No	Single-family	5516012019	$496,000	$1,226,085	-$730,085	-$810	$7,447	59.55%	High	6.46	Low to Medium Barriers
632	419 S SPRING ST	2012	N/A	385	Title Insurance & Trust	HCM	CHC-2012-1638-MA	C-121465	N/A	N/A	14	Central City	[Q]C4-4D	No	No	Commercial	5149024027	$5,626,492	$21,500,000	-$15,873,508	-$17,605	$161,910	73.83%	High	6.39	Low to Medium Barriers
633	232 S ST ANDREWS PL	2012	N/A	1012	Ganahl House	HCM	CHC-2012-1653-MA	C-121466	N/A	N/A	4	Wilshire	R1-1	No	No	Single-family	5516024019	$425,000	$896,783	-$471,783	-$523	$4,812	52.61%	High	6.46	Low to Medium Barriers
634	1244 S ST ANDREWS PL	2012	Country Club Park	N/A	N/A	HPOZ	CHC-2012-1618-MA	C-121467	N/A	N/A	10	Wilshire	R1-1-HPOZ	Yes	No	Multi-family	5080004001	$381,000	$509,141	-$128,141	-$142	$1,307	25.17%	Moderate	5.61	Medium to High Barriers
635	925 N STONEHILL LN	2012	N/A	1016	Schneidman House	HCM	CHC-2012-1593-MA	C-121469	N/A	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4493022022	$606,000	$3,429,240	-$2,823,240	-$3,131	$28,797	82.33%	Very High	8.22	Low Barriers
636	968 N STONEHILL LN	2012	N/A	1015	Stein House	HCM	CHC-2012-1563-MA	C-121468	N/A	N/A	11	Brentwood - Pacific Palisades	RE15-1-H	No	No	Single-family	4494007008	$605,000	$873,150	-$268,150	-$297	$2,735	30.71%	Moderate	8.22	Low Barriers
637	350 N SYCAMORE AVE	2012	N/A	1010	North Sycamore Chateau	HCM	CHC-2012-1645-MA	C-121470	N/A	N/A	5	Wilshire	[Q]R3-1	Yes	No	Multi-family	5525031003	$1,330,000	$3,123,915	-$1,793,915	-$1,990	$18,298	57.43%	High	7.32	Low to Medium Barriers
638	1955 N TAFT AVE	2012	HOLLYWOOD	N/A	N/A	HPOZ	CHC-2012-1582-MA	C-121471	N/A	N/A	4	Hollywood	R1-1	No	No	Single-family	5587017012	$367,000	$826,914	-$459,914	-$510	$4,691	55.62%	High	7.69	Low Barriers
639	2656 S VAN BUREN PL	2012	Adams - Normandie	N/A	N/A	HPOZ	CHC-2012-1491-MA	C-121472	N/A	N/A	8	South Los Angeles	R2-1-O-HPOZ	Yes	No	Single-family	5054016017	$502,184	$502,184	$0	$0	$0	0.00%	No Savings	5.16	Medium to High Barriers
640	432 S VAN NESS AVE	2012	WINDSOR SQUARE	N/A	N/A	HPOZ	CHC-2012-1616-MA	C-121473	N/A	N/A	4	Wilshire	R1-1XL-HPOZ	No	No	Single-family	5504020017	$589,294	$1,092,657	-$503,363	-$558	$5,134	46.07%	Moderate	6.83	Low to Medium Barriers
641	1237 S VAN NESS AVE	2012	Country Club Park	N/A	N/A	HPOZ	CHC-2012-1562-MA	C-121474	N/A	N/A	10	Wilshire	RE9-1-O	No	No	Single-family	5081022014	$511,000	$1,172,616	-$661,616	-$734	$6,748	56.42%	High	5.61	Medium to High Barriers
642	890 S VICTORIA AVE	2012	Windsor Village	N/A	N/A	HPOZ	CHC-2012-1612-MA	C-121475	N/A	N/A	4	Wilshire	R1-1	No	No	Single-family	5090033027	$506,844	$1,730,775	-$1,223,931	-$1,357	$12,484	70.72%	High	6.49	Low to Medium Barriers
643	1680 N VINE ST	2012	N/A	666	Taft Building and Neon	HCM	CHC-2012-1495-MA	C-121476	N/A	N/A	13	Hollywood	C4-2D-SN	No	No	Commercial	5546029001	$43,230,000	$70,000,000	-$26,770,000	-$29,690	$273,054	38.24%	Moderate	6.13	Low to Medium Barriers
644	1645 S VIRGINIA RD	2012	La Fayette Square	N/A	N/A	HPOZ	CHC-2012-1585-MA	C-121477	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071008052	$480,000	$1,182,278	-$702,278	-$779	$7,163	59.40%	High	5.49	Medium to High Barriers

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645	1836 S VIRGINIA RD	2012	La Fayette Square	N/A	N/A	HPOZ	CHC-2012-1678-MA	C-121478	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071006046	$530,000	$1,335,154	-$805,154	-$893	$8,213	60.30%	High	5.49	Medium to High Barriers
646	2717 W WAVERLY DR	2012	N/A	1011	McAlmon House	HCM	CHC-2012-1639-MA	C-121480	N/A	N/A	4	Silver Lake - Echo Park - Elysian Valley	RD2-1VL	Yes	No	Multi-family	5438024014	$524,000	$1,385,700	-$861,700	-$956	$8,789	62.19%	High	7.17	Low to Medium Barriers
647	1683 S WELLINGTON RD	2012	La Fayette Square	N/A	N/A	HPOZ	CHC-2012-1675-MA	C-121479	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071005026	$496,000	$1,431,573	-$935,573	-$1,038	$9,543	65.35%	High	5.49	Medium to High Barriers
648	220 S WILTON PL	2012	N/A	1005	Catalina Brent Pico House	HCM	CHC-2012-1613-MA	C-121481	N/A	N/A	4	Wilshire	R1-1	No	No	Single-family	5516016020	$532,000	$2,072,157	-$1,540,157	-$1,708	$15,710	74.33%	High	6.46	Low to Medium Barriers
649	152 N WINDSOR BLVD	2012	WINDSOR SQUARE	N/A	N/A	HPOZ	CHC-2012-1676-MA	C-121483	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5516005011	$649,700	$1,562,770	-$913,070	-$1,013	$9,313	58.43%	High	6.46	Low to Medium Barriers
650	414 S WINDSOR BLVD	2012	WINDSOR SQUARE	N/A	N/A	HPOZ	CHC-2012-1561-MA	C-121482	N/A	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5504003005	$971,000	$3,797,998	-$2,826,998	-$3,135	$28,835	74.43%	High	6.83	Low to Medium Barriers
651	2203 W 20TH ST	2013	Western Heights	N/A	N/A	HPOZ	CHC-2013-1601-MA	C-123247	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073030032	$353,000	$761,689	-$408,689	-$453	$4,169	53.66%	High	4.71	Medium to High Barriers
652	2129 W 21ST ST	2013	Western Heights	N/A	N/A	HPOZ	CHC-2013-1632-MA	C-123252	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073030067	$574,000	$954,633	-$380,633	-$422	$3,882	39.87%	Moderate	4.71	Medium to High Barriers
653	2038 W 29TH ST	2013	Jefferson Park	N/A	N/A	HPOZ	CHC-2013-1593-MA	C-123249	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5053004023	$179,000	$270,230	-$91,230	-$101	$931	33.76%	Moderate	5.75	Medium to High Barriers
654	2234 W 31ST ST	2013	Jefferson Park	N/A	N/A	HPOZ	CHC-2013-1606-MA	C-123290	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5052023026	$268,000	$308,218	-$40,218	-$45	$410	13.05%	Low	5.75	Medium to High Barriers
655	1223 S 3RD AVE	2013	Country Club Park	N/A	N/A	HPOZ	CHC-2013-1621-MA	C-123246	N/A	N/A	10	Wilshire	RD1.5-1-O	No	No	Single-family	5081014001	$493,000	$1,098,381	-$605,381	-$671	$6,175	55.12%	High	5.17	Medium to High Barriers
656	922 S 4TH AVE	2013	Wilshire Park	N/A	N/A	HPOZ	CHC-2013-1602-MA	C-123245	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092018015	$299,000	$647,435	-$348,435	-$386	$3,554	53.82%	High	5.56	Medium to High Barriers
657	622 N ALDAMA TER	2013	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2013-1678-MA	C-123244	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	No	No	Single-family	5469027012	$234,000	$859,162	-$625,162	-$693	$6,377	72.76%	High	6.5	Low to Medium Barriers
658	134 S ALTA VISTA BLVD	2013	Miracle Mile North	N/A	N/A	HPOZ	CHC-2013-1750-MA	C-123248	N/A	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512024007	$566,000	$997,803	-$431,803	-$479	$4,404	43.28%	Moderate	7.3	Low to Medium Barriers
659	1062 S ALVIRA ST	2013	South Carthay	N/A	N/A	HPOZ	CHC-2013-1592-MA	C-123254	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087013010	$553,000	$1,145,054	-$592,054	-$657	$6,039	51.71%	High	7.19	Low to Medium Barriers
660	1133 S ALVIRA ST	2013	South Carthay	N/A	N/A	HPOZ	CHC-2013-1652-MA	C-123251	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087011008	$440,000	$1,465,734	-$1,025,734	-$1,138	$10,462	69.98%	High	7.19	Low to Medium Barriers

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661	11600 W AMANDA DR	2013	N/A	1024	Lechner House	HCM	CHC-2013-1646-MA	C-123255	N/A	N/A	2	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	RE15-1-H	No	No	Single-family	2377005043	$1,045,000	$2,237,237	-$1,192,237	-$1,322	$12,161	53.29%	High	7.96	Low Barriers
662	3410 N AMESBURY RD	2013	N/A	1025	Durex Model Home	HCM	CHC-2013-1648-MA	C-123256	N/A	N/A	4	Hollywood	R1-1	No	No	Single-family	5592008009	$528,000	$751,253	-$223,253	-$248	$2,277	29.72%	Moderate	7.58	Low Barriers
663	3435 N AMESBURY RD	2013	N/A	1026	Sherwood House	HCM	CHC-2013-1645-MA	C-123257	N/A	N/A	4	Hollywood	R1-1	No	No	Single-family	5592022018	$503,000	$1,018,659	-$515,659	-$572	$5,260	50.62%	High	7.58	Low Barriers
664	756 N AVENUE 66	2013	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2013-1675-MA	C-123258	N/A	N/A	14	Northeast Los Angeles	RD2-1	Yes	No	Multi-family	5716026035	$320,902	$320,902	$0	$0	$0	0.00%	No Savings	6.91	Low to Medium Barriers
665	6108 W BARROWS DR	2013	Carthay Circle	N/A	N/A	HPOZ	CHC-2013-1658-MA	C-123259	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088004037	$478,000	$1,351,177	-$873,177	-$968	$8,906	64.62%	High	7.35	Low to Medium Barriers
666	686 S BRONSON AVE	2013	Wilshire Park	N/A	N/A	HPOZ	CHC-2013-1679-MA	C-123260	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092007016	$418,000	$1,091,074	-$673,074	-$747	$6,865	61.69%	High	5.85	Medium to High Barriers
667	847 S BRONSON AVE	2013	Wilshire Park	N/A	N/A	HPOZ	CHC-2013-1661-MA	C-123261	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092002010	$336,000	$868,262	-$532,262	-$590	$5,429	61.30%	High	5.56	Medium to High Barriers
668	871 S BRONSON AVE	2013	Wilshire Park	N/A	N/A	HPOZ	CHC-2013-1685-MA	C-123262	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092002015	$471,000	$908,356	-$437,356	-$485	$4,461	48.15%	Moderate	5.56	Medium to High Barriers
669	1947 N CANYON DR	2013	Hollywood Grove	N/A	N/A	HPOZ	CHC-2013-1677-MA	C-123263	N/A	N/A	4	Hollywood	R1-1	No	No	Single-family	5586023001	$372,000	$1,238,577	-$866,577	-$961	$8,839	69.97%	High	6.85	Low to Medium Barriers
670	6502 W COMMODORE SLOAT DR	2013	Carthay Circle	N/A	N/A	HPOZ	CHC-2013-1597-MA	C-123297	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Multi-family	5088009004	$504,000	$936,251	-$432,251	-$479	$4,409	46.17%	Moderate	7.35	Low to Medium Barriers
671	6681 W EMMET TER	2013	Whitley Heights	N/A	N/A	HPOZ	CHC-2013-1611-MA	C-123267	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5575008008	$867,000	$2,028,780	-$1,161,780	-$1,289	$11,850	57.26%	High	6.79	Low to Medium Barriers
672	203 S FORMOSA AVE	2013	Miracle Mile North	N/A	N/A	HPOZ	CHC-2013-1676-MA	C-123276	N/A	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512025020	$397,000	$1,056,617	-$659,617	-$732	$6,728	62.43%	High	7.3	Low to Medium Barriers
673	1034 S GRAMERCY PL	2013	Country Club Park	N/A	N/A	HPOZ	CHC-2013-1636-MA	C-123275	N/A	N/A	10	Wilshire	R1-1	No	No	Single-family	5081031005	$452,000	$1,651,431	-$1,199,431	-$1,330	$12,234	72.63%	High	5.61	Medium to High Barriers
674	1121 S GRAMERCY PL	2013	Country Club Park	N/A	N/A	HPOZ	CHC-2013-1616-MA	C-123274	N/A	N/A	10	Wilshire	R1-1	No	No	Single-family	5081026012	$470,916	$470,916	$0	$0	$0	0.00%	No Savings	5.61	Medium to High Barriers
675	2037 S HARVARD BLVD	2013	Harvard Heights	961	N/A	HCM and HPOZ	CHC-2013-1618-MA	C-123273	N/A	N/A	10	South Los Angeles	[Q]R4-1-HPOZ	No	No	Single-family	5074032014	$543,851	$543,851	$0	$0	$0	0.00%	No Savings	4.71	Medium to High Barriers
676	6004 E HAYES AVE	2013	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2013-1638-MA	C-123272	N/A	N/A	14	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Single-family	5492020010	$347,724	$347,724	$0	$0	$0	0.00%	No Savings	5.91	Medium to High Barriers
677	760 S HILL ST	2013	N/A	1030	Union Bank and Trust	HCM	CHC-2013-1670-MA	C-123270	N/A	N/A	14	Central City	C5-4D	No	No	Condominium	5144014046-5144014139	$28,921,747	$28,921,747	$0	$0	$0	0.00%	No Savings	6.39	Low to Medium Barriers
678	2327 W HILL DR	2013	N/A	1042	Egasse-Braasch	HCM	CHC-2013-1663-MA	C-123271	N/A	N/A	14	Northeast Los Angeles	R1-1	No	Yes	Single-family	5671001028	$353,000	$855,743	-$502,743	-$558	$5,128	58.75%	High	7.46	Low to Medium Barriers
679	6630 W IRIS DR	2013	Whitley Heights	N/A	N/A	HPOZ	CHC-2013-1617-MA	C-123268	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5576003038	$534,000	$1,219,810	-$685,810	-$761	$6,995	56.22%	High	6.79	Low to Medium Barriers
680	209 S IRVING BLVD	2013	Windsor Square	N/A	N/A	HPOZ	CHC-2013-1633-MA	C-123277	N/A	N/A	4	Wilshire	RE9-1-HPOZ	No	No	Single-family	5516002022	$874,000	$1,446,705	-$572,705	-$635	$5,842	39.59%	Moderate	6.46	Low to Medium Barriers
681	211 S LARCHMONT BLVD	2013	Windsor Square	N/A	N/A	HPOZ	CHC-2013-1631-MA	C-123266	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5515021023	$500,000	$1,440,693	-$940,693	-$1,043	$9,595	65.29%	High	7.89	Low Barriers
682	678 S LORRAINE BLVD	2013	Windsor Village	N/A	N/A	HPOZ	CHC-2013-1635-MA	C-123269	N/A	N/A	4	Wilshire	[Q]R3-1	No	No	Single-family	5090032024	$463,000	$1,041,532	-$578,532	-$642	$5,901	55.55%	High	6.49	Low to Medium Barriers

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683	845 S LORRAINE BLVD	2013	Windsor Village	N/A	N/A	HPOZ	CHC-2013-1637-MA	C-123265	N/A	N/A	4	Wilshire	[Q]R3-1	Yes	No	Single-family	5090027012	$479,304	$930,960	-$451,656	-$501	$4,607	48.52%	Moderate	6.49	Low to Medium Barriers
684	4955 W MARATHON ST	2013	Melrose Hill	N/A	N/A	HPOZ	CHC-2013-1660-MA	C-123264	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535028017	$314,000	$645,780	-$331,780	-$368	$3,384	51.38%	High	4.91	Medium to High Barriers
685	118 N MARTEL AVE	2013	Miracle Mile North	N/A	N/A	HPOZ	CHC-2013-1655-MA	C-123253	N/A	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512014022	$435,000	$1,241,889	-$806,889	-$895	$8,230	64.97%	High	7.3	Low to Medium Barriers
686	3542 S MEIER ST	2013	Gregory Ain Mar Vista Tract	N/A	N/A	HPOZ	CHC-2013-1654-MA	C-123288	N/A	N/A	11	Palms - Mar Vista - Del Rey	R1-1-HPOZ	Yes	No	Single-family	4246002007	$418,000	$971,433	-$553,433	-$614	$5,645	56.97%	High	7.34	Low to Medium Barriers
687	6423 W MOORE DR	2013	Carthay Circle	N/A	N/A	HPOZ	CHC-2013-1673-MA	C-123279	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088008034	$373,000	$1,068,368	-$695,368	-$771	$7,093	65.09%	High	7.35	Low to Medium Barriers
688	17103 W NANETTE ST	2013	Balboa Highlands	N/A	N/A	HPOZ	CHC-2013-1600-MA	C-123280	N/A	N/A	12	Granada Hills - Knollwood	RE11-1	No	No	Single-family	2602018032	$325,000	$996,857	-$671,857	-$745	$6,853	67.40%	High	7.91	Low Barriers
689	6507 W OLYMPIC PL	2013	South Carthay	N/A	N/A	HPOZ	CHC-2013-1653-MA	C-123281	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087007010	$514,000	$1,346,400	-$832,400	-$923	$8,490	61.82%	High	7.19	Low to Medium Barriers
690	1325 N ORANGE GROVE AVE	2013	Spaulding Square	N/A	N/A	HPOZ	CHC-2013-1656-MA	C-123282	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5551027017	$433,000	$1,024,639	-$591,639	-$656	$6,035	57.74%	High	7.01	Low to Medium Barriers
691	6039 E PIEDMONT AVE	2013	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2013-1641-MA	C-123283	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Single-family	5484035001	$463,000	$1,071,000	-$608,000	-$674	$6,202	56.77%	High	6.01	Low to Medium Barriers
692	167 N POINSETTIA PL	2013	Miracle Mile North	N/A	N/A	HPOZ	CHC-2013-1651-MA	C-123284	N/A	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512017004	$441,000	$1,935,000	-$1,494,000	-$1,657	$15,239	77.21%	Very High	7.3	Low to Medium Barriers
693	367 S RIMPAU BLVD	2013	Hancock Park	N/A	N/A	HPOZ	CHC-2013-1598-MA-MAEX	C-123285	Yes	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5505004002	$1,371,000	$6,216,604	-$4,845,604	-$5,374	$49,425	77.95%	Very High	7.89	Low Barriers
694	450 N ROSSMORE AVE	2013	N/A	309	El Royale Apartments	HCM	CHC-2013-1605-MA-MAEX	C-123286	Yes	N/A	4	Wilshire	R4-2	Yes	No	Multi-family	5523018001	$29,041,000	$36,108,000	-$7,067,000	-$7,838	$72,083	19.57%	Low	7.7	Low Barriers
695	416 S SPRING ST	2013	N/A	1029	Stowell Hotel	HCM	CHC-2013-1657-MA	C-123295	N/A	N/A	14	Central City	[Q]C4-4D	No	No	Condominium	5149038001-5149038066	$12,965,983	$34,936,080	-$21,970,097	-$24,367	$224,095	62.89%	High	6.49	Low to Medium Barriers
696	6121 W SUNSET BLVD	2013	N/A	947	CBS Columbia Square	HCM	CHC-2013-1667-MA-MAEX	C-123296	Yes	N/A	13	Hollywood	[Q]C4-1VL-SN	No	Yes	Commercial	5546026050	$49,900,000	$60,457,102	-$10,557,102	-$11,709	$107,682	17.46%	Low	6.13	Low to Medium Barriers
697	216 S THORNE ST	2013	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2013-1650-MA	C-123287	N/A	N/A	14	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5492040003	$326,000	$531,177	-$205,177	-$228	$2,093	38.63%	Moderate	6.08	Low to Medium Barriers
698	5867 W TUXEDO TER	2013	N/A	1031	Frederick A.	HCM	CHC-2013-1680-MA	C-123250	N/A	N/A	4	Hollywood	R1-1D	No	No	Single-family	5580023032	$255,000	$1,084,617	-$829,617	-$920	$8,462	76.49%	Very High	7.69	Low Barriers
699	262 S VAN NESS AVE	2013	Windsor Square	N/A	N/A	HPOZ	CHC-2013-1662-MA	C-123289	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5516010012	$762,000	$1,125,655	-$363,655	-$403	$3,709	32.31%	Moderate	6.46	Low to Medium Barriers
700	446 S VAN NESS AVE	2013	Windsor Square	N/A	N/A	HPOZ	CHC-2013-1672-MA	C-123278	N/A	N/A	4	Wilshire	R1-1XL-HPOZ	No	No	Single-family	5504020020	$400,000	$1,410,788	-$1,010,788	-$1,121	$10,310	71.65%	High	6.83	Low to Medium Barriers
701	1814 S VIRGINIA RD	2013	La Fayette Square	N/A	N/A	HPOZ	CHC-2013-1671-MA	C-123291	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071006042	$459,000	$878,261	-$419,261	-$465	$4,276	47.74%	Moderate	5.49	Medium to High Barriers
702	106 N VISTA ST	2013	Miracle Mile North	N/A	N/A	HPOZ	CHC-2013-1682-MA	C-123292	N/A	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512011020	$573,000	$1,343,956	-$770,956	-$855	$7,864	57.36%	High	7.3	Low to Medium Barriers
703	6537 W WHITWORTH DR	2013	South Carthay	N/A	N/A	HPOZ	CHC-2013-1599-MA	C-123293	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087008008	$495,000	$1,351,175	-$856,175	-$950	$8,733	63.37%	High	7.19	Low to Medium Barriers
704	245 S WILTON PL	2013	N/A	1032	Emma Wood House	HCM	CHC-2013-1674-MA	C-123294	N/A	N/A	4	Wilshire	R1-1	No	No	Single-family	5516010020	$852,000	$1,790,221	-$938,221	-$1,041	$9,570	52.41%	High	6.46	Low to Medium Barriers
705	2190 W 24TH ST	2014	West Adams Terrace	N/A	N/A	HPOZ	CHC-2014-1250-MA	C-125009	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5058006004	$261,000	$714,292	-$453,292	-$503	$4,624	63.46%	High	4.66	Medium to High Barriers
706	2254 W 25TH ST	2014	West Adams Terrace	N/A	N/A	HPOZ	CHC-2014-1241-MA	C-125010	N/A	N/A	10	South Los Angeles	[Q]R4-1-O-HPOZ	No	No	Single-family	5058004007	$411,000	$1,071,441	-$660,441	-$732	$6,736	61.64%	High	4.66	Medium to High Barriers
707	2107 W 28TH ST	2014	Jefferson Park	N/A	N/A	HPOZ	CHC-2014-1213-MA	C-125011	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5052029033	$240,000	$333,374	-$93,374	-$104	$952	28.01%	Moderate	5.75	Medium to High Barriers

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708	2078 W 29TH PL	2014	Jefferson Park	N/A	N/A	HPOZ	CHC-2014-1246-MA	C-125012	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5053005002	$389,000	$1,183,246	-$794,246	-$881	$8,101	67.12%	High	5.75	Medium to High Barriers
709	2201 W 31ST ST	2014	Jefferson Park	N/A	N/A	HPOZ	CHC-2014-1282-MA	C-125013	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	Yes	No	Multi-family	5052022001	$381,000	$464,839	-$83,839	-$93	$855	18.04%	Low	5.75	Medium to High Barriers
710	2389 W 31ST ST	2014	Jefferson Park	N/A	N/A	HPOZ	CHC-2014-1255-MA	C-125014	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-O-HPOZ	No	No	Single-family	5052005010	$204,000	$323,437	-$119,437	-$132	$1,218	36.93%	Moderate	5.4	Medium to High Barriers
711	1265 S 3RD AVE	2014	Country Club Park	N/A	N/A	HPOZ	CHC-2014-1223-MA	C-125004	N/A	N/A	10	Wilshire	RD1.5-1-O	No	No	Single-family	5081014008	$461,000	$921,509	-$460,509	-$511	$4,697	49.97%	Moderate	5.17	Medium to High Barriers
712	3661 S 3RD AVE	2014	Jefferson Park	N/A	N/A	HPOZ	CHC-2014-1202-MA	C-125005	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5042006016	$180,000	$418,002	-$238,002	-$264	$2,428	56.94%	High	5.19	Medium to High Barriers
713	3665 S 3RD AVE	2014	Jefferson Park	N/A	N/A	HPOZ	CHC-2014-1247-MA	C-125006	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5042006017	$180,000	$277,047	-$97,047	-$108	$990	35.03%	Moderate	5.19	Medium to High Barriers
714	2426 S 4TH AVE	2014	West Adams Terrace	1062	Roberta Apartments	HCM and HPOZ	CHC-2014-1299-MA	C-125007	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	RD2-1-O-HPOZ	No	No	Condominium	5059025031-5059025034	$792,000	$2,636,371	-$1,844,371	-$2,046	$18,813	69.96%	High	4.36	High Barriers
715	4071 W 8TH ST	2014	Wilshire Park	N/A	N/A	HPOZ	CHC-2014-1177-MA	C-125034	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092011024	$344,000	$750,358	-$406,358	-$451	$4,145	54.16%	High	5.85	Medium to High Barriers
716	1325 W ADAMS BLVD	2014	N/A	1043	Herman Kerckhoff House	HCM	CHC-2014-1181-MA	C-125015	N/A	N/A	8	South Los Angeles	RD1.5-1	No	No	Single-family	5055004003	$568,000	$1,114,267	-$546,267	-$606	$5,572	49.02%	Moderate	4.42	High Barriers
717	3701 W ADAMS BLVD	2014	West Adams Terrace	N/A	N/A	HPOZ	CHC-2014-1189-MA	C-125016	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R3-1-O-HPOZ	No	No	Single-family	5059016008	$388,000	$1,018,287	-$630,287	-$699	$6,429	61.90%	High	4.36	High Barriers
718	9027 W ALDEN DR	2014	N/A	995	9027 West Alden Drive Apts	HCM	CHC-2014-1259-MA	C-125017	N/A	N/A	5	Wilshire	[Q]R4-1-O	Yes	No	Multi-family	4335005011	$1,070,000	$2,722,255	-$1,652,255	-$1,833	$16,853	60.69%	High	7.54	Low Barriers
719	1130 S ALVIRA ST	2014	South Carthay	N/A	N/A	HPOZ	CHC-2014-1260-MA	C-125018	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087014006	$538,000	$1,545,463	-$1,007,463	-$1,117	$10,276	65.19%	High	7.19	Low to Medium Barriers
720	1206 S ALVIRA ST	2014	South Carthay	N/A	N/A	HPOZ	CHC-2014-1168-MA	C-125019	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087015002	$463,000	$1,390,917	-$927,917	-$1,029	$9,465	66.71%	High	7.19	Low to Medium Barriers
721	5609 E BALTIMORE ST	2014	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2014-1185-MA	C-125021	N/A	N/A	1	Northeast Los Angeles	R2-1-HPOZ	No	No	Single-family	5478028014	$183,000	$471,571	-$288,571	-$320	$2,943	61.19%	High	5.77	Medium to High Barriers
722	1100 S BROADWAY	2014	N/A	1075	Commercial Club Building	HCM	CHC-2014-1236-MA	C-125022	N/A	N/A	14	Central City	C2-4D-O	No	No	Commercial	5139017001	$27,300,000	$27,300,000	$0	$0	$0	0.00%	No Savings	6.76	Low to Medium Barriers
723	680 S BRONSON AVE	2014	Wilshire Park	N/A	N/A	HPOZ	CHC-2014-1222-MA	C-125025	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092007015	$448,000	$1,125,540	-$677,540	-$751	$6,911	60.20%	High	5.85	Medium to High Barriers
724	811 S BRONSON AVE	2014	Wilshire Park	N/A	N/A	HPOZ	CHC-2014-1206-MA	C-125023	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092002003	$336,000	$934,076	-$598,076	-$663	$6,100	64.03%	High	5.56	Medium to High Barriers
725	861 S BRONSON AVE	2014	Wilshire Park	N/A	N/A	HPOZ	CHC-2014-1281-MA	C-125024	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092002013	$478,000	$1,004,934	-$526,934	-$584	$5,375	52.43%	High	5.56	Medium to High Barriers

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726	1160 S BRONSON AVE	2014	Country Club Park	N/A	N/A	HPOZ	CHC-2014-1290-MA	C-125026	N/A	N/A	10	Wilshire	R3-1-O	Yes	No	Multi-family	5081006008	$649,000	$1,016,495	-$367,495	-$408	$3,748	36.15%	Moderate	5.17	Medium to High Barriers
727	1626 S BUCKINGHAM RD	2014	La Fayette Square	N/A	N/A	HPOZ	CHC-2014-1172-MA	C-125027	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071008063	$351,000	$1,374,264	-$1,023,264	-$1,135	$10,437	74.46%	High	5.49	Medium to High Barriers
728	1841 S BUCKINGHAM RD	2014	La Fayette Square	N/A	N/A	HPOZ	CHC-2014-1180-MA	C-125028	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071011025	$493,000	$1,481,410	-$988,410	-$1,096	$10,082	66.72%	High	5.49	Medium to High Barriers
729	3327 W COUNTRY CLUB DR	2014	Country Club Park	N/A	N/A	HPOZ	CHC-2014-1243-MA	C-125029	N/A	N/A	10	Wilshire	R1-1-O	Yes	No	Single-family	5081024027	$353,000	$1,644,381	-$1,291,381	-$1,432	$13,172	78.53%	Very High	5.61	Medium to High Barriers
730	1167 S CRESCENT HEIGHTS BLVD	2014	South Carthay	N/A	N/A	HPOZ	CHC-2014-1295-MA	C-125030	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Single-family	5087014032	$786,000	$1,360,805	-$574,805	-$638	$5,863	42.24%	Moderate	7.19	Low to Medium Barriers
731	12743 N DARLA AVE	2014	Balboa Highlands	N/A	N/A	HPOZ	CHC-2014-1252-MA	C-125031	N/A	N/A	12	Granada Hills - Knollwood	RE11-1	No	No	Single-family	2602019050	$325,000	$807,038	-$482,038	-$535	$4,917	59.73%	High	7.91	Low Barriers
732	162 N DETROIT ST	2014	Miracle Mile North	N/A	N/A	HPOZ	CHC-2014-1175-MA	C-125032	N/A	N/A	5	Wilshire	R2-1-HPOZ	Yes	No	Multi-family	5513002019	$755,000	$1,236,312	-$481,312	-$534	$4,909	38.93%	Moderate	7.3	Low to Medium Barriers
733	771 N EAST KENSINGTON RD	2014	Angelino Heights	N/A	N/A	HPOZ	CHC-2014-1188-MA	C-125042	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5405019012	$380,000	$958,800	-$578,800	-$642	$5,904	60.37%	High	5.98	Medium to High Barriers
734	6317 E ELGIN ST	2014	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2014-1178-MA	C-125035	N/A	N/A	14	Northeast Los Angeles	RD2-1	No	No	Single-family	5493009012	$179,000	$608,059	-$429,059	-$476	$4,376	70.56%	High	6.82	Low to Medium Barriers
735	975 S FOSTER DR	2014	Carthay Circle	N/A	N/A	HPOZ	CHC-2014-1261-MA	C-125036	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088007033	$575,000	$1,563,303	-$988,303	-$1,096	$10,081	63.22%	High	7.35	Low to Medium Barriers
736	2090 S HARVARD BLVD	2014	Harvard Heights	N/A	N/A	HPOZ	CHC-2014-1263-MA	C-125037	N/A	N/A	10	South Los Angeles	RD2-1-HPOZ	No	No	Single-family	5074030006	$426,000	$573,417	-$147,417	-$163	$1,504	25.71%	Moderate	4.71	Medium to High Barriers
737	1805 S HOBART BLVD	2014	Harvard Heights	N/A	N/A	HPOZ	CHC-2014-1209-MA	C-125038	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074019016	$373,000	$689,936	-$316,936	-$352	$3,233	45.94%	Moderate	4.68	Medium to High Barriers
738	1811 S HOBART BLVD	2014	Harvard Heights	N/A	N/A	HPOZ	CHC-2014-1286-MA	C-125039	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074019015	$383,000	$607,542	-$224,542	-$249	$2,290	36.96%	Moderate	4.68	Medium to High Barriers
739	2703 S HOOVER ST	2014	N/A	240	Residence	HCM	CHC-2014-1251-MA	C-125040	N/A	N/A	9	South Los Angeles	R3-1-O	No	No	Multi-family	5055027004	$1,431,000	$1,686,821	-$255,821	-$284	$2,609	15.17%	Low	6.53	Low to Medium Barriers
740	121 S HUDSON AVE	2014	Hancock Park	N/A	N/A	HPOZ	CHC-2014-1285-	C-125041	Yes	N/A	4	Wilshire	RE11-1-HPOZ	No	No	Single-family	5515002018	$1,128,000	$9,363,600	-$8,235,600	-$9,134	$84,003	87.95%	Very High	7.89	Low Barriers
741	1130 S LA JOLLA AVE	2014	South Carthay	N/A	N/A	HPOZ	CHC-2014-1265-MA	C-125043	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	Yes	No	Single-family	5087011021	$504,000	$1,902,743	-$1,398,743	-$1,551	$14,267	73.51%	High	7.19	Low to Medium Barriers
742	1163 S LA JOLLA AVE	2014	South Carthay	N/A	N/A	HPOZ	CHC-2014-1266-MA	C-125044	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087009001	$483,000	$1,537,382	-$1,054,382	-$1,169	$10,755	68.58%	High	7.19	Low to Medium Barriers
743	7129 W LA PRESA DR	2014	N/A	1064	ABICHANDANI RESIDENCE	HCM	CHC-2014-1291-MA	C-125045	N/A	N/A	4	Hollywood	RE9-1	No	No	Single-family	5549012020	$650,000	$1,266,793	-$616,793	-$684	$6,291	48.69%	Moderate	7.36	Low to Medium Barriers
744	215 S LARCHMONT BLVD	2014	Windsor Square	N/A	N/A	HPOZ	CHC-2014-1242-MA	C-125046	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5515021022	$493,000	$1,323,577	-$830,577	-$921	$8,472	62.75%	High	7.89	Low Barriers
745	813 1/2 N LAVETA TER	2014	Angelino Heights	N/A	N/A	HPOZ	CHC-2014-1221-MA	C-125047	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD3-1VL-HPOZ	No	No	Single-family	5405005005	$228,000	$383,517	-$155,517	-$172	$1,586	40.55%	Moderate	5.82	Medium to High Barriers
746	505 S LORRAINE BLVD	2014	Windsor Square	N/A	N/A	HPOZ	CHC-2014-3536-MAEX	C-125048	Yes	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5504002007	$1,345,000	$3,199,222	-$1,854,222	-$2,057	$18,913	57.96%	High	6.83	Low to Medium Barriers
747	611 S LORRAINE BLVD	2014	Windsor Square	N/A	N/A	HPOZ	CHC-2014-1176-MAEX	C-125049	Yes	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5504001008	$926,000	$2,967,073	-$2,041,073	-$2,264	$20,819	68.79%	High	6.83	Low to Medium Barriers
748	730 S LOS ANGELES ST	2014	N/A	1067	Grether & Grether Building	HCM	CHC-2014-1293-MA	C-125050	N/A	N/A	14	Central City	M2-2D	No	No	Multi-family	5145002001	$15,450,000	$23,698,913	-$8,248,913	-$9,149	$84,139	34.81%	Moderate	5.06	Medium to High Barriers
749	617 S LUCERNE BLVD	2014	Windsor Square	N/A	N/A	HPOZ	CHC-2014-1203-MAEX	C-125051	Yes	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5505021002	$833,000	$3,179,234	-$2,346,234	-$2,602	$23,932	73.80%	High	7.89	Low Barriers
750	2800 N MANITOU AVE	2014	Lincoln Heights	N/A	N/A	HPOZ	CHC-2014-1292-MA	C-125052	N/A	N/A	1	Northeast Los Angeles	RD3-1-HPOZ	No	No	Single-family	5204019024	$340,000	$452,595	-$112,595	-$125	$1,148	24.88%	Low	4.78	Medium to High Barriers
751	121 N MARTEL AVE	2014	Miracle Mile North	N/A	N/A	HPOZ	CHC-2014-1274-MA	C-125053	N/A	N/A	5	Wilshire	R1-1-HPOZ	No	No	Single-family	5512011014	$412,000	$1,352,978	-$940,978	-$1,044	$9,598	69.55%	High	7.3	Low to Medium Barriers
752	156 S MARTEL AVE	2014	Miracle Mile North	N/A	N/A	HPOZ	CHC-2014-1279-MA	C-125054	N/A	N/A	5	Wilshire	R1-1-HPOZ	Yes	No	Single-family	5512015023	$778,000	$1,693,382	-$915,382	-$1,015	$9,337	54.06%	High	7.3	Low to Medium Barriers

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753	6503 W MOORE DR	2014	Carthay Circle	N/A	N/A	HPOZ	CHC-2014-1275-MA	C-125055	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088008030	$426,000	$1,142,604	-$716,604	-$795	$7,309	62.72%	High	7.35	Low to Medium Barriers
754	103 N NORTON AVE	2014	Windsor Square	N/A	N/A	HPOZ	CHC-2014-1220-MA	C-125056	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5516006018	$448,000	$1,924,740	-$1,476,740	-$1,638	$15,063	76.72%	Very High	6.46	Low to Medium Barriers
755	1338 N ORANGE GROVE AVE	2014	Spaulding Square	N/A	N/A	HPOZ	CHC-2014-1235-MA	C-125057	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5551028015	$635,000	$2,316,388	-$1,681,388	-$1,865	$17,150	72.59%	High	7.01	Low to Medium Barriers
756	231 S PLYMOUTH BLVD	2014	Windsor Square	N/A	N/A	HPOZ	CHC-2014-1171-	C-125058	Yes	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5515022018	$1,317,000	$2,111,657	-$794,657	-$881	$8,106	37.63%	Moderate	7.89	Low Barriers
757	4421 N RICHARD CIR	2014	N/A	1037	SOUTHAVEN	HCM	CHC-2014-1179-MA	C-125059	N/A	N/A	14	Northeast Los Angeles	[Q]R1-1D	No	No	Single-family	5309011033	$176,000	$315,269	-$139,269	-$154	$1,421	44.17%	Moderate	6.12	Low to Medium Barriers
758	632 S SPRING ST	2014	N/A	631	Banks-Huntley Building	HCM	CHC-2014-1296-MA	C-125060	N/A	N/A	14	Central City	C2-4D	No	No	Commercial	5144001016	$5,174,271	$5,174,271	$0	$0	$0	0.00%	No Savings	6.49	Low to Medium Barriers
759	1225 S VAN NESS AVE	2014	Country Club Park	N/A	N/A	HPOZ	CHC-2014-1167-MA	C-125061	N/A	N/A	10	Wilshire	RE9-1-O	No	Yes	Single-family	5081022015	$624,000	$1,456,062	-$832,062	-$923	$8,487	57.14%	High	5.61	Medium to High Barriers
760	1230 S VAN NESS AVE	2014	Country Club Park	N/A	N/A	HPOZ	CHC-2014-1287-MA	C-125062	N/A	N/A	10	Wilshire	RE9-1-O	No	No	Single-family	5081023006	$162,047	$162,047	$0	$0	$0	0.00%	No Savings	5.61	Medium to High Barriers
761	1662 S VICTORIA AVE	2014	La Fayette Square	N/A	N/A	HPOZ	CHC-2014-1170-MA	C-125064	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071001019	$379,000	$1,195,537	-$816,537	-$906	$8,329	68.30%	High	5.49	Medium to High Barriers
762	2012 S VICTORIA AVE	2014	N/A	1044	Haight-Dandridge House	HCM	CHC-2014-1198-MA	C-125063	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1	No	No	Single-family	5061021027	$528,400	$1,302,491	-$774,091	-$859	$7,896	59.43%	High	5.5	Medium to High Barriers
763	1657 S VIRGINIA RD	2014	La Fayette Square	N/A	N/A	HPOZ	CHC-2014-1210-MA	C-125065	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071008054	$309,000	$763,714	-$454,714	-$504	$4,638	59.54%	High	5.49	Medium to High Barriers
764	1832 S VIRGINIA RD	2014	La Fayette Square	N/A	N/A	HPOZ	CHC-2014-1284-MA	C-125066	N/A	N/A	10	West Adams - Baldwin Hills -	R1-1-HPOZ	No	No	Single-family	5071006045	$527,000	$1,737,500	-$1,210,500	-$1,343	$12,347	69.67%	High	5.49	Medium to High Barriers
765	6258 W WARNER DR	2014	Carthay Circle	N/A	N/A	HPOZ	CHC-2014-1310-MA	C-125067	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5088016013	$471,000	$1,362,654	-$891,654	-$989	$9,095	65.44%	High	7.35	Low to Medium Barriers
766	2226 N WAYNE AVE	2014	N/A	1065	MCTERNAN RESIDENCE	HCM	CHC-2014-1283-MA	C-125068	N/A	N/A	4	Hollywood	R1-1	No	No	Single-family	5592023001	$681,000	$1,618,247	-$937,247	-$1,039	$9,560	57.92%	High	7.58	Low Barriers
767	1044 N WEST EDGEWARE RD	2014	Angelino Heights	N/A	N/A	HPOZ	CHC-2014-1300-MA	C-125033	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405010017	$682,000	$1,611,600	-$929,600	-$1,031	$9,482	57.68%	High	5.82	Medium to High Barriers
768	507 N WILCOX AVE	2014	Hancock Park	N/A	N/A	HPOZ	CHC-2014-1169-MAEX	C-125069	Yes	N/A	4	Wilshire	RE9-1-HPOZ	No	No	Single-family	5523037046	$702,000	$2,208,912	-$1,506,912	-$1,671	$15,371	68.22%	High	7.7	Low Barriers
769	859 W 13TH ST	2015	N/A	147	James H. Dodson Residence	HCM	CHC-2015-1405-MA	C-126784	N/A	N/A	15	San Pedro	RD1.5-1XL	No	No	Single-family	7454023001	$367,000	$747,274	-$380,274	-$422	$3,879	50.89%	High	5.7	Medium to High Barriers
770	2908 W 15TH ST	2015	Harvard Heights	N/A	N/A	HPOZ	CHC-2015-1408-MA	C-126781	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074010007	$448,000	$969,650	-$521,650	-$579	$5,321	53.80%	High	4.72	Medium to High Barriers
771	1431 W 24TH ST	2015	Adams - Normandie	N/A	N/A	HPOZ	CHC-2015-1409-MA	C-126776	N/A	N/A	8	South Los Angeles	RD2-1-HPOZ	Yes	No	Multi-family	5054025017	$423,000	$1,020,000	-$597,000	-$662	$6,089	58.53%	High	4.61	Medium to High Barriers
772	2255 W 25TH ST	2015	West Adams Terrace	N/A	N/A	HPOZ	CHC-2015-1413-MA	C-126780	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5058003014	$499,000	$682,649	-$183,649	-$204	$1,873	26.90%	Moderate	4.66	Medium to High Barriers
773	2103 W 28TH ST	2015	Jefferson Park	N/A	N/A	HPOZ	CHC-2015-1417-MA	C-126788	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5052029035	$226,000	$484,822	-$258,822	-$287	$2,640	53.38%	High	5.75	Medium to High Barriers
774	2082 W 29TH PL	2015	Jefferson Park	N/A	N/A	HPOZ	CHC-2015-1423-MA	C-126771	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5053005003	$234,000	$597,948	-$363,948	-$404	$3,712	60.87%	High	5.75	Medium to High Barriers

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775	2117 W 29TH ST	2015	Jefferson Park	N/A	N/A	HPOZ	CHC-2015-1427-MA	C-126789	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5052028033	$204,000	$445,057	-$241,057	-$267	$2,459	54.16%	High	5.75	Medium to High Barriers
776	1229 S 3RD AVE	2015	Country Club Park	N/A	N/A	HPOZ	CHC-2015-1375-MA	C-126791	N/A	N/A	10	Wilshire	RD1.5-1-O	Yes	No	Single-family	5081014002	$426,000	$682,005	-$256,005	-$284	$2,611	37.54%	Moderate	5.17	Medium to High Barriers
777	1107 S 4TH AVE	2015	Country Club Park	N/A	N/A	HPOZ	CHC-2015-1379-MA	C-126772	N/A	N/A	10	Wilshire	RD1.5-1-O	Yes	No	Multi-family	5081012002	$444,000	$813,194	-$369,194	-$409	$3,766	45.40%	Moderate	5.17	Medium to High Barriers
778	1262 S 5TH AVE	2015	Country Club Park	N/A	N/A	HPOZ	CHC-2015-1382-MA	C-126794	N/A	N/A	10	Wilshire	RD1.5-1-O	Yes	No	Single-family	5081013019	$336,000	$1,220,388	-$884,388	-$981	$9,021	72.47%	High	5.17	Medium to High Barriers
779	3184 W 8TH ST	2015	N/A	1085	Haddon Hall	HCM	CHC-2015-1570-MAEX	C-126786	Yes	Downtown Los Angeles	10	Wilshire	C2-1	Yes	Yes	Commercial	5094016011-5094016012	$3,744,462	$5,933,047	-$2,188,585	-$2,427	$22,324	36.89%	Moderate	4.34	High Barriers
780	4255 N AGNES AVE	2015	N/A	1076	Presburger House	HCM	CHC-2015-1436-MA	C-126824	N/A	N/A	2	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	R1-1	Yes	No	Single-family	2368015032	$403,000	$833,615	-$430,615	-$478	$4,392	51.66%	High	7.63	Low Barriers
781	1041 S ALFRED ST	2015	South Carthay	N/A	N/A	HPOZ	CHC-2015-1441-MA	C-126775	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Single-family	5087001030	$672,000	$1,515,861	-$843,861	-$936	$8,607	55.67%	High	7.19	Low to Medium Barriers
782	1053 S ALVIRA ST	2015	South Carthay	N/A	N/A	HPOZ	CHC-2015-1442-MA	MISSING IN OHR FILES	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	No	No	Single-family	5087012010	$375,000	$1,532,985	-$1,157,985	-$1,284	$11,811	75.54%	Very High	7.19	Low to Medium Barriers
783	6141 W BARROWS DR	2015	Carthay Circle	N/A	N/A	HPOZ	CHC-2015-1445-MA	C-126828	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	Yes	No	Single-family	5088017033	$394,000	$1,045,709	-$651,709	-$723	$6,647	62.32%	High	7.35	Low to Medium Barriers
784	1453 W BELLEVUE AVE	2015	Angelino Heights	N/A	N/A	HPOZ	CHC-2015-1447-MA	C-126813	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5405014020	$340,000	$1,096,500	-$756,500	-$839	$7,716	68.99%	High	5.82	Medium to High Barriers
785	4350 W BEVERLY BLVD	2015	N/A	552	Einar C. Petersen Studio Court	HCM	CHC-2015-1450-MA	C-126821	N/A	N/A	10	Wilshire	R1-1	Yes	No	Commercial	5517017008	$620,000	$1,489,028	-$869,028	-$964	$8,864	58.36%	High	5.51	Medium to High Barriers
786	801 S BROADWAY	2015	N/A	459	Hamburger's Department Store	HCM	CHC-2015-1548-MA	C-126823	N/A	Downtown Los Angeles	14	Central City	[Q]C5-4D-CDO	No	Yes	Commercial	5144017028-5144017030	$131,721,866	$131,721,866	$0	$0	$0	0.00%	No Savings	6.39	Low to Medium Barriers
787	702 S BRONSON AVE	2015	Wilshire Park	N/A	N/A	HPOZ	CHC-2015-1486-MA	C-126822	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5092007019	$418,000	$1,018,290	-$600,290	-$666	$6,123	58.95%	High	5.85	Medium to High Barriers
788	6524 W COMMODORE SLOAT DR	2015	Carthay Circle	N/A	N/A	HPOZ	CHC-2015-1494-MA	C-126779	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Single-family	5088009008	$441,000	$1,283,286	-$842,286	-$934	$8,591	65.64%	High	7.35	Low to Medium Barriers
789	6421 E CRESCENT ST	2015	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2015-1517-MA	C-126778	N/A	N/A	14	Northeast Los Angeles	RD2-1	Yes	No	Single-family	5493018018	$178,000	$431,623	-$253,623	-$281	$2,587	58.76%	High	6.08	Low to Medium Barriers
790	740 N EAST KENSINGTON RD	2015	Angelino Heights	N/A	N/A	HPOZ	CHC-2015-1572-MA	C-126830	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Single-family	5405023020	$290,000	$784,321	-$494,321	-$548	$5,042	63.03%	High	5.98	Medium to High Barriers
791	847 N EAST KENSINGTON RD	2015	Angelino Heights	N/A	N/A	HPOZ	CHC-2015-1573-MA	C-126831	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405020019	$865,000	$1,562,213	-$697,213	-$773	$7,112	44.63%	Moderate	5.98	Medium to High Barriers
792	1950 N EDGEMONT ST	2015	N/A	1068	J.W. Blank Residence	HCM	CHC-2015-1575-MAEX	C-126811	Yes	N/A	4	Hollywood	R1-1	No	No	Single-family	5589018025	$827,000	$2,078,489	-$1,251,489	-$1,388	$12,765	60.21%	High	7.43	Low to Medium Barriers

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793	2574 N GLENDOWER AVE	2015	N/A	1069	Hlaffer-Courcier Residence	HCM	CHC-2015-1578-MA	C-126777	N/A	N/A	4	Hollywood	RE11-1	No	No	Single-family	5588019015	$417,000	$861,123	-$444,123	-$493	$4,530	51.57%	High	7.43	Low to Medium Barriers
794	245 N GOWER ST	2015	Windsor Square	N/A	N/A	HPOZ	CHC-2015-1580-MA	C-126810	N/A	N/A	4	Wilshire	R1-1-HPOZ	No	No	Single-family	5515025017	$515,000	$1,546,053	-$1,031,053	-$1,144	$10,517	66.69%	High	7.89	Low Barriers
795	1139 S HARVARD BLVD	2015	N/A	272	Peet House	HCM	CHC-2015-1581-MA	C-126809	N/A	N/A	10	Wilshire	R3-1	No	No	Single-family	5080021022	$172,000	$711,740	-$539,740	-$599	$5,505	75.83%	Very High	4.83	Medium to High Barriers
796	1732 S HARVARD BLVD	2015	Harvard Heights	N/A	N/A	HPOZ	CHC-2015-1582-MA	C-126782	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	Yes	No	Single-family	5074022013	$336,000	$708,920	-$372,920	-$414	$3,804	52.60%	High	5.22	Medium to High Barriers
797	508 N HIGHLAND AVE	2015	Hancock Park	N/A	N/A	HPOZ	CHC-2015-1588-MA	C-126770	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5524025017	$679,000	$970,888	-$291,888	-$324	$2,977	30.06%	Moderate	7.14	Low to Medium Barriers
798	624 N HIGHLAND AVE	2015	Hancock Park	N/A	N/A	HPOZ	CHC-2015-1591-MA	C-126790	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5524018003	$538,000	$1,071,440	-$533,440	-$592	$5,441	49.79%	Moderate	7.14	Low to Medium Barriers
799	1806 S HOBART BLVD	2015	Harvard Heights	N/A	N/A	HPOZ	CHC-2015-1604-MA	C-126805	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074020006	$321,000	$614,869	-$293,869	-$326	$2,997	47.79%	Moderate	5.22	Medium to High Barriers
800	2242 S HOBART BLVD	2015	N/A	1086	Charles I.D. Moore Residence	HCM	CHC-2015-1605-MA	C-126793	N/A	N/A	8	South Los Angeles	[Q]RD2-1	Yes	No	Single-family	5058018014	$493,000	$823,796	-$330,796	-$367	$3,374	40.16%	Moderate	4.65	Medium to High Barriers
801	4529 N HOMER ST	2015	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2015-1610-MA	C-126801	N/A	N/A	1	Northeast Los Angeles	RD5-1-HPOZ	Yes	No	Single-family	5303002023	$158,000	$285,429	-$127,429	-$141	$1,300	44.64%	Moderate	5.32	Medium to High Barriers
802	6622 W IRIS DR	2015	Whitley Heights	N/A	N/A	HPOZ	CHC-2015-1611-MA	C-126802	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5576003035	$207,000	$534,836	-$327,836	-$364	$3,344	61.30%	High	6.79	Low to Medium Barriers
803	464 N JUNE ST	2015	Hancock Park	N/A	N/A	HPOZ	CHC-2015-1613-	C-126803	Yes	N/A	4	Wilshire	R1-1-HPOZ	Yes	No	Single-family	5523003013	$1,233,000	$4,001,655	-$2,768,655	-$3,071	$28,240	69.19%	High	7.7	Low Barriers
804	5900 W MANOLA WAY	2015	N/A	1084	Villa Manola	HCM	CHC-2015-1630-MA	C-126807	N/A	N/A	4	Hollywood	R1-1	No	No	Multi-family	5586020020	$890,000	$1,927,242	-$1,037,242	-$1,150	$10,580	53.82%	High	6.85	Low to Medium Barriers
805	3539 S MOORE ST	2015	Gregory Ain Mar Vista Tract	N/A	N/A	HPOZ	CHC-2015-1634-MA	C-126816	N/A	N/A	11	Palms - Mar Vista - Del Rey	R1-1-HPOZ	Yes	No	Single-family	4245007016	$464,500	$1,331,153	-$866,653	-$961	$8,840	65.11%	High	7.34	Low to Medium Barriers
806	6511 W MOORE DR	2015	Carthay Circle	N/A	N/A	HPOZ	CHC-2015-1635-MA	C-126792	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	Yes	No	Single-family	5088008028	$456,000	$1,238,577	-$782,577	-$868	$7,982	63.18%	High	7.35	Low to Medium Barriers
807	17031 W NANETTE ST	2015	Balboa Highlands	N/A	N/A	HPOZ	CHC-2015-1664-MA	C-126798	N/A	N/A	12	Granada Hills - Knollwood	RE11-1	No	No	Single-family	2602018039	$325,000	$836,287	-$511,287	-$567	$5,215	61.14%	High	7.91	Low Barriers
808	1530 N OGDEN DR	2015	Sunset Square	235	Bollman House	HCM and HPOZ	CHC-2015-1667-MAEX	C-126797	Yes	N/A	4	Hollywood	R1-1	No	No	Single-family	5551021005	$613,000	$2,047,040	-$1,434,040	-$1,590	$14,627	70.05%	High	7.01	Low to Medium Barriers
809	1017 S ORLANDO AVE	2015	South Carthay	N/A	N/A	HPOZ	CHC-2015-1669-MA	C-126796	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	Yes	No	Single-family	5087006005	$496,000	$1,309,027	-$813,027	-$902	$8,293	62.11%	High	7.19	Low to Medium Barriers
810	1164 S ORLANDO AVE	2015	South Carthay	N/A	N/A	HPOZ	CHC-2015-1740-MA	C-126795	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	Yes	No	Single-family	5087009002	$405,000	$1,235,209	-$830,209	-$921	$8,468	67.21%	High	7.19	Low to Medium Barriers
811	1709 S OXFORD AVE	2015	Harvard Heights	N/A	N/A	HPOZ	CHC-2015-1743-MA	C-126773	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074014004	$284,000	$560,441	-$276,441	-$307	$2,820	49.33%	Moderate	4.68	Medium to High Barriers
812	819 S SANTEE ST	2015	N/A	1092	Maxfield Building	HCM	CHC-2015-1747-MA	C-126812	N/A	Downtown Los Angeles	14	Central City	M2-2D	No	Yes	Multi-family	5145013023	$16,500,000	$25,779,882	-$9,279,882	-$10,292	$94,655	36.00%	Moderate	5.06	Medium to High Barriers
813	1351 N SPAULDING AVE	2015	Spaulding Square	N/A	N/A	HPOZ	CHC-2015-1771-MA	C-126817	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5551030010	$579,000	$783,386	-$204,386	-$227	$2,085	26.09%	Moderate	7.01	Low to Medium Barriers
814	1352 N SPAULDING AVE	2015	Spaulding Square	N/A	N/A	HPOZ	CHC-2015-1772-MA	C-126829	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5550031002	$463,000	$1,363,973	-$900,973	-$999	$9,190	66.06%	High	7.01	Low to Medium Barriers
815	5730 W SPRING OAK DR	2015	N/A	1080	Appel House	HCM	CHC-2015-1774-MA	C-126825	N/A	N/A	4	Hollywood	R1-1D	Yes	No	Single-family	5580022004	$342,000	$1,408,646	-$1,066,646	-$1,183	$10,880	75.72%	Very High	7.69	Low Barriers

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816	1830 N TAFT AVE	2015	N/A	1070	The Polynesian	HCM	CHC-2015-3306-MAEX	C-126818	Yes	N/A	13	Hollywood	RD1.5-1XL	Yes	No	Condominium	5586033025-55860330247	$4,858,085	$8,352,508	-$3,494,423	-$3,876	$35,643	41.84%	Moderate	5.93	Medium to High Barriers
817	125 N VAN NESS AVE	2015	Windsor Square	N/A	N/A	HPOZ	CHC-2015-1776-MA	C-126819	N/A	N/A	4	Wilshire	R1-1-HPOZ	Yes	No	Single-family	5516007008	$911,000	$2,704,566	-$1,793,566	-$1,989	$18,294	66.32%	High	6.46	Low to Medium Barriers
818	906 S VICTORIA AVE	2015	Windsor Square	N/A	N/A	HPOZ	CHC-2015-2308-MA	C-126804	N/A	N/A	4	Wilshire	R1-1	Yes	No	Single-family	5090034026	$463,000	$1,438,313	-$975,313	-$1,082	$9,948	67.81%	High	6.49	Low to Medium Barriers
819	1801 S VICTORIA AVE	2015	La Fayette Square	N/A	N/A	HPOZ	CHC-2015-1777-MA	C-126820	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	Yes	No	Single-family	5071003007	$474,000	$1,379,877	-$905,877	-$1,005	$9,240	65.65%	High	5.49	Medium to High Barriers
820	4359 W VICTORIA PARK PL	2015	N/A	1073	Charles C. Hurd Residence	HCM	CHC-2015-1780-MA	C-126826	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R2-1-O	No	No	Single-family	5082014027	$515,000	$1,113,586	-$598,586	-$664	$6,106	53.75%	High	5.61	Medium to High Barriers
821	1201 S WESTCHESTER PL	2015	Country Club Park	N/A	N/A	HPOZ	CHC-2015-1781-MA	C-126787	N/A	N/A	10	Wilshire	R1-1-O	Yes	No	Single-family	5081020016	$620,000	$1,214,292	-$594,292	-$659	$6,062	48.94%	Moderate	5.17	Medium to High Barriers
822	1212 S WESTCHESTER PL	2015	Country Club Park	N/A	N/A	HPOZ	CHC-2015-3378-MA	C-126827	N/A	N/A	10	Wilshire	R1-1-O	Yes	No	Single-family	5081021011	$477,000	$1,162,181	-$685,181	-$760	$6,989	58.96%	High	5.17	Medium to High Barriers
823	1810 S WESTMORELAND BLVD	2015	Harvard Heights	N/A	N/A	HPOZ	CHC-2015-1782-MA	C-126785	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074019008	$498,000	$594,508	-$96,508	-$107	$984	16.23%	Low	4.68	Medium to High Barriers
824	1965 N WHITLEY AVE	2015	Whitley Heights	N/A	N/A	HPOZ	CHC-2015-1783-MA	C-126800	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5575009007	$323,000	$735,029	-$412,029	-$457	$4,203	56.06%	High	6.79	Low to Medium Barriers
825	6660 W WHITLEY TER	2015	Whitley Heights	N/A	N/A	HPOZ	CHC-2015-1789-MA	C-126806	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5575011008	$542,000	$950,745	-$408,745	-$453	$4,169	42.99%	Moderate	6.79	Low to Medium Barriers
826	6697 W WHITLEY TER	2015	Whitley Heights	N/A	N/A	HPOZ	CHC-2015-1857-MA	C-126799	N/A	N/A	4	Hollywood	R1-1-HPOZ	No	No	Single-family	5575014002	$598,000	$1,569,005	-$971,005	-$1,077	$9,904	61.89%	High	6.79	Low to Medium Barriers
827	1215 S WILTON PL	2015	Country Club Park	N/A	N/A	HPOZ	CHC-2015-1860-MA	C-126883	N/A	N/A	10	Wilshire	RE9-1-O-HPOZ	No	No	Single-family	5081023017	$595,000	$1,530,739	-$935,739	-$1,038	$9,545	61.13%	High	5.61	Medium to High Barriers
828	454 S WINDSOR BLVD	2015	Windsor Square	N/A	N/A	HPOZ	CHC-2015-1861-MAEX	C-126832	Yes	N/A	4	Wilshire	RE15-1-HPOZ	No	No	Single-family	5504003001	$1,291,000	$5,219,856	-$3,928,856	-$4,357	$40,074	75.27%	Very High	6.83	Low to Medium Barriers
829	8941 W WONDERLAND PARK AVE	2015	N/A	1083	Zieger House	HCM	CHC-2015-1862-MAEX	C-126815	Yes	N/A	4	Bel Air - Beverly Crest	RE15-1-H	No	No	Single-family	5564015043	$941,000	$2,966,629	-$2,025,629	-$2,247	$20,661	68.28%	High	8.37	Low Barriers
830	4908 E YORK BLVD	2015	N/A	1071	York Boulevard Church of Christ	HCM	CHC-2015-1863-MA	C-126814	N/A	N/A	14	Northeast Los Angeles	[Q]C4-1XL	No	No	Industrial	5477002002	$607,142	$607,142	$0	$0	$0	0.00%	No Savings	6.64	Low to Medium Barriers
831	2895 W 15TH ST	2016	Harvard Heights	N/A	N/A	HPOZ	CHC-2016-1818-MA	C-128274	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5074004018	$448,000	$798,027	-$350,027	-$388	$3,570	43.86%	Moderate	4.72	Medium to High Barriers
832	2251 W 20TH ST	2016	Western Heights	N/A	N/A	HPOZ	CHC-2016-1821-MA	C-128275	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	Yes	No	Single-family	5073028022	$347,000	$827,742	-$480,742	-$533	$4,904	58.08%	High	4.71	Medium to High Barriers
833	929 W 23RD ST	2016	University Park	N/A	N/A	HPOZ	CHC-2016-1822-MA	C-128276	N/A	N/A	1	South Los Angeles	RD1.5-1-O-HPOZ	No	No	Single-family	5124013017	$299,000	$441,560	-$142,560	-$158	$1,454	32.29%	Moderate	4.33	High Barriers
834	2176 W 24TH ST	2016	West Adams Terrace	N/A	N/A	HPOZ	CHC-2016-1823-MA	C-128277	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	Yes	No	Single-family	5058006006	$523,000	$1,432,630	-$909,630	-$1,009	$9,278	63.49%	High	4.66	Medium to High Barriers
835	601 W 5TH ST	2016	N/A	347	One Bunker Hill Bldg.	HCM	CHC-2016-1814-MA	C-128272	N/A	Downtown Los Angeles	14	Central City	C2-4D	No	Yes	Commercial	5151017030	$88,320,000	$130,083,000	-$41,763,000	-$46,319	$425,983	32.10%	Moderate	5.75	Medium to High Barriers

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836	1132 S 5TH AVE	2016	Country Club Park	N/A	N/A	HPOZ	CHC-2016-1815-MA	C-128271	N/A	N/A	10	Wilshire	RD1.5-1-O	Yes	Yes	Single-family	5081012016	$336,000	$629,221	-$293,221	-$325	$2,991	46.60%	Moderate	5.17	Medium to High Barriers
837	2508 S 9TH AVE	2016	West Adams Terrace	N/A	N/A	HPOZ	CHC-2016-1817-MA	C-128273	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	Yes	No	Single-family	5059015013	$452,000	$981,616	-$529,616	-$587	$5,402	53.95%	High	4.36	High Barriers
838	518 N AVENUE 53	2016	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2016-1825-MA	C-128278	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	Yes	No	Single-family	5469023023	$193,000	$540,461	-$347,461	-$385	$3,544	64.29%	High	5.69	Medium to High Barriers
839	6663 W BONAIR PL	2016	Whitley Heights	N/A	N/A	HPOZ	CHC-2016-1828-MA	C-128279	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Multi-family	5575011011-5575011012	$344,000	$860,830	-$516,830	-$573	$5,272	60.04%	High	6.79	Low to Medium Barriers
840	510 S BROADWAY	2016	N/A	1125	Forve-Pettebone Building	HCM	CHC-2016-2856-MA	C-128280	N/A	Downtown Los Angeles	14	Central City	C5-4D	No	Yes	Commercial	5149034002	$12,850,000	$22,000,000	-$9,150,000	-$10,148	$93,330	41.59%	Moderate	6.39	Low to Medium Barriers
841	840 S BRONSON AVE	2016	Wilshire Park	N/A	N/A	HPOZ	CHC-2016-3011-MA	C-128281	N/A	N/A	4	Wilshire	R1-1-HPOZ	Yes	Yes	Single-family	5092005017	$441,000	$920,334	-$479,334	-$532	$4,889	52.08%	High	5.56	Medium to High Barriers
842	1853 S BUCKINGHAM RD	2016	La Fayette Square	N/A	N/A	HPOZ	CHC-2016-1829-MA	C-128282	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	Yes	No	Single-family	5071011026	$366,000	$1,481,410	-$1,115,410	-$1,237	$11,377	75.29%	Very High	5.49	Medium to High Barriers
843	1862 S BUCKINGHAM RD	2016	La Fayette Square	N/A	N/A	HPOZ	CHC-2016-1831-MA	C-128283	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	Yes	No	Single-family	5071007091	$353,000	$935,171	-$582,171	-$646	$5,938	62.25%	High	5.49	Medium to High Barriers
844	2192 W CAMBRIDGE ST	2016	Harvard Heights	N/A	N/A	HPOZ	CHC-2016-1832-MA	C-128284	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	Yes	No	Single-family	5074012005	$284,000	$840,474	-$556,474	-$617	$5,676	66.21%	High	4.72	Medium to High Barriers
845	3600 W COUNTRY CLUB DR	2016	Country Club Park	N/A	N/A	HPOZ	CHC-2016-1834-MA	C-128285	N/A	N/A	10	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5081015019	$1,083,000	$1,510,627	-$427,627	-$474	$4,362	28.31%	Moderate	5.17	Medium to High Barriers
846	3612 W COUNTRY CLUB DR	2016	Country Club Park	N/A	N/A	HPOZ	CHC-2016-1835-MA	C-128286	N/A	N/A	10	Wilshire	RD1.5-1-O	Yes	No	Multi-family	5081015018	$1,083,000	$1,510,627	-$427,627	-$474	$4,362	28.31%	Moderate	5.17	Medium to High Barriers
847	3620 W COUNTRY CLUB DR	2016	Country Club Park	N/A	N/A	HPOZ	CHC-2016-1836-MA	C-128287	N/A	N/A	10	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Single-family	5081015017	$685,000	$955,086	-$270,086	-$300	$2,755	28.28%	Moderate	5.17	Medium to High Barriers
848	1216 S CRESCENT HEIGHTS BLVD	2016	South Carthay	N/A	N/A	HPOZ	CHC-2016-1837-MA	C-128288	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087016026	$485,000	$1,173,814	-$688,814	-$764	$7,026	58.68%	High	7.19	Low to Medium Barriers
849	4784 W CROMWELL AVE	2016	N/A	1117	Welfer Res.	HCM	CHC-2016-1838-MA	C-128289	N/A	N/A	4	Hollywood	RE11-1	Yes	No	Single-family	5588016027	$570,000	$1,639,418	-$1,069,418	-$1,186	$10,908	65.23%	High	7.43	Low to Medium Barriers
850	5715 N FIGUEROA ST	2016	Highland Park -	N/A	N/A	HPOZ	CHC-2016-1856-	C-128290	Yes	N/A	1	Northeast Los Angeles	[Q]C4-2D-HPOZ	No	No	Commercial	5492001015	$9,351,000	$10,950,000	-$1,599,000	-$1,773	$16,310	14.60%	Low	5.77	Medium to High Barriers
851	1115 S GRAMERCY PL	2016	Country Club Park	N/A	N/A	HPOZ	CHC-2016-1857-MA	C-128291	N/A	N/A	10	Wilshire	R1-1	No	No	Single-family	5081026013	$386,000	$819,910	-$433,910	-$481	$4,426	52.92%	High	5.61	Medium to High Barriers
852	4550 N GRIFFIN AVE	2016	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2016-1858-MA	C-128292	N/A	N/A	1	Northeast Los Angeles	[Q]RD3-1D-HPOZ	Yes	No	Multi-family	5303005004	$502,000	$758,249	-$256,249	-$284	$2,614	33.79%	Moderate	5.95	Medium to High Barriers
853	701 S HILL ST	2016	N/A	953	Foreman & Clark Bldg.	HCM	CHC-2015-1597-MA	C-128294	N/A	Downtown Los Angeles	14	Central City	C5-4D	No	Yes	Commercial	5144013020	$29,000,000	$65,794,000	-$36,794,000	-$40,808	$375,299	55.92%	High	6.79	Low to Medium Barriers
854	808 S HOBART BLVD	2016	N/A	960	Ashby Apts	HCM	CHC-2016-1860-MAEX	C-128293	Yes	N/A	10	Wilshire	R4-2	Yes	Yes	Multi-family	5093017031	$5,808,000	$8,888,677	-$3,080,677	-$3,417	$31,423	34.66%	Moderate	5.04	Medium to High Barriers
855	6253 W HOLLYWOOD BLVD	2016	N/A	1088	Bank of Hollywood /Equitable Bldg.	HCM	CHC-2015-1606-MA	C-128295	N/A	Hollywood	13	Hollywood	C4-2D-SN	No	Yes	Condominium	5546030036-5546030103	$25,557,101	$56,184,002	-$30,626,901	-$33,968	$312,394	54.51%	High	6.13	Low to Medium Barriers
856	6820 W IRIS CIR	2016	Whitley Heights	N/A	N/A	HPOZ	CHC-2016-1861-MA	C-128296	N/A	N/A	4	Hollywood	RD2-1XL-HPOZ	Yes	Yes	Single-family	5576002024	$613,000	$1,601,175	-$988,175	-$1,096	$10,079	61.72%	High	6.79	Low to Medium Barriers
857	800 S LA BREA AVE	2016	N/A	1020	Firestone Bldg	HCM	CHC-2016-1867-MA	C-128297	N/A	N/A	4	Wilshire	C2-1	No	No	Commercial	5084003001	$3,173,011	$3,173,011	$0	$0	$0	0.00%	No Savings	6.49	Low to Medium Barriers
858	2700 S LA SALLE AVE	2016	N/A	1104	Hammers Res.	HCM	CHC-2016-1870-MA	C-128298	N/A	N/A	8	South Los Angeles	R1R3-O-CPIO	Yes	No	Single-family	5053021001	$447,000	$813,194	-$366,194	-$406	$3,735	45.03%	Moderate	5.16	Medium to High Barriers

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859	154 S LARCHMONT BLVD	2016	Windsor Square	N/A	N/A	HPOZ	CHC-2016-1868-MA	C-128299	N/A	N/A	4	Wilshire	R1-1-HPOZ	Yes	No	Single-family	5515023009	$536,000	$1,266,628	-$730,628	-$810	$7,452	57.68%	High	7.89	Low Barriers
860	17013 W LISETTE ST	2016	Balboa Highlands	N/A	N/A	HPOZ	CHC-2016-1871-MA	C-128300	N/A	N/A	12	Granada Hills - Knollwood	RE11-1	Yes	No	Single-family	2602017002	$325,000	$806,409	-$481,409	-$534	$4,910	59.70%	High	7.8	Low Barriers
861	1547 S MANHATTAN PL	2016	N/A	627	John F. Powers Res.	HCM	CHC-2016-1873-MA	C-128301	N/A	N/A	10	South Los Angeles	R2-1	Yes	No	Multi-family	5073009007	$776,000	$1,299,979	-$523,979	-$581	$5,345	40.31%	Moderate	4.72	Medium to High Barriers
862	3118 W MONT CLAIR ST	2016	Jefferson Park	N/A	N/A	HPOZ	CHC-2016-1872-MA	C-128302	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	RD3-1-O-HPOZ	No	No	Single-family	5052010018	$95,000	$222,851	-$127,851	-$142	$1,304	57.37%	High	5.4	Medium to High Barriers
863	1700 S OXFORD AVE	2016	Harvard Heights	N/A	N/A	HPOZ	CHC-2016-1875-MA	C-128303	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	Yes	No	Single-family	5074017005	$336,000	$571,433	-$235,433	-$261	$2,401	41.20%	Moderate	4.68	Medium to High Barriers
864	433 S SPRING ST	2016	N/A	385	Title Insurance & Trust Company	HCM	CHC-2016-2857-MA	C-128304	N/A	Downtown Los Angeles	14	Central City	[Q]C4-4D	No	Yes	Commercial	5149024026	$59,200,000	$85,321,123	-$26,121,123	-$28,971	$266,435	30.62%	Moderate	6.39	Low to Medium Barriers
865	5863 W TUXEDO TER	2016	N/A	1094	Building and Annex	HCM	CHC-2016-1876-MA	C-128305	N/A	N/A	4	Hollywood	R1-1	Yes	Yes	Single-family	5580023034	$340,000	$995,140	-$655,140	-$727	$6,682	65.83%	High	7.69	Low Barriers
866	1847 S VIRGINIA RD	2016	La Fayette Square	N/A	N/A	HPOZ	CHC-2016-1880-MA	C-128306	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	Yes	No	Single-family	5071007069	$493,000	$850,000	-$357,000	-$396	$3,641	42.00%	Moderate	5.49	Medium to High Barriers
867	940 N WEST KENSINGTON RD	2016	Angelino Heights	N/A	N/A	HPOZ	CHC-2016-1862-MA	C-128309	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Single-family	5405004004	$436,000	$1,054,180	-$618,180	-$686	$6,305	58.64%	High	5.82	Medium to High Barriers
868	1142 N WEST KENSINGTON RD	2016	Angelino Heights	N/A	N/A	HPOZ	CHC-2016-1866-MA	C-128308	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Single-family	5404023002	$535,000	$955,086	-$420,086	-$466	$4,285	43.98%	Moderate	5.82	Medium to High Barriers
869	6711 W WHITLEY TER	2016	Whitley Heights	N/A	N/A	HPOZ	CHC-2016-1877-MA	C-128307	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5575014004	$504,000	$780,166	-$276,166	-$306	$2,817	35.40%	Moderate	6.79	Low to Medium Barriers
870	2317 W 21ST ST	2017	Western Heights	N/A	N/A	HPOZ	CHC-2017-891-MA	C-130088	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5073027024	$426,000	$1,019,591	-$593,591	-$658	$6,055	58.22%	High	4.71	Medium to High Barriers
871	2022 W 27TH ST	2017	Jefferson Park	N/A	N/A	HPOZ	CHC-2017-893-MA	C-130089	N/A	N/A	10	South Los Angeles	RD2-1-O-HPOZ	Yes	No	Single-family	5053002027	$237,000	$353,786	-$116,786	-$130	$1,191	33.01%	Moderate	5.75	Medium to High Barriers
872	2368 W 31ST ST	2017	Jefferson Park	N/A	N/A	HPOZ	CHC-2017-897-MA	C-130090	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-O-HPOZ	No	No	Single-family	5052006019	$254,000	$601,767	-$347,767	-$386	$3,547	57.79%	High	5.4	Medium to High Barriers
873	1215 S 3RD AVE	2017	Country Club Park	N/A	N/A	HPOZ	CHC-2017-888-MA	C-130086	N/A	N/A	10	Wilshire	RD1.5-1-O	No	No	Single-family	5081015023	$441,000	$954,023	-$513,023	-$569	$5,233	53.77%	High	5.17	Medium to High Barriers
874	215 W 7TH ST	2017	N/A	1089	Bartlett Building	HCM	CHC-2015-1571-MA	C-130087	N/A	Downtown Los Angeles	14	Central City	C5-4D	Yes	Yes	Condominium	5144026023-5144026162	$26,865,099	$59,483,349	-$32,618,250	-$36,177	$332,706	54.84%	High	6.79	Low to Medium Barriers
875	432 S ARDEN BLVD	2017	Windsor Square	N/A	N/A	HPOZ	CHC-2017-2792-	C-130091	Yes	N/A	4	Wilshire	RE11-1-HPOZ	Yes	No	Single-family	5505019004	$747,000	$2,553,613	-$1,806,613	-$2,004	$18,427	70.75%	High	7.89	Low Barriers
876	244 S AVENUE 24	2017	Lincoln Heights	N/A	N/A	HPOZ	CHC-2017-904-MA	C-130092	N/A	N/A	1	Northeast Los Angeles	RD1.5-1-HPOZ	No	No	Single-family	5204005028	$175,000	$342,291	-$167,291	-$186	$1,706	48.87%	Moderate	4.92	Medium to High Barriers
877	6151 W BARROWS DR	2017	Carthay Circle	N/A	N/A	HPOZ	CHC-2017-907-MA	C-130093	N/A	N/A	5	Wilshire	R1-1-O-HPOZ	Yes	No	Single-family	5088017031	$300,000	$957,082	-$657,082	-$729	$6,702	68.65%	High	7.35	Low to Medium Barriers

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878	1111 S BROADWAY	2017	N/A	178	Los Angeles Herald-Examiner Building	HCM	CHC-2017-908-MA	C-130094	N/A	Downtown Los Angeles	14	Central City	C2-4D-O	No	Yes	Industrial	5139019035	$15,300,000	$15,300,000	$0	$0	$0	0.00%	No Savings	6.76	Low to Medium Barriers
879	4109 N GLENALBYN DR	2017	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2017-918-MA	C-130098	N/A	N/A	1	Northeast Los Angeles	R1-1-HPOZ	Yes	No	Multi-family	5465021010	$354,000	$681,462	-$327,462	-$363	$3,340	48.05%	Moderate	6.27	Low to Medium Barriers
880	1230 S GRAMERCY PL	2017	Country Club Park	N/A	N/A	HPOZ	CHC-2017-920-MA	C-130099	N/A	N/A	10	Wilshire	RE9-1	No	No	Single-family	5081028010	$470,700	$1,316,200	-$845,500	-$938	$8,624	64.24%	High	5.61	Medium to High Barriers
881	2400 S GRAMERCY PL	2017	West Adams Terrace	N/A	N/A	HPOZ	CHC-2017-922-MA	C-130100	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5058011016	$598,000	$1,508,580	-$910,580	-$1,010	$9,288	60.36%	High	4.66	Medium to High Barriers
882	1123 S HAYWORTH AVE	2017	Carthay Square	N/A	N/A	HPOZ	CHC-2017-925-MA	C-130101	N/A	N/A	5	Wilshire	R2-1-O-HPOZ	Yes	No	Single-family	5087026005	$673,000	$1,252,755	-$579,755	-$643	$5,914	46.28%	Moderate	7.19	Low to Medium Barriers
883	1810 N LUCILE AVE	2017	N/A	1133	S.T. Falk Apts.	HCM	CHC-2017-915-MA	C-130095	N/A	N/A	13	Silver Lake - Echo Park - Elysian Valley	R3-1VL	Yes	No	Multi-family	5429017013	$849,000	$2,546,898	-$1,697,898	-$1,883	$17,319	66.67%	High	7.05	Low to Medium Barriers
884	1826 N LUCILE AVE	2017	N/A	1118	Sachs Apts.	HCM	CHC-2017-2796-MAEX	C-130097	Yes	N/A	13	Silver Lake - Echo Park - Elysian Valley	R3-1VL	Yes	No	Multi-family	5429017027	$1,978,000	$3,186,856	-$1,208,856	-$1,341	$12,330	37.93%	Moderate	7.05	Low to Medium Barriers
885	640 S MAIN ST	2017	N/A	1140	Hotel Cecil	HCM	CHC-2017-939-MA	C-130102	N/A	Downtown Los Angeles	14	Central City	C2-2D	Yes	Yes	Commercial	5148021010	$35,581,631	$35,581,631	$0	$0	$0	0.00%	No Savings	6.49	Low to Medium Barriers
886	5128 W MARATHON ST	2017	N/A	390	Jardinette Apts.	HCM	CHC-2017-2794-	C-130103	Yes	N/A	13	Hollywood	RD1.5-1XL	Yes	No	Multi-family	5535017014	$5,915,000	$6,684,570	-$769,570	-$854	$7,850	11.51%	Low	4.78	Medium to High Barriers
887	800 N MELROSE HILL	2017	Melrose Hill	N/A	N/A	HPOZ	CHC-2017-945-MA	C-130104	N/A	N/A	13	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5535026015	$322,000	$995,509	-$673,509	-$747	$6,870	67.65%	High	4.91	Medium to High Barriers
888	221 S NORTON AVE	2017	Windsor Square	N/A	N/A	HPOZ	CHC-2017-2793-MAEX	C-130106	Yes	N/A	4	Wilshire	R1-1-HPOZ	Yes	No	Single-family	5516003015	$1,046,000	$2,569,140	-$1,523,140	-$1,689	$15,536	59.29%	High	6.46	Low to Medium Barriers
889	443 S SAN PEDRO ST	2017	N/A	1139	Catalina Swimwear Bldg	HCM	CHC-2017-974-MA	C-130108	N/A	Downtown Los Angeles	14	Central City	[Q]R5-2D	No	Yes	Multi-family	5148011018	$10,100,000	$20,214,950	-$10,114,950	-$11,218	$103,172	50.04%	High	5.39	Medium to High Barriers
890	5631 E TEHAMA ST	2017	N/A	1107	Coughlin House	HCM	CHC-2017-980-MA	C-130105	N/A	N/A	14	Northeast Los Angeles	R1-1	Yes	No	Single-family	5485001024	$212,000	$500,253	-$288,253	-$320	$2,940	57.62%	High	6.34	Low to Medium Barriers
891	125 S WILTON DR	2017	N/A	1128	125 S Wilton Dr Res.	HCM	CHC-2017-989-MA	C-130110	N/A	N/A	4	Wilshire	R1-1	Yes	No	Single-family	5516011011	$508,000	$1,171,644	-$663,644	-$736	$6,769	56.64%	High	6.46	Low to Medium Barriers
892	2524 S 11TH AVE	2018	West Adams	N/A	N/A	HPOZ	CHC-2018-1326-MA	C-132112	N/A	N/A	10	West Adams - Baldwin Hills -	R1-1-HPOZ	Yes	No	Single-family	5059011010	$469,517	$900,000	-$430,483	-$477	$4,391	47.83%	Moderate	4.6	Medium to High Barriers
893	2910 W 15TH ST	2018	Harvard Heights	N/A	N/A	HPOZ	CHC-2018-1334-MA	C-132113	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	Yes	No	Single-family	5074010008	$397,000	$759,491	-$362,491	-$402	$3,697	47.73%	Moderate	4.72	Medium to High Barriers
894	2378 W 23RD ST	2018	West Adams Terrace	N/A	N/A	HPOZ	CHC-2018-1337-MA	C-132114	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	Yes	No	Single-family	5058002003	$275,000	$880,260	-$605,260	-$671	$6,174	68.76%	High	4.66	Medium to High Barriers
895	2158 W 24TH ST	2018	West Adams Terrace	N/A	N/A	HPOZ	CHC-2018-1335-MA	C-132115	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	No	No	Single-family	5058006008	$267,000	$1,020,204	-$753,204	-$835	$7,683	73.83%	High	4.66	Medium to High Barriers

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896	2186 W 24TH ST	2018	West Adams Terrace	N/A	N/A	HPOZ	CHC-2018-1341-MA	C-132116	N/A	N/A	10	South Los Angeles	R1-1-O-HPOZ	Yes	No	Single-family	5058006005	$413,000	$1,038,603	-$625,603	-$694	$6,381	60.24%	High	4.66	Medium to High Barriers
897	922 S 3RD AVE	2018	Wilshire Park	N/A	N/A	HPOZ	CHC-2018-1243-MA	C-132108	N/A	N/A	4	Wilshire	R1-1-HPOZ	Yes	No	Single-family	5092019004	$267,000	$1,013,349	-$746,349	-$828	$7,613	73.65%	High	5.56	Medium to High Barriers
898	3513 W 6TH ST	2018	N/A	280	Chapman Park Studio	HCM	CHC-2018-1273-MAEX	C-132110	Yes	N/A	10	Wilshire	C2-1	Yes	No	Commercial	5502019019	$4,843,000	$10,346,778	-$5,503,778	-$6,104	$56,139	53.19%	High	5.34	Medium to High Barriers
899	416 W 8TH ST	2018	N/A	1145	Commercial Exchange	HCM	CHC-2018-1409-MA	C-132111	N/A	Downtown Los Angeles	14	Central City	C5-4D	No	Yes	Commercial	5144018030	$16,893,701	$16,893,701	$0	$0	$0	0.00%	No Savings	6.39	Low to Medium Barriers
900	104 N AVENUE 56	2018	Highland Park - Garvanza	282	N/A	HCM and HPOZ	CHC-2018-1406-MAEX	C-132118	Yes	N/A	1	Northeast Los Angeles	C2-2D-HPOZ	No	Yes	Commercial	5468024010	$4,814,500	$5,425,502	-$611,002	-$678	$6,232	11.26%	Low	5.48	Medium to High Barriers
901	212 N AVENUE 57	2018	Highland Park - Garvanza	556	N/A	HCM and HPOZ	CHC-2018-1351-MA	C-132119	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	Yes	No	Multi-family	5468033037	$466,000	$867,000	-$401,000	-$445	$4,090	46.25%	Moderate	5.77	Medium to High Barriers
902	8527 W BRIER DR	2018	N/A	1152	Hogan Residence	HCM	CHC-2018-1266-MA	C-132120	N/A	N/A	4	Hollywood	R1-1	Yes	No	Single-family	5556012028	$458,000	$1,300,499	-$842,499	-$934	$8,593	64.78%	High	8.21	Low Barriers
903	2317 S BUDLONG AVE	2018	Adams - Normandie	N/A	N/A	HPOZ	CHC-2018-1350-MA	C-132121	N/A	N/A	8	South Los Angeles	R2-1-HPOZ	No	No	Single-family	5054018011	$420,000	$770,434	-$350,434	-$389	$3,574	45.49%	Moderate	4.61	Medium to High Barriers
904	1708 S HARVARD BLVD	2018	Harvard Heights	N/A	N/A	HPOZ	CHC-2018-1356-MA	C-132122	N/A	N/A	10	South Los Angeles	R2-1-HPOZ	Yes	No	Single-family	5074022009	$382,000	$902,700	-$520,700	-$578	$5,311	57.68%	High	5.22	Medium to High Barriers
905	6809 W IRIS CIR	2018	Whitley Heights	N/A	N/A	HPOZ	CHC-2018-1382-MA	C-132123	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5576002027-5576002028	$412,000	$1,131,255	-$719,255	-$798	$7,336	63.58%	High	6.79	Low to Medium Barriers
906	1200 S LA JOLLA AVE	2018	South Carthay	N/A	N/A	HPOZ	CHC-2018-1384-MA	C-132124	N/A	N/A	5	Wilshire	RD1.5-1-O-HPOZ	Yes	No	Multi-family	5087010011	$818,000	$1,872,720	-$1,054,720	-$1,170	$10,758	56.32%	High	7.19	Low to Medium Barriers
907	401 S MAIN ST	2018	N/A	271	Farmers and Merchant	HCM	CHC-2018-1261-MA	C-132125	N/A	Downtown Los Angeles	14	Central City	[Q]C4-4D	No	Yes	Commercial	5149022013-5149022014	$6,808,459	$9,072,067	-$2,263,608	-$2,511	$23,089	24.95%	Low	6.49	Low to Medium Barriers
908	1222 S ORANGE DR	2018	Miracle Mile	N/A	N/A	HPOZ	CHC-2018-1324-MA	C-132128	N/A	N/A	10	Wilshire	R2-1-O	Yes	Yes	Multi-family	5084028027	$382,000	$1,151,410	-$769,410	-$853	$7,848	66.82%	High	6.08	Low to Medium Barriers
909	1632 N ORANGE GROVE AVE	2018	Sunset Square	N/A	N/A	HPOZ	CHC-2018-1388-MA	C-132127	N/A	N/A	4	Hollywood	R1-1	Yes	No	Single-family	5551015011	$619,000	$1,487,509	-$868,509	-$963	$8,859	58.39%	High	7.01	Low to Medium Barriers
910	6137 E PIEDMONT AVE	2018	Highland Park - Garvanza	N/A	N/A	HPOZ	CHC-2017-968-MA	C-130107	N/A	N/A	1	Northeast Los Angeles	RD2-1-HPOZ	No	No	Single-family	5484033011	$202,000	$694,466	-$492,466	-$546	$5,023	70.91%	High	6.01	Low to Medium Barriers
911	1053 S REDONDO BLVD	2018	Miracle Mile	N/A	N/A	HPOZ	CHC-2018-1390-MA	C-132129	N/A	N/A	10	Wilshire	R2-1-O	Yes	No	Multi-family	5084015011	$917,000	$1,109,187	-$192,187	-$213	$1,960	17.33%	Low	6.49	Low to Medium Barriers
912	1457 W RIDGE WAY	2018	Angelino Heights	N/A	N/A	HPOZ	CHC-2018-1391-MA	C-132130	N/A	N/A	1	Silver Lake - Echo Park -	R2-1VL-HPOZ	Yes	No	Multi-family	5405009023	$879,000	$1,248,480	-$369,480	-$410	$3,769	29.59%	Moderate	5.82	Medium to High Barriers

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913	735 W ROME DR	2018	N/A	717	Jeffries House	HCM	CHC-2018-1392-MA	C-132131	N/A	N/A	1	Northeast Los Angeles	R1-1	Yes	No	Single-family	5466035005	$479,000	$1,432,630	-$953,630	-$1,058	$9,727	66.56%	High	6.8	Low to Medium Barriers
914	1219 S SYCAMORE AVE	2018	Miracle Mile	N/A	N/A	HPOZ	CHC-2018-1394-MA	C-132132	N/A	N/A	10	Wilshire	R2-1-O	Yes	No	Multi-family	5084030031	$581,000	$1,586,610	-$1,005,610	-$1,115	$10,257	63.38%	High	6.08	Low to Medium Barriers
915	800 E TRACTION AVE	2018	N/A	1154	Joannes Brothers Company Building	HCM	CHC-2018-1396-MAEX	C-132133	Yes	Downtown Los Angeles	14	Central City North	M3-1-RIO	No	Yes	Industrial	5163013001	$6,885,000	$13,265,100	-$6,380,100	-$7,076	$65,077	48.10%	Moderate	7.04	Low to Medium Barriers
916	1607 S WELLINGTON RD	2018	La Fayette Square	N/A	N/A	HPOZ	CHC-2018-1397-MA	C-132134	N/A	N/A	10	West Adams - Baldwin Hills - Leimert	R1-1-HPOZ	No	No	Single-family	5071005016	$397,000	$972,773	-$575,773	-$639	$5,873	59.19%	High	5.49	Medium to High Barriers
917	1736 S WELLINGTON RD	2018	La Fayette Square	N/A	N/A	HPOZ	CHC-2018-1398-MA	C-132135	N/A	N/A	10	West Adams - Baldwin Hills -	R1-1-HPOZ	No	No	Single-family	5071003019	$504,000	$1,402,500	-$898,500	-$997	$9,165	64.06%	High	5.49	Medium to High Barriers
918	6620 W WHITLEY TER	2018	Whitley Heights	N/A	N/A	HPOZ	CHC-2018-1400-MA	C-132136	N/A	N/A	4	Hollywood	R1-1-HPOZ	Yes	No	Single-family	5575009005	$611,000	$1,452,791	-$841,791	-$934	$8,586	57.94%	High	6.79	Low to Medium Barriers
919	1279 S WINDSOR BLVD	2018	Oxford Square	N/A	N/A	HPOZ	CHC-2018-1401-MA	C-132137	N/A	N/A	10	Wilshire	R1-1-O	Yes	No	Single-family	5082016041	$275,000	$821,372	-$546,372	-$606	$5,573	66.52%	High	6.45	Low to Medium Barriers
920	1271 S 3RD AVE	2019	Country Club Park	N/A	N/A	HPOZ	CHC-2019-1343-MA	C-134325	N/A	N/A	10	Wilshire	RD1.5-1-O	No	No	Single-family	5081014009	$656,648	$1,508,886	-$852,238	-$945	$8,693	56.48%	High	5.17	Medium to High Barriers
921	2656 N ABERDEEN AVE	2019	N/A	1171	Aberdeen House	HCM	CHC-2019-1328-MAEX	C-134324	Yes	N/A	4	Hollywood	RE11-1	No	No	Single-family	5588030017	$1,572,088	$4,962,300	-$3,390,212	-$3,760	$34,580	68.32%	High	7.29	Low to Medium Barriers
922	921 S BEACON ST	2019	Vinegar Hill	252	N/A	HCM and HPOZ	CHC-2019-1291-MAEX	C-134323	Yes	N/A	15	San Pedro	[Q]C2-1XL	Yes	No	Industrial	7455025019	$3,884,987	$9,500,000	-$5,615,013	-$6,228	$57,273	59.11%	High	5.41	Medium to High Barriers
923	718 N ECHO PARK AVE	2019	Angelino Heights	N/A	N/A	HPOZ	CHC-2019-1178-MA	C-134322	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	No	No	Single-family	5404022002	$250,680	$918,000	-$667,320	-$740	$6,807	72.69%	High	5.82	Medium to High Barriers
924	2052 S HOBART BLVD	2019	West Adams Terrace	N/A	N/A	HPOZ	CHC-2019-1375-MA	C-134321	N/A	N/A	10	South Los Angeles	[Q]R4-1-HPOZ	No	No	Single-family	5074032006	$389,327	$1,250,000	-$860,673	-$955	$8,779	68.85%	High	4.71	Medium to High Barriers
925	1314 W KELLAM AVE	2019	Angelino Heights	N/A	N/A	HPOZ	CHC-2019-1370-MA	C-134320	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	R2-1VL-HPOZ	Yes	No	Multi-family	5405017010	$374,594	$1,060,283	-$685,689	-$760	$6,994	64.67%	High	5.98	Medium to High Barriers
926	1315 W KELLAM AVE	2019	Angelino Heights	N/A	N/A	HPOZ	CHC-2019-1337-MA	C-134319	N/A	N/A	1	Silver Lake - Echo Park - Elysian Valley	RD2-1VL-HPOZ	Yes	No	Multi-family	5405018008	$267,790	$936,360	-$668,570	-$742	$6,819	71.40%	High	5.98	Medium to High Barriers
927	818 N MELROSE HILL	2019	Melrose Hill	N/A	N/A	HPOZ	CHC-2019-1341-MA	C-134318	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535026018	$385,048	$1,265,012	-$879,964	-$976	$8,976	69.56%	High	4.91	Medium to High Barriers
928	836 N MELROSE HILL	2019	Melrose Hill	N/A	N/A	HPOZ	CHC-2019-1330-MA	C-134317	N/A	N/A	13	Hollywood	R1-1-HPOZ	No	No	Single-family	5535026021	$309,810	$1,060,800	-$750,990	-$833	$7,660	70.79%	High	4.91	Medium to High Barriers
929	1283 S WINDSOR BLVD	2019	Oxford Square	N/A	N/A	HPOZ	CHC-2019-1179-MA	C-134315	N/A	N/A	10	Wilshire	R1-1-O	No	No	Single-family	5082016042	$360,232	$878,508	-$518,276	-$575	$5,286	59.00%	High	6.45	Low to Medium Barriers
930	855 S SERRANO AVE	2019	N/A	1146	Chateau Chaumont	HCM	CHC-2019-1295-MAEX	C-134316	Yes	N/A	10	Wilshire	R4-2	No	No	Condominium	5093010018-5093010032	$178,117	$460,000	-$281,883	-$313	$2,875	61.28%	High	5.9	Medium to High Barriers

Appendix B:
Summary List of Recommendations

Program Sustainability

Goal 1: Improve Fiscal Sustainability

Strategy 1: Establish System for Fee Collection and Tracking

1. Establish a direct assessment with the Los County Auditor-Controller to collect contract maintenance fees.
2. Create a dedicated Mills Act account to ensure fee revenue is directly supporting the program.
3. Amend pre-2014 Mills Act contracts to enable fee collection under state law and current City ordinance.

Strategy 2: Expand Program Fees

4. Develop additional fee to recover administrative costs for contract noncompliance.
5. Refine existing fee schedule to address variable costs associated with the periodic inspections of different property types.

Goal 2: Facilitate Compliance with State Law and Mills Act Ordinance

Strategy 1: Expand Enforcement Policies

6. Amend the Mills Act ordinance to include additional contract compliance and enforcement provisions, and utilize the Los Angeles Municipal Code for contract enforcement.

Strategy 2: Facilitate Contract Compliance

7. Establish Mills Act compliance and noncompliance protocols and procedures that document and track compliance and follow-up correspondence.
8. Pursue cancellation of habitually noncompliant properties due to non-responsive owners.

Goal 3: Expand Program Staffing

Strategy 1: Provide Additional Staffing to Effectively Manage the Program

9. Expand staffing to include 1 full-time Architect, 1 full-time City Planning Associate/Assistant, and 1 full-time Management Analyst, utilizing program revenue.

Goal 4: Refine Program Capacity

Strategy 1: Establish a Sustainable, Manageable Number of Contracts

10. Enact a cap of 1,500 Mills Act contracts.
11. Record 25 contracts per year to align with the General Plan Housing Element goal.
12. Revise contract term limits to be 20-years for new contracts and not renew existing contracts older than 10 years.

Strategy 2: Address Program's Fiscal Capacity

13. Update the Mills Act ordinance to eliminate the annual threshold of unrealized property tax revenue.
14. Increase pre-contract assessed value limit for single-family dwellings from $1,500,00 to $2,500,000.
15. Separate pre-contract assessed value limits for multi-family buildings from commercial and industrial buildings, and increase pre-contract assessed value limits for multi-family buildings to $10,000,000.
16. Eliminate the current valuation exemption areas of Hollywood and Greater Downtown Los Angeles, and apply the exemption from property valuation limits to Adaptive Reuse Ordinance projects citywide.

Strategy 3: Expand Program Eligibility

17. Revise the eligibility requirements to include National and California Register-listed properties, SurveyLA-identified eligible properties, and CPA-, CPIO-, CDO- identified properties.

Goal 5: Address Program Management

Strategy 1: Effectively Manage Data and Expand Communication

18. Create a database system to track individual contracts, contract compliance status, inspections, correspondence with contract holders, fee collection, covenanted affordable units, annual assessment valuations, and ownership email addresses and phone numbers.
19. Maintain a list of Mills Act properties on City Planning's website.
20. Communicate annually with all Mills Act program participants to confirm email addresses and contact information.

Program Equity

Goal 1: Retain and Preserve Affordable Multi-Family Housing

Strategy 1: Prioritize Multi-Family Properties and ARO Projects with Affordable Housing

21. Codify prioritization of applications from multi-family properties and ARO projects with affordable housing components in high barriers to opportunity areas.
22. Track the retention of rental units at affordable rates.
23. Contractually require no net loss of affordable rental units.

Strategy 2: Implement tenant anti-displacement safeguard measures

24. Require the preparation of a tenant retention and tenant habitability plan as part of the contract.

Goal 2: Expand Mills Act Benefit in Areas Facing Higher Barriers to Opportunity

Strategy 1: Prioritize New Contracts in Areas Facing Higher Barriers to Opportunity

25. Add new Priority Consideration Criteria for properties in high barriers to opportunity areas.
26. Establish an annual application goal to encourage participation in areas facing higher barriers to opportunity.
27. Collect socio-demographic data as part of the application to assess equity among applicants.

Strategy 2: Prioritize Outreach to Underserved Areas

28. Prepare and implement a strategic outreach plan that provides education, access, and multilingual support to equity priority implementation areas.
29. Identify dedicated equity-related funding sources.

Strategy 3: Lessen Barriers to Program Participation

30. Reduce or eliminate application fees for properties located in equity priority areas.
31. Exempt citywide equity priority properties from the assessed valuation limits.
32. Provide for program assessments every five years to ensure program goals and efficacy are being met.

Appendix C:
Summary of Municipality Survey Responses

Appendix N
SUMMARY OF MUNICIPALITY SURVEY RESPONSES

Below is a table summarizing total of 30 surveyed municipalities with Mills Act programs in California.

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
Section 1: Background				
1-7	When was the municipality's Mills Act Program established?	The response range of known years ranges from 1972 at the earliest to 2016 at the latest. The responses appear to be a consistent range of programs established between 1984 and 2006. The 1990s and 2000s both saw 11 responses each.	The City of Los Angeles Mills Act program was established in 1996.	
Section 2: Program Admin				
2-1	On average, how many Mills Act applications are typically received in a year?	27 of 30 surveyed municipalities receive less than 15 Mills Act applications each year. Only 3 exceed that number: City of San Diego (50, est. 1995), City of Pasadena (30, est. 2002), and City of Long Beach (20, est. 1993). There does not appear to be a correlation between how long a Mills Act program has been established and how many applications are received annually.		
2-3	How many Mills Act contracts are currently active in your municipality?	13 of 30 surveyed municipalities have greater than 50 active Mills Act contracts. 7 surveyed municipalities have greater than 100 active Mills Act contracts. Only 3 surveyed municipalities exceed 200 active Mills Act contracts: City of San Diego (1,557), City of Pasadena (360), and City of Orange (340). Note that City of San Diego and City of Pasadena receive the 2 highest total Mills Act applications annually.	The City of Los Angeles currently has 926-930 active Mills Act contracts. Might be worth it to have a separate table that only compares survey responses of Cities of San Diego, Pasadena, and Orange with City of Los Angeles.	Follow-up to San Diego, do these numbers include individual condominiums or one contract with an HOA? San Diego: "This # includes individual condominiums. Ex: 666 Upas is a historically designated resource and has 40 units under the Mills Act. That "40" was included in the 1,557 total. … Per our records, there are 197 condo units under the Mills Act across 6 historically designated buildings."
2-4	Does your municipality track fiscal revenue loss each year due to the Mills Act program?	12 surveyed municipalities track fiscal revenue loss from the Mills Act program, while 18 do not. Of the 3 surveyed municipalities with the largest Mills Act programs, only the		

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		City of Pasadena tracks fiscal revenue loss. The City of San Diego and City of Orange do not.		
2-5	Please provide information on eligibility criteria for the Mills Act program in your municipality, and how applications are evaluated.	Generally, a property must be found eligible or listed in the National Register, California Register, or local register to be eligible for the Mills Act. Some surveyed municipalities require that the property have been included in previous historic inventories or designated locally, while others only require that they be identified as eligible. City of Claremont: "The subject property must be residential." City of Long Beach: "Applications are reviewed in categories (SFR, MFR, Commercial, etc.) with caps by category as well."	Potential recommendation: Cap not just by total number of applications but by category for prioritization of MFR with affordable component.	
Section 3: Sunsetting Contracts				
3-1	How many contracts had a property owner submit a letter of nonrenewal to terminate the contract? Please describe.	Almost all surveyed municipalities have seen 1 or no Mills Act contracts terminated by a property owner. The City of San Diego is the only outlier, with 17 properties having submitted documentation indicating that they would like to enter into non-renewal.		Follow-up to San Diego, what prompted owners submitting documentation to enter into non-renewal? Were owners notified they weren't receiving benefit or other reason? San Diego: "The documentation submitted did not include why they wanted to enter into non-renewal and only stated that they would like to and were the current homeowner. Prior to 2008, the 5-year monitoring fee was not required so it is my understanding some homeowners who had a MA done prior to 2008 and had owned the property for a long period of time were not seeing benefits when they had to pay the monitoring fee. Their taxes

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
				were low enough without the MA in place that the 5-year monitoring fee made it not worth it. The Monitoring Fee used to be close to $500, now it is $234."
3-2	How many contracts had a letter of nonrenewal sent by the municipality to the property owner to terminate the contract? Please describe.	All surveyed municipalities have either sent 1 or no letter terminating a Mills Act contract. The City of Long Beach is planning to begin a non-renewal on dozens of contracts in the coming year that have completed their work plans and have no further work to complete yet are currently still receiving a tax benefit.	Not many examples of contracts being terminated, either by the property owner or the municipality	Follow-up to Long Beach, is there an appeal process? Long Beach: "Mills Act non-renewals are a last resort. Staff requests additional work plan items and notifies the applicant if they are insufficient. There is not a formal appeal process but the non-renewal is a council action and the property owner can testify and request council to take an alternative action to non-renewal."
3-3	What are reasons for cancelling contracts with letters of nonrenewal? Select all that apply.	Only 11 surveyed municipalities responded with reasons for cancelling contracts with letters of non-renewal. Of these 11 responses, 10 note property owners either finding no benefit to the program or finding that there is lower than expected or no tax savings. 6 noted chronic code compliance issues as a cause for non-renewal.		
3-4	How many contracts have been cancelled due to breach of contract? Please describe.	None. The City of Redondo Beach considered it, but ultimately sent a letter of non-renewal.		San Diego: Non-renewal has been threatened and a few have been put into NR for not paying their MA monitoring fees. Cancellation isn't as the house would need to be in absolutely awful condition and since we are monitoring the properties every 5 years – we usually

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
				intervene with CE and threaten NR before that. Cancellation also comes with a fine of 12.5% of the fair market value of the home and must be discussed at a public hearing. There are steps staff takes to prevent cancellation and get the property consistent with the Standards again.
Section 4: Periodic Inspections, Compliance, Monitoring				
4-1	How are periodic inspections conducted in compliance with the 2012 changes in the State legislation?	11 surveyed municipalities use self-reporting from property owners, including the use of mail-out questionnaires. 15 surveyed municipalities have staff conducting inspections, while 2 (Cities of Gilroy and West Hollywood) have consultants conduct inspections.		
4-2	Which of the following do periodic inspections of properties cover? Select all that apply: - Exterior from public right-of-way only - Exterior of property only - Exterior and interior of property - We do not conduct inspections	6 surveyed municipalities reported that they do not conduct inspections or the question was not applicable. Note that this includes the City of Palm Springs, where contracts require periodic inspections, but low staffing limits the ability to do the inspections. 8 surveyed municipalities do inspections of the exterior from the public right-of-way only, 7 inspect exterior only outside of the public right-of way, and 8 inspect both the exterior and interior of the property. The City of San Diego does a mix of all 3 inspections, though interiors are only reviewed when interior elements were included in the designation. Of the other 2 surveyed municipalities with the largest number of Mills Act contracts, the City of Pasadena inspects both the exterior and interior of the property and the City of Orange inspects the exterior of the property only.		
4-3	How often are periodic inspections conducted?	13 surveyed municipalities do not conduct periodic inspections with any regular frequency. 7 conduct periodic inspections biennially (every 2 years), 6 conduct them annually, and the City of Monterey does not conduct inspections. Note that the number of surveyed municipalities		

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		that selected "no regular frequency" include those that had previously marked that they do not conduct inspections. The City of Claremont conducts inspections annually in the first 10 years of the contract and switch to every 5 years afterwards.		
4-4	How often do periodic inspections find properties in partial compliance or noncompliance?	3 surveyed municipalities (Cities of Arcata, Tustin, and San Juan Capistrano) never find properties in partial compliance or non-compliance, while 1 (City of Benicia) always finds properties in partial compliance or non-compliance. 10 marked "not very often," 5 marked "somewhat often," and 11 were not sure. Of the 3 municipalities with the largest Mills Act Programs, the City of San Diego and the City of Pasadena somewhat often finds properties in partial compliance or non-compliance, while the City of Orange sees partial compliance or non-compliance not very often.		
4-5	What are typical reasons for partial or noncompliance? Select all that apply. - Inappropriate alteration - Noncompliant code issues - Not following Rehabilitation/Maintenance plan	The most common reason for partial or non-compliance is not following the rehabilitation plan, noted by 18 surveyed municipalities. 5 surveyed municipalities each marked non-compliant code issues and inappropriate alteration as a reason for partial or non-compliance.		
4-6	What does the follow-up process look like for partial or noncompliant properties?	Follow-up with partial or non-compliant property includes various levels of communication with property owners, ranging from correction letters being sent to in-person meetings and direct outreach by staff. Some municipalities, such as the Cities of Oakland, Orange, Pasadena, and San Dimas have property owners establish revised rehabilitation plans or timelines to ensure compliance. For the City of San Diego, depending on severity of the issue, staff will report to Code Enforcement.		
4-7	How often do owners correct issues of partial or noncompliance?	12 surveyed municipalities are not sure how often property owners correct issues of partial or non-compliance. 9 find that property owners correct issues very often and 6 find they		

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		correct issues somewhat often. The City of San Diego (1,557 active Mills Act contracts) was the only municipality to find property owners do not correct issues of partial or non-compliance very often. The City of Saratoga (13 active Mills Act contracts) was the only municipality to find that property owners always correct issues.		
4-8	To monitor compliance, how is data tracked? Select all that apply. - Data not tracked - Data tracked by digital database platform managed by the municipality - Data tracked by building permit review - Data tracked by spreadsheet or similar (regularly updated) - Data tracked by spreadsheet or similar (not regularly updated)	10 surveyed municipalities track data using a regularly updated spreadsheet, 6 use a non-regularly updated spreadsheet, 5 use a digital database managed by the municipality, and 5 use building permit review. At least 8 surveyed municipalities do not track data to monitor compliance. The 3 municipalities with the largest Mills Act programs (Cities of San Diego, Pasadena, and Orange) all track their data with a regularly updated spreadsheet. The City of Pasadena also uses a digital database managed by the municipality and building permit review.	Regularly updated spreadsheet being used by the 3 largest programs.	
4-9	Is there coordination in the compliance tracking system between the building department, planning department, or similar?	12 surveyed municipalities responded that compliance is tracked but there is no coordination between the building department, planning department, or similar. Only 4 surveyed municipalities responded that compliance is tracked and there is coordination. The 3 municipalities with the largest Mills Act program (Cities of San Diego, Pasadena, and Orange) all track compliance but do not have coordination between the building department, planning department, or similar.	Coordination an issue all around.	
4-10	What mechanisms are there, if any, to enforce compliance and/or contractual obligations of Mills Act contract holders?	The most used mechanism to enforce compliance is threat of cancellation of contract, noted explicitly by 10 surveyed municipalities, followed by code enforcement, noted by 4. Other mechanisms include various types of financial penalties such as a cancellation fee (City of Ontario) or use of the	Potential recommendation: Cancellation fee	

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		state's 12.5% of property value penalty as a last option (City of Oakland). Some surveyed municipalities will involve other parties in enforcing compliance. The City of Orange sends notice of violations through the City Attorney's office while the City of West Hollywood may have the Code Compliance Division enforce the contract with the assistance of the City Prosecutor in severe cases.	Important to note in report: municipalities that involve other parties in enforcing compliance.	
Section 5: Fee Collection				
5-1	What fees are collected under your municipality's Mills Act program? Select all that apply.	The most common fee collected for the Mills Act Program is the application fee, noted by 18 surveyed municipalities. 9 surveyed municipalities do not collect any fees. Other kinds of fees that were reported include contract recordation (6), periodic inspection (5), administrative (1), enforcement (1), and non-compliance penalty (1). The City of San Gabriel includes a City Architect review deposit as part of its fees.		Possible follow-up to municipalities with fees for: enforcement (1), and non-compliance penalty (1). Follow-up to San Diego, to request enforcement fee in adopted fee schedule San Diego: $756 fee Thus far, they have not collected enforcement of the MA. "If/when staff is doing their site visits/ MA monitoring of the site and we notice a change to the property we will make note of it, research it to see if the change was in fact permitted, and if it was not we will report it to Code Enforcement who will open a case on the property and make sure that the proper permits are applied for. If the owner obviously disregards the CE notice, then CE has

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
				procedures in place (like taking the owner to a hearing) to ensure that they get the permits or heavily penalized. If the owner works with CE and Historical Resource staff to get the correct permits, no fees are accrued and the CE case can be closed once the work is completed." Follow-up to Long Beach, to request non-compliance penalty fee in adopted fee schedule Long Beach: "The current monitoring fees is $205 (fee HP-016) which may apply in all cases, the proposal just approved would waive that general fee but assess a $1,000 non-compliance fee only on those out of compliance after requests to come into compliance. This is our first year collecting a non-compliance fee but we will be sending a demand letter and if its not paid by the third notice we would impose a lien similar to code enforcement actions. Our hope and expectation is that after the first notice property owners will pay the fee and come into compliance."

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
5-3	Is the municipality's program full, partial, or no cost recovery?	10 surveyed municipalities reported having no cost recovery, 7 reported partial cost recovery, and 4 reported full cost recovery. Of the 3 largest Mills Act programs surveyed, the City of Pasadena and City of Orange both reported having a partial cost recovery while City of San Diego was unsure. The 4 surveyed municipalities that reported full cost recovery have comparably smaller Mills Act programs: Ventura (22), National City (18), Sunnyvale (4), and Sierra Madre (1).		
5-4	If the Mills Act program is partial cost recovery, what percentage of the program is subsidized?	7 surveyed municipalities reported partial cost recovery in the previous question. City of Ontario estimates over 90% of its program is subsidized, while City of Long Beach says 50%, depending on the application type and complexity. In the City of Pomona, 0.1% of the assessed value of the property (up to a maximum of $2,470.33) is subsidized. Other municipalities did not provide a percentage but described a mix of fees. City of Laguna Beach subsidizes the $300 staff fee, but eligible property owners are responsible for a $3,000 consultant fee. The City of Oakland has an application fee of $601.29, with the rest of the program subsidized. The City of Orange uses its application fee to cover the staff time to review the application. The City of Pasadena noted partial cost recovery, though left percentage subsidized unknown.		
5-5	Are fees or deposits collected to support the administration of the Mills Act program?	Of the surveyed municipalities, 9 use a fee system only, 2 use a deposit system only, and 4 use both a fee and deposit system. 9 surveyed municipalities have no system in place and 6 were not sure.		
5-6	Do Mills Act contract holders pay a periodic inspection/ contract maintenance fee?	21 surveyed municipalities reported no periodic inspection or contract maintenance fee, 6 had a fee, and 3 were unsure.		
5-7	For periodic inspection/contract maintenance fees, how often are fees collected?	Of the 6 surveyed municipalities where periodic inspection or contract maintenance fees are collected, 2 collect annually (City of Orange, County of Ventura), 1 collects annually and then every 5 years (City of Claremont), 1 collects every 5		

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		years (City of San Diego), and 2 collect during corresponding inspection years (Cities of Long Beach and Oakland).		
5-8	What enables collection of periodic inspection/contract maintenance fees?	5 of the 6 surveyed municipalities that collect periodic inspection or contract maintenance fees, listed in the previous question summary, have contracts that clearly describe periodic inspection or contract maintenance fees will be collected. The City of Oakland reported that Mills Act contracts do not enable collection of period inspection and contract maintenance fees (see following question).	Include periodic inspection and contract maintenance fees in Mills Act contracts to allow for collection	
5-9	If collection of periodic inspection/contract maintenance fees is not enabled in the contract, is there another method, policy, or ordinance that enables collection?	The City of Oakland includes an inspection fee of $100 in the planning/building fee schedule.		
5-10	Do all Mills Act contracts clearly state they are subject to Mills Act ordinance or resolution updates?	About half of the surveyed municipalities (16 of 30) are unclear or not sure if their Mills Act contracts clearly state that they are subject to Mills Act ordinance or resolution updates. 10 said no and only 3 said yes: City of Arcata, City of Tustin, and City of Sierra Madre. The City of Redondo Beach wrote that "the contracts clearly state compliance with the Preservation Ordinance and the Secretary of the Interior's Standards for Rehabilitation."	Potential recommendation: Make clear in ordinance update that all MA contracts are subject to MA ordinance updates?	
5-11	Are there any additional changes to fees or fee collection in the Mills Act program? Please explain.	22 surveyed municipalities reported that there don't appear to be changes to fees or fee collection in the Mills Act program. 2 were unsure. The City of San Diego conducts an audit of fees bi-annually, the City of Claremont may change fees based on changing staff hourly rates, and the City of Pasadena's execution fee is subject to annual cost-of-living adjustments (COLA). The City of Long Beach has its Mills Act program on hold for one year due to escalating tax loss and the cost of compliance on existing contracts.	Consider in recommendation to continue program once equity focus in place and noncompliant properties are resolved.	
Section 6: Equity				
6-1	Which of the following eligibility limitations are incorporated into your municipality's Mills Act program? Select all that apply.	Most of the surveyed municipalities either do not incorporate any eligibility limitations (14) or are not sure (6). Of the listed eligibility limitations, the most common was a limit or cap in the total number of applications processed each year, noted	Recommendation: Cap in total number of applications processed each year.	Follow-up to San Diego, is the $200,000 annual cap for new contracts only?

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		by only 4 surveyed municipalities. No surveyed municipality has an eligibility limitation based on the applicant's income. Both the Cities of Long Beach and Pasadena use a mix of eligibility limitations including criteria for ranking or prioritizing applications, cap in current property valuation by property, and limit in total number of applications processed each year. The City of Pasadena also includes a limit in the total amount of unrealized City revenue from all new contracts and a limit in the amount of unrealized revenue to the City from a single contract. City of San Diego: "The City Manager is authorized to enter into all agreements that collectively fall within an annual threshold of $200,000 projected reduction in property tax revenue to the City's General Fund."	Interesting to consider for recommendation: limit in the amount of unrealized revenue to the City from a single contract	San Diego: "Correct, as noted in the City Council Policy link, "the City is authorized to enter into all agreements that collectively fall within an annual threshold of $200,000 projected reduction in property tax revenue."
6-2	If marked any of the above, please explain your answer(s).	City of Long Beach: "The program is intended to serve those who would most benefit (for example single-family homes valued under $1.1 million) but also in terms of properties that would benefit most from restoration. This is complicated by fees imposed (even at 50% cost recovery) that make the mills act a poor choice for some lower-value homes, and then lower than expected tax savings on commercial properties. Priority is also given to applications for which the work program includes use of local labor and materials in support of economic development and a culture of preservation within the City." City of Pasadena: "The Zoning Code limits the annual number of new single-family contracts to 20 and non-single-family to 6, and also limits the amount of unrealized revenue to the City for all new contracts to $75,000 annually and from a single contract to $25,000. The City's administrative guidelines also limit single-family valuation to $1.5 million (likely to increase to $2 million this year) with exceptions and include ranking/evaluation criteria."	Consider recommendation: annual fiscal revenue loss cap.	Follow-up to Pasadena and San Diego, is there an annual fiscal revenue loss for the program or only new contracts? Pasadena: "The revenue cap is for new contracts only – we do not have an overall fiscal loss cap at this time." San Diego: "There is currently no maximum revenue loss cap for the Mills Act."

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		City of Oakland: "Cap on tax loss to City is in our 2006-08 ordinance, at $25,000/year in new contracts. Real estate inflation suggests that a cap on current property valuation might be a good idea so a few millions-dollar [sic] houses don't eat up the whole allocation."		
6-3	The City of Los Angeles reviews all Mills Act contract applications on the merits of 5 Priority Consideration Criteria (PCC), and applications must meet the minimum required criteria to be considered for the Mills Act Program. The 5 PCC are: Necessity, Uniqueness, Investment, Affordability, and Employment. Does the municipality's Mills Act application similarly require priority consideration criteria to be met? Please explain?	A majority of the surveyed municipalities do not implement any kind of priority consideration criteria and only 4 do or use something similar: Cities of Saratoga, Highland, Long Beach, and Oakland. For many of the surveyed municipalities with smaller Mills Act program, such as the City of San Dimas, they receive so few applications each year that there is no necessity for priority consideration. City of Long Beach: "While Long Beach uses different criteria we aim for similar goals. Uniqueness is not necessarily a consideration in Long Beach but need, depth of the investment and work plan, relative affordability and local hire are all considerations." City of Oakland: "Similar criteria, dating back to 2006: necessity and impact of work, catalyst potential, diversity of properties and locations, preferences for East and West Oakland [former] Redevelopment areas, historical, cultural, and architectural significance of buildings."		
6-4	Does the municipality's Mills Act application require priority consideration criteria that address equity? Please explain.	Only 2 of the 30 surveyed municipalities indicated that they directly or indirectly require priority consideration criteria that addresses equity. The City of Pasadena targets specific areas in the city and applicants with economic hardship are given priority consideration. The City of Oakland indirectly addresses equity with requirements for diversity of location and property type and urgency of work program. The City of Long Beach: "As part of the City's equity and racial reconciliation efforts, all of these priorities and programs are under review. Ultimately, a challenge for achieving equity within the Mills Act program is that it rewards property	Consideration: Long Beach response - MA program is focused on property owners gaining value rather than renters and there are already other affordable housing benefits outside of the Mills Act program. How do you make the Mills Act program a competitive alternate incentive for affordable housing than the others provided?	Follow-up to Pasadena, how is applicant income or economic hardship considered? How do applicants prove? Pasadena: "Applicants provide a statement describing any economic hardship that applies and provide evidence to support. Staff considers any evidence that may be provided;

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		ownership in a majority-renter City where homeownership is out of reach to most in particular people of color. Furthermore, the City supports affordable housing and adaptive-reuse of properties as affordable housing but those projects do not require a Mills Act incentive because they are already off the tax rolls through other public-benefit programs."	Benefits in MA program: property better maintained. Ancillary benefits. Fiscal benefit to property owner.	we have not established specific requirements."
6-5	Is any weight in the Mills Act application process given to additional consideration criteria such as: public benefit, affordable housing, heritage tourism, visibility from the street, etc.? Please list and/or explain.	Only 5 surveyed municipalities indicated some kind of weight in the Mills Act application process given to additional criteria: Cities of Long Beach, Oakland, Ontario, Pasadena, and San Diego. This list includes the 3 municipalities with largest average amount of applications each year (Cities of San Diego, Pasadena, and Long Beach). Visibility of the property is considered for the Cities of Oakland, Ontario, Pasadena, and San Diego. The City of Oakland also looks at potential as a neighborhood catalyst to provide public benefits. The City of Long Beach gives significant consideration in potential to create new local landmarks and offers a joint landmark and Mills Act application that has been well-received and effective over the last five years.	Consider recommendation: joint landmark and Mills Act application West Hollywood has concurrently processed local designation and MA contract (in sequence)	
Section 7: Program Assessment				
7-1	Has a program assessment of the Mills Act Program been conducted in the municipality?	Only 9 surveyed municipalities have conducted a program assessment of the Mills Act Program, including the Cities of San Diego, Long Beach, and West Hollywood.		
7-2	What are strengths and weaknesses of the Mills Act Program in the municipality generally?	Strengths: The Mills Act Program is consistently seen as one of the most popular incentives a municipality can offer to property owners to invest in historic resources. Some municipalities highlighted the accessibility of their information and ease of applying for the program. Property owners appear to generally comply with the program. Weaknesses: As number of Mills Act contracts continue to grow, there are limited staff and resources to manage them. Some municipalities worry about the sustainability of the program with revenue loss, especially with a lack of clear	Noted twice: Ease of application and making it more accessible helps and hurts as more applications are received but staff aren't capable of managing all of them. How do you restrict with equity in mind? Recommendations: Staff needs to grow with contracts or contracts need to be limited to stay	

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		direction and staff training. 1 municipality noted a lack of public awareness, while others described a focus on residential rather than commercial properties and lack of geographic and demographic diversity among applicants. City of San Diego: "The ease of which homeowners can apply and be granted for the Mills Act is both a strength and a weakness as we now have a very large program that is understaffed and likely not cost effective." City of Long Beach: "Challenges with the program include lower than ideal number of applications (applications still exceed available contracts however the City's goal of achieving fierce competition among stellar applications has never been achieved." City of Oakland: "No benefit to offer long-time owners with low Prop 13 taxes."	manageable by current number of staff.	
7-3	What are the strengths and weaknesses of administration of the Mills Act Program in the municipality?	Strengths: Reported strengths include support from City Council, accessible information available on website, clear documentation of the process, and a no-fee application. Weaknesses: The biggest challenge identified by nearly half of the surveyed municipalities is very limited staff time and staffing. As the number of contracts continues to grow, there are not enough people or time to devote to inspections, fee collections, and trainings. Administration of the Mills Act Program requires more resources than municipalities can provide. There can also be lack of coordination between departments. City of San Dimas: "Follow-up and administration of the Mills Act had not been a priority since there were no fees collected from the program."	See previous comment about staff capability. Too much focus on administering the program is taking away from other preservation efforts.	

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		City of Long Beach: "Resources dedicated to Mills Act have detracted from finishing surveys, context updates, and other preservation efforts, particularly as time required for compliance on legacy contracts has increased dramatically."		
7-4	What are recommendations or suggestions for the long-term sustainability of Los Angeles' Mills Act Program?	1 of the primary recommendations that surveyed municipalities have is to make sure that the Mills Act Program is adequately staffed to take on the responsibility of managing so many contracts. Communication with property owners is also emphasized, such as City of Orange recommending an established communication protocol and City of Claremont recommending a streamlined annual reporting form. The City of Monrovia recommends taking advantage of the latest technology in the field to build a comprehensive database for tracking contract obligations. City of Highland: "A reserve fund for the property owners to receive their money sooner that is later replenished by the county." City of Long Beach: "Long Beach is seriously considering non-renewal of most contracts after ten years in order to be able to provide more assistance each year to new properties. In light of current property values and extreme housing challenges, a jurisdiction also has to examine providing these tax breaks more sparingly. For Long Beach and LA and a few other cities with more substantial property tax share, the impacts of the contracts are greater than in low-low property tax cities." County of Ventura: "Establishing connection in eyes of public/elected officials between program and physical rehabilitation improvements of historic properties of value in the community."		
Section 8: Outreach and Education				
8-1	Which of the following outreach and education materials are	Educational brochures are the most popular method of outreaching to property owners eligible for the Mills Act		

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
	provided to property owners eligible to apply for the Mills Act Program? Select all that apply.	Program, with 18 surveyed municipalities using them. Used much less often are targeted outreach and both on-demand and annual workshops. The Cities of Gilroy, Monrovia, and Oakland noted that they communicate with local realtors and real estate agents to inform eligible property owners. The City of Redondo Beach occasionally provides educational seminars for the public during Preservation Commission meetings. The City of Ontario sends out postcards periodically reminding eligible property owners of the incentives. Looking specifically at the 3 municipalities with the highest average Mills Act applications per year, the City of San Diego (average 50 applications per year) primarily uses its website while the City of Pasadena (average 30 applications per year) uses educational brochures and annual workshops. The City of Long Beach (average 20 applications per year) appears to have the 1 of the most substantial outreach programs of the surveyed municipalities, with educational brochures, annual workshops, on-demand workshops, and targeted outreach.		
8-2	Which of the following outreach and education materials are provided to property owners with existing Mills Act contracts? Select all that apply.	Most of the surveyed municipalities (21 of 30) do not provide any outreach and education materials to property owners with existing Mills Act contracts. Of the 9 that do, 7 use educational brochures while 3 use targeted outreach. The City of Redondo Beach works to actively provide new owners taking on an existing Mills Act property with planning records and the overall framework for maintaining a historic property. The City of Sierra Madre sends annual letters to Mills Act contract holders reminding them to submit their maintenance and rehabilitation plan. The City of Long Beach provides on-demand workshops for existing owners.		
8-3	Which of the following groups are targeted in your outreach efforts, if any? Select all that apply.	Most of the surveyed municipalities (22 of 30) do not target any specific groups in their outreach. Of the 8 that submitted a response other than “not applicable,” 5 target specific property types while 4 target preservation advocacy groups. Only the City of Oakland noted that they target a specific demographic – the oldest neighborhoods in East and West Oakland. Staff	Potential recommendation: Coordination with DCP/DBS/HCID for outreach.	

#	Question	Response Summary	Chattel Notes	Follow-up Questions & Answers
		solicits applications from likely prospects when they apply for permits.		

Appendix D:
Chronology of the Mills Act Program
with Attachments

Chattel, Inc. | Historic Preservation Consultants

MEMORANDUM

DATE February 10, 2021 DRAFT

TO Ken Bernstein, Manager, Principal City Planner
Shannon Ryan, Supervisor, Senior City Planner
Office of Historic Resources, Department of City Planning
City of Los Angeles

CC Lambert Giessinger, Historic Preservation Architect
Melissa Jones, City Planning Associate
Office of Historic Resources, Department of City Planning
City of Los Angeles

FROM Robert Chattel, AIA, President
Aleli Balaguer, Associate II
Narek Mkrtoumian, Intern
Chattel, Inc. | Historic Preservation Consultants

RE Los Angeles Mills Act Program Assessment
Memorandum on Mills Act Program Chronology

The Mills Act program is an economic incentive program in California that was created to encourage private property owners to restore and preserve qualified historical properties. The State of California defines qualified historical properties as a property listed on any federal, state, county, or city register. To take part in this program, it is required that a municipality create a Mills Act resolution or ordinance that describes specific protocols for administration of the program. The City of Los Angeles (City) Council created a Mills Act Ordinance in 1996. Since then, it has been periodically updated with amendments. The following is a chronology of the Mills Act program. This chronology focuses on creating a link between affordability, housing, and equity relating to historic preservation in the City. Thus, most gray points provide context but do not relate to this goal and do not include corresponding attachments.

1962 Los Angeles City Council (City Council) adopted City of Los Angeles Cultural Heritage Ordinance. The provisions of the Cultural Heritage Ordinance are codified in Division 22, Chapter 9, Article 1 of the Los Angeles Administrative Code, commencing with Section 22.171

1972 Senator James R. Mills (San Diego) introduced Senate Bill (SB) 357, the Mills Act program, was codified in California Government Code Article 12, Section 50280-50290. The Mills Act enabling legislation grants local governments (cities and counties) that adopt a policy (by ordinance or resolution) the authority to enter into contracts with owners of qualified historical properties who actively participate in preservation, restoration, and rehabilitation of their historic properties in exchange for *potential* property tax relief. See Attachment A.

1978 Ballot measure Proposition 13 introduced by lobbyist Howard Jarvis, which was codified in Article XIII A, Section 1-7, establishes the annual maximum amount of any ad valorem tax on real property shall not exceed one percent of the full cash value of

13417 Ventura Boulevard, Sherman Oaks, CA 91423-3938 Phone 818-788-7954 Fax 818-788-9795 www.chattel.us

such property. The one percent tax to be collected by the counties and apportioned according to law to the districts within the counties.[1]

1979 City Council adopted the Historic Preservation Overlay Zone (HPOZ) Ordinance No. 184903, codified as Section 12.20.3 of Los Angeles Municipal Code. Angelino Heights became the first HPOZ in 1983.

1985 The California Legislature amended the Mills Act to clarify and expand on the definition of qualified Historical Properties. Additionally, it reduced the Mills Act contract minimum period from 20 to 10 years, simplified the tax assessment and eliminated the public visitation and access requirement.

1993 The California Legislature amended the Mills Act strengthening the restoration and rehabilitation requirements to conform with guidelines of the State Office of Historic Preservation and the U.S. Secretary of the Interior's Standards and the State Historical Building Code.

1994 Historical Property Contract (Mills Act) Ordinance introduced in City Council, Council File (CF) 94-0644. See Attachment B.

1996 City Council adopted the initial Mills Act Ordinance, Ordinance No. 171413, codified in Los Angeles Administrative Code Division 19, Chapter 14 created with amendments, Ordinance 171413. The Mills Act program is managed by the Department of Cultural Affairs (DCA) and the Cultural Heritage Commission. See Attachment C. The initial Mills Act Ordinance established several criteria for eligibility:

- The pre-contract property valuation threshold for eligibility was $500,000 or less for single-family dwellings, and $1,500,000 or less for multi-family residential, commercial, or industrial buildings, unless the individual property is granted an exemption from such limits by the Cultural Heritage Commission.
- Established five priority consideration criteria (PCC): Necessity, Uniqueness, Investment, Affordability, Employment.
- Single-family and multi-family/commercial mixed-use properties with fewer than 20 residential rental units must meet a minimum of three PCC. All other properties must meet a minimum of four criteria.
- Established two exemption areas: Hollywood Boulevard Commercial and Entertainment National Register Historic District, Downtown Historic Core.
- Established annual property tax revenue loss cap of $500,000.

1998 City Council adopted the Adaptive Reuse Ordinance (ARO), Ordinance No. 174315, codified under, Subdivision 26, of Subsection A, of Section 12.22, of the Los Angeles Municipal Code (LAMC). The initial ARO ordinance does not reference the Mills Act program. See Attachment D.

1999 Department of City Planning (DCP) recommended that City Council adopt Mills Act Ordinance amendment that would exempt ARO projects from the calculation of annual property tax revenue loss cap and to increase the cap from $500,000 to $1,000,000. City Council instructed the City Administrative Office (CAO) to estimate possible property tax revenue loss if Mills Act ARO projects are not calculated as part

[1] Mills Act contracts between property owners and the local authority can *potentially* save a substantial amount in annual property taxes when compared to the Proposition 13 and Fair Market value of a property.

of the property tax revenue loss cap. City Council did not exempt ARO from the property tax loss cap. See Attachment E.[2]

1999 City Council adopted the first amendment to the Mills Act Ordinance, Ordinance No. 172857, raising the property tax revenue loss cap from $500,000 to $1,000,000. See Attachment F.

2004 Mills Act program is managed by the DCP in the Office of Historic Resources (OHR) and the Cultural Heritage Commission; no longer managed by DCA.

2006 Office of Historic Resources (OHR), in conjunction with The Getty Conservation Institute, created a citywide survey called SurveyLA. SurveyLA covered over 880,000 legal parcels, the largest citywide historic resources survey in the nation. Identifying thousands of properties potentially eligible for designation, thus increasing the potential for more properties to apply for a Mills Act contract upon designation.

2007 OHR proposed amendment to the Mills Act Ordinance to increase initial property valuation threshold for eligibility limits from $500,000 $1,500,000 for single-family homes and from $1,500,000 to $3,000,000 for multi-family, commercial and industrial properties. See Attachment G.

2008 OHR recommended that City Council increase pre-contract property valuation threshold of eligibility from $500,000 to $1,500,000 for single-family homes and from $1,500,000 to $3,000,000 for multi-family, commercial and industrial properties. City Council adopted the second amendment to the Mills Act Ordinance, Ordinance No. 179713. See Attachment H.

2011 Assemblymember Ben Hueso (San Diego) introduced Assembly Bill (AB) 654 that was passed by California legislature. This act amended the Historical Property Contract program codified as California Government Code Section 50280-50290. See Attachment I. The amendment required:

- Inspections occur before contract approval and every five years thereafter
- Eliminated the requirement of property owner notification of the Office of Historic Preservation (OHP) that a new contract was recorded
- Allowed for local governments with Mills Act programs to collect fees that shall not exceed the reasonable cost of providing the service of contract administration
- Clarified the options for proceeding with or appealing contract cancellation.

2012 OHR recommended City Council consider a higher property tax revenue loss cap of $3,000,000. City Council increased property tax revenue loss cap from $1,000,000 to $2,000,000. City Council adopted third amendment to the Mills Act Ordinance, Ordinance No. 182332. See Attachment J.

2013 The Housing Element of the General Plan established policy goals from 2013-2021. ARO and implementation of the Mills Act program are two programs used in the Housing Element to meet housing goals, objectives, and policies. ARO was intended to facilitate and provide incentives and expand opportunities for adaptive reuse of economically obsolete commercial buildings for housing. The Mills Act program was identified as an incentive for preservation of historic residential structures that

[2] January 14, 2021 inquiry to the CAO office confirmed no such report was issued.

ensures adequate maintenance of housing stock in economically diverse neighborhoods.

2014 OHR staff and the City Attorney updated Mills Act historical property contract language following AB 654 for collection of fees and eliminating the requirement of property owners to notify OHP that they entered a historic property contract.

2017 OHR staff recommended to City Council clarification of criteria for HCM eligibility, Ordinance No. 185472.

2019 Senator Toni Atkins (San Diego) introduced SB 451 passed that was passed by the California Legislature and is known as California State Historic Tax Credit. Governor Gavin Newsom signed the bill into law. The California Tax Credit Allocation Committee (CTCAC) and the OHP will administer the tax credit program. OHP will be responsible for preparing regulations, requirements, and an application process. The Governor's 2021 budget does not include funding for initiating the program including drafted regulations.

2019 OHR staff created a Mills Act program application requirement that multi-family properties with more than 20 residential rental units must meet a minimum of four of five PCC. All other properties applying must meet a minimum of three of five criteria, consistent with initial MA ordinance. The affordability PCC was expanded to require documentation showing preservation or addition of safe and affordable dwelling units for low (50% median) and moderate (80% of median) income households, per current U.S. Department of Housing and Urban Development (HUD) criteria for affordable housing.

2021 The Initial Study for the Housing Element Update Environmental Impact Report (EIR) was released by DCP on January 13, 2021 (Initial Study). The proposed Housing Element Update for 2021-2029 establishes programs, policies, and actions to further the goal of meeting existing and projected housing needs of all income levels of the community. The proposed Housing Element Update would provide potential amendments to ordinances to increase incentives for alternative building typologies such as micro-units, adaptive reuse of existing structures, and low- to medium-scale multi-family housing ("missing-middle"). The Initial Study described revisions to the Housing Element Update that will largely restate and refine existing goals, objectives, policies and programs but are likely to include an added focus or emphasis on stated Housing Element Update goals stated above. It is assumed the ARO and Mills Act provisions of the 2013-2021 Housing Element will be retained, however the Initial Study does not reference ARO or Mills Act.

Attachments

Attachment A: Mills Act Enabling Legislation
Attachment B: Council File 94-0644
Attachment C: 1996 Mills Act Ordinance
Attachment D: 1998 Adaptive Reuse Ordinance
Attachment E: 1999 ARO Exemption Recommendation
Attachment F: 1999 Mills Act Amendment
Attachment G: CAO Report on Amendment
Attachment H: 2008 Mills Act Amendment
Attachment I: 2012 Mills Act Amendment

ATTACHMENT A

MILLS ACT ENABLING LEGISLATION

California Government Code, Article 12, Sections 50280 - 50290

(Article 12 added by Stats. 1972, Ch. 1442.)

50280. Restriction of property use.

Upon the application of an owner or the agent of an owner of any qualified historical property, as defined in Section 50280.1, the legislative body of a city, county, or city and county may contract with the owner or agent to restrict the use of the property in a manner which the legislative body deems reasonable to carry out the purposes of this article and of Article 1.9 (commencing with Section 439) of Chapter 3 of Part 2 of Division 1 of the Revenue and Taxation Code. The contract shall meet the requirements of Sections 50281 and 50282.
(Amended by Stats. 1985, Ch. 965, Sec. 1.7.)

50280.1. Qualified historic property.

"Qualified historical property" for purposes of this article, means privately owned property which is not exempt from property taxation and which meets either of the following:
(a) Listed in the National Register of Historic Places or located in a registered historic district, as defined in Section 1.191-2(b) of Title 26 of the Code of Federal Regulations.
(b) Listed in any state, city, county, or city and county official register of historical or architecturally significant sites, places, or landmarks.
(Added by Stats. 1985, Ch. 965, Sec. 2.)

50281. Required contract provisions.

Any contract entered into under this article shall contain the following provisions:
(a) The term of the contract shall be for a minimum period of 10 years.
(b) Where applicable, the contract shall provide the following:
(1) For the preservation of the qualified historical property and, when necessary, to restore and rehabilitate the property to conform to the rules and regulations of the Office of Historic Preservation of the Department of Parks and Recreation, the United States Secretary of the Interior's Standards for Rehabilitation, and the State Historical Building Code.
(2) For an inspection of the interior and exterior of the premises by the city, county, or city and county, prior to a new agreement, and every five years thereafter, to determine the owner's compliance with the contract.
(3) For it to be binding upon, and inure to the benefit of, all successors in interest of the owner. A successor in interest shall have the same rights and obligations under the contract as the original owner who entered into the contract.
(Amended by Stats. 2013, Ch. 210, Sec. 6.5. (SB 184) Effective January 1, 2014.)

50281.1. Fees.

The legislative body entering into a contract described in this article may require that the property owner, as a condition to entering into the contract, pay a fee that shall not exceed the reasonable cost of providing the service pursuant to this article for which the fee is charged.
(Amended by Stats. 2011, Ch. 278, Sec. 2. (AB 654) Effective January 1, 2012.)

50282. Renewal.

(a) Each contract shall provide that on the anniversary date of the contract or such other annual date as is specified in the contract, a year shall be added automatically to the initial term of the contract unless notice of nonrenewal is given as provided in this section. Each contract shall also provide that after five years, and every five years thereafter, the city, county, or city and county shall inspect the interior and exterior of the premises to determine the owner's continued compliance with the contract. If the property owner or the legislative body desires in any year not to renew the contract, that party shall serve written notice of nonrenewal of the contract on the other party in advance of the annual renewal date of the contract. Unless the notice is served by the owner at least 90 days prior to the renewal date or by the legislative body at least 60 days prior to the renewal date, one year shall automatically be added to the term of the contract.
(b) Upon receipt by the owner of a notice from the legislative body of nonrenewal, the owner may make a written protest of the notice of nonrenewal. The legislative body may, at any time prior to the renewal date, withdraw the notice of nonrenewal.
(c) If the legislative body or the owner serves notice of intent in any year not to renew the contract, the existing contract shall remain in effect for the balance of the period remaining since the original execution or the last renewal of the contract, as the case may be.
(d) The owner shall furnish the legislative body with any information the legislative body shall require in order to enable it to determine the eligibility of the property involved.
(e) No later than 20 days after a city or county enters into a contract with an owner pursuant to this article, the clerk of the legislative body shall record with the county recorder a copy of the contract, which shall describe the property subject thereto. From and after the time of the recordation, this contract shall impart a notice thereof to all persons as is afforded by the recording laws of this state.
(Amended by Stats. 2011, Ch. 278, Sec. 3. (AB 654) Effective January 1, 2012.)

50284. Cancellation.

If the legislative body determines that the owner has breached any of the conditions of the contract provided for in this article or has allowed the property to deteriorate to the point that it no longer meets the standards for a qualified historical property, the legislative body shall do one of the following:

(a) Cancel the contract by following the procedures specified in Sections 50285 and 50286.
(b) Bring any action in court necessary to enforce a contract, including, but not limited to, an action to enforce the contract by specific performance or injunction.
(Amended by Stats. 2011, Ch. 278, Sec. 4. (AB 654) Effective January 1, 2012.)

50285. Cancellation.

No contract shall be canceled under Section 50284 until after the legislative body has given notice of, and has held, a public hearing on the matter. Notice of the hearing shall be mailed to the last known address of each owner of property within the historic zone and shall be published pursuant to Section 6061.
(Added by Stats. 1972, Ch. 1442.)

50286. Cancellation.

(a) If a contract is canceled under Section 50284, the owner shall pay a cancellation fee equal to $12^1/_2$ percent of the current fair market value of the property, as determined by the county assessor as though the property were free of the contractual restriction.
(b) The cancellation fee shall be paid to the county auditor, at the time and in the manner that the county auditor shall prescribe, and shall be allocated by the county auditor to each jurisdiction in the tax rate area in which the property is located in the same manner as the auditor allocates the annual tax increment in that tax rate area in that fiscal year.
(c) Notwithstanding any other law, revenue received by a school district pursuant to this section shall be considered property tax revenue for the purposes of Section 42238.02 of the Education Code, as implemented pursuant to Section 42238.03 of the Education Code, and revenue received by a county superintendent of schools pursuant to this section shall be considered property tax revenue for purposes of Article 4 (commencing with Section 2570) of Chapter 12 of Part 2 of Division 1 of Title 1 of the Education Code.
(Amended by Stats. 2013, Ch. 47, Sec. 109. (AB 97) Effective July 1, 2013.)

50287. Action to enforce contract.

As an alternative to cancellation of the contract for breach of any condition, a landowner that is a party to the contract may bring any action in court necessary to enforce a contract, including, but not limited to, an action to enforce the contract by specific performance or injunction.
(Amended by Stats. 2011, Ch. 278, Sec. 5. (AB 654) Effective January 1, 2012.)

50288. Eminent domain.

In the event that property subject to contract under this article is acquired in whole or in part by eminent domain or other acquisition by any entity authorized to exercise the power of eminent domain, and the acquisition is determined by the

legislative body to frustrate the purpose of the contract, such contract shall be canceled and no fee shall be imposed under Section 50286. Such contract shall be deemed null and void for all purposes of determining the value of the property so acquired.
(Amended by Stats. 1974, Ch. 544.)

50289. Annexation by city.

In the event that property restricted by a contract with a county under this article is annexed to a city, the city shall succeed to all rights, duties, and powers of the county under such contract.
(Added by Stats. 1972, Ch. 1442.)

50290. Consultation with state commission.

Local agencies and owners of qualified historical properties may consult with the State Historical Resources Commission for its advice and counsel on matters relevant to historical property contracts.
(Amended by Stats. 1985, Ch. 965, Sec. 8.)

hidden

ATTACHMENT B

COUNCIL FILE 94-0644

mlp

HOUSING & COMMUNITY REDEVELOPMENT
APR 15 1994

M O T I O N

The average age of the housing stock in Los Angeles is more than thirty-four years old. While the Planning Department has surveyed only four communities to date for historic structures, older communities such as South Central, Southeast, West Adams, Boyle Hights, Wilshire, Silverlake-Echo Park, and Northeast contain 70-87% of the homes and apartment buildings which were built prior to 1950.

Retaining older residential structures of real historic significance not only helps to conserve irreplaceable resources, it can also serve to maintain affordability. When older housing is replaced by new units, they are generally offered at rents which are not affordable to a majority of the City's residents.

The State Legislature enacted the Mills Act in 1976 to aid in the preservation of older buildings with historic significance. The Act allows the City to enter into contracts with the owners of such properties, allowing them to reduce their property taxes for at least ten years in return for the maintenance and preservation of their historic structure.

1985 amendments to the Mills Act, which among other changes broadened the definition of what could be considered an historic property, have made the Act increasingly attractive as a means of persuading property owners to preserve historic dwelling structures. The City should look into developing a local program implementing the Mills Act to take advantage of this tool.

I THEREFORE MOVE that the Housing Department be instructed to work with the City Attorney, the City Administrative Officer, the County Assessor and the Cultural Affairs Department to develop rules and procedures by which the City could implement the provisions of the Mills Act; and report to the Housing and Community Redevelopment Committee within 60 days on their findings.

I FURTHER MOVE that the City Attorney be requested to review the Mills Act in order to determine whether it would be necessary for the City to adopt an ordinance to allow the Act to be implemented, and, if so, what should be included in that ordinance.

PRESENTED BY: Mark Ridley-Thomas
Mark Ridley-Thomas
Councilmember, 8th District

SECONDED BY: Julie Goldberg

gsdraft:cd08.3

LOS ANGELES CONSERVANCY

Roosevelt Building • 727 West Seventh Street • Suite 955 • Los Angeles, California 90017 • 213 /623-CITY

April 25, 1994

Honorable Mark Ridley-Thomas, Chair
City Council Housing & Community Development Committee
Los Angeles City Hall, Room 290
200 North Spring Street
Los Angeles, California 90012

Re: Mills Act Motion

Dear Councilman Ridley-Thomas:

The Los Angeles Conservancy commends you for taking the initiative to implement the Mills Act in the City of Los Angeles. It is a successful program in other California cities and it can be an important tool in helping Los Angeles maintain affordable housing.

In addition to encouraging owners of multi-family buildings to reinvest the tax savings in their properties, the Mills Act will help the owners of properties in the City's seven Historic Preservation Overlay Zones ("HPOZs") and of the Historic-Cultural Monuments.

One of the common expressions of opposition to Monument designation is the lack of any incentives from the City to encourage an owner to accept the historical recognition. If a Mills Act program is established, owners of historic buildings are more likely to support Monument designation.

The Conservancy's Legal Committee began working with the City's Cultural Heritage Commission and the City Attorney's office on this issue last year. We would be pleased to assist your staff and the City agencies addressing this issue by providing the services of our Legal Committee and Conservancy staff, by sharing with you the information that we have gathered to date, by helping to draft language of any legislation, and by meeting with other members of the City Council to encourage their support of a Mills Act program.

Thank you for considering our comments.

Yours very truly,

Barbara A. Hoff

Barbara A. Hoff
Director of Preservation Issues

Mount Washington Association

April 25, 1994

Honorable Mark Ridley-Thomas, Chair
City Council Housing & Community Development Committee
Los Angeles City Hall, Room 290
200 North Spring Street
Los Angeles, CA 90012

Re: Mills Act Motion

Dear Councilman Ridley-Thomas:

The Mount Washington Association enthusiastically supports your motion for the City of Los Angeles exploring the feasibility of developing a program to implement The Mills Act in the City.

Mt. Washington, in the Northeast part of Los Angeles, has with its neighbor, Highland Park worked long and hard to support, sustain and maintain the unique character and special qualities of our communities. The Highland Park HPOZ (which includes parts of Mt. Washington) has been supported by the Mount Washington Association as a mechanism that will preserve not only the historical character of the area but affordable housing as well. Clearly, the implementation of the Mills Act takes this type of effort to its logical next step: the financial incentives for owners to maintain and reinvest in these older properties thus maintaining moderately priced housing, so desperately needed in our City.

We salute you for this bold and creative initiative to bring the benefits of the Mills Act to Los Angeles.

Cordially,

Clare Marter-Kenyon

Clare Marter-Kenyon, President
Mount Washington Association

ELIAS MARTINEZ
City Clerk

J. Michael Carey
Executive Officer

When making inquiries relative to this matter refer to File No.
94-0644

CITY OF LOS ANGELES
CALIFORNIA

RICHARD J. RIORDAN
MAYOR

Office of
CITY CLERK
Council and Public Services
Room 395, City Hall
Los Angeles, CA 90012
Council File Information - (213) 485-5703
General Information - (213) 485-5705

Pat Healy
Chief Legislative Assistant

April 18, 1994

2

HOUSING & COMMUNITY REDEVELOPMENT COMMITTEE

At the meeting of the Council held April 15, 1994 the motion (Ridley-Thomas - Goldberg) attached to the file was referred to the HOUSING & COMMUNITY REDEVELOPMENT COMMITTEE.

Elias Martinez

City Clerk
bs

940644

Recyclable and made from recycled waste.

HISTORIC PRESERVATION
REVIEW COMMITTEE

SOUTH CARTHAY

April 22, 1994

Honorable Mark Ridley-Thomas, Chair
City Council Housing & Community Development Committee
Los Angeles City Hall, Room 290
200 North Spring Street
Los Angeles, CA 90012

Subject: Mills Act Motion

Dear Councilman Ridley-Thomas:

The South Carthay HPOZ Design Review Committee wholheartedly supports your motion for the City of Los Angeles to "look into developing a local program implementing the "MILLS ACT" The Mills Act incentive will assist the home owners (and apartment owners, if applicable) in our neighborhood by helping them maintain their properties which in turn, will help maintain the quality and character of our historic neighborhood.

Our neighborhood was designated a HPOZ in 1984. Our HPOZ Deaign Review Committee has worked diligently over the past ten yeats with our property owners to assure a high level of maintainence and proper rehabilitation. The Mills ACT will support our efforts by offering a financial incentive for owners to reinvest in their properties, thus maintaining moderately priced housong which is so desperately needed in Los Angeles.

We congratulate you on taking the initiative to bring the Mills Act to los Angeles.

Respectfully,

Fred C. Naiditch, Chairman
South Carthay Design Review Committee

cc: L.A. Conservancy

Spaulding Square Neighborhood Association
Post Office Box 46580
Los Angeles, California 90046

April 22, 1994

Honorable Mark Ridley-Thomas, Chair
City Council Housing & Community Development Committee
Los Angeles City Hall, Room 290
200 North Spring Street
Los Angeles, California 90012

Re: Mills Act Motion

Dear Councilman Ridley-Thomas:

The Spaulding Square HPOZ Association wholeheartedly supports your motion for the City of Los Angeles to "look into developing a local program implementing the Mills Act." The Mills Act incentive will assist the homes in our neighborhood by helping them maintain their properties which in turn, will help maintain the character and quality of our neighborhood.

Our neighborhood was designated an HPOZ in 1993. Our HPOZ association has worked diligently over the years with the property owners to assure a level of maintenance and proper rehabilitation. The Mills Act will support our efforts by offering a financial incentive for owners to reinvest in their properties, thus maintaining moderately priced housing which is so desperately needed in Los Angeles.

We congratulate you on taking the initiative to bring the Mills Act to Los Angeles.

Yours very truly,

Mark M. Meltzer
Spaulding Square Neighborhood Association

MMM/ff

WHITLEY HEIGHTS HISTORIC PRESERVATION OVERLAY ZONE ASSOCIATION

MICHAEL MEKEEL, CHAIR
TIM STREET-PORTER, VICE-CHAIR
ANNIE KELLEY
BARRY SLOANE

April 25,1994

Honorable Mark Ridley-Thomas, Chair
City Council Housing and Community Development Committee
Los Angeles City Hall Room 290
200 North Spring Street
Los Angeles, Ca. 90012

Re: **Mills Act Supported by our Organization**

Dear Councilman Ridley-Thomas:

The Whitley Heights Historic Preservation Overlay Zone Association thanks you for your foresight and effort in introducing the Mills Act discussion to the Los Angeles City Council.

With the current situation of planning in Los Angeles, historic preservation overlay zones are one of the only tools homeowners have to protect their neighborhoods. In our neighborhood , which was designated an HPOZ in 1992 and is a National Register Historic District, we give countless volunteer hours to educate and assist our neighbors. It takes constant vigilance, money, and effort to just to stay even.

Our work, and that of significant neighborhoods like ours, would be greatly eased if we could tell our property owners that they would get a tax exemption because of their historic status. They have agreed to take on an extra burden -- in bureaucratic paperwork, review fees, hiring better architects and contractors, maintaining their properties with quality older materials rather than "Home Depot" specials, bugging the City --in order to protect the neighborhood from gradual decay.

Your efforts in obtaining Mills Act property tax exemptions can reward us and our neighbors for the extra effort we put into keeping LA healthy.

Thank you, and please let us know if we can help.

Best regards,

Michael Mekeel

1922 NORTH SYCAMORE AVENUE LOS ANGELES, CALIFORNIA 90068 TEL: 213 874 1637

Highland Park Heritage Trust

Post Office Box 42894, Los Angeles, CA 90050-0894 - Telephone: (213) 256-4326

Honorable Mark Ridley-Thomas
Chairman
Housing and Community Development Committee
City Council
200 North Spring Street
Los Angeles, Ca. 90012

April 25, 1994

Re: Mills Act Motion

Dear Councilman Ridley-Thomas:

The Highland Park Heritage Trust supports enthusiastically your motion to develop legislation to incorporate the Mills Act into Los Angeles policy. The Mills Act incentive will encourage and help the home owner and/or apartment owner to maintain their properties which will help preserve the character and quality of our older, more historic inner city neighborhoods.

Last week Highland Park was designated Los Angeles' newest and largest Historic Preservation Overlay Zone. When working with our City Councilmen-Mike Hernandez and Richard Alatorre- we have always stressed the need for incentives to assist homeowners to restore and/or rehabilitate their homes in order to retain existing affordable housing in our neighborhood. The Mills Act will provide this financial incentive to encourage owners to reinvest in not only their properties but also the community.

We applaud your insight and initiative in using this valuable preservation tool: The Mills Act.

Sincerely,

Robert F. Ebinger, Jr.

cc: Los Angeles Conservancy
Councilman Mike Hernandez
Councilman Richard Alatorre

ELIAS MARTINEZ
City Clerk

J. Michael Carey
Executive Officer

When making inquiries relative to this matter refer to File No.

94-0644

CITY OF LOS ANGELES
CALIFORNIA

RICHARD J. RIORDAN
MAYOR

Office of
CITY CLERK
Council and Public Services
Room 395, City Hall
Los Angeles, CA 90012
Council File Information - (213) 485-5703
General Information - (213) 485-5705

Pat Healy
Chief Legislative Assistant

PLACE IN FILES
MAY 11 1994
DEPUTY

May 5, 1994

Councilmember Ridley-Thomas
City Administrative Officer
Los Angeles Housing Department
Cultural Affairs Department

Councilmember Goldberg
City Attorney
City Planning Department

RE: MOTION (RIDLEY-THOMAS - GOLDBERG) ON CITY IMPLEMENTATION OF PROVISIONS OF STATE LAW (THE "MILLS ACT"), WHICH ALLOWS REDUCTION OF PROPERTY TAXES ON HISTORIC STRUCTURES IN RETURN FOR PRESERVATION AND MAINTENANCE OF SUCH STRUCTURES

At the meeting of the Council held May 3, 1994, the following action was taken:

Attached report adopted	
Attached motion adopted ( )	
Attached resolution adopted	
Ordinance adopted	
Motion adopted to approve attached report	
Motion adopted to approve attached communication	X
To the Mayor for concurrence	
To the Mayor FORTHWITH	
Mayor concurred	
Appointment confirmed	
Findings adopted	
Negative Declaration adopted	
Categorically exempt	
Generally exempt	
EIR certified	
Tract map approved for filing with the County Recorder	
Parcel map approved for filing with the County Recorder	
Bond approved is No. _____ of Contract	
Resolution of acceptance of future street to be known as	

Elias Martinez

City Clerk
crm
steno\940644

F/F- WJJ 5/9/94

Recyclable and made from recycled waste.

COMMUNICATION

TO: **LOS ANGELES CITY COUNCIL** **File No. 94-0644**

FROM: **COUNCIL MEMBER MARK RIDLEY-THOMAS, Chair**
HOUSING AND COMMUNITY REDEVELOPMENT COMMITTEE

	Yes	No
Public Comments	___	XX

COMMUNICATION FROM CHAIRPERSON, HOUSING AND COMMUNITY REDEVELOPMENT COMMITTEE relative to a Council motion (Ridley-Thomas - Goldberg) on City implementation of provisions of State law (the "Mills Act"), which allows reduction of property taxes on historic structures in return for preservation and maintenance of such structures.

Recommendations for Council action:

ADOPT the Council motion (Ridley-Thomas - Goldberg), thereby issuing the following directives:

1. Instruct the Los Angeles Housing Department to work with the City Attorney, City Administrative Officer, County Assessor and the Cultural Affairs Department to develop rules and procedures by which the City could implement the provisions of the Mills Act, and report to this Committee within 60 days on their findings.

2. Request the City Attorney to review the Mills Act to determine whether it would be necessary for the City to adopt an ordinance to allow the Act to be implemented, and if so, what should be included in that ordinance.

Summary:

As stated in the Council motion (Ridley-Thomas - Goldberg), the average age of the housing stock in the City of Los Angeles exceeds 34 years, with significant concentrations of older homes in communities such as South Central, Southeast, West Adams, Boyle Heights, Wilshire, Silverlake-Echo Park and Northeast Los Angeles.

Retaining older structures with historic significance not only conserves irreplaceable resources, but can also serve to maintain affordability. When older housing is replaced by new units, the new construction is generally offered at rents which are not affordable to a majority of the City's residents.

State legislation passed in 1976, termed the Mills Act, was enacted to aid in the preservation of older buildings with historic significance. The Act allows local governments to enter into contracts with the owners of such properties, allowing them to have reduced property taxes for at least ten years in return for the preservation and maintenance of their historic structure.

Later amendments have made the Act increasingly attractive as a means of pursuading property owners to preserve historic dwellings. As pointed out in testimony at the Committee hearing on this matter, one of the common expressions of opposition to Historical Monument designation is the lack of incentives from the City to encourage an owner to accept the historical recognition. If a Mills Act program is established, the owners of historic buildings are more likely to support Monument designation.

In letters made part of the Council file, the Los Angeles Conservancy and several associations of historic properties have endorsed the City's participation in such a program.

It is therefore recommended that the motion be adopted, to issue appropriate direction to City agencies to review and report back on implementation of the Mills Act in our City.

Respectfully submitted,

Mark Ridley-Thomas

Councilman Mark Ridley-Thomas, Chairperson
Housing and Community Redevelopment Committee

WJS
4/28/94

#940644

ADOPTED

MOTION ADOPTED TO APPROVE COMMUNICATION RECOMMENDATION
MAY 0 3 1994

LOS ANGELES CITY COUNCIL

ATTACHMENT C

1996 MILLS ACT ORDINANCE ADOPTED
ORDINANCE NO. 171413

ORDINANCE NO. 171413

An Ordinance of the City of Los Angeles implementing California Government Code Sections 50280, et seq., commonly known as the "Mills Act", by authorizing real property tax reductions for owners of certain qualified historic properties within the City of Los Angeles, provided the owners enter into binding agreements to preserve those properties.

THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:

Section 1. Division 19 of the Los Angeles Administrative Code is amended by adding Chapter 14 thereto, to read:

CHAPTER 14

APPROVAL OF HISTORICAL PROPERTY CONTRACTS

Sec. 19.140. Purpose.

Pursuant to California Government Code Section 50280, the City Council may contract with an owner or agent of the owner of any qualified historical property, as defined in Section 50280.1 thereof, provided the contract meets the requirements of Sections 50281 and 50282 thereof. Pursuant to Article 1.9 of the California Revenue and Taxation Code, historical properties that are "restricted" by the type of contracts referenced in the previous sentence shall be reassessed by the County Assessor in a manner that may result in lower real property taxes. The purpose of this Chapter is to implement State law permitting the approval of such Historical Property Contracts by establishing a uniform procedure for the owners of certain qualified historic properties within the City of Los Angeles to follow when applying for approval of Historical Property Contracts.

The City Council finds and determines that entering into Historical Property Contracts as hereinafter provided, will provide an incentive for the owners of the City's Historic-Cultural Monuments to preserve their properties, thereby providing a cultural benefit to the citizens of Los Angeles. It is also the intent of the Council to provide the same preservation incentive to the owners of Contributing Structures within the City's Historic Preservation Overlay Zones, established pursuant to Section 12.20.3 of the Los Angeles Municipal Code. The City Council further finds that such preservation will assist in maintaining the City's existing stock of affordable housing, thereby providing a social and economic benefit to the citizens of Los Angeles.

Sec. 19.141. Definitions.

A. For purposes of this Chapter, the following words and phrases are defined as follows:

1. "Contributing Structure" shall mean a site, building or structure located within a Historic Preservation Overlay Zone and designated as contributing in the architectural/historical survey prepared pursuant to Subdivisions 1 and 2 of Subsection E of Section 12.20.3 of the Los Angeles Municipal Code or otherwise determined by the Cultural Heritage Commission to be a contributor to the Historic Preservation Overlay Zone. A structure which is designated in the survey as noncontributing may be rehabilitated, thereby becoming eligible for designation as a Contributing Structure.

2. "Downtown Historic Core" shall mean the area in downtown Los Angeles bounded by First Street on the north, Los Angeles Street on the east, Ninth Street on the south, and Hill Street on the west.

3. "Historic-Cultural Monument" shall mean a site, building or structure, as defined in Section 22.130 of the Los Angeles Administrative Code, which has been included in the City's list of such monuments pursuant to Section 22.126 of the Los Angeles Administrative Code.

4. "Historical Property Contract" shall mean a contract between an owner(s) of a Historic-Cultural Monument or a Contributing Structure and the City of Los Angeles, meeting all requirements of California Government Code Sections 50281 and 50282 and this Chapter.

5. "Hollywood Historic District" shall mean the area defined in the Hollywood Redevelopment Plan map as the Hollywood Boulevard Commercial and Entertainment District.

Sec. 19.142. Limitations on Eligibility.

It is the intent of the City Council that unrealized City revenue from loss of property taxes not collected due to executed Historical Property Contracts not exceed $500,000 annually. In furtherance of this policy, eligibility for Historical Property Contracts shall be limited, except within the Downtown Historic Core or the Hollywood Historic District, to sites, buildings or structures with a pre-contract assessed valuation of $500,000 or less for single-family dwellings, and $1,500,000 or less for multi-family residential, commercial or industrial buildings, unless the individual property is granted an exemption from such limits by the Cultural Heritage Commission.

For the purpose of this Section, "assessed valuation" does not include any

portion of the value of a mixed-use structure which is already exempt from payment of property taxes by a determination of the County Assessor pursuant to Sections 4(b) and 5 of Article XIII of the California Constitution and Sections 214, 254.5, and 259.5 of the Revenue and Taxation Code.

The Cultural Heritage Commission may grant an exemption from the limitations imposed by this Section when: (a) granting the exemption will not cause the cumulative loss of property tax revenue to the City to exceed $500,000 annually; and (b) the site, building or structure is a particularly significant Historic-Cultural Monument or Contributing Structure; and (c) granting the exemption will assist in the preservation of a site, building or structure which would otherwise be in danger of demolition, substantial alteration or relocation.

The City Council may, by majority vote, approve Historical Property Contracts not otherwise meeting the eligibility requirements contained in this Chapter if it is found that the property meets all requirements of California Government Code Sections 50281 and 50282 and is especially deserving of a contract due to the exceptional nature of the property or other special circumstances.

Sec. 19.143. Required Provisions of Historical Property Contracts.

The required provisions of a Historical Property Contract shall be those required by California Government Code Sections 50281 and 50282, including, but not limited to: (a) a minimum term of 10 years; (b) the owner's commitment and obligation to preserve and, when necessary, restore and rehabilitate the property to conform to the rules and regulations of the Office of Historic Preservation of the Department of Parks and Recreation, the United States Secretary of the Interior's Standards for Rehabilitation, and the State Historic Building Code; (c) permission for periodic examination of the interior and exterior of the premises by State and local officials as may be necessary to verify the owner's compliance with the agreement; (d) a provision binding all successors in interest of the owner to the benefits and burdens of the contract; (e) a requirement that the owner provide written notice of the contract to the Office of Historic Preservation within six months of entering into the contract; (f) automatic annual renewal(s) of the contract, absent timely written notice of nonrenewal by the owner or the City, as prescribed in Section 50282(a).

Additionally, the contract shall require that the owner furnish the City with any information requested to determine the eligibility of the property. The contract shall state that the City may cancel the contract if it determines that the owner has breached any of the conditions of the contract or has allowed the property to deteriorate to the point that it no longer meets the standards for a Historic-Cultural Monument or Contributing Structure, and that the City may also cancel the contract if the City determines that the owner has failed to restore or rehabilitate the property in the manner specified in the contract. The contract shall also state that if the City does cancel the contract for the above reasons the owner shall pay the State of

California a cancellation fee of twelve and one-half percent (12½%) of the full value of the property at the time of cancellation, as determined by the County Assessor without regard to any restriction on the property imposed pursuant to the Historical Property Contract.

The contract shall also provide that in the event preservation, restoration or rehabilitation becomes infeasible due to damage caused by natural disaster (e.g., fire, flood, earthquake, etc.), the City may cancel the contract without the owner being required to pay the State of California the above-referenced cancellation fee as a penalty. However, in such event, no contract shall be cancelled by the City unless the Cultural Heritage Commission determines, after consultation with the State Office of Historic Preservation pursuant to Public Resources Code Section 5028, that preservation, restoration or rehabilitation is infeasible.

The Department of Cultural Affairs ("Department") shall maintain a sample "Historical Property Contract" containing all required provisions specified by this Section. Contracts submitted on the City's form shall be deemed to contain all provisions necessary for a Historical Property Contract with the City. Additional provisions desired by the owner shall be subject to approval by the City Council and the City Attorney.

Sec. 19.144. Procedures for Application and Approval of Historical Property Contracts.

An owner of a Historic-Cultural Monument or Contributing Structure may file an application with the Department for approval of a Historical Property Contract. Each application shall be accompanied by a nonrefundable application fee of $25 and an additional nonrefundable contract execution fee of $243.

Each application for approval of a Historical Property Contract shall include a complete legal description of the property.

Upon receipt of an application on a form to be prescribed by the Department and payment of the fees required by this Section, eligibility of the property for a Historical Property Contract pursuant to this Chapter shall be determined. Upon verification that the property is a Historic-Cultural Monument or a Contributing Structure, the amount of revenue loss to the City from real property tax savings shall be calculated. If the amount of lost revenue from the proposed Historical Property Contract will not cause the City's lost revenues from Historical Property Contracts in the aggregate to exceed $500,000 annually, then it shall be ascertained whether the property's current assessed valuation is $500,000 or less for single-family dwellings, or $1,500,000 or less for multi-family residential, commercial or industrial buildings, unless the property is located within the Downtown Historic Core or the Hollywood Historic District in which case the dollar limitations relating to assessed valuation shall not apply. If such respective valuations are exceeded, the

Cultural Heritage Commission shall make a determination for properties located outside of the Downtown Historic Core or the Hollywood Historic District, pursuant to Section 19.142, whether an exemption shall be granted.

If the property is determined eligible for a Historical Property Contract pursuant to this Section, the owner or the owner's agent shall prepare and submit to the Department a Historical Property Contract containing the required provisions as set forth in Section 19.143. If the owner submits a Historical Property Contract other than the City's standard form of Historical Property Contract, or desires modification thereof or addition(s) thereto, the agreement shall be submitted to the City Attorney for approval prior to City Council consideration. The City's standard form of Historical Property Contract or the owner's version upon approval by the City Attorney shall thereafter be submitted by the Department for consideration by the City Council. Historical Property Contracts shall be subject to City Council approval by majority vote of the entire City Council.

Sec. 19.145. Execution and Recordation of Approved Historical Property Contract.

Upon approval by the City Council of a Historical Property Contract, the General Manager of the Department and the owner of the property shall be authorized to execute the agreement on condition that the property owner submit a check to the Department made payable to the "L.A. County Recorder" in the amount of the fee for recording the agreement. No later than 20 calendar days after execution of the agreement, the Department shall deliver the check and cause a copy of the executed Historical Property Contract to be recorded in the Office of the Los Angeles County Recorder.

Sec. 19.146. Severability.

If any provision of this Chapter is held to be invalid by a court of competent jurisdiction, it is the intent of the City Council that all other provisions of this Chapter shall remain in full force and effect. The City Council hereby declares the provisions of this Chapter to be severable.

Sec. 2. The sample Historical Property Contract required by this Ordinance to be maintained by the Department shall be in a form substantially similar to the model agreement contained in Council File No. 94-0644 as "Appendix 1" to the Housing Department's report dated August 11, 1994; provided, the model agreement shall be amended by the City Attorney to include all provisions required by Section 1 of this Ordinance.

Sec. 3. The City Clerk shall certify to the passage of this ordinance and cause the same to be published in some daily newspaper printed and published in the City of Los Angeles.

I hereby certify that the foregoing ordinance was passed by the Council of the City of Los Angeles, at its meeting of NOV 13 1996.

J. MICHAEL CAREY, City Clerk

By _____ Deputy.

Approved NOV 22 1996

_____ ACTING Mayor.

Approved as to Form and Legality

November 13, 1996

JAMES K. HAHN, City Attorney

By _____
MARK L. BROWN
Assistant City Attorney

File No. 94-0644

4124

ATTACHMENT D

1998 ADAPTIVE REUSE ORDINANCE (ARO)
ORDINANCE NO. 174315

ORDINANCE NO. 174315

An ordinance amending Sections 12.22, 12.24 and 19.01 of the Los Angeles Municipal Code and Section 19.141 of the Los Angeles Administrative Code to encourage the adaptive reuse of buildings in the Greater Downtown Los Angeles Area.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Subdivision 26 of Subsection A of Section 12.22 of the Los Angeles Municipal Code is amended to read:

26. Downtown Adaptive Reuse Projects.

(a) Purpose. The purpose of this Subdivision is to revitalize the Greater Downtown Los Angeles Area and implement the General Plan by facilitating the conversion of older, economically distressed, or historically significant buildings to apartments, live/work units or visitor-serving facilities. This will help to reduce vacant space as well as preserve Downtown's architectural and cultural past and encourage the development of a live/work and residential community Downtown, thus creating a more balanced ratio between housing and jobs in the region's primary employment center. This revitalization will also facilitate the development of a "24-hour city" and encourage mixed commercial and residential uses in order to improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, hotels and transit services near each other.

(b) Application. If the provisions of Subparagraph (2) of Paragraph (h) and of Subparagraphs (1), (2) or (3) of Paragraph (j) of this subdivision conflict with those of any specific plan, supplemental use district, "Q" condition, "D" limitation, or citywide regulation, any of which were adopted or imposed by City action prior to the effective date of this ordinance, then this Subdivision shall prevail.

(c) Definition of Adaptive Reuse Project. Notwithstanding any other provisions of this chapter to the contrary, for the purposes of this subdivision, an Adaptive Reuse Project is any change of use to dwelling units, guest rooms, or joint living and work quarters in all or any portion of any eligible building.

(d) Eligible Buildings. The provisions of this subdivision shall apply to Adaptive Reuse Projects in all or any portion of the following buildings in the CR, C1, C1.5, C2, C4, C5, CM and R5 Zones in the Downtown Project Area:

(1) Buildings constructed in accordance with building and zoning codes in effect prior to July 1, 1974. A Certificate of Occupancy, building

permit, or other suitable documentation may be submitted as evidence to verify the date of construction.

(2) Buildings constructed in accordance with building and zoning codes in effect on or after July 1, 1974, if:

(i) Five years have elapsed since the date of issuance of final Certificates of Occupancy; and

(ii) A Zoning Administrator finds that the building is no longer economically viable as an exclusively commercial or industrial building, pursuant to Section 12.24 X 1(b).

(3) Buildings designated on the National Register of Historic Places, the California Register of Historical Resources, or the City of Los Angeles List of Historic-Cultural Monuments. Contributing Buildings in National Register Historic Districts or Contributing Structures in Historic Preservation Overlay Zones (HPOZ) established pursuant to Section 12.20.3 of this Code are also eligible buildings.

(e) M Zones. The Zoning Administrator may, upon application, permit Adaptive Reuse Projects in all or any portion of buildings in the MR1, MR2, M1, M2 and M3 zones in the Downtown Project Area, pursuant to Section 12.24 X 1(a).

(f) Unified Adaptive Reuse Projects. The Zoning Administrator may, upon application, permit floor area averaging in unified Adaptive Reuse Projects, pursuant to Section 12.24 X 1(c).

(g) Downtown Project Area. The Downtown Project Area includes the following areas:

(1) The Central City Community Plan Area as shown on the General Plan of the City of Los Angeles; and

(2) All that real property in the City of Los Angeles, described by the following boundary lines: Bounded northerly by the centerline of Freeway Number 10 (commonly called the Santa Monica Freeway); bounded southerly by the centerline of Vernon Avenue; bounded easterly and southeasterly by the following centerline courses: beginning at the intersection of the Santa Monica Freeway and Grand Avenue, then southerly along Grand Avenue to the most easterly line of Freeway Number 110 (commonly called the Harbor Freeway), then southerly along that right of way to the centerline of Martin Luther King, Jr. Boulevard, then easterly along Martin Luther King,

Jr. Boulevard to the centerline of Grand Avenue, then southerly along Grand Avenue to the centerline of Vernon Avenue. Bounded westerly and northwesterly by the following centerline courses: beginning at the intersection of Vermont Avenue and Vernon Avenue, then northerly along Vermont Avenue to Jefferson Boulevard, then easterly along Jefferson Boulevard to University Avenue, then northerly along University Avenue to 28th Street, then westerly along 28th Street to Severance Street, then northerly along Severance Street to Adams Boulevard, then westerly along Adams Boulevard to Scarff Street, then northerly along Scarff Street to 23rd Street, then southerly along 23rd Street to Bonsallo Avenue, then northerly along Bonsallo Avenue to Washington Boulevard, then westerly along Washington Boulevard to Oak Street, then northerly along Oak Street and its northerly prolongation to the Santa Monica Freeway.

(h) Incentives. Notwithstanding any other provisions of this chapter to the contrary, Adaptive Reuse Projects shall be entitled to the incentives set forth below. Except for the provision concerning mezzanines set forth in Subparagraph (1) below, these incentives shall not apply to any new floor area that is added to an Adaptive Reuse Project.

(1) Mezzanines. Loft spaces in joint living and work quarters, dwelling units and guest rooms which do not exceed more than 33 percent of the floor area of the space below shall not be considered new floor area. Mezzanines may be included in the calculation of floor area for the purpose of determining compliance with the standards set forth in Paragraph (i) of this subdivision.

(2) Density. Dwelling units, joint living and work quarters and guest rooms shall not be subject to the lot area requirements of the zone or height district.

(3) Off-Street Automobile Parking. The required number of parking spaces shall be the same as the number of spaces that existed on the site on June 3, 1999, and shall be maintained and not reduced. Adaptive Reuse Projects shall otherwise be exempt from the provisions of Section 12.21 A 4(m) of this Code.

(4) Mini-Shopping Center and Commercial Corner Development Regulations. Adaptive Reuse Projects shall be exempt from the mini-shopping center and commercial corner development regulations set forth in Section 12.22 A 23.

(5) Site Plan Review. Adaptive Reuse Projects shall be exempt from the requirements for Site Plan Review set forth in Section 16.05.

(6) Loading Space. Where an existing loading space is provided, the provisions of Section 12.21 C 6(h) shall apply. If no loading spaces exist, then a loading space shall not be required in conjunction with the development of an Adaptive Reuse Project.

(i) Standards. Adaptive Reuse Projects permitted pursuant to this subdivision shall be developed in compliance with the following standards:

(1) Dwelling Units and Joint Living and Work Quarters. The minimum floor area for new dwelling units and joint living and work quarters shall be 450 square feet. Floor area shall not include hallways or other common areas, or rooftops, balconies, terraces, fire escapes, or other projections or surfaces exterior to the walls of the building. The floor area of both the living space and the work space shall be combined to determine the size of joint living and work quarters.

The average floor area, as defined above, of all the dwelling units and joint living and work quarters in the building, including those that existed prior to the effective date of this ordinance, shall be at least 750 square feet. That minimum average size shall be maintained and not reduced.

(2) Guest Rooms. Guest rooms shall include a toilet and bathing facilities.

(j) Exceptions. Notwithstanding the nonconforming provisions of Section 12.23, the following exceptions shall apply to the buildings in which Adaptive Reuse Projects are located. These exceptions shall also apply to any building in which new floor area or height was added or observed yards changed on or after July 1, 1974, as evidenced by a valid Certificate of Occupancy.

(1) Floor Area. Existing floor area which exceeds that permitted by the zone, height district, specific plan, supplemental use district, or any other land use regulation shall be permitted.

(2) Height. Existing height which exceeds that permitted by the zone, height district, specific plan, supplemental use district, or any other land use regulation shall be permitted.

(3) Yards. Existing observed yards which do not meet the yards required by the zone, height district, specific plan, supplemental use district, or any other land use regulation shall be permitted.

(k) Uses. Notwithstanding the nonconforming provisions of Section 12.23,

dwelling units, guest rooms, and joint living and work quarters shall be permitted in Adaptive Reuse Projects, so long as the use is permitted by the underlying zone.

Sec. 2. Subdivision 1 of Subsection X of Section 12.24 of the Los Angeles Municipal Code is amended to read:

1. Adaptive Reuse Projects in the Downtown Project Area. Pursuant to Section 12.22 A 26, a Zoning Administrator may, upon application, permit Adaptive Reuse Projects in the M Zones, and in the R5 and C Zones in all or any portion of a building constructed on or after July 1, 1974. The Zoning Administrator may also permit floor area averaging in unified Adaptive Reuse Projects.

(a) M Zones. A Zoning Administrator may, upon application, permit Adaptive Reuse Projects in all or any portion of a building in the MR1, MR2, M1, M2 and M3 zones in the Downtown Project Area, subject to the following:

(1) Eligible Buildings. A Zoning Administrator shall only permit Adaptive Reuse Projects in the following buildings:

(i) Buildings constructed in accordance with building and zoning codes in effect prior to July 1, 1974. A Certificate of Occupancy, building permit, or other suitable documentation may be submitted as evidence to verify the date of construction; or

(ii) Buildings constructed in accordance with building and zoning codes in effect on or after July 1, 1974, if: five years have elapsed since the date of issuance of final Certificates of Occupancy; and the Zoning Administrator finds that the building is no longer economically viable as an exclusively commercial or industrial building.

The Zoning Administrator may only make this finding after reviewing information submitted by the applicant concerning vacancy rates, profit and loss statements, or other relevant data as the Zoning Administrator may require. The Zoning Administrator may require the applicant to submit an independent audit or other independently verified documentation; or

(iii) Buildings designated on the National Register of Historic Places, the California Register of Historical Resources, or the City of Los Angeles List of Historic-Cultural Monuments. Contributing Buildings in National Register Historic Districts or Contributing Structures in Historic Preservation Overlay Zones (HPOZ) established pursuant to Section 12.20.3 of this Code are also eligible buildings.

(2) Provisions. The Zoning Administrator may apply some or all of the provisions set forth in Section 12.22 A 26 to Adaptive Reuse Projects.

(3) Signs. The Zoning Administrator shall require that one or more signs or symbols of a size and design approved by the Fire Department are placed by the applicant at designated locations on the exterior of each Adaptive Reuse Project to indicate the presence of residential uses.

(4) Findings. In addition to the findings otherwise required by this Section, the Zoning Administrator shall also find:

(i) That the uses of property surrounding the proposed location of the Adaptive Reuse Project will not be detrimental to the safety and welfare of prospective residents;

(ii) That the Adaptive Reuse Project will not displace viable industrial uses; and

(iii) That the Adaptive Reuse Project complies with the standards for dwelling units, joint living and work quarters and guest rooms set forth in Section 12.22 A 26(i).

(b) Buildings constructed on or after July 1, 1974. The provisions of Section 12.22 A 26 shall apply to Adaptive Reuse Projects in all or any portion of a building constructed on or after July 1, 1974, in the CR, C1, C1.5, C2, C4, C5, CM, or R5 Zones in the Downtown Project Area, if: five years have elapsed since the date of issuance of final Certificates of Occupancy; and a Zoning Administrator finds that the building is no longer economically viable as an exclusively commercial or industrial building.

The Zoning Administrator may only make this finding after reviewing information submitted by the applicant concerning vacancy rates, profit and loss statements, or other relevant data as the Zoning Administrator may require. The Zoning Administrator may require the applicant to submit an independent audit or other independently verified documentation.

(c) Unified Adaptive Reuse Projects. The Zoning Administrator may, upon application, permit floor area averaging in the MR1, MR2, M1, M2, M3, CR, C1, C1.5, C2, C4, C5, CM, or R5 Zones in the Downtown Project Area. The averaging of floor area in unified Adaptive Reuse Projects may be permitted for purposes of determining compliance with the 750 square foot minimum average unit size standard for dwelling units and joint living and work quarters, as set forth in Section 12.22 A 26(i). For purposes of this subdivision, a unified Adaptive Reuse Project

means an Adaptive Reuse Project composed of two or more buildings, so long as the Project has all of the following characteristics: (1) functional linkages, such as pedestrian or vehicular connections; (2) common architectural and landscape features, which constitute distinctive design elements of the project; and (3) a unified appearance when viewed from adjoining streets. Unified Adaptive Reuse Projects may include lots that abut or are separated only by an alley or are located across the street from any portion of each other.

Individual buildings may fall below the minimum average unit size standard, so long as the average size of all the dwelling units and joint living and work quarters in the Unified Adaptive Reuse Project is at least 750 square feet, and no dwelling unit or joint living and work quarters is less than 450 square feet in area. The Zoning Administrator shall determine whether a project meets the definition of a unified Adaptive Reuse Project as set forth above. All owners of the property requesting floor area averaging must sign the application. A current title search shall be submitted with the application to insure that all required persons have signed the application.

If the Zoning Administrator approves the floor area averaging, then all owners of the property requesting floor area averaging and all owners of each lot contained in the unified Adaptive Reuse Project shall execute and record an affidavit. A copy of each executed and recorded affidavit shall be filed with the Office of Zoning Administration. Each affidavit shall run with the land, be approved by the Zoning Administrator prior to the issuance of any building permits and shall guarantee the following: (1) the use of any floor area converted to dwelling units or joint living and work quarters shall be maintained and not changed; and (2) the number of these units or quarters approved by the Zoning Administrator shall not be increased.

(d) Procedures. An application for permission pursuant to this subdivision shall follow the procedures for adjustments set forth in Section 12.28 C 1, 2, and 3. However, the Zoning Administrator may waive the public hearing required in that section if the owners of all properties abutting, across the street or alley from, or having a common corner with the building have expressed in writing no objections to the Adaptive Reuse Project.

Sec. 3. Paragraph (d) of Subdivision 13 of Subsection X of Section 12.24 of the Los Angeles Municipal Code is amended to read:

(d) Procedures. An application for permission pursuant to this subdivision shall follow the procedures for adjustments set forth in Section 12.28 C 1, 2, and 3. However, the Zoning Administrator may waive the public hearing required in that section if the owners of all properties abutting, across the street or alley from, or having a common corner with the buildings have expressed in writing no objections

to the quarters.

Sec. 4. Subsection E of Section 19.01 of the Los Angeles Municipal Code is amended to read:

Type of Application	**Flat Fee**	**For First Block Or Portion Of A Block**	**For Each Additional Block Or Portion Of A Block**	**Appeal**
Adaptive Reuse Projects in the M Zones; post-July, 1974 buildings in the C zones; and Unified Adaptive Reuse Projects in the M, C, or R5 zones; in the Downtown Project Area. (Section 12.24 X 1)	$750.00	None	None	$50.00 for applicant or non-applicant

Sec. 5. The definition of "Greater Downtown Los Angeles Area" in Los Angeles Administrative Code Section 19.141 is amended to read:

"Greater Downtown Los Angeles Area" shall mean the area in downtown Los Angeles located within the boundaries of the Central City Community Plan Area as shown on the General Plan of the City of Los Angeles and the Figueroa Economic Strategy Area, as further depicted on the map attached to the Planning Department staff report, dated October 4, 2001, and identified as Exhibit 1 in Council File No. 97-0648.

Sec. 6. The City Clerk shall certify to the passage of this ordinance and have it published in a daily newspaper printed and published in the City of Los Angeles.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, at its meeting of NOV 02 2001.

J. MICHAEL CAREY, City Clerk

By _____
Deputy

NOV 13 2001

Approved _____

_____
Mayor

Approved as to Form and Legality

10/5/01

Rockard J. Delgadillo, City Attorney

By _____
CLAUDIA CULLING
Assistant City Attorney

Pursuant to Charter Section 559, I approve this ordinance and recommend its adoption on behalf of the City Planning Commission . . . . . .

October 4, 2001

see attached report.

_____
CON HOWE
Director of Planning

File No.: C.F. No. 97-0648

ATTACHMENT E

1999 ARO EXEMPTION RECOMMENDATION

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF
CITY PLANNING
221 N. FIGUEROA STREET
LOS ANGELES, CA 90012-2601

CITY PLANNING
COMMISSION

PETER M. WEIL
PRESIDENT
ROBERT L. SCOTT
VICE-PRESIDENT
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MARNA SCHNABEL
NICHOLAS H. STONNINGTON

GABRIELE WILLIAMS
COMMISSION EXECUTIVE ASSISTANT
(213) 580-5234

RICHARD J. RIORDAN
MAYOR

EXECUTIVE OFFICES
16TH FLOOR
CON HOWE
DIRECTOR
(213) 580-1160
FRANKLIN P. EBERHARD
DEPUTY DIRECTOR
(213) 580-1163
GORDON B. HAMILTON
DEPUTY DIRECTOR
(213) 580-1165
ROBERT H. SUTTON
DEPUTY DIRECTOR
(213) 580-1167

FAX: (213) 580-1176

INFORMATION
(213) 580-1172

June 14, 1999

C.F. No. 94-0644

The Honorable James K. Hahn
City Attorney
Room 1800, City Hall East
Stop 140

Attention: Gwendolyn Ryder Poindexter
Assistant City Attorney

RULE 38 COMMENTS ON ORDINANCE AMENDING SECTIONS 19.141, 19.142 AND 19.144 OF DIVISION 19 OF CHAPTER 14 OF THE LOS ANGELES ADMINISTRATIVE CODE TO MODIFY DEFINITIONS OF TERMS AND INCLUDE REFERENCES TO THE GREATER DOWNTOWN LOS ANGELES AREA

Dear Mr. Hahn:

In compliance with Council Rule 38, the Department of City Planning provides the following comments concerning the above referenced amendment to the City's Mills Act enabling legislation. The amendment was prepared in response to Councilmember Rita Walters' motion adopted by the Council on July 17, 1998. The City's Mills Act enabling ordinance establishes procedures for awarding property tax reduction contracts with the City of Los Angeles to owners of designated historically significant buildings. In exchange for reduced taxes, owners must agree to preserve and, when necessary, restore the property in conformance with the Secretary of the Interior's Standards for Rehabilitation and the State Historic Building Code. The Council must approve Mills Act historical property contracts.

Recommendations

The Department supports adoption of the proposed code amendment, which makes the City's Mills Act ordinance consistent with the Council's recently adopted Downtown Adaptive Reuse Ordinance (Ordinance No. 172,571). As further explained below, we also

support the Cultural Heritage Commission's recommendation to increase the annual property tax loss cap to $1,000,000.

We also recommend that (1) property tax contracts awarded to adaptive reuse projects not be included in the calculation of the annual property tax loss; and (2) state and federally designated historic structures, including contributing buildings in National Register Historic Districts, be eligible to apply for Mills Act contracts.

Greater Downtown Los Angeles Area

The Adaptive Reuse Ordinance became effective on June 3, 1999, and amends the planning and zoning code to provide incentives for adaptive reuse projects, defined as the conversion of older commercial or industrial buildings to residential uses such as live/work lofts, traditional apartments, or hotel guest rooms. The incentives apply to buildings constructed prior to July 1, 1974 in the "Greater Downtown Los Angeles Area," which includes the Central City Community Plan Area and the Figueroa Sports and Entertainment Corridor.

When Council adopted the Mills Act ordinance, it limited eligibility to "sites, buildings or structures with a pre-contract assessed valuation of $500,000 or less for single-family dwellings, and $1,500,000 or less for multi-family residential, commercial, or industrial buildings." Properties within the Downtown Historic Core or the Hollywood Historic District are automatically exempt from these valuation caps. All other properties must petition the Cultural Heritage Commission for an exemption.

The proposed ordinance substitutes the Greater Downtown Los Angeles Area for the Downtown Historic Core. Consequently, many more designated historic landmarks would be automatically exempted from the assessed valuation cap. As defined in the current Mills Act ordinance, the boundaries of the Downtown Historic Core are entirely within the boundaries of the Greater Downtown Los Angeles Area (see attached map).

These changes all further the purpose and goals of the Downtown Adaptive Reuse Ordinance, which seeks to turn Downtown into a "24-hour central city." The cost of retrofitting for residential uses and complying with applicable building and safety standards, however — particularly seismic safety — is exorbitant. Property owners will need financial incentives as well as streamlined zoning regulations to ensure the successful adaptive reuse of their historic buildings.

Annual Cap on Citywide Total Property Tax Loss

Pursuant to Council Rule 38, the Cultural Heritage Commission recommends that the citywide annual property tax loss cap be increased from $500,000 to $1,000,000. The Council adopted a cap to control the total amount of revenue loss. The Cultural Heritage Commission recommends doubling the cap out of concern that the proposed code

amendment "could quickly deplete the Council-restricted allowable annual property tax loss of $500,000."

The Department of City Planning supports the Cultural Heritage Commission's recommendation. In addition, we recommend that historic property contracts awarded to adaptive reuse projects not be included in the calculation of the citywide annual property tax loss. Adaptive reuse projects represent a significant investment of private sector monies, and could substantially increase the assessed valuations of currently vacant or underutilized historic buildings which generate little or, in some cases, no property taxes (many are probably delinquent).

Given the vibrant demand for housing Downtown, we believe that adaptive reuse projects have the potential to generate substantial property tax revenues for the City of Los Angeles. There are an estimated 8,000,000 square feet of vacant commercial space in the Greater Downtown Los Angeles area eligible for conversion to residential uses. Demand for lofts in particular is a growing phenomenon across the country, and Downtown Los Angeles is no exception. Adaptive reuse projects will generally be market-rate developments that will significantly increase the number of Downtown's full-time residents and overnight visitors, which in turn will attract retail and other sales tax generating uses that will also enhance the City's fiscal base.

However, in consideration of the risks and costs involved, adaptive reuse projects require incentives. Given the potential for revitalization, it is in the City's economic interests to provide these incentives. For some adaptive reuse projects, a Mills Act tax reduction contract could make the difference between a property owner obtaining lender financing, or the building remaining vacant and a blight on Downtown. We therefore strongly recommend that historic property contracts awarded to eligible adaptive reuse projects not be included in the calculation of the annual citywide property tax loss.

Eligible Buildings

The definition of buildings eligible to receive Mills Act historical property contracts seems to be unnecessarily restrictive in that it excludes buildings that may be on the National Register or the California Register, but are not locally designated. A state or federally designated building located in the City of Los Angeles is not automatically placed on the City's List of Historic-Cultural Monuments, or may not be listed as a Contributing Structure in a locally established Historic Preservation Overlay Zone.

The Planning Department therefore recommends that all buildings that have been officially recognized by the state or federal governments as being historically significant be eligible to apply for a Mills Act contract. The definition of "Contributing Structure" should therefore be amended to include Contributing Buildings in National Register Historic Districts. The definition of "Historic-Cultural Monument" should also be amended to include buildings on the National Register of Historic Places and the California Register of Historical Resources.

These changes will make the Mills Act Ordinance consistent with the definitions contained in the Downtown Adaptive Reuse Ordinance.

If you have any questions concerning the recommendations in this letter, please call Alan Bell of my staff at (213) 580-5507.

Very truly yours,

CON HOWE
Director of Planning

Franklin P. Eberhard
Deputy Director

cc: Don Spivak, Community Redevelopment Agency
Jay Oren, Cultural Heritage Commission
Paul Smith, Chief Legislative Analyst

attachment

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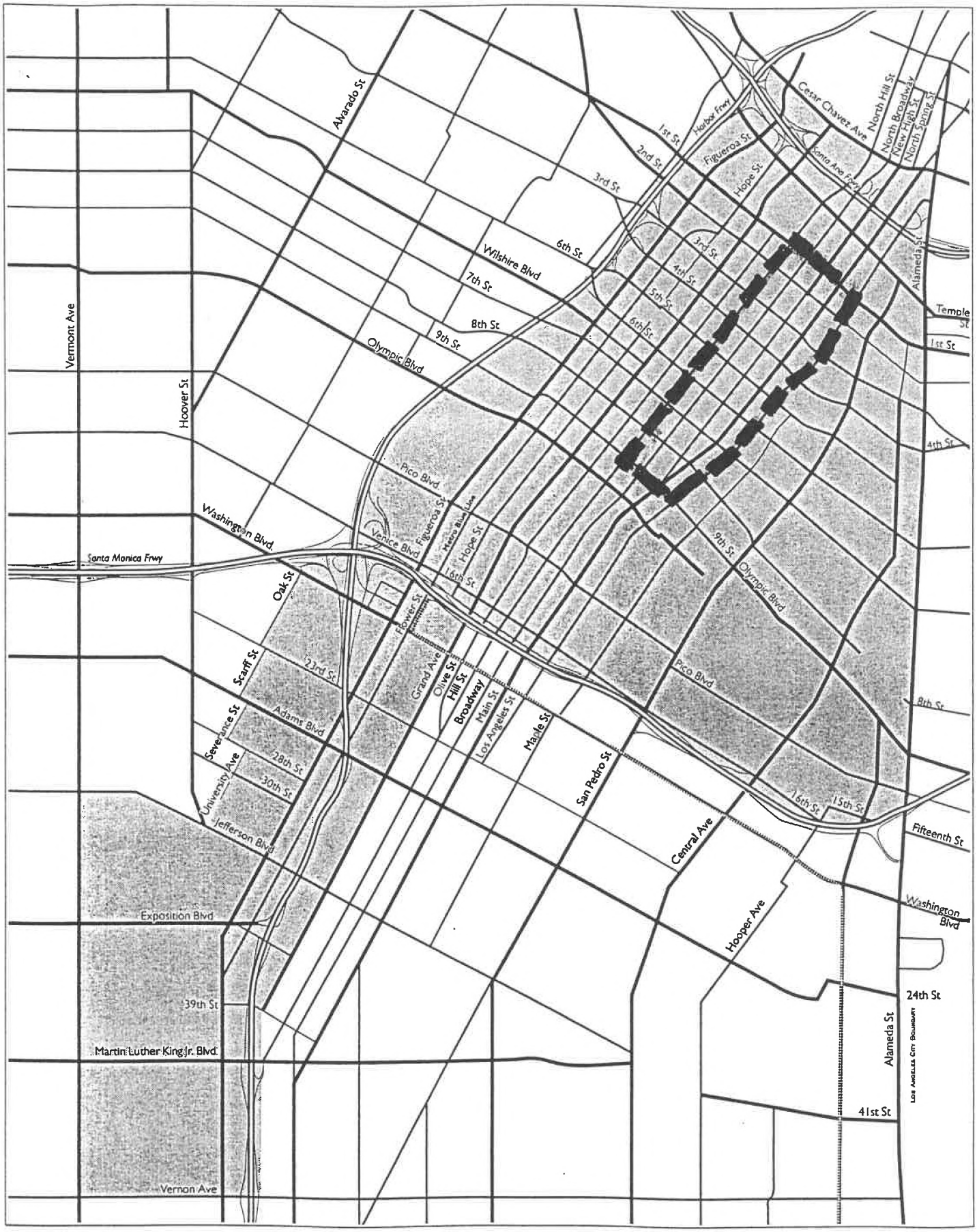


Exhibit 1

Project Area

Downtown Adaptive Reuse, Live/Work Ordinance

Not to Scale

Boundaries of Downtown Historic Core as described in current Mills Act ordinance.

ATTACHMENT F

1999 MILLS ACT AMENDMENT
ORDINANCE NO. 172857

ORDINANCE NO. 172857

An ordinance amending Sections 19.141, 19.142 and 19.144 of Division 19 of Chapter 14 of the Los Angeles Administrative Code to modify definitions of terms and include references to the "Greater Downtown Los Angeles Area".

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Section 19.141 of the Los Angeles Administrative Code is amended to read:

For purposes of this Chapter, the following words and phrases are defined as follows:

"Contributing Structure" shall mean a structure located within a Historic Preservation Overlay Zone, as defined in Section 12.20.3 A 6 of the Los Angeles Municipal Code as contributing to the historic significance of the Historic Preservation Overlay Zone, or otherwise determined by the Cultural Heritage Commission to be a contributor to the Historic Preservation Overlay Zone. A structure which is designated in a Historic Resources Survey pursuant to Section 12.20.3 E of the Los Angeles Municipal Code as Non-Contributing may be rehabilitated, thereby becoming eligible for designation as a Contributing Structure.

"Downtown Historic Core" shall mean the area in downtown Los Angeles bounded by First Street on the north, Los Angeles Street on the east, Ninth Street on the south, and Hill Street on the west.

"Greater Downtown Los Angeles Area" shall mean the area in downtown Los Angeles located within the boundaries of the Central City Community Plan Area as shown on the General Plan of the City of Los Angeles and the Figueroa Corridor Economic Strategy Area, as further depicted on the map identified as Exhibit 1 in Council File No. 94-0644.

"Historic-Cultural Monument" shall mean a site, building or structure, as defined in Section 22.130 of this Code, which has been included in the City's list of monuments pursuant to Section 22.126 of this Code.

"Historical Property Contract" shall mean a contract between an owner(s) of a Historic-Cultural Monument or a Contributing Structure and the City of Los Angeles, meeting all the requirements of California Government Code Sections 50281 and 50282 and this Chapter.

"Hollywood Historic District" shall mean the area defined in the Hollywood Redevelopment Plan map as the Hollywood Boulevard Commercial and Entertainment District.

Sec. 2. The first unnumbered paragraph of Section 19.142 of the Los Angeles Administrative Code is hereby amended to read:

It is the intent of the City Council that unrealized City revenue from loss of property taxes not collected due to executed Historical Property Contracts not exceed $1,000,000 annually. In furtherance of this policy, eligibility for Historical Property Contracts shall be limited, except within the Downtown Historic Core, the Hollywood Historic District or the Greater Downtown Los Angeles Area, to sites, buildings or structures with a pre-contract assessed valuation of $500,000 or less for single-family dwellings, and $1,500,000 or less for multi-family residential, commercial, or industrial buildings, unless the individual property is granted an exemption from those limits by the Cultural Heritage Commission.

Sec 3. The third unnumbered paragraph of Section 19.142 of the Los Angeles Administrative Code is hereby amended to read:

The Cultural Heritage Commission may grant an exemption from the limitations imposed by this Section when: (a) granting the exemption will not cause the cumulative loss of property tax revenue to the City to exceed $1,000,000 annually; and (b) the site, building or structure is a particularly significant Historic-Cultural Monument or Contributing Structure; and (c) granting the exemption will assist in the preservation of a site, building or structure which would otherwise be in danger of demolition, substantial alteration or relocation.

Sec. 4. The third unnumbered paragraph of Section 19.144 of the Los Angeles Administrative Code is hereby amended to read:

Upon receipt of an application on a form to be prescribed by the Department and payment of the fees required by this Section, eligibility of the property for a Historical Property Contract pursuant to this Chapter shall be determined. Upon verification that the property is a Historic-Cultural Monument

or a Contributing Structure, the amount of revenue loss to the City from real property tax savings shall be calculated. If the amount of lost revenue from the proposed Historical Property Contract will not cause the City's lost revenues from Historical Property Contracts in the aggregate to exceed $1,000,000 annually, then it shall be ascertained whether the property's current assessed valuation is $500,000 or less for single-family dwellings, or $1,500,000 or less for multi-family residential, commercial or industrial buildings, unless the property is located within the Downtown Historic Core, the Hollywood Historic District, or the Greater Los Angeles Downtown Area in which case the dollar limitations relating to assessed valuation shall not apply. If those respective valuations are exceeded, the Cultural Heritage Commission shall make a determination for properties located outside of the Downtown Historic Core, the Hollywood Historic District or the Greater Los Angeles Downtown Area, pursuant to Section 19.142 of this Code, as to whether an exemption shall be granted.

(70814)

Sec. 5. The City Clerk shall certify to the passage of this ordinance and cause the same to be published in some daily newspaper printed and published in the City of Los Angeles.

I hereby certify that the foregoing ordinance was introduced at the meeting of the Council of the City of Los Angeles SEP 22 1999 and was passed at its meeting of SEP 29 1999.

J. MICHAEL CAREY, CITY CLERK

BY Maria Kostenko
Deputy

Approved OCT 06 1999

ACTING Mayor

Approved as to Form and Legality

AUG 13 1999

James K. Hahn, City Attorney

By
GWENDOLYN RYDER POINDEXTER
Assistant City Attorney

File No. C.F. 94-0644

ATTACHMENT G

2008 CAO REPORT
MILLS ACT AMENDMENT

FRANK T. MARTINEZ
City Clerk

KAREN E. KALFAYAN
Executive Officer

When making inquiries relative to this matter refer to File No.

CITY OF LOS ANGELES
CALIFORNIA

ANTONIO R. VILLARAIGOSA
MAYOR

Office of the
CITY CLERK
Council and Public Services
Room 395, City Hall
Los Angeles, CA 90012
Council File Information - (213) 978-1043
General Information - (213) 978-1133
Fax: (213) 978-1040

CLAUDIA M. DUNN
Chief, Council and Public Services Division

www.cityclerk.lacity.org

07-0146

March 20, 2008

Office of the Mayor
Councilmember Garcetti
Councilmember Reyes
City Administrative Officer
Department of Cultural Affairs

City Planning Department
Attn: Director of Planning
cc: Geographic Information Section
Attn: Fae Tsukamoto

RE: AMENDING SECTION 19.142 OF THE LOS ANGELES ADMINISTRATIVE CODE, TO INCREASE PRE-CONTRACT ASSESSED VALUATION LIMIT OF $500,000 FOR SINGLE-FAMILY DWELLINGS TO $1,500,000 AND TO INCREASE THE PRE-CONTRACT ASSESSED VALUATION LIMIT OF $1,500,000 FOR MULTI-FAMILY RESIDENTIAL COMMERCIAL OR INDUSTRIAL BUILDINGS TO $3,000,000

At the meeting of the Council held February 29, 2008, the following action was taken:

Attached report adopted	
Attached motion (-) adopted	
Attached resolution (-) adopted	
To the Mayor FORTHWITH	
Motion adopted to approve committee reports recommendation(s)	X
Motion adopted to approve communication recommendation(s)	
Ordinance adopted	X
Ordinance number	179713
Publication date	03-20-08
Effective date	04-20-08
Mayor approved	03-12-08
Mayor failed to act – deemed approved	
Findings adopted	X
Negative Declaration adopted	
Categorically exempt	
Generally exempt	

Frank T. Martinez

City Clerk
cr

TO THE COUNCIL OF THE CITY OF LOS ANGELES **FILE NO. 07-0146**

Your PLANNING AND LAND USE MANAGEMENT AND BUDGET AND FINANCE COMMITTEES

reports as follows:

EXEMPT, PLANNING AND LAND USE MANAGEMENT AND BUDGET AND FINANCE COMMITTEES' REPORT relative to amending Section 19.142 of the Los Angeles Administrative Code (LAAC) relative to increase pre-contract assessed valuation limits for single-family, multi-family residential commercial or industrial buildings.

Recommendations for Council action, SUBJECT TO THE APPROVAL OF THE MAYOR:

1. FIND that the proposed Ordinance is exempt from the California Environmental Act (CEQA), pursuant to Article II, Section 2, Subsection (m) of the City's CEQA guidelines.

2. ADOPT the FINDINGS of the Cultural Heritage Commission (CHC), as the Findings of the Council.

3. PRESENT and ADOPT the accompanying ORDINANCE amending Section 19.142 of the LAAC, to increase pre-contract assessed valuation limit of $500,000 for single-family dwellings to $1,500,000 and to increase the pre-contract assessed valuation limit of $1,500,000 for multi-family residential commercial or industrial buildings to $3,000,000.

4. NOTE and FILE the City Administrative Officer's (CAO) report dated June 18, 2007, inasmuch as this report was provided for analysis and fiscal impact information only.

Fiscal Impact Statement: The City Administrative Officer reported that there is no fiscal impact associated with adopting the recommendations in this report. Adoption of the proposed amendment to the Approval of Historical Property Contracts Ordinance would also have no fiscal impact. Approval of the recommendation in this report is consistent with the City's Financial Policies.

Summary:

At its meeting held on May 22, 2007, the Planning and Land Use Management (PLUM) Committee considered a report from the Cultural Heritage Commission (CHC) relative to a request for the City Attorney to prepare a draft Ordinance amending Division 19, Chapter 14, Section 19.142 of the Los Angeles Administrative Code - "Approval of Historical Property Contracts" - "Limitations on Eligibility" to increase the pre-contract assessed valuation limit of $500,000 for single family dwellings to $1.5 million; and increase the pre-contract assessed valuation limit of $1.5 million for multi-family residential commercial or industrial buildings to $3 million, pursuant to Motion (Garcetti - Reyes).

The proposed Ordinance amends the Historical Property Contract Ordinance (also known as Mills Act Ordinance), to increase the pre-contract assessed valuation limit of $500,000 for single-family dwellings to $1,500,000 and to increase the pre-contract assessed valuation limit of $1,500,000 for multi-family residential commercial or industrial buildings to $3,000,000.

On May 22, 2007, the PLUM Committee requested the City Administrative Officer (CAO) to report back to the PLUM Committee regarding the estimates noted in the CHC report, and with any information relative to potential impacts. On June 26, 2007, in consideration of the CAO's report and presentation, the PLUM Committee recommended that the CAO report be noted and filed, as it was provided for analysis and fiscal impact information only. Consideration of the CHC request was continued in the PLUM Committee until July 3, 2007.

On July 3, 2007, the PLUM Committee after consideration of staff reports, approved the CHC request and requested the City Attorney to prepare an ordinance amending Division 19, Chapter 14, Section 19.142 of the LAAC - "Approval of Historical Property Contracts" - "Limitations on Eligibility" to increase the pre-contract assessed valuation limit of $500,000 for single-family dwellings to $1.5 million; and increase the pre-contract assessed valuation limit of $1.5 million for multi-family residential commercial or industrial buildings to $3 million, pursuant to Motion (Garcetti - Reyes). The City Attorney's draft Ordinance was transmitted to the Council on July 18, 2007.

This matter was also referred to the Budget and Finance Committee. On February 11, 2008, the Budget and Finance Committee concurred with the actions of the PLUM Committee.

The matter is hereby transmitted to Council for its consideration.

Respectfully submitted,

PLANNNING AND LAND USE MANAGEMENT COMMITTEE

MEMBER	VOTE
REYES:	YES
HUIZAR:	YES
WEISS:	YES

BUDGET AND FINANCE COMMITTEE

MEMBER	VOTE
PARKS	YES
GREUEL	YES
SMITH	YES
ROSENDAHL	YES
HUIZAR	YES

BG
#070146
02/20/08

Findings & ORD

ADOPTED
MOTION ADOPTED TO APPROVE COMMITTEE REPORT RECOMMENDATIONS
FEB 29 2008
LOS ANGELES CITY COUNCIL

ATTACHMENT H

2008 MILLS ACT AMENDMENT
ORDINANCE NO. 179713

ORDINANCE NO. 179713

An ordinance amending Section 19.142 of the Los Angeles Administrative Code to increase the pre-contract assessed valuation limit of $500,000 for single-family dwellings to $1,500,000 and to increase the pre-contract assessed valuation limit of $1,500,000 for multi-family residential, commercial or industrial buildings to $3,000,000.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. The first unnumbered paragraph of Section 19.142 of the Los Angeles Administrative Code is amended to read:

It is the intent of the City Council that unrealized City revenue from loss of property taxes not collected due to executed Historical Property Contracts shall not exceed $1,000,000 annually. In furtherance of this policy, eligibility for Historical Property Contracts shall be limited, except within the Downtown Historic Core, the Hollywood Historic District or the Greater Downtown Los Angeles Area, to sites, buildings or structures with pre-contract assessed valuation of $1,500,000 or less for single-family dwellings, and $3,000,000 or less for multi-family residential, commercial, or industrial buildings, unless the individual property is granted an exemption from these limits by the Cultural Heritage Commission.

Sec. 2. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, at its meeting of FEB 29 2008.

FRANK T. MARTINEZ, City Clerk

By _____
Deputy

Approved MAR 12 2008

_____
Mayor

Approved as to Form and Legality

ROCKARD J. DELGADILLO, City Attorney

By Claudia Culling for
TERRY KAUFMANN MACIAS
Deputy City Attorney

Date 7/18/07

File No. CF 07-0146

M:\Real Prop_Env_Land Use\Land Use\Terry K. Macias\ORDINANCES\Valuation Limits Ord..doc

ATTACHMENT I

2012 MILLS ACT AMENDMENT
ORDINANCE NO. 182332

ORDINANCE NO. 182332

An ordinance amending Sections 19.142 and 19.144 of the Los Angeles Administrative Code to increase the annual limit on the amount of unrealized City revenue from loss of property taxes not collected due to executed historical property contracts.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Section 19.142 of the Los Angeles Administrative Code is amended to read as follows:

Sec. 19.142. Limitations on Eligibility.

It is the intent of the City Council that unrealized City revenue from loss of property taxes not collected due to executed Historical Property Contracts shall not exceed $2,000,000 annually. In furtherance of this policy, eligibility for Historical Property Contracts shall be limited, except within the Downtown Historic Core, the Hollywood Historic District or the Greater Downtown Los Angeles Area, to sites, buildings or structures with a pre-contract assessed valuation of $1,500,000 or less for single-family dwellings, and $3,000,000 or less for multi-family residential, commercial, or industrial buildings, unless the individual property is granted an exemption from those limits by the Cultural Heritage Commission.

The limitations on eligibility shall be based on the Priority Consideration Criteria as developed by the Historical Property Contracts Manager or the Cultural Heritage Commission and kept on file with the Office of Historic Resources in the Department of City Planning. The Priority Consideration Criteria are as follows:

(a) **Necessity.** The residential, commercial or industrial project will require financial incentives in addition to any mortgage financing, private capital or public loans, to help ensure the preservation of the property. This criterion shall establish that the structure is in danger of deterioration and in need of substantial rehabilitation that has significant associated costs.

(b) **Uniqueness.** The project is a unique example of a residential, commercial or industrial property. The unique characteristics of the Historic-Cultural Monument or HPOZ Contributing property are identified under this criterion.

(c) **Investment.** The residential, commercial or industrial project will result in additional private investment in the building other than for routine maintenance that may include seismic retrofitting, and substantial repair or rehabilitation work. This criterion will estimate the costs for the restoration and rehabilitation of the property that the owner is committed to undertaking.

(d) **Affordability.** (Multi-family/Commercial mixed-use properties only): The residential or mixed-use project will result in the preservation or addition of safe and affordable dwelling units for low and moderate income households. Eligible properties under this criterion shall conform to current United States Department of Housing and Urban Development (HUD) criteria for affordable housing.

(e) **Employment.** (Commercial and Industrial buildings only): The commercial or industrial project will primarily supply goods or services to residents of low and moderate income areas or provide employment of low and moderate income persons.

For the purpose of this section, "**assessed valuation**" does not include any portion of the value of a mixed-use project which is already exempt from payment of property taxes by a determination of the County Assessor pursuant to Sections 4(b) and 5 of Article XIII of the California Constitution and Sections 214, 254.5, and 259.5 of the Revenue and Taxation Code.

The Cultural Heritage Commission may grant an exemption from the limitations imposed by this section when:

(a) granting the exemption will not cause the cumulative loss of property tax revenue to the City to exceed $2,000,000 annually; and

(b) the site, building or structure is a particularly significant Historic-Cultural Monument or Contributing Structure; and

(c) granting the exemption will assist in the preservation of a site, building or structure which would otherwise be in danger of demolition, substantial alteration or relocation.

The City Council may, by majority vote, approve Historical Property Contracts not otherwise meeting the eligibility requirements contained in this chapter if it is found that the property meets all requirements of California Government Code Sections 50281 and 50282 and is especially deserving of a contract due to the exceptional nature of the property or other special circumstances.

Sec. 2. Section 19.144 of the Los Angeles Administrative Code is amended to read as follows:

An owner of a Historic-Cultural Monument or Contributing Structure may file an application with the Department for approval of a Historical Property Contract. Each application shall be accompanied by a nonrefundable application fee according to the following schedule:

(a) Single-family residential property: $250

(b) Multi-family, Commercial and Industrial property: $1,142

(c) Valuation Exemption: $473

An application for approval of a Historical Property Contract must include a complete legal description of the property.

Upon receipt of an application on a form to be prescribed by the Department and upon the payment of the fees required by this section, eligibility of the property for a Historical Property Contract pursuant to this chapter shall be determined. Upon verification that the property is a Historic-Cultural Monument or a Contributing Structure, the Department shall calculate the amount of revenue loss to the City from real property tax savings. If the amount of lost revenue from the proposed Historical Property Contract will not cause the City's lost revenues from Historical Property Contracts in the aggregate to exceed $2,000,000 annually, then the Department shall ascertain whether the property's current assessed valuation is $1,500,000 or less for single-family dwellings, or $3,000,000 or less for multi-family residential, commercial or industrial buildings, unless the property is located within the Downtown Historic Core, the Hollywood Historic District, or the Greater Los Angeles Downtown Area, in which case the dollar limitations relating to assessed valuation are inapplicable. If those respective valuations are exceeded and the property is located outside of the Downtown Historic Core, the Hollywood Historic District or the Greater Los Angeles Downtown Area, the Cultural Heritage Commission shall determine whether an exemption should be granted, pursuant to Section 19.142 of this Code.

If the property is determined ineligible for a Historical Property Contract by the Historical Property Contracts Manager pursuant to this section, the owner or the owner's agent may appeal the Staff Determination of Ineligibility to the Cultural Heritage Commission. The appeal shall be filed on a form provided by the Department of City Planning. The fee for an appeal is $473. The Cultural Heritage Commission shall make a determination of eligibility subsequent to the appeal.

If the property is determined eligible for a Historical Property Contract pursuant to this Section, the owner or the owner's agent shall prepare and submit to the Department a Historical Property Contract containing the required provisions as set forth in Section 19.143 and pay a Contract Execution Fee according to the following schedule:

(a) Single-family residential property: $1.00 per every $1,000 of assessed property valuation

(b) Multi-family, Commercial and Industrial property: $1,866

The City's standard Historical Property Contract or the owner's version, as approved by the City Attorney, shall then be submitted by the Department to the City Council for its consideration. Historical Property Contracts are subject to City Council approval by majority vote of the entire City Council.

Sec. 3. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, at its meeting of NOV. 2 1 2012.

JUNE LAGMAY, City Clerk

By _____
Deputy

Approved DEC 0 6 2012

_____
Mayor

Approved as to Form and Legality

CARMEN A. TRUTANICH, City Attorney

By _____
ADRIENNE S. KHORASANEE
Deputy City Attorney

Date August 6, 2012

File No. CF 11-1778

Appendix E:
Program Required Staffing Hours Per Task

SERVICE	TASK	EMPLOYEE TOTAL HOURS PER TASK						TOTAL LABOR HOURS PER YEAR		ASSUMPTIONS
		Architect		Planner		Admin				
		Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year			
Contract Processing										
Application Processing	Review applications (includes consultation with HPOZ planners and current property tax status verification), creation of case numbers, and process fees collected	2	130	6	390	2	130	650		Per application and 65 complete applications submitted
Application Processing	Draft and send out correspondence with staff-level determination via e-mail, includes follow-up inquiries from applicants	1	65	3	195	0.5	33	293		Per application and 65 complete applications submitted
Application Processing	For Condo Applications, Coordinate with Applicant, Applicant's Attorney, and City Attorney to develop draft contract and advise on requirements for amending CC&Rs	4	4	8	8	1	1	13		One condominium application is processed per year
Application Processing	Contract Development Submission Appointments and fee collection for Exemption cases, includes scheduling appointments and inquiries from applicants	0.5	20	3	120	1.5	60	200	1566	Per application; 40 approved applications
Application Processing	Review Draft Contracts and Supplemental Information, includes follow-up with applicants for missing or incomplete information or incorrect forms	0.5	20	2	80	0.25	10	110		Per application; 40 approved applications
Application Processing	Update PCTS with Tax Adjustment Worksheet data to calculate estimated lost revenue for the City	0	0	0.25	10	0.25	10	20		Per application; 40 approved applications
Application Processing	Administration and organization of physical and digital files, including PCTS updates	0	0	1	40	3	120	160		Per application; 40 approved applications
Application Processing	Schedule review of conditions of approval with applicants and collect Contract Execution Fee, includes responding to inquiries and processing fee	0.5	20	2	60	1	40	120		Per application; 40 approved applications
Pre-contract Approval Inspections	Transmittal of application materials to consultant, includes organization of electronic files and compression	0	0	3	120	2	80	200		40 inspections
Pre-contract Approval Inspections	Pre-approval inspections – Field Work	4	160	4	160	0	0	320	600	40 inspections

SERVICE	TASK	EMPLOYEE TOTAL HOURS PER TASK						TOTAL LABOR HOURS PER YEAR		ASSUMPTIONS
		Architect		Planner		Admin				
		Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year			
Pre-contract Approval Inspections	Review pre-approval inspection reports and revised Exhibit A's to include conditions of approval	1	40	1	40	0	0	80		40 inspections
Appeal to Cultural Heritage Commission	Appeals process - fee collection and case creation, staff report(s), e-mail correspondence w/ applicant, PowerPoint presentation, CHC hearing	3	15	10	50	2	10	75	75	5 appeals
Valuation Exemption	Exemption Application Process – staff report(s), correspondece with applicant, PowerPoint presentation(s), CHC hearing	8	40	16	80	2	10	130	130	5 exemptions
Contract Execution	Draft and Finalize Cover Letters and Package Contracts for Transmittal to the Mayor's Office for Review and City Council for Approval	1	1	6	6	1	1	8		All 25 contracts
Contract Execution	PLUM and City Council Hearings, includes presentations as necessary, pre-PLUM, and transportation to/from City Hall	2	2	3	3	0	0	5		All 25 contracts
Contract Execution	Coordinate contract signatures with Director of Planning or representative, includes e-mail correspondence, adding signature tabs to each contract, and transportation to and from City Hall	0.25	0.25	4	4	2	2	6		All 25 contracts
Contract Execution	Coordinate Contract Number Assignment by City Clerk, includes preparing and mail merging cover letters and transportation to/from City Hall	0	0	4	4	2	2	6		All 25 contracts
Contract Execution	Coordinate City Attorney contract signature, includes preparing and mail merging cover letters, transportation to/from City Hall, and e-mail correspondence	0	0	4	4	1	1	5	256	All 25 contracts
Contract Execution	Coordinate City Clerk signature and notary acknowledgment, includes transportation to/from City Hall and attaching cover sheet	0	0	3	3	1	1	4		All 25 contracts

SERVICE	TASK	EMPLOYEE TOTAL HOURS PER TASK						TOTAL LABOR HOURS PER YEAR		ASSUMPTIONS
		Architect		Planner		Admin				
		Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year			
Contract Execution	Finalize Contracts (replacing Exhibit A's with revised documents as necessary), Photocopy for conformed copy, and package for County Recorder's Office	0	0	2	50	1	25	75		Per contract; 25 contracts
Contract Execution	Record Contracts with County Recorder's Office, addressing any corrections as necessary	2	2	16	16	1	1	19		All 25 contracts, and at least 4 trips to Los Angeles County Registrar-Recorder/County Clerk
Contract Execution	Scan recorded contracts, file originals in hardcopy folder, send copies to applicants with cover letter (via e-mail and USPS mail)	0	0	2	50	3	75	125		Per contract; 25 contracts
Contract Execution	Electronically transmit contracts to City Clerk's Office, City Attorney, and County Assessor's Office	0	0	2	2	1	1	3		All 25 contracts
Contract Maintenance										
Periodic Inspections Field Work	Periodic inspections (consultant)	4	756	4	756	0	0	1512	1512	189 annual inspections
Periodic Inspections Management, Oversight, and Follow Up	Periodic inspections RFQ and engage qualified consultant bench	4	4	4	4	2	2	10		Annually
Periodic Inspections Management, Oversight, and Follow Up	Develop property inspection list	1	1	2	2	1	1	4		Annually
Periodic Inspections Management, Oversight, and Follow Up	Scan contracts and gather photos, past inspection reports, and additional information, including correspondence with owner, project approvals, and recent building permits from OHR files	0.5	95	1	189	3	567	851		189 annual inspections
Periodic Inspections Management, Oversight, and Follow Up	Draft and send inspection notices and coordinate with property owners to confirm scheduled inspection	0.5	95	2	378	1	189	662	3322	189 annual inspections
Periodic Inspections Management, Oversight, and Follow Up	Draft inspection reports	1	189	5	945	0	0	1134		189 annual inspections
Periodic Inspections Management, Oversight, and Follow Up	Review and finalize periodic inspection reports	0.5	95	1	189	0	0	284		189 annual inspections
Periodic Inspections Management, Oversight, and Follow Up	Send inspection reports via e-mail and hard copy to property owners	0	0	1	189	1	189	378		189 annual inspections

SERVICE	TASK	EMPLOYEE TOTAL HOURS PER TASK						TOTAL LABOR HOURS PER YEAR		ASSUMPTIONS
		Architect		Planner		Admin				
		Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year			
Activities with No Fee										
Education and Outreach	MA Workshop, includes outreach to prospective applicant pool and correspondence with attendees pre- and post-workshop to answer inquiries, room reservation and processing payment. Prepare PowerPoint presentation and script. Coordinate logistics with venue staff and speakers. Conduct workshop. Update website with PowerPoint presentation and report to External Affairs unit on workshop.	16	16	56	56	5	5	77	476	1 annual workshop
Education and Outreach	Respond to inquiries from prospective applicants	0.5	125	0.5	125	0.25	125	375		10 inquiries per week and 50 working weeks in a year
Education and Outreach	Outreach to Council Offices and interested parties list to launch application cycle	6	6	16	16	2	2	24		Annually
Contracting and Contract Staff Administration	Prepare Request for Bids and engage consultant	2	4	8	16	1	2	22	56	Twice annually
Contracting and Contract Staff Administration	Consultant management, including coordination of deliverables providing feedback, responding to inquiries and processing invoices	8	16	8	16	0	0	32		Twice annually
Contracting and Contract Staff Administration	Prepare Request For Qualifications and engage qualified consultant bench	4	0.8	4	0.8	2	0.4	2		Once every 5 years
Contract Enforcement	Respond to non-compliant property owners and review proposed work plans	2	74	1	37	0.5	19	130	958	Per contract; 20% of inspections will be "non compliant"; estimated to be 37 if 189 annual periodic inspections are conducted
Contract Enforcement	Follow-up on correspondence with property owner	8	296	2	74	0	0	370		Per contract; 20% of inspections will be "non compliant"; estimated to be 37 if 189 annual periodic inspections are conducted
Contract Enforcement	Coordinate with Building and Safety for code enforcement	4	40	1	10	0	0	50		Per contract; 10 contracts per year
Contract Enforcement	Coordinate and Consult with Council Office, Cultural Heritage Commission, and City Attorney	6	60	2	20	0	0	80		Per contract; 10 contracts per year
Contract Enforcement	Determine course of action and follow-up with property owner	8	80	4	40	0	0	120		Per contract; 10 contracts per year

SERVICE	TASK	EMPLOYEE TOTAL HOURS PER TASK						TOTAL LABOR HOURS PER YEAR		ASSUMPTIONS
		Architect		Planner		Admin				
		Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year			
Contract Enforcement	Enforcement proceedings, including staff reports and presentations for CHC, PLUM, and City Council as necessary; Regular review and consultation on MA properties	16	64	32	128	4	16	208		Per contract; 4 contracts per year
General Administration	Request, review, and file update memos from property owners on work plan progress	1	12	1	12	0	0	24		Per property; 24 properties per year
General Administration	Prepare for Cultural Heritage Commission hearing(s) with property owner(s)/architect(s) to update Commission on projects, as necessary	2	24	2	24	0	0	48		Per property; 12 properties per year
General Administration	Cultural Heritage Commission hearing – Coordinate with property owners and/or representatives to address any Commission comments on proposed work	2	24	2	24	0	0	48		Per property; 12 properties per year
General Administration	Review and provide comments on proposed larger scopes of work on Mills Act properties and coordinate with HPOZ planners for Board input as necessary	8	96	8	96	0	0	192		Per contract; 24 per year
General Administration	Review and approve building permits for smaller projects on Mills Act properties	1	48	1	48	0	0	96		Per contract; 96 per year
General Administration	Respond to property owner/architect inquiries	1	48	1	48	0.25	12	108	1889	Per contract, per inquiry; 96 per year
General Administration	Respond to inquiries from prospective buyers/agents of Mills Act properties and requests for copies of Contracts	1	48	1	48	0.5	48	144		Per contract, per inquiry; 96 per year
General Administration	Update PCTS with annual Mills Act Property Assessments to track City's lost revenue, and file in hardcopy and electronic files (processed when received from the County Assessor's Office)	0	0	0	0	0.5	474	474		948 contracts
General Administration	Administration and organization of physical and digital files	0.25	237	0.25	237	0.25	237	711		948 contracts
General Administration	Update MA application forms, instruction sheets, guidelines, and website language, as necessary	8	8	24	24	4	4	36		Annually

SERVICE	TASK	EMPLOYEE TOTAL HOURS PER TASK						TOTAL LABOR HOURS PER YEAR		ASSUMPTIONS
		Architect		Planner		Admin				
		Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year	Hours per Task	Total Hours per Year			
General Administration	Respond to inquiries from County Assessor's Office	1	4	1	4	0	0	8		Per contract; 4 contracts per year
TOTALS		**147**	**3084**	**300**	**5251**	**57**	**2504**		**10840**	
Percent of full-time employee			**154%**		**263%**		**125%**			

Appendix F:
AECOM Equity Analysis Memorandum
dated April 26, 2021

Memo

To: Robert Chattel, Aleli Balaguer, Nels Youngborg, Chattel

From: Rachel Lindt and Aryeh Cohen, AECOM

Date: April 26, 2021

Re: Equity Analysis for the City of Los Angeles Mills Act Program Assessment

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Overview

This Equity Analysis Memo (Memo) serves as the final deliverable of *Task 2: Review and Determine Equity* as part of the City of Los Angeles Mills Act (MA) Program Assessment. The purpose of this Memo is to:

1. Assess existing MA contracts and remaining eligible parcels and their distribution among communities facing varying barriers to opportunity based on the Los Angeles Equity Index
2. Identify general focus areas and remaining MA eligible parcels across the City of Los Angeles to prioritize for placing under MA contract to advance equity in the MA Program

As described in the Equity Analysis Approach Memo (March 2021), the Los Angeles (LA) Equity Index was selected for conducting further equity analysis of the MA Program due to the focus and relevance of the scoring categories and the newness of the data sources. Developed by the Los Angeles Controller Ron Galperin's Office (Controller) for the purposes of mapping existing disparities and barriers to opportunity in the City of Los Angeles, the LA Equity Index is comprised of 13 indicators of four dimensions at the census tract level that are central to the issues of equity and opportunity: education, access to resources, environment, and socioeconomic.[1] Using the American Community Survey (ACS) 5-Year Data (2009-2019), the Controller's Office developed a composite Equity Index with scores for each of the four dimensions. The LA Equity Index is measured between 0 and 10, where a lower score indicates more (high) barriers to opportunity, and a higher score indicates less (low) barriers to opportunity, as shown in Figure 1. For the purposes of this Memo, the LA Equity Index serves as the basis for assessing equity in the City of Los Angeles for the MA Program Assessment.

This Memo is organized into the following sections:

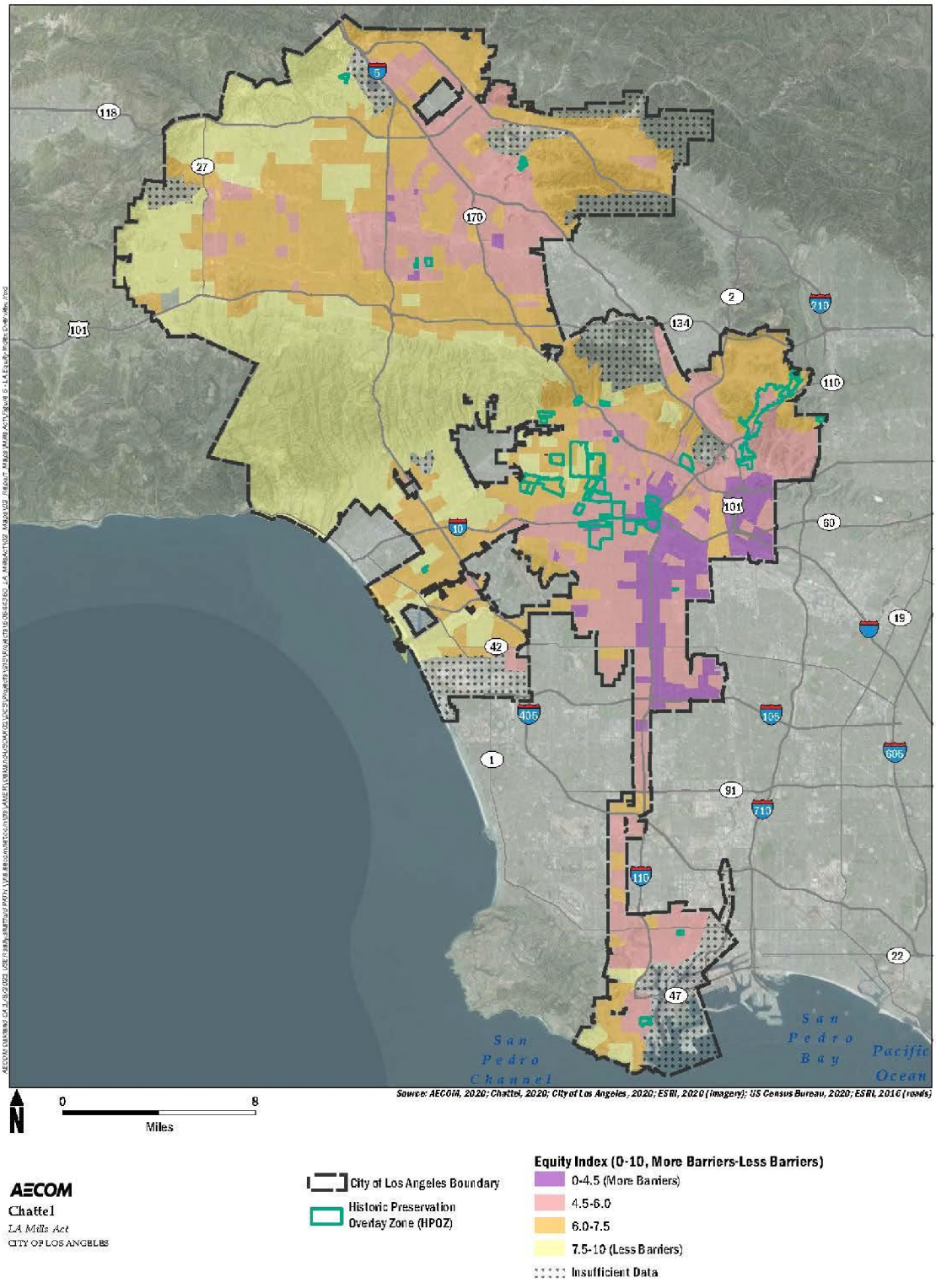
- Section 2: Approach. Provides a summary of how existing MA contracts and eligible parcels were assessed in this Memo based on four organizational frameworks

[1] According to the Controller, dozens of additional variables were also examined, including ethnic makeup and median income, which also informed the final results. See Equity Analysis Approach Memo for additional detail on the LA Equity Index methodology.

including Community Plan Area, Council District, Historic Preservation Overlay Zone and Property Type.

- Section 3: Citywide totals by Equity Score. Outlines findings from the assessment of Citywide MA parcels by equity score to provide a baseline understanding of how existing and eligible MA parcels are distributed among communities facing varying barriers to opportunity.
- Section 4: Community Plan Area. Provides findings from the assessment of existing MA contracts and remaining eligible parcels by Community Plan Area to provide an understanding of existing MA contract distribution and opportunities for the future.
- Section 5: Council District. Provides findings from the assessment of existing MA contracts and remaining eligible parcels by Council District to provide an understanding of existing MA contract distribution and opportunities for the future.
- Section 6: Historic Preservation Overlay Zone. Provides findings from the assessment of existing MA contracts and remaining eligible parcels by Historic Preservation Overlay Zone to provide an understanding of existing MA contract distribution and opportunities for the future.
- Section 7: Advancing Equity in the MA Program. Identifies recommendations for general focus areas and remaining MA eligible parcels across the City of Los Angeles to prioritize for placing under MA contract to advance equity in the MA program.
- Appendix. Provides tables and charts as supplemental resources

Figure 1: Los Angeles Equity Index



Approach

In this analysis, existing MA contracts and eligible parcels were assessed within four organizational frameworks: Three distinct sets of City-established spatial boundaries, and one non-spatial categorization of property types. While each framework provided unique insights into patterns of MA participation, and how existing contracts and eligible parcels are distributed among communities facing various barriers to opportunity, certain frameworks emerged as more useful than others. The strengths and challenges of each organizational framework are summarized below:

Community Plan Areas

Community Plan Areas (CPAs) are the most effective spatial framework for this equity analysis, reflecting clear relationships between LA Equity Index score (equity score), MA participation rates, and remaining eligible MA parcels. As a spatial framework, CPAs are planning-focused boundaries, established to align with existing communities and land use patterns. As such, other patterns related to equity, land use, and community resources are naturally reflected in this spatial analysis. As CPAs cover the entire City of Los Angeles, both HPOZ and HCM parcels are included, allowing for a comprehensive assessment of existing and eligible MA parcels within the City.

Council Districts

While Council Districts (CDs) also cover the entire City of Los Angeles and allow for a comprehensive assessment of MA parcels, CDs are a less effective spatial framework for this equity analysis of existing MA participation, due primarily to their size and diversity. With each district's geographic area and/or population size equal to that of a large city, a comparative analysis of CDs does not provide useful insight into relationships between current MA participation and barriers to opportunity within specific communities. As political districts with varying levels of geographic cohesiveness, CDs are also less reflective of neighborhood identities, demographic enclaves, and spatial distribution of land uses and community resources.

However, as Council Offices have dedicated staff and resources for outreach and constituent services, CDs are an effective framework for assessing eligible MA parcels and implementing a prioritization strategy through outreach and efforts to identify savings and provide guidance for high-priority properties.

Historic Preservation Overlay Zones

Historic Preservation Overlay Zones (HPOZs) are most effective as a framework for assessing the relationship between MA participation and equity in concentrated areas of MA eligibility. An assessment of MA participation between HPOZs also requires consideration of HPOZ establishment dates, which help to explain MA participation rates. An HPOZ-based analysis does not provide a comprehensive assessment of MA parcels throughout the City. While limited as a framework for assessing existing MA parcels citywide, HPOZs are an effective framework for implementing a prioritization strategy, as HPOZ planners can target specific HPOZs to close participation gaps within communities facing higher barriers to opportunity.

Property Type

An assessment of MA parcels by property type provides a distinct set of insights from the spatial frameworks of the analysis outlines above. A property type analysis examines the difference between MA participation for single-family and multi-family properties, for example, and introduces important questions around distribution of MA benefits for residents versus non-resident property owners.

Property type is most effective as a framework for refining prioritization of eligible MA parcels. Under a well-regulated MA program that aims to benefit *residents* of a property under contract, multi-family properties have the potential to extend the benefit of a single MA contact to a wider potential number of residents. For example, MA benefits can help a multi-family property owner financially justify preserving and rehabilitating multi-family rental properties that provide rent-stabilized housing units to low-income residents.

Citywide Totals by Equity Score

An assessment of Citywide MA parcels by equity score provides a baseline understanding of how existing and eligible MA parcels are distributed among communities facing varying barriers to opportunity.

Key Findings:

As shown in Figure 2 of **existing** MA contracts, the vast majority fall within the medium barriers to opportunity equity score categories, with a slight skew toward the **low-medium barriers** to opportunity category. About twice as many existing contracts fall within the low barriers category than within high barriers category. Overall, this assessment suggests that existing MA contracts are more often benefitting property owners in communities that are already facing lower barriers to opportunity.

As shown in Figure 3, of remaining **eligible** parcels, the vast majority fall within the medium barriers to opportunity equity score categories, with a moderate skew toward the **medium-high barriers** to opportunity category. About twice as many eligible parcels fall within the high barriers category than within the low barriers category. Overall, this assessment suggests that the MA program should focus prioritization on communities facing higher barriers to opportunity.

Figure 2: Existing Mills Act Contracts by Equity Score

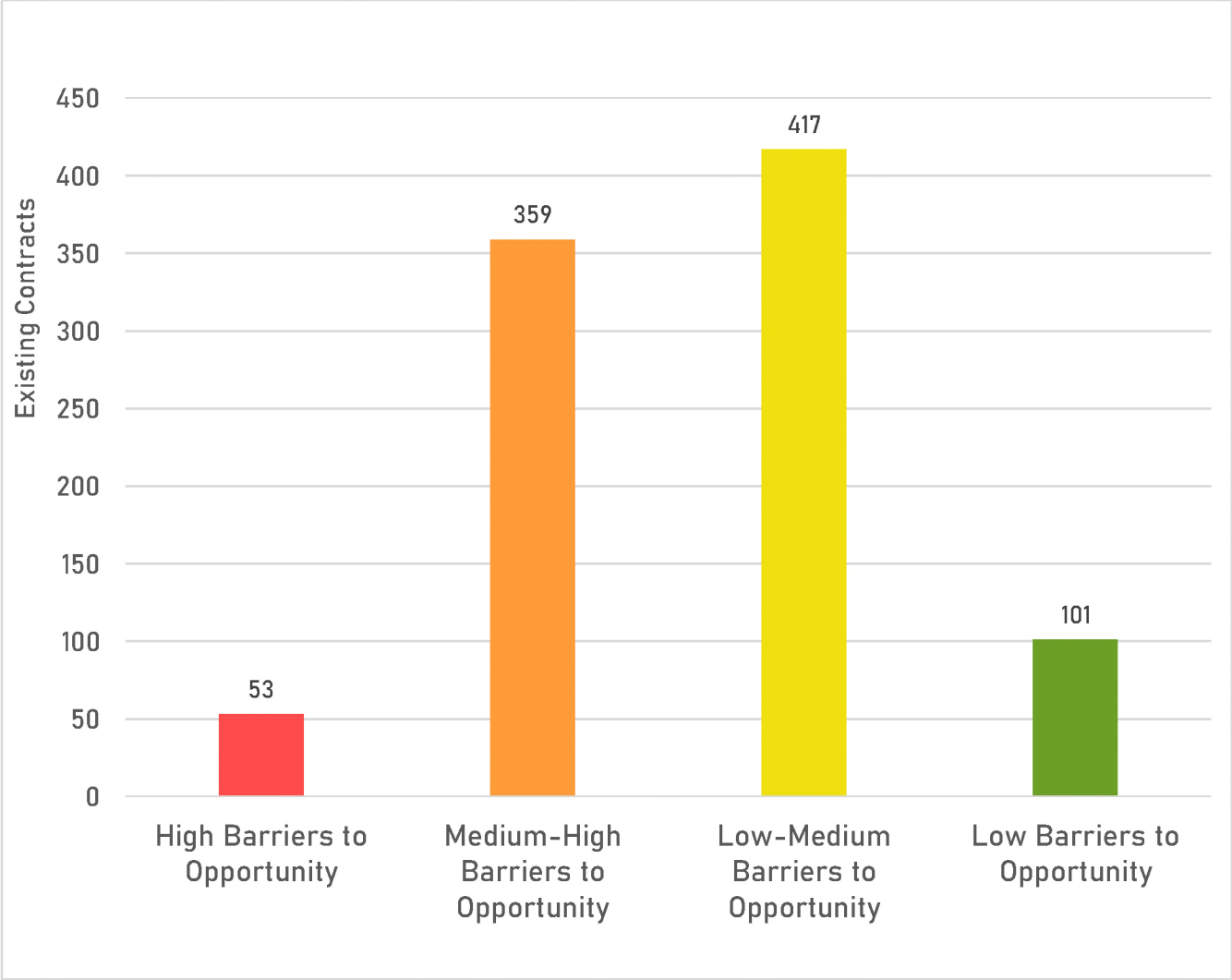
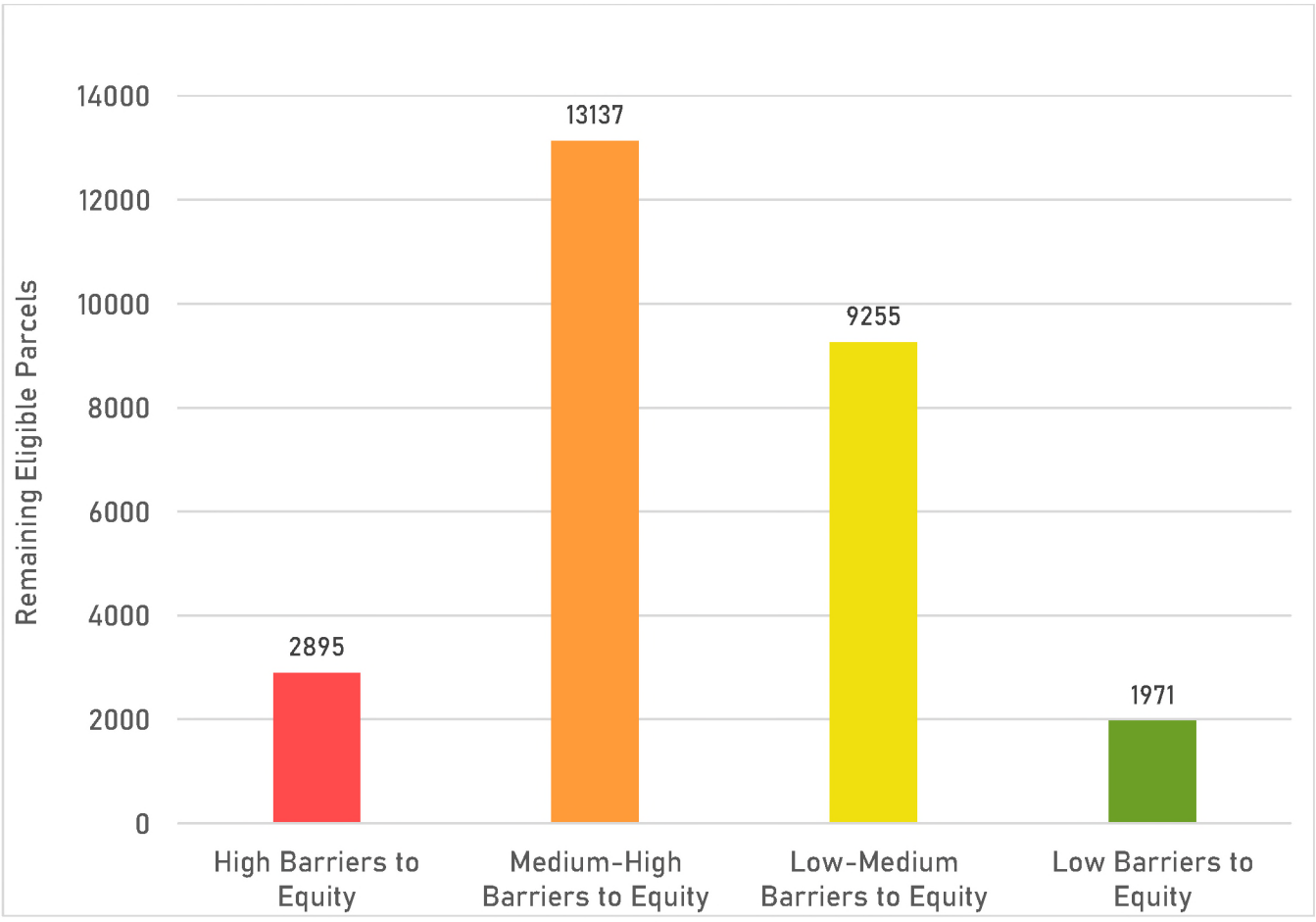


Figure 3: Remaining Eligible Mills Act Parcels by Equity Score



Community Plan Area

Program Today-Existing Contracts

An assessment of MA parcels by Community Plan Area (CPA) provides a baseline understanding of how existing MA contracts are distributed throughout the City, and what percent of eligible parcels in each CPA are under MA contract.

Key Findings:

As shown in Figure 4, CPAs with the highest number of existing contracts have relatively low participation rates. This data indicates that overall MA eligibility is disproportionately concentrated within just a few CPAs, rather than evenly distributed throughout the City.

Among these CPAs, participation rates are **higher** in Hollywood and Silver Lake, while participation rates are **lower** in Wilshire, South Los Angeles, Northeast Los Angeles, and West Adams. Central City is the only CPA with both a relatively high participation rate (20%) and high number of existing contracts (64).

Among CPAs with higher participation rates (20% or above), those with low numbers of existing contracts such as Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass, West Los Angeles, Encino–Tarzana, and Westchester–Playa Del Rey, are indicative of low MA eligibility resulting in inflated participation rates. CPAs with both low participation rates and low numbers of existing contracts may have moderate to high eligibility but low program awareness, access, or interest,

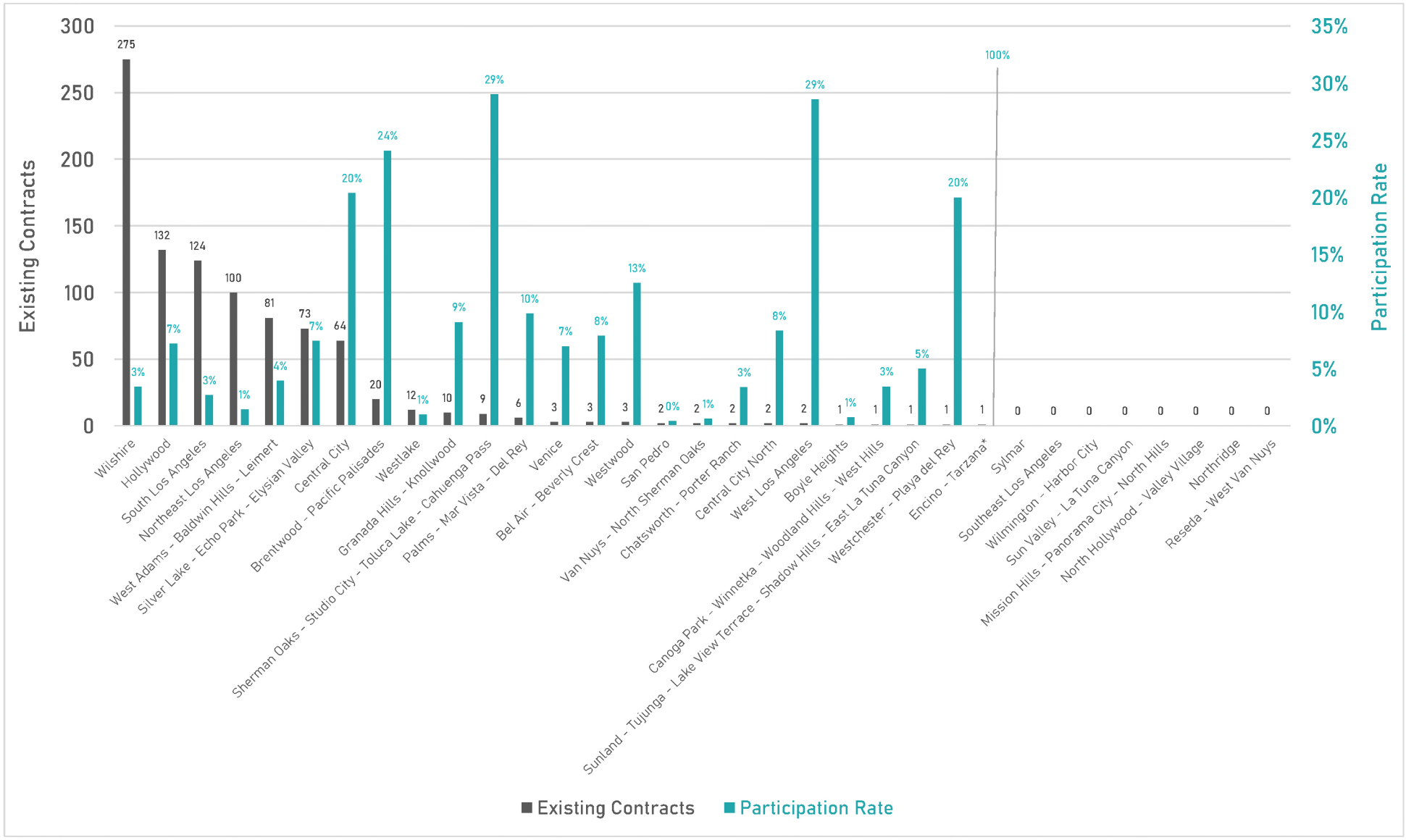
An assessment of CPA Participation Rates by Equity Score contextualizes MA program participation within citywide patterns of equity and access and seeks to understand if higher participation rates are associated with lower barriers to opportunity.

Key Findings:

As shown in Figure 5, existing MA contracts in CPAs with higher participation rates generally face lower barriers to opportunity, as exemplified by Encino-Tarzana, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass, West Los Angeles, Brentwood-Pacific Palisades, and Westchester-Playa del Rey. An important consideration to recall from Figure 4 is that higher participation rate also typically correlates with a lower number of total existing contracts.

Figure 5 also demonstrates that equity scores of existing MA contracts are relatively consistent within CPAs. For 16 CPAs, the existing contracts within a given CPA all fall within a single equity score category, and no CPA contains existing contracts across all 4 categories. This consistency within CPAs indicates that CPAs will be useful for identifying and prioritizing focus areas for remaining eligible parcels.

Figure 4: CPA-Existing Mills Act Contracts and Participation Rate



*Encino-Tarzana's sole eligible parcel is under MA contract. 100% participation rate is not displayed to scale on bar graph to avoid skewing data visualization

Figure 5: CPA-Participation Rate by Equity Score of Existing Contracts (Proportions)



Future Program: Remaining Eligible Parcels

Count of remaining eligible parcels by HCM and HPOZ

An assessment of remaining eligible (eligible) MA parcels by CPA provides a baseline understanding of how eligible parcels are distributed throughout the City, and a comparison between HCM and HPOZ eligibility.

Key Findings:

As shown in Table 1, MA eligibility is disproportionately concentrated in the CPAs of Wilshire (7,773 eligible parcels) and Northeast Los Angeles (6,927 eligible parcels), which together account for more than half of the 27,258 eligible parcels in the City. The high eligibility in these CPAs is primarily due to a concentration of HPOZs. South Los Angeles, West Adams-Baldwin Hills-Leimert Park, Hollywood, and Westlake CPAs also contain over 1,000 eligible HPOZ parcels each. Eligible HCM parcels are more evenly distributed across CPAs, with Hollywood contributing the highest number (415) of eligible HCM parcels.

An assessment of CPA Eligibility by Equity Score contextualizes MA program eligibility within citywide patterns of equity and access and seeks to understand if higher concentrations of eligible parcels are associated with higher barriers to opportunity.

Key Findings:

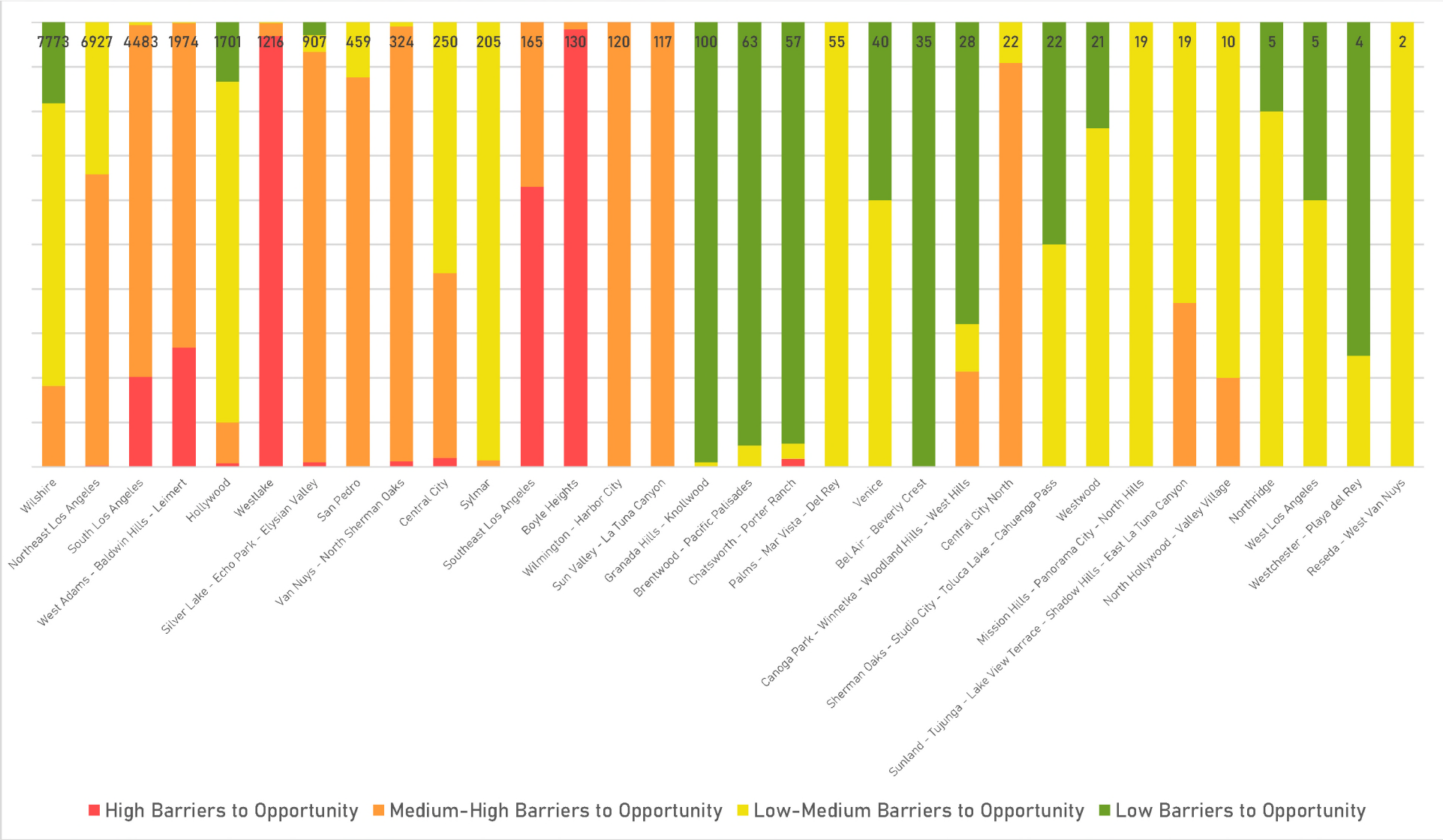
As shown in Figure 6, CPAs with higher numbers of eligible parcels generally face higher barriers to opportunity. An apparent distinction appears between equity scores in CPAs with over 100 eligible parcels (Wilshire to Sun Valley-La Tuna Canyon), and under 100 eligible parcels (Granada Hills-Knollwood to Reseda-West Van Nuys). Similar to the findings in Figure 4, Figure 6 shows relative consistency in equity scores within each CPA. Most CPAs have all eligible parcels within two adjacent score categories, or one single category. This consistency reaffirms that CPAs are a useful spatial framework for identifying and prioritizing focus areas for future MA participation.

Figure 6 suggests that CPAs with the most opportunity to advance equity as part of the MA Program include Westlake, Boyle Heights, Southeast Los Angeles, South Los Angeles, and West Adams-Baldwin Hills-Leimert Park. More broadly, if the MA Program focuses on CPAs with over 100 eligible parcels, it will de facto prioritize areas with higher barriers to opportunity.

Table 1: CPA - Count of Remaining Eligible Parcels by HCM and HPOZ

CPA	HCM	HPOZ	HPOZ - In Prog.	Grand Total
Wilshire	214	7559		7773
Northeast Los Angeles	331	6596		6927
South Los Angeles	244	4239		4483
West Adams-Baldwin Hills-Leimert	54	1920		1974
Hollywood	415	1286		1701
Westlake	101	1115		1216
Silver Lake-Echo Park-Elysian Valley	123	784		907
San Pedro	69	390		459
Van Nuys-North Sherman Oaks	43	281		324
Central City	250			250
Sylmar	205			205
Southeast Los Angeles	85	51	29	165
Boyle Heights	130			130
Wilmington-Harbor City	32	88		120
Sun Valley-La Tuna Canyon	5	112		117
Granada Hills-Knollwood	2	98		100
Brentwood-Pacific Palisades	63			63
Chatsworth-Porter Ranch	57			57
Palms-Mar Vista-Del Rey	9	46		55
Venice	40			40
Bel Air-Beverly Crest	35			35
Canoga Park-Winnetka-Woodland Hills-West Hills	28			28
Central City North	22			22
Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass	22			22
Westwood	21			21
Mission Hills-Panorama City-North Hills	19			19
Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon	19			19
North Hollywood-Valley Village	10			10
Northridge	5			5
Outside Designated CPA	5			5
West Los Angeles	5			5
Westchester-Playa del Rey	4			4
Reseda-West Van Nuys	2			2

Figure 6: CPA-Remaining Eligible Parcels by Equity Score (Proportions)



Property Type

Program Today-Existing Contracts

An assessment of existing MA contracts by Property Type provides a non-spatial understanding of how contracts are currently distributed, and a basic sense of the program's key beneficiaries.

Key Findings:

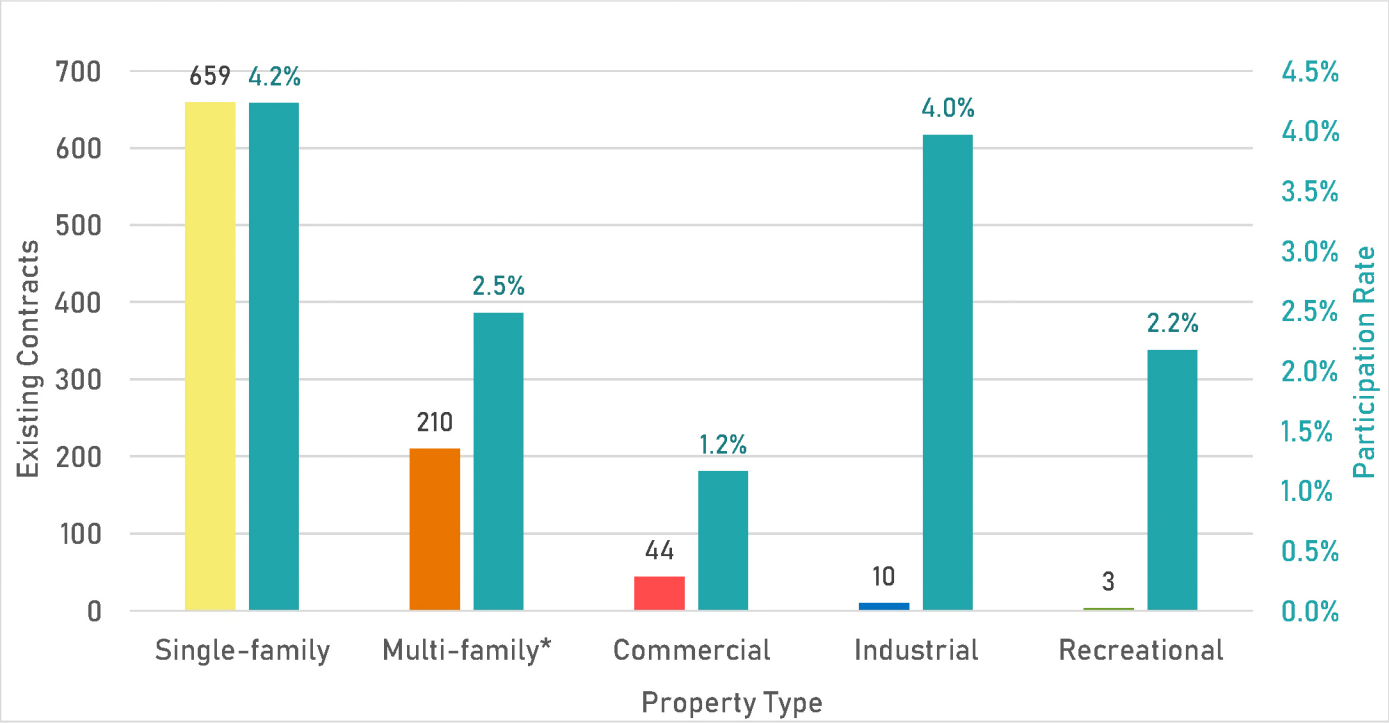
Figure 7 shows that single-family residences comprise the majority of existing contracts (659), about three times the number of multi-family residence contracts (210). It is important to note that multi-family contracts are counted by property, and do not account for the total number of dwelling units within each property. Contracts for commercial (44), industrial (10), and recreational (3) properties together comprise only 6% of existing MA contracts. Participation rate is highest among single-family (4.2%), followed by industrial (4.0%), multi-family (2.5%), recreational (2.2%), and commercial (1.2%).

An assessment of contracts by property type and equity score seeks to understand if contracts for particular property types are associated with higher or lower barriers to opportunity.

Key Findings:

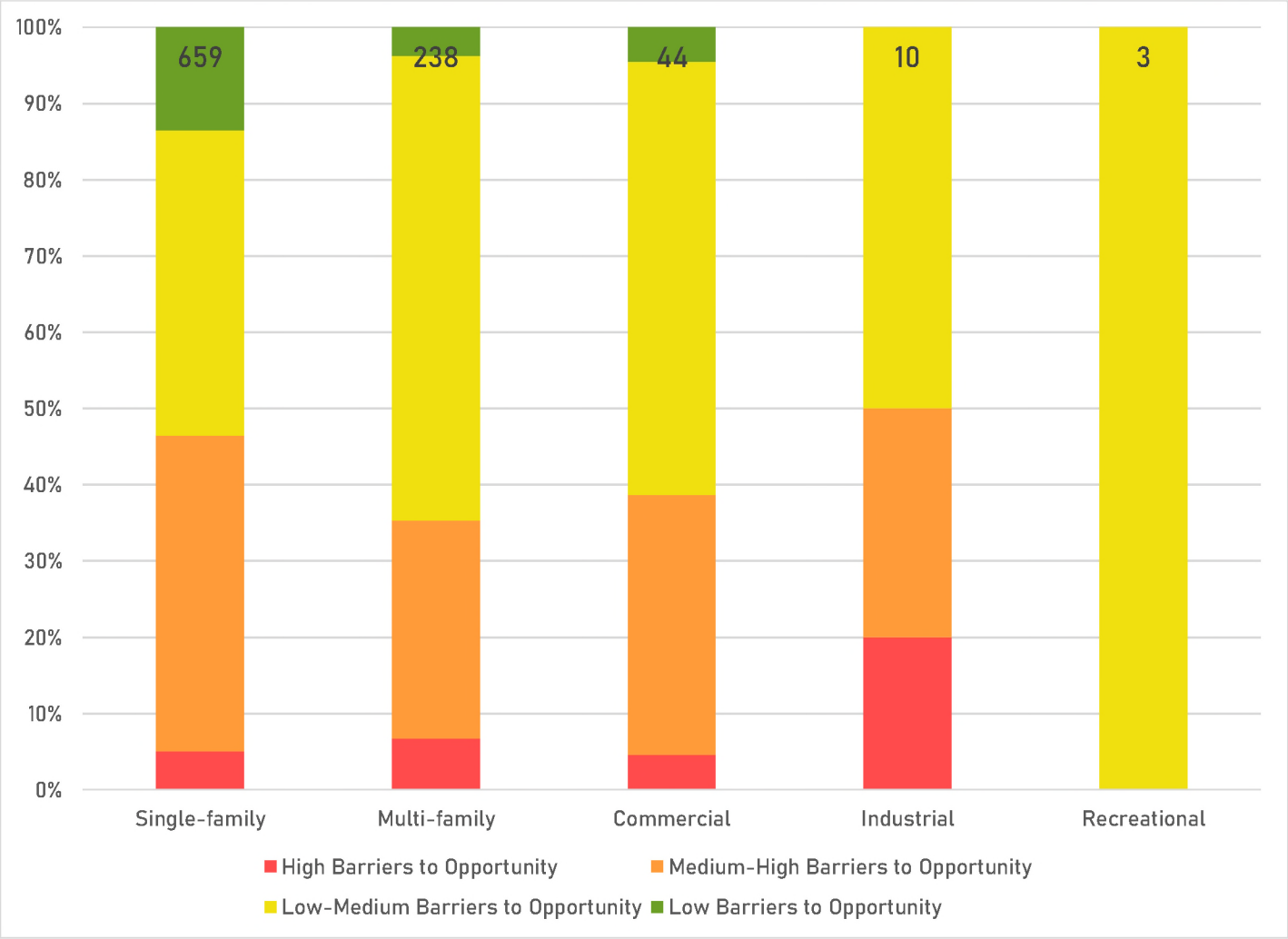
Figure 8 shows that single-family properties have the largest number (89) and proportion (14%) of existing contracts located in communities facing low barriers to opportunity. Multi-family and commercial properties share a relatively equal distribution of existing contracts across equity scores, with a slightly higher proportion of multi-family contracts located in communities experiencing high barriers to opportunity. Of the 10 industrial MA contracts, 2 are located in communities facing high barriers to opportunity (20%), The data for equity score by property type generally reflects overall equity score distribution (Figure 2), however single-family properties are clearly more closely associated with low barriers to opportunity.

Figure 7: Existing Contracts and Participation Rate by Property Type



*Includes 26 Condominium parcels totaling 2,568 individual condominium units

Figure 8: Equity Score by Property Type - Existing Contracts (Proportions)



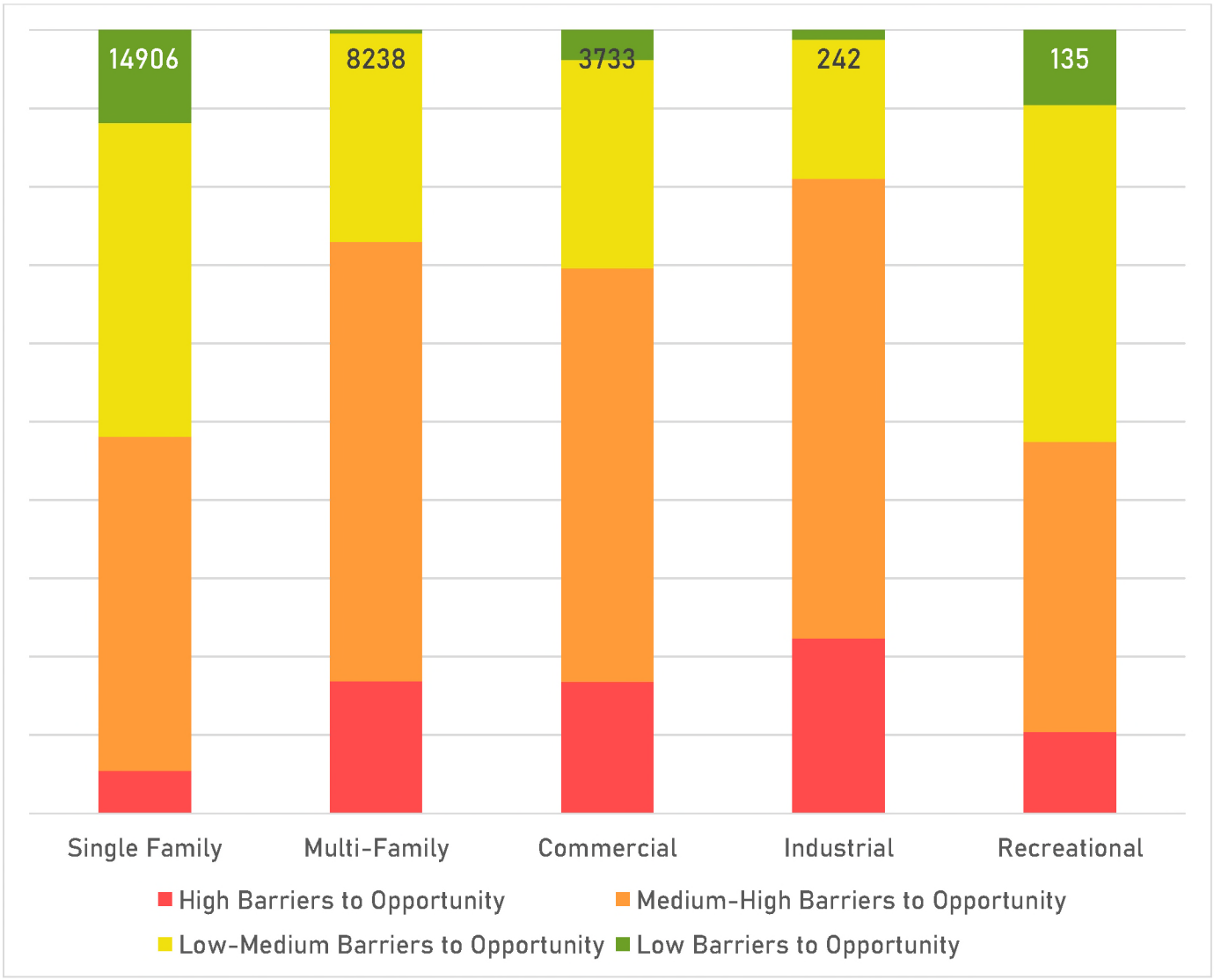
Future Program: Eligible Parcels

An assessment of remaining eligible (eligible) MA parcels by property type and equity score seeks to understand the overall distribution of eligible properties by property type, and to determine if eligible properties of particular property types are associated with higher or lower barriers to opportunity.

Key Findings:

Figure 9 shows that residential parcels (single-family and multi-family combined) account for 85% of all remaining eligible parcels. Consistent with the data for existing contracts, single-family properties have the largest number (14,906) and proportion (12%) of remaining eligible properties located in communities facing low barriers to opportunity. Multi-family properties have a minimal number (39) and proportion (<1%) of eligible properties located in communities facing low barriers to opportunity, and a relatively high number (1,390) and proportion (17%) of remaining eligible parcels (17%) located in communities facing high barriers to opportunity. This data suggests that prioritizing eligible multi-family parcels may help advance equity in the MA program. Of the 242 eligible industrial properties, a relatively high proportion are located in communities facing high barriers to opportunity (22%), The data for equity score by property type generally reflects overall equity score distribution (Figure 3), however single-family properties are clearly more closely associated with low barriers to opportunity, and multi-family properties more closely associated with high barriers to opportunity.

Figure 9: Property Type by Equity Score-Remaining Eligible Parcels (Proportions)



Council District

Program Today-Existing Contracts

An assessment of MA parcels by Council District (CD) provides a baseline understanding of how existing MA contracts are distributed between the City's 15 CD representatives, and what percent of eligible parcels in each CD are under MA contract.

Key Findings:

Figure 10 shows that the three CDs with the highest numbers of existing parcels (CDs 10, 4, and 1) have relatively low participation rates, suggesting that overall MA eligibility is disproportionately concentrated within just a few CDs, rather than evenly distributed throughout the City.

Among CDs with higher participation rates (10% or above), CD 3's low number of existing contracts (2) is indicative of low MA eligibility resulting in an inflated participation rate. CDs with both low participation rates and low numbers of existing contracts may have moderate to high eligibility but low program awareness, access, or interest.

An assessment of CD Participation Rates by Equity Score contextualizes MA program participation within citywide patterns of equity and access and seeks to understand if higher participation rates are associated with lower barriers to opportunity.

Key Findings

Figure 11 shows that contracts in CDs with the highest participation rates are predominantly located in communities facing lower barriers to opportunity. While this data echoes the findings for CPAs (Figure 5), the pattern is not as clearly defined across the CD graph, reflecting that CDs cover larger and more diverse areas than CPAs, and CD boundaries are less defined by distinct geographic areas or neighborhoods.

Figure 10: CD - Existing Contracts and Participation Rate

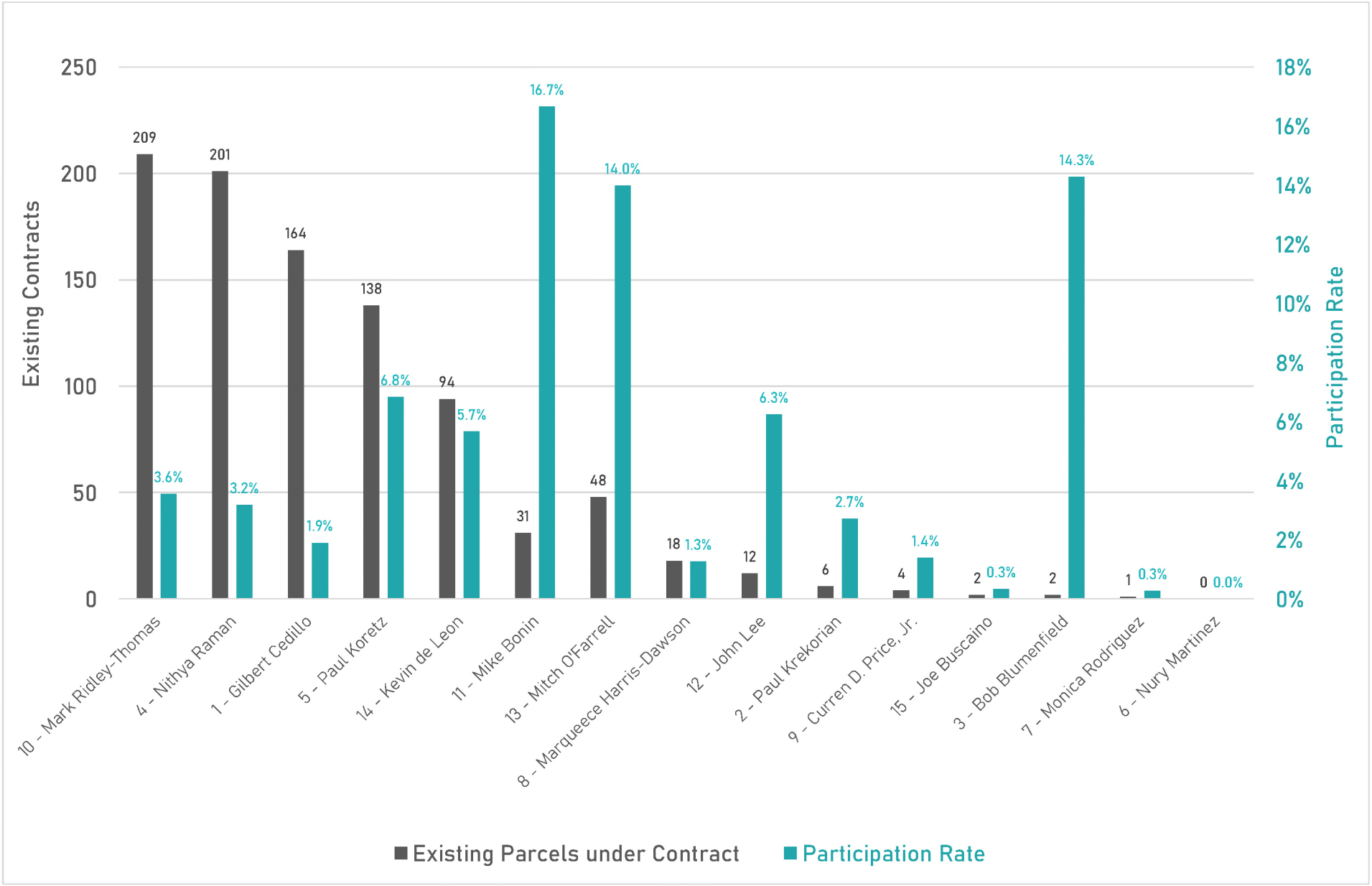


Figure 11: CD-Participation Rate by Equity Score of Existing Contracts (Proportions)



Future Program: Eligible Parcels

An assessment of remaining eligible (eligible) MA parcels by CD provides a baseline understanding of how eligible parcels are distributed between the City's 15 CD representatives, and a comparison between HCM and HPOZ eligibility.

Key Findings:

As shown in Table 2, MA eligibility is disproportionately concentrated in CD 1 (8,458 eligible parcels), CD 4 (6,105 eligible parcels) and CD 10 (5,658 eligible parcels). Collectively, these three CDs account for 75% of the City's eligible parcels, primarily due to concentrations of HPOZs. CD 5, CD 14, and CD 8 also contain over 1,000 eligible HPOZ parcels each. CD 1, CD 4, and CD 14 each have over 400 eligible HCM parcels. CD 3 is the only district without an HPOZ, and only contains 12 eligible HCM parcels.

An assessment of CD eligibility by equity score contextualizes MA program eligibility within citywide patterns of equity and access and seeks to understand if higher concentrations of eligible parcels are associated with higher barriers to opportunity.

Key Findings:

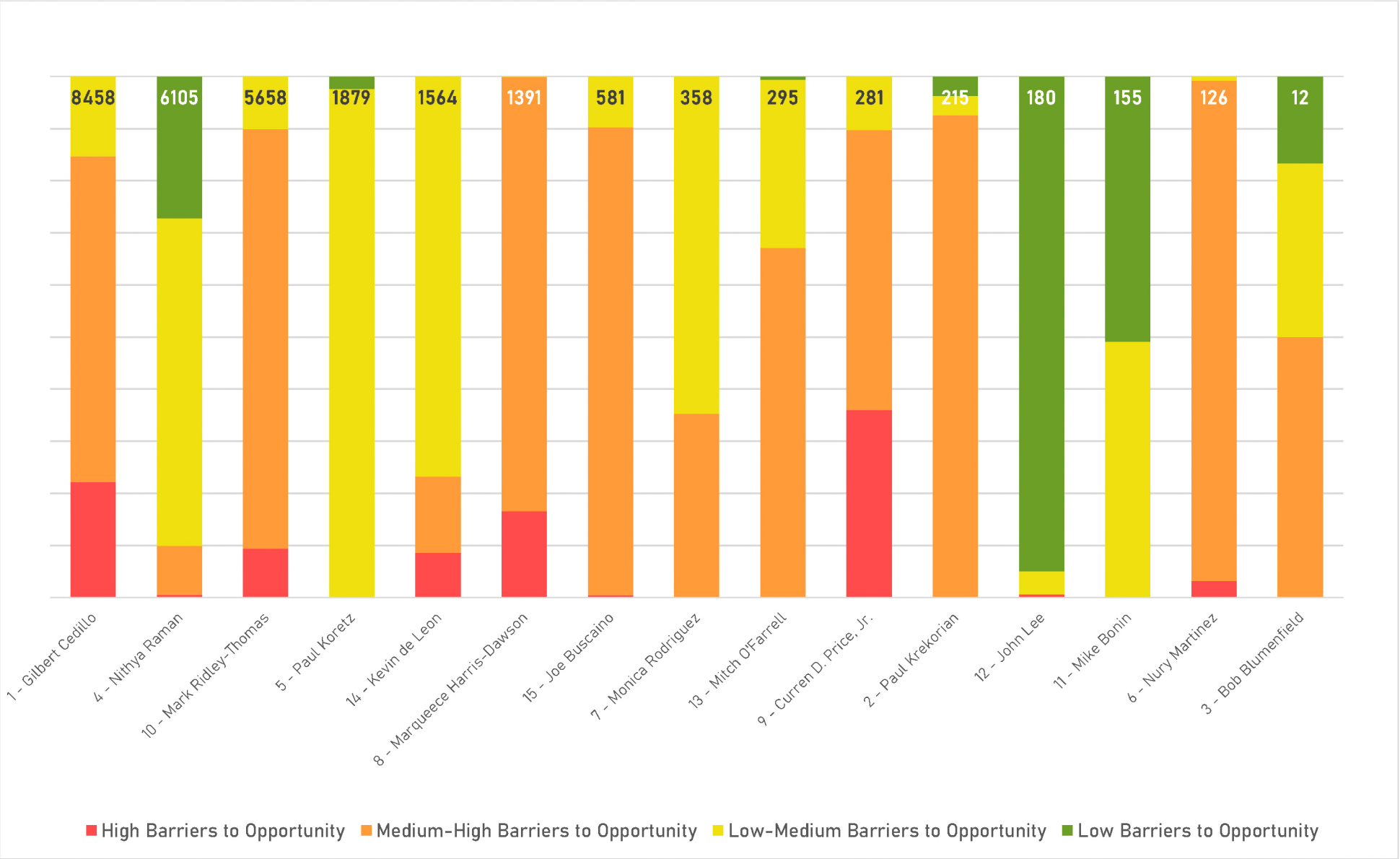
Figure 12 suggests some relationship between eligible parcels and equity scores, as eligible parcels facing high barriers to opportunity are predominantly located in CDs with 1,000+ eligible parcels. However, a more significant number of parcels in CD 4, CD 5, and CD 14 face low or low-medium barriers to opportunity. Unlike CPAs, most CDs have eligible parcels within 3 different equity score categories; no CD's eligible parcels are limited to only one equity score category.

This data suggests that while some CDs encompass communities that face more barriers to opportunity, CDs are too large and diverse as a spatial framework to use as focus areas without further criteria. CD offices can help implement equity goals of MA program by increasing awareness and access to the MA program in high priority areas. To support this effort, the appendix includes graphs of each Council District's eligible parcels by equity score and property type.

Table 2: CD- Count of Remaining Eligible Parcels by HCM and HPOZ

Council District	HCM	HPOZ	HPOZ - In Prog.	Grand Total
1 - Gilbert Cedillo	421	8037		8458
4 - Nithya Raman	407	5698		6105
10 - Mark Ridley-Thomas	180	5478		5658
5 - Paul Koretz	82	1797		1879
14 - Kevin de Leon	461	1103		1564
8 - Marqueece Harris-Dawson	41	1350		1391
15 - Joe Buscaino	103	478		581
7 - Monica Rodriguez	246	112		358
13 - Mitch O'Farrell	259	36		295
9 - Curren D. Price, Jr.	201	51	29	281
2 - Paul Krekorian	18	197		215
12 - John Lee	82	98		180
11 - Mike Bonin	109	46		155
6 - Nury Martinez	42	84		126
3 - Bob Blumenfield	12			12

Figure 12: CD-Remaining Eligible Parcels by Equity Score (Proportions)



Historic Preservation Overlay Zone (HPOZ)

Program Today-Existing Contracts

As HPOZs comprise the vast majority of MA parcels, an assessment of total contracts and participation rate by HPOZ provides a baseline understanding of the program's key clusters of contributing properties.

Key Findings:

Figure 13 shows wide variation across HPOZs for both existing contracts and participation rate, however contracts are more evenly distributed across HPOZs than they are across CPAs or CDs. Due to a disproportionately high number of total eligible parcels, the Highland Park-Garvanza HPOZ contains the highest number of existing contracts (69), despite having a 1% participation rate. Of other HPOZs with high numbers of contracts, both South Carthay (66), and LaFayette Square (48) have relatively high participation rate of 16%. Melrose Hill has the highest participation rate by far (28%), but only 14 existing contracts, suggesting a lower number of total eligible parcels, and high levels of program awareness and access. 13 HPOZs contain five or fewer existing contracts.

An important factor to assess is year of HPOZ establishment, given that properties in more recently established HPOZs have had a smaller window of opportunity to participate in the program. An assessment of HPOZ contracts by decade of HPOZ establishment seeks to understand whether year of HPOZ establishment is indeed correlated to numbers of existing contracts.

Key Findings:

As shown in Figure 14, many of the HPOZs with the highest numbers of existing parcels have been established for at least 20 years. High numbers of existing contracts in more recently established HPOZs likely reflect high initial levels of MA program awareness and interest, and high numbers of eligible parcels.

While Figure 14 focuses on number of existing contracts, Figure 15 provides a supplementary assessment of participation rate by year of HPOZ establishment.

Key Findings:

As shown in Figure 15, this assessment appears to provide a more intuitive relationship between HPOZ establishment date and program participation, as it controls for HPOZs with exceptionally high numbers of eligible parcels such as Highland Park-Garvanza. Higher participation rates in older HPOZs such as South Carthay, LaFayette Square, and Carthay Circle suggest that the communities are aware of the MA program and have been taking advantage of its benefits. Most HPOZs with low participation rates are relatively new, and participation can be expected to rise over time.

An assessment of HPOZ participation rates by equity score seeks to understand if higher participation rates are more likely to occur in HPOZs with lower barriers to equity.

Key Findings:

Figure 15 shows no discernible correlation between HPOZ participation rate and equity score of existing contracts.

Figure 13: HPOZ-Existing Contracts and Participation Rate

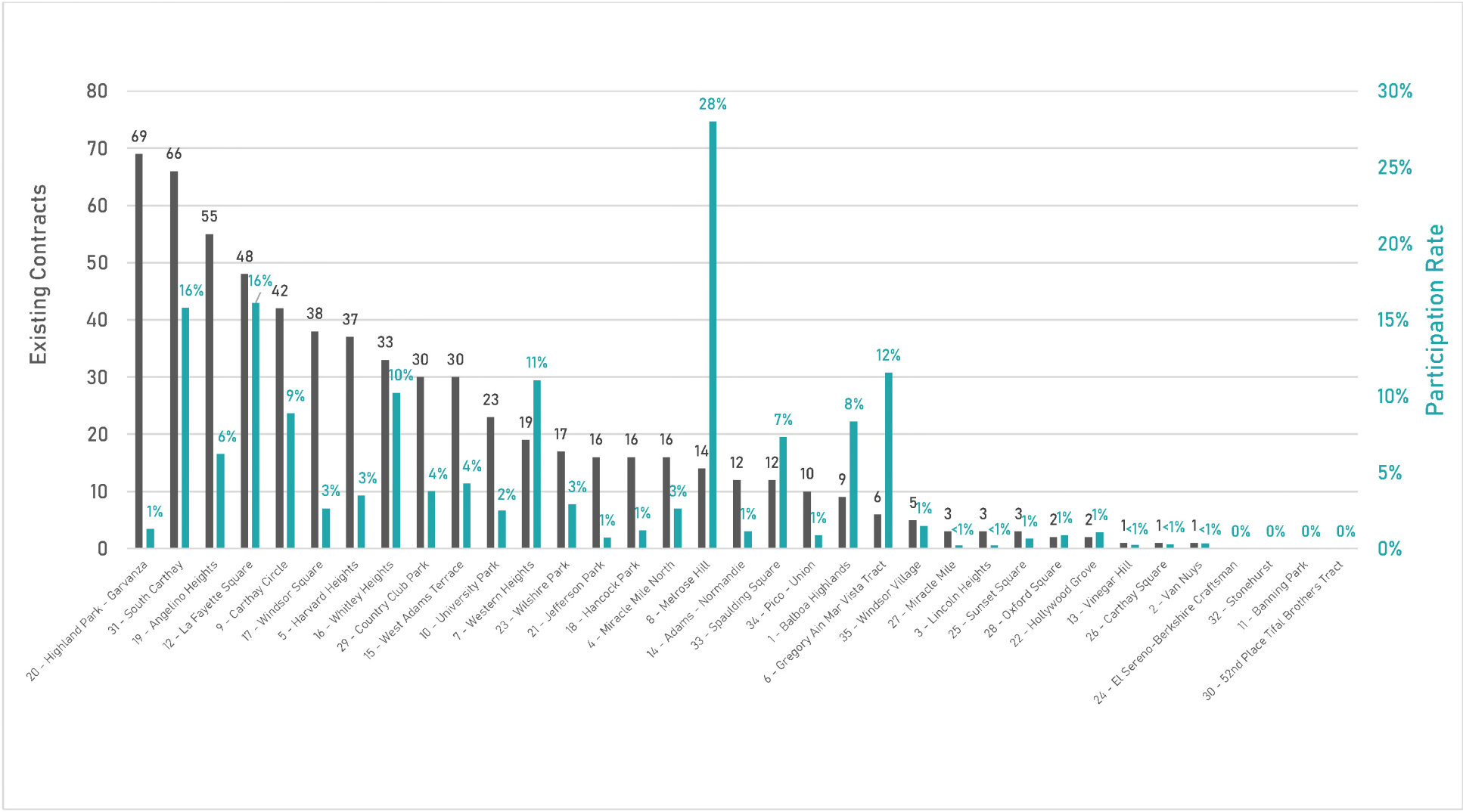


Figure 14: Existing Contracts by HPOZ and HPOZ Establishment Decade

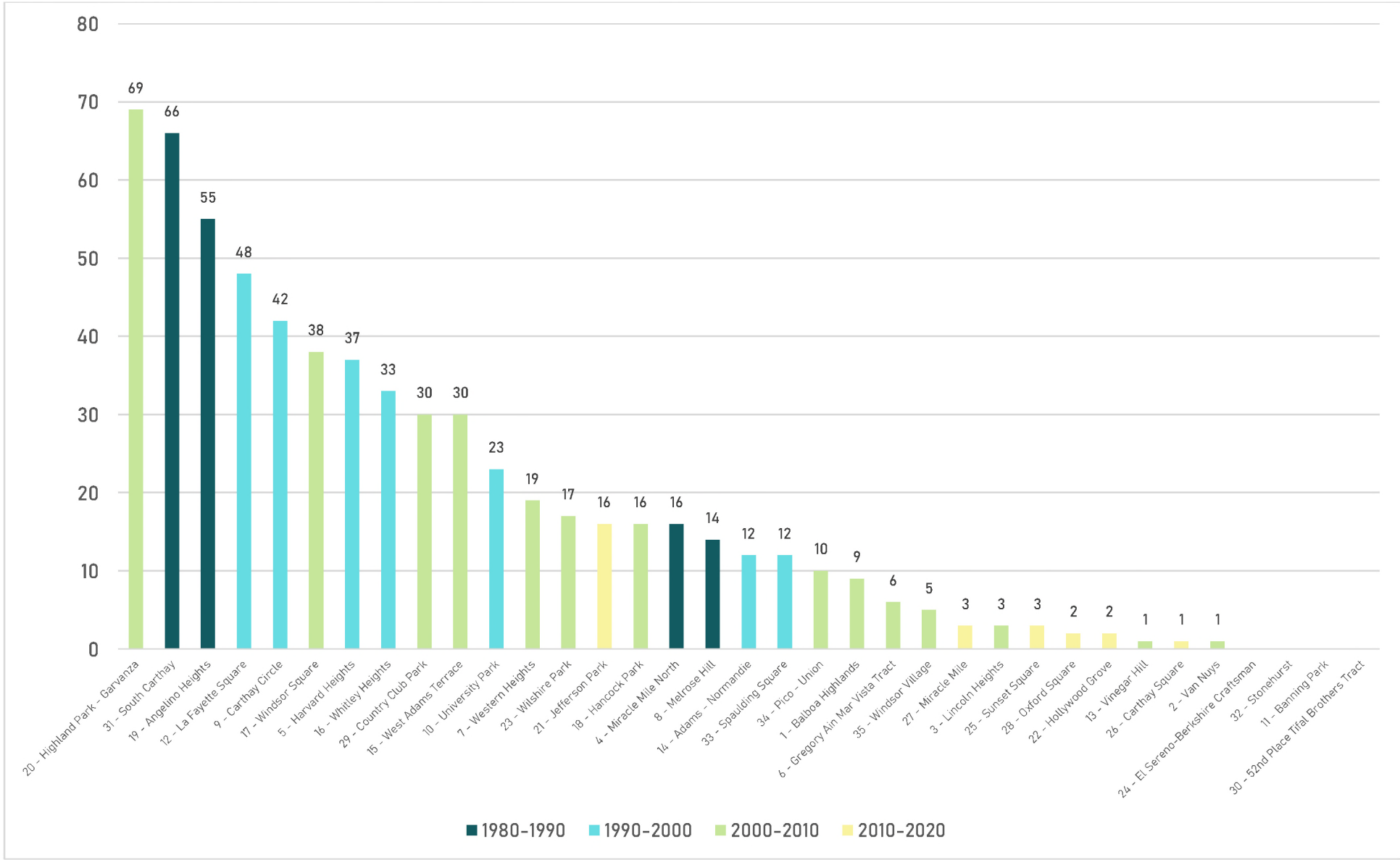


Figure 15: Participation Rate by HOZ and HPOZ Establishment Rate

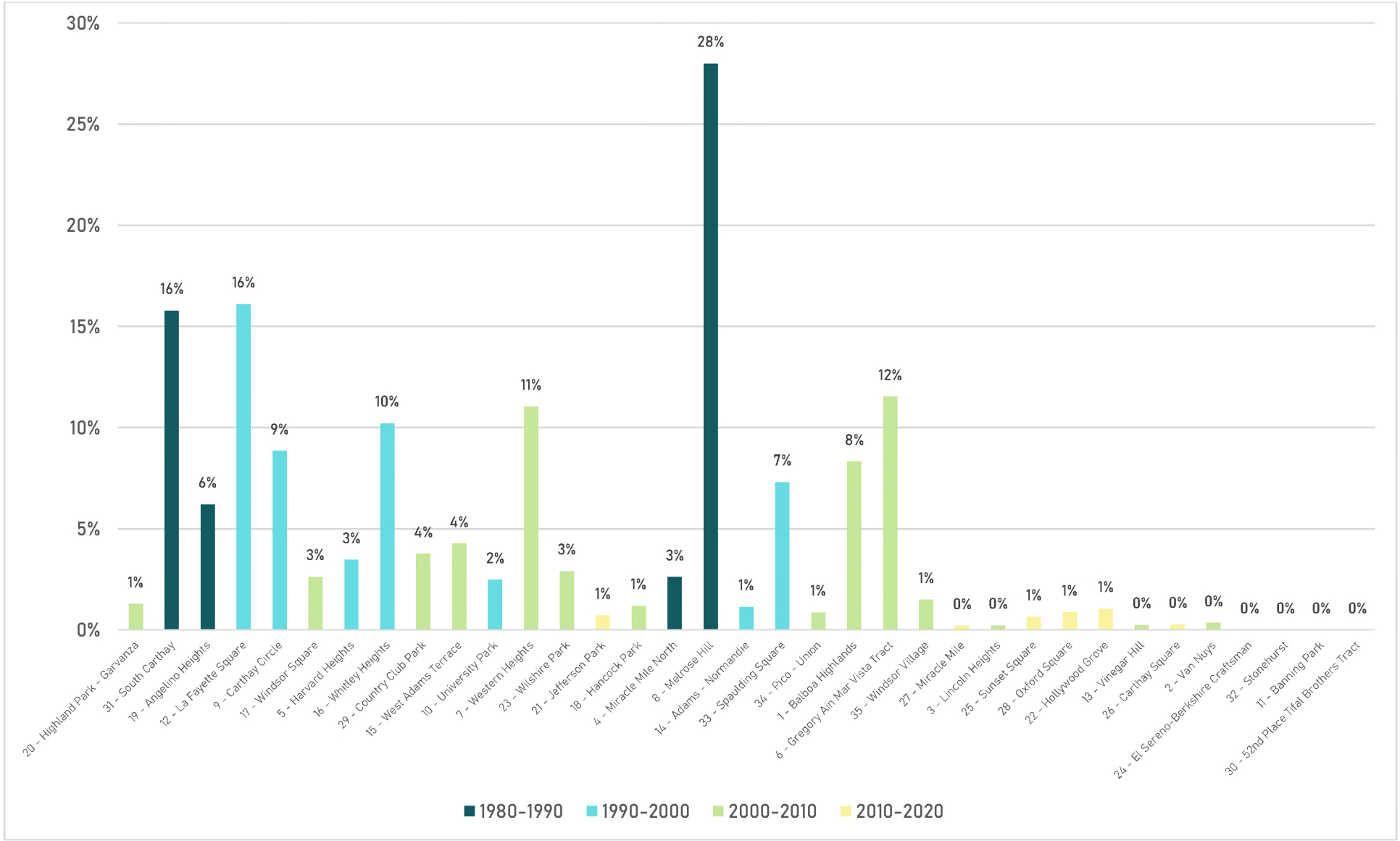
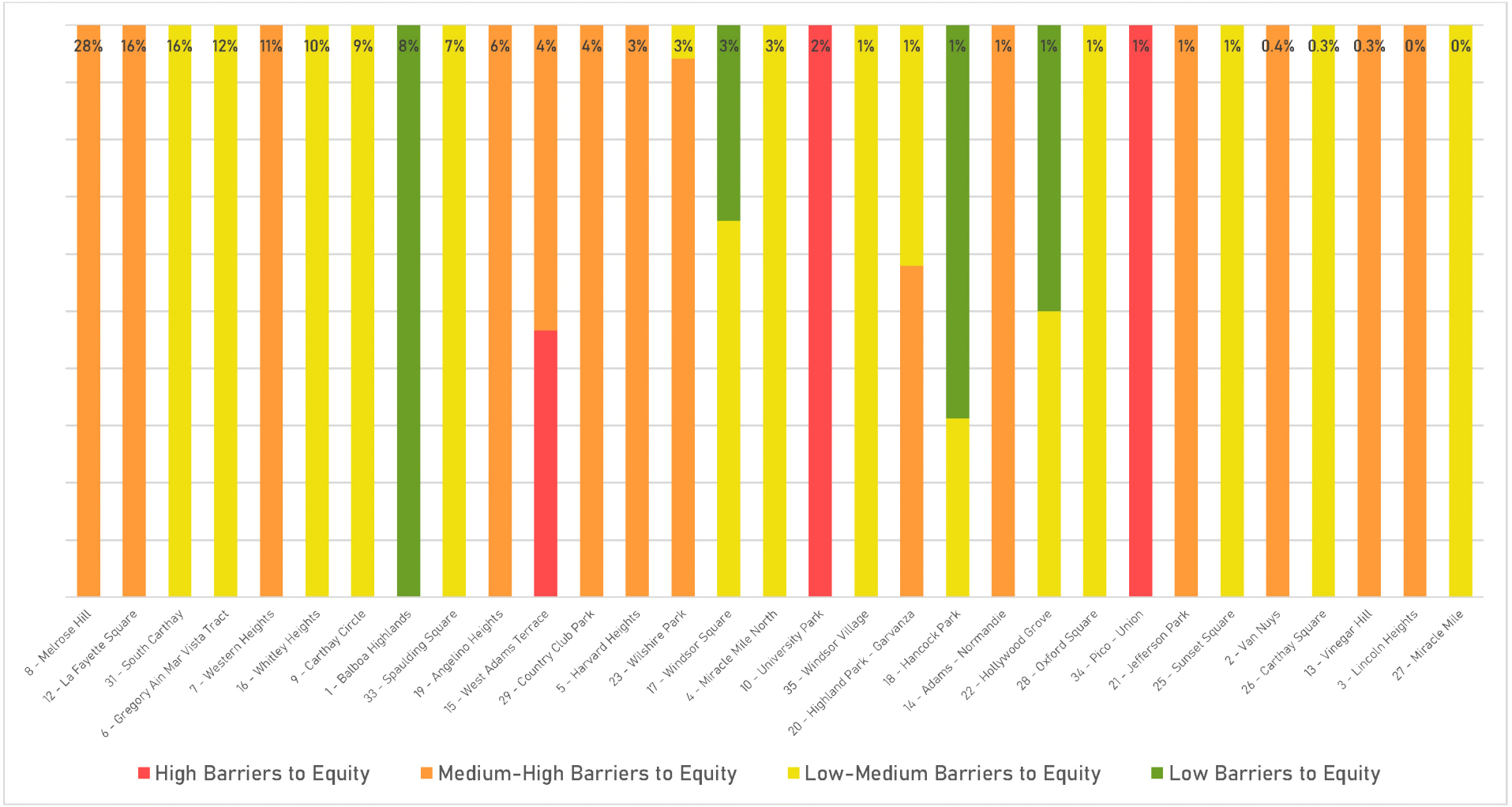


Figure 16: HPOZ-Participation Rate by Equity Score of Existing Contracts (Proportions)



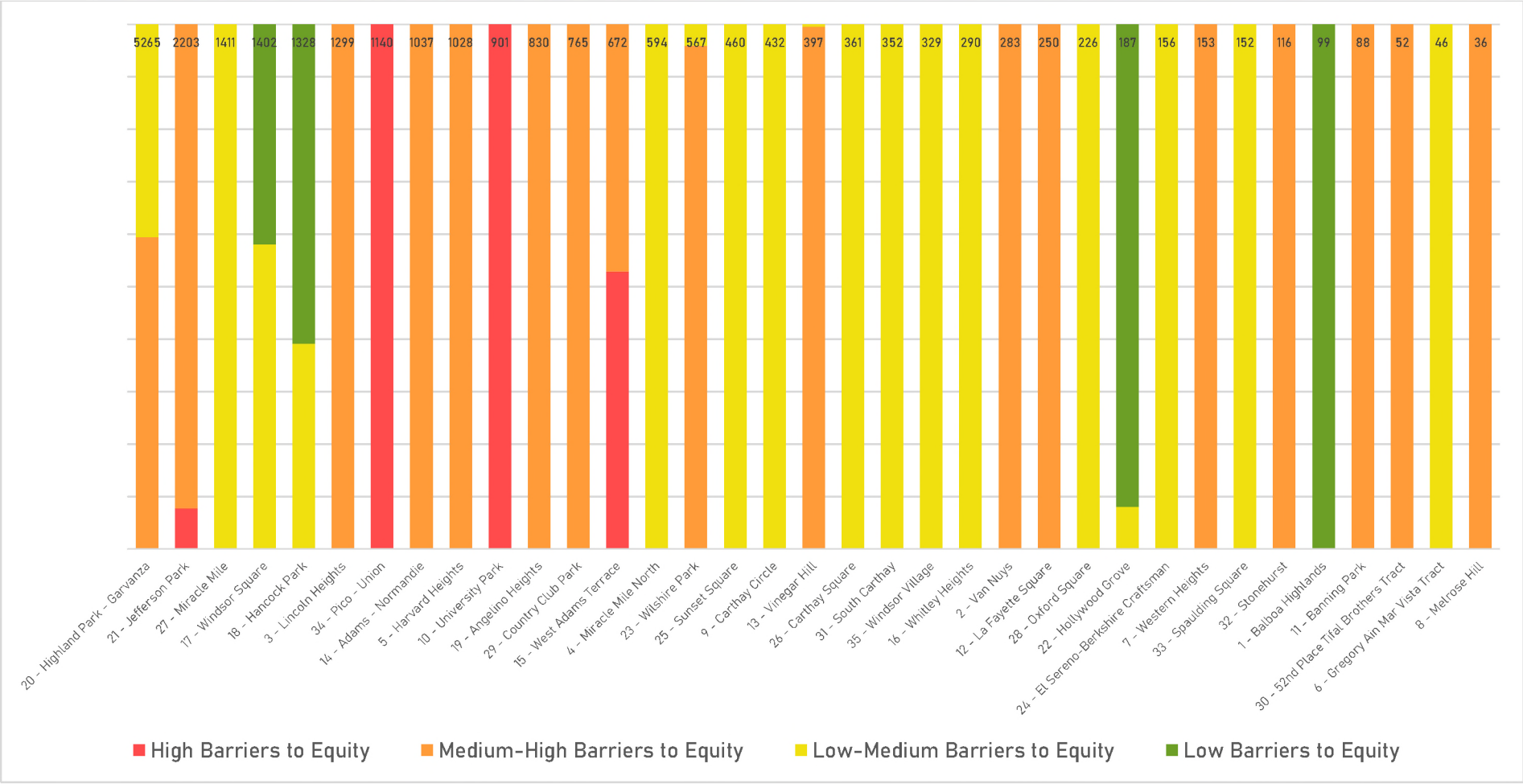
Future Program: Eligible Parcels

An assessment of HPOZ eligibility by equity score contextualizes MA program eligibility within citywide patterns of equity and access and seeks to understand if higher concentrations of eligible parcels are associated with higher barriers to opportunity.

Key Findings:

Figure 17 shows that all eligible HPOZ parcels located in communities facing high barriers to opportunity are in HPOZs with 600+ parcels. The HPOZs of Pico Union (1140 eligible parcels) and University Park (901 eligible parcels) are comprised entirely of parcels located in communities facing High Barriers to opportunity and reflect clear opportunities to advance equity through MA program. Within each HPOZ, equity scores of eligible parcels are relatively consistent; most HPOZs are comprised of parcels in a single equity score category, and no HPOZs contain eligible parcels in more than two score categories. This indicates that HPOZs may also be useful for identifying focus areas for program prioritization.

Figure 17: HPOZ Eligible Parcels by Equity Score (Proportions)



Advancing Equity in the MA Program

Prioritization Method

To encourage the advancement of equity in the MA program, this section identifies recommendations for general focus areas and remaining MA eligible parcels across the City of Los Angeles to prioritize for placing under MA contract. A GIS spatial analysis was conducted to select remaining eligible MA parcels based on the following criteria and identify general focus areas facing the highest barriers to equitable outcomes:

- High Priority
  - High or Medium-High Barriers to opportunity per the Los Angeles Equity Index
    AND
  - Multi-family residence property type

- Medium Priority
  - High or Medium-high Barriers to opportunity per the Los Angeles Equity Index
  - Single-family, Commercial, Industrial, Recreational and NA

- Low Priority
  - Low or Medium-low Barriers to opportunity per the Los Angeles Equity Index

Figure 17 provides an overview of the identified eligible MA parcels color-coded by High, Medium, or Low priority score for the City of Los Angeles. High priority implementation areas with the number of properties which fall within the high priority category are also listed.

Figures 18-23 provide zoomed-in maps of the eligible MA parcels color-coded by High, Medium, or Low priority score with additional boundaries and annotations overlayed for each of the three spatial assessment frameworks (CPAs, CDs, and HPOZs).

As shown in Figure 18, there are large clusters of medium- and high-priority parcels in the CPAs of Northeast Los Angeles, Silver Lake-Echo Park-Elysian Valley, Westlake, Wilshire, South Los Angeles, and West Adams-Baldwin Hills-Leimert Park. Within the San Pedro CPA, there is a moderate cluster of medium- and high-priority parcels, as shown in Figure 19.

CD1, CD10, CD8, CD4, and CD9 contain large clusters of medium- and high-priority parcels, as shown in Figure 20. Figure 21 identifies two clusters of medium- and high-priority parcels in CD15.

As shown in Figure 22, several large clusters of medium- and high-priority parcels are located within the HPOZs of Highland Park-Garvanza, Lincoln Heights, Angelino Heights, Harvard Heights, Pico Union, University Park, Adams-Normandie, Jefferson Park, West Adams Terrace, Country Club Park, La Fayette Square. This figure also highlights several clusters of medium-priority HCM properties outside of HPOZs, such as the Cesar E Chavez commercial corridor in Boyle Heights, 27th Street Historic District near Historic South Central, Lincoln Park, North Atwater Park, Barnsdall Art Park, and the USC Campus, among others. Figure 23 identifies the cluster of medium- and high-priority parcels in the Vinegar Hill HPOZ.

Recommendations for Next Steps

As the City of Los Angeles Department of City Planning's Office of Historic Resources implements recommendations as part of the comprehensive MA Program Assessment, there is opportunity to take steps to advance program-wide equity through focused equity-driven actions. As summarized in the previous section, there are several locations throughout the City of Los Angeles where placing remaining eligible MA parcels under MA contract can directly help to increase opportunity and promote equitable outcomes. While prioritizing these locations for placing remaining eligible MA parcels under MA contract can promote equity as it relates to the distribution of MA contracts citywide, there is also opportunity to take actions to promote an equitable process and program, which helps to advance broad equity objectives including:

1. Prioritize outreach by HPOZ planners within areas that include a density of medium and high priority parcels to ensure property owners are aware of the MA Program and its benefits
2. Explore opportunity to partner with CDs that include a density of medium and high priority parcels to ensure property owners are aware of the MA Program and promote participation
3. Encourage identification of dedicated equity-related funding sources, including CD budgets, to promote focused efforts to place remaining eligible parcels under MA contract within medium and high priority focus areas
4. Ensure outreach materials related to the MA Program are multi-lingual and accessible online as printed materials
5. Reduce or eliminate fees related to the application process for the MA Program for parcels within medium and/or high priority focus areas
6. Identify performance metrics for the number of medium and high priority parcels the City would like to place under MA contract annually and ensure tracking over time

High Priority Implementation Areas (number of high priority properties):

Council Districts:

- CD1: **3,337**
- CD10: **1,618**
- CD8: **630**
- CD15: **208**
- CD4: **79**
- CD9: **57**
- CD14: **50**

Community Plan Areas:

- Northeast Los Angeles: **1,886**
- South Los Angeles: **1,703**
- Westlake: **711**
- West Adams - Baldwin Hills – Leimert: **548**
- Silver Lake - Echo Park - Elysian Valley: **497**
- Wilshire: **362**
- San Pedro: **205**

HPOZs:

- 20 - Highland Park – Garvanza: **1176**
- 3 - Lincoln Heights: **708**
- 34 - Pico – Union: **690**
- 21 - Jefferson Park: **679**
- 19 - Angelino Heights: **497**
- 14 - Adams – Normandie: **480**
- 10 - University Park: **406**
- 5 - Harvard Heights: **399**

Figure 17: Equity Prioritization of Eligible Parcels Citywide

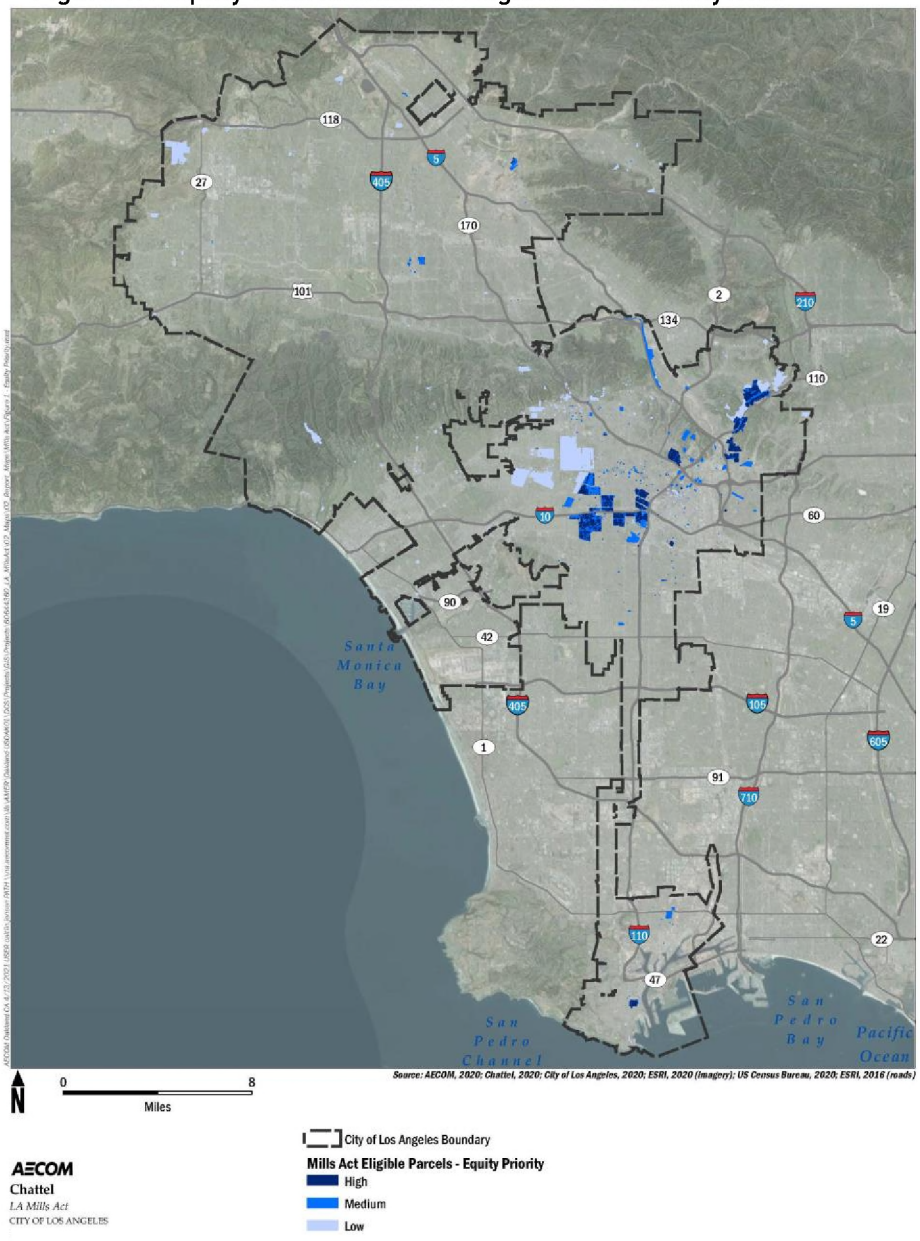


Figure 18: Equity Prioritization of Eligible Parcels Citywide – CPA (north)

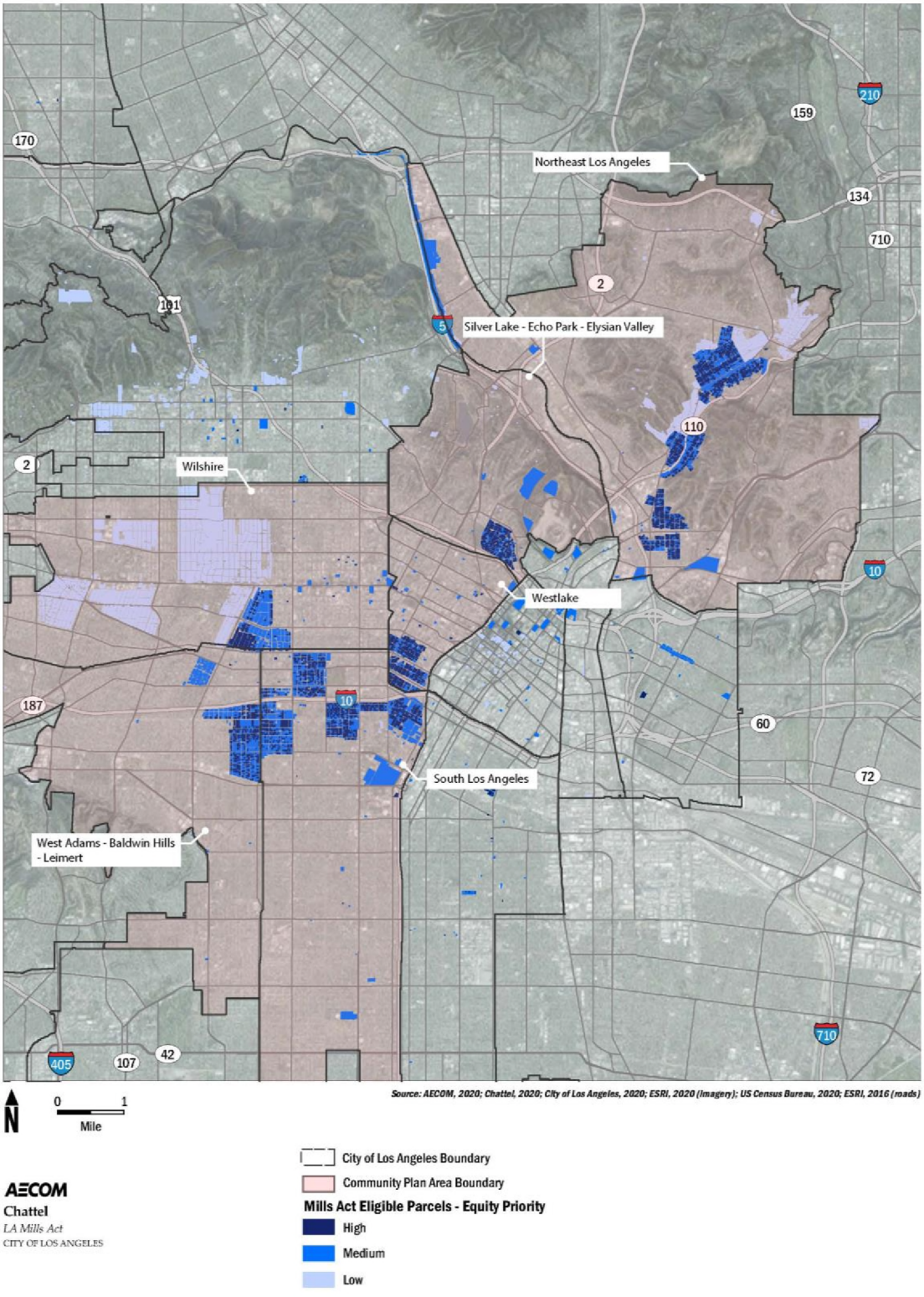


Figure 19: Equity Prioritization of Eligible Parcels Citywide – CPA (south)

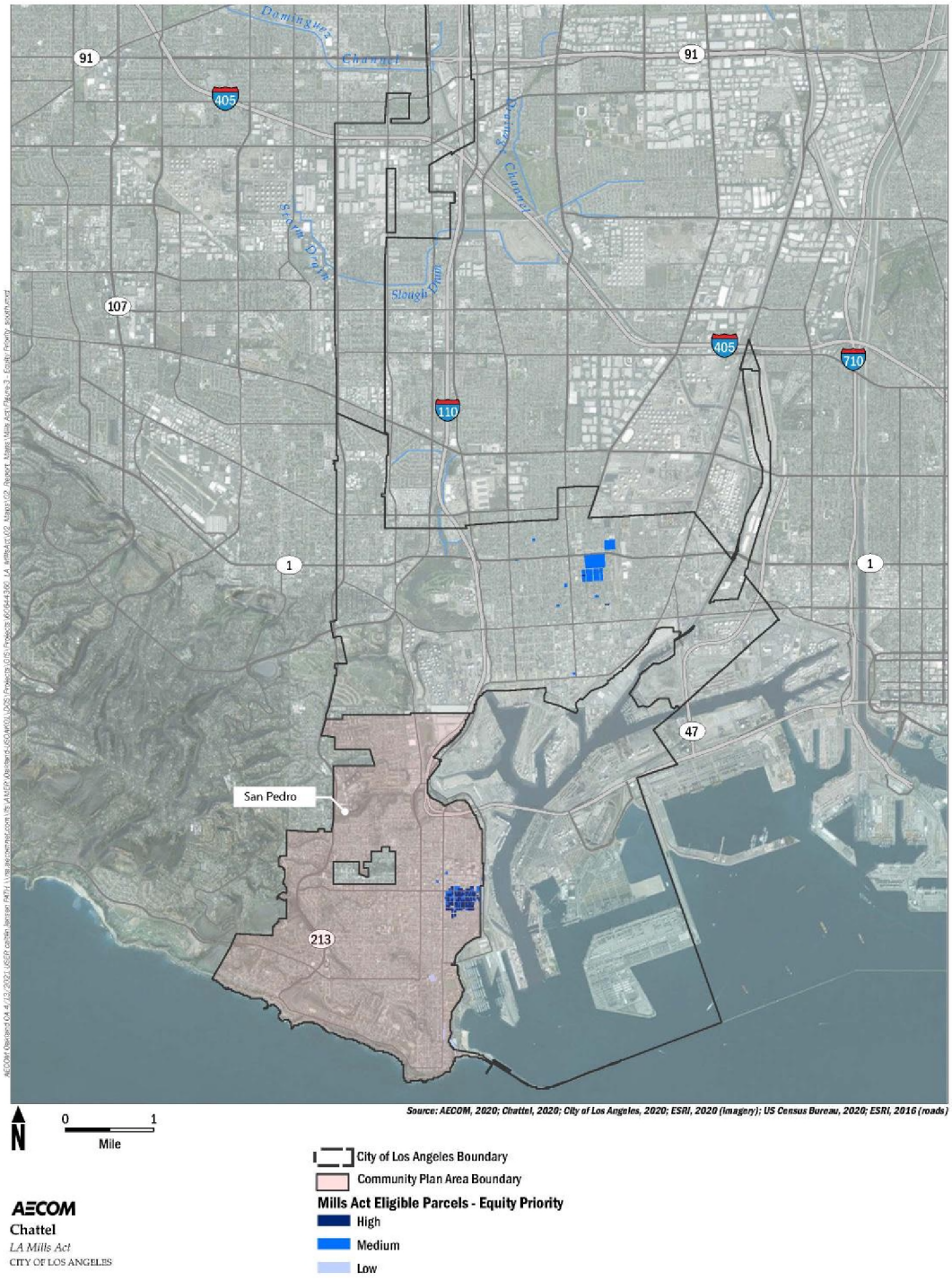


Figure 20: Equity Prioritization of Eligible Parcels Citywide – CD (north)

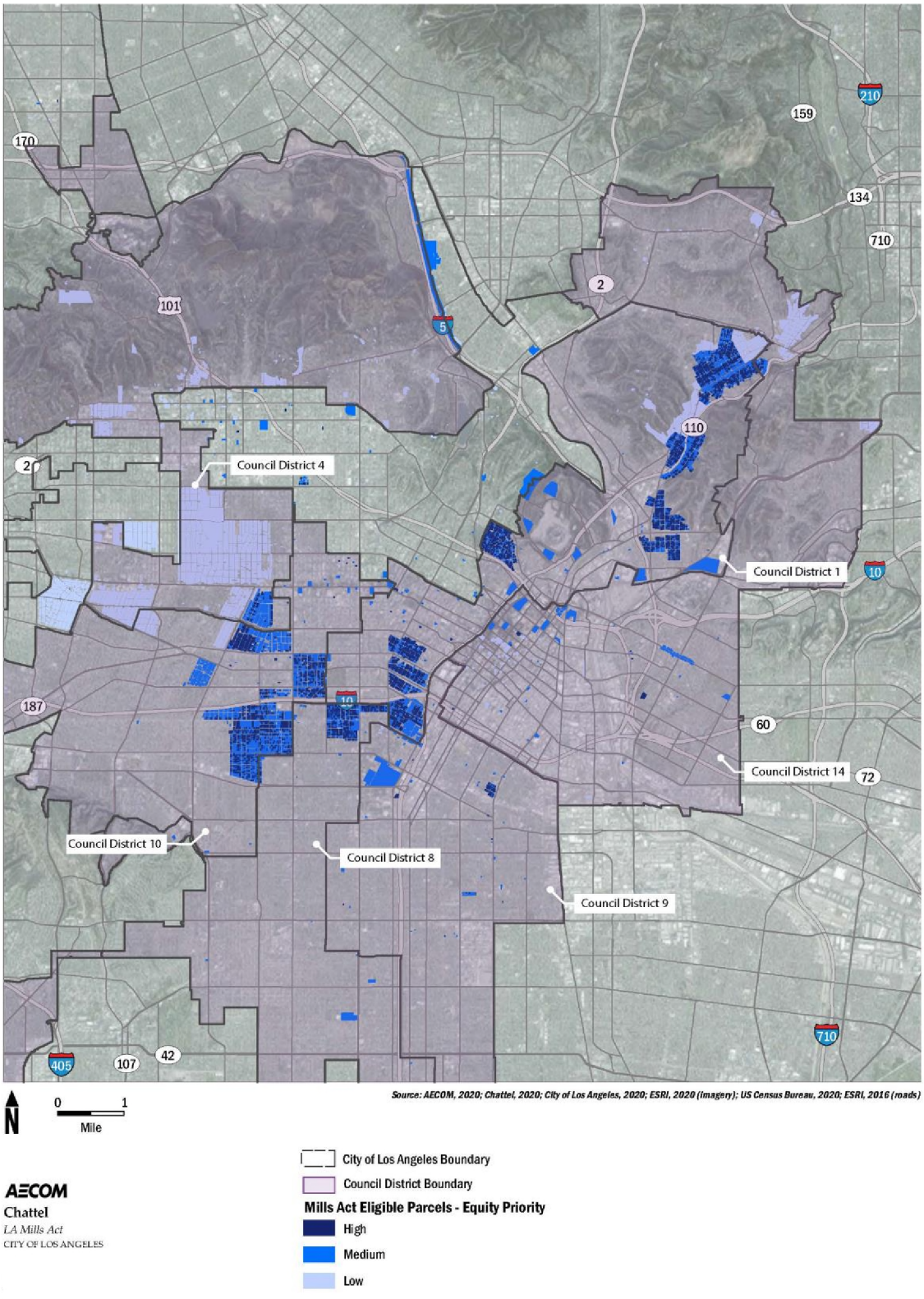


Figure 21: Equity Prioritization of Eligible Parcels Citywide – CD (south)

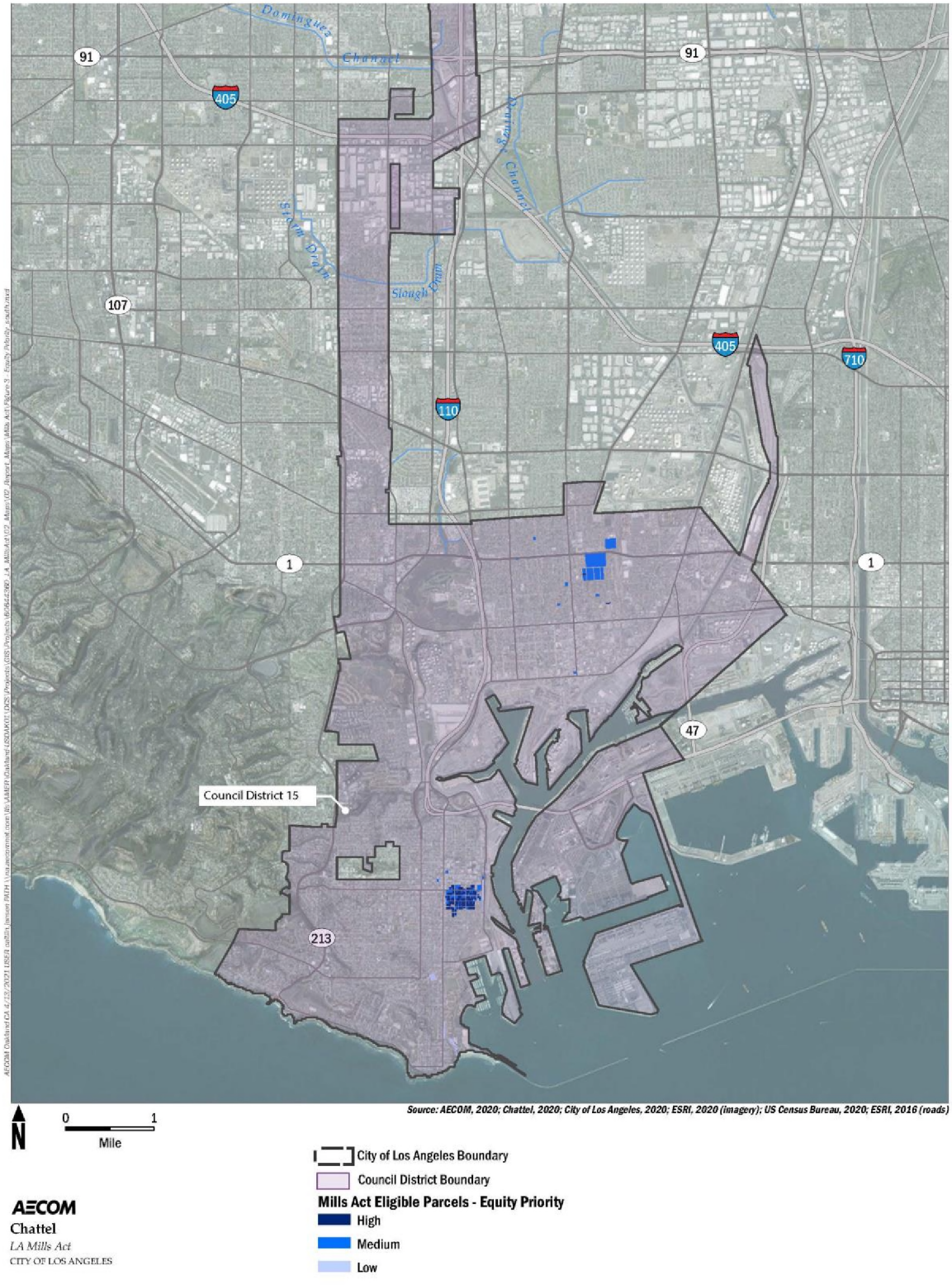


Figure 22: Equity Prioritization of Eligible Parcels Citywide – HPOZ (north)

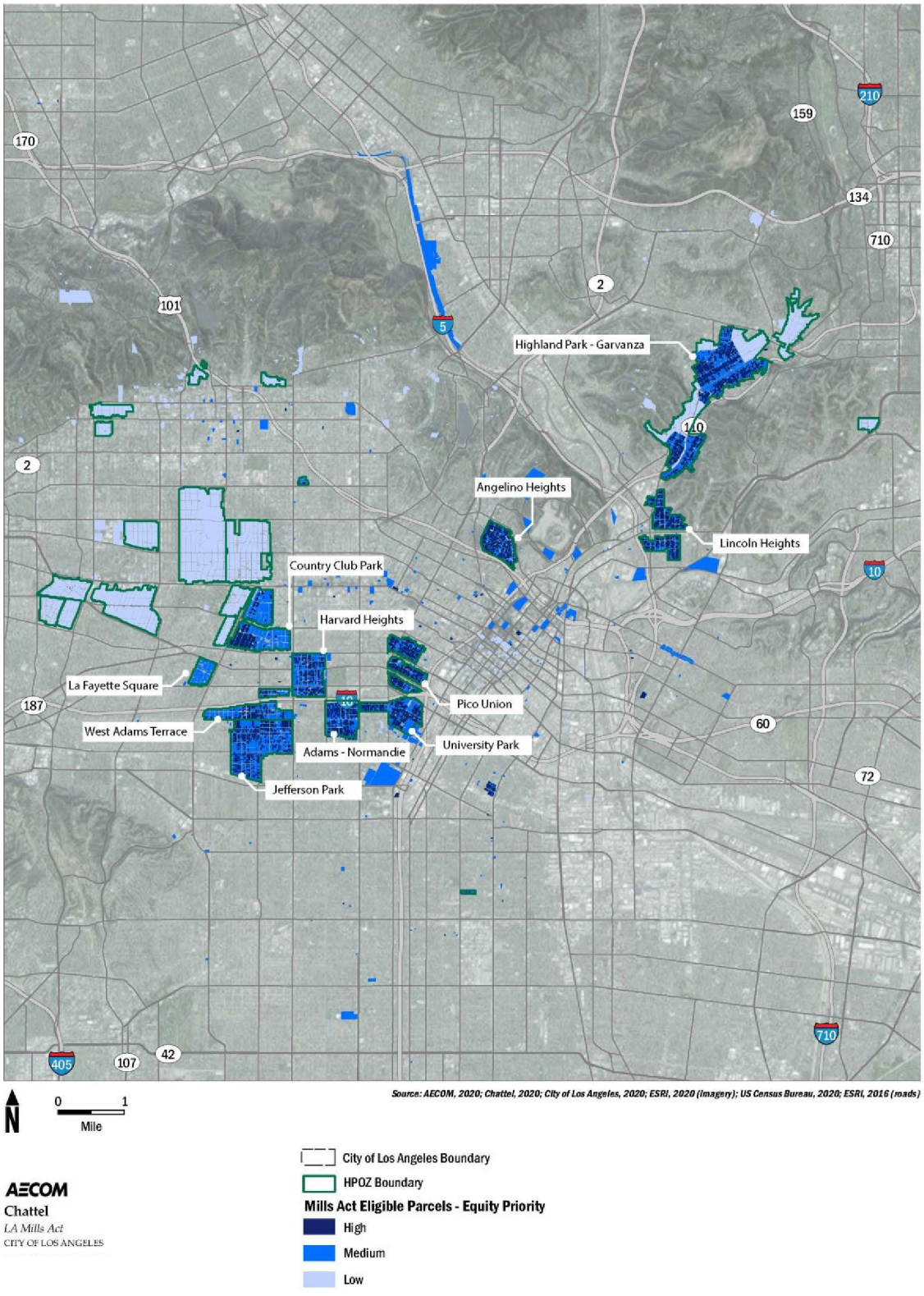
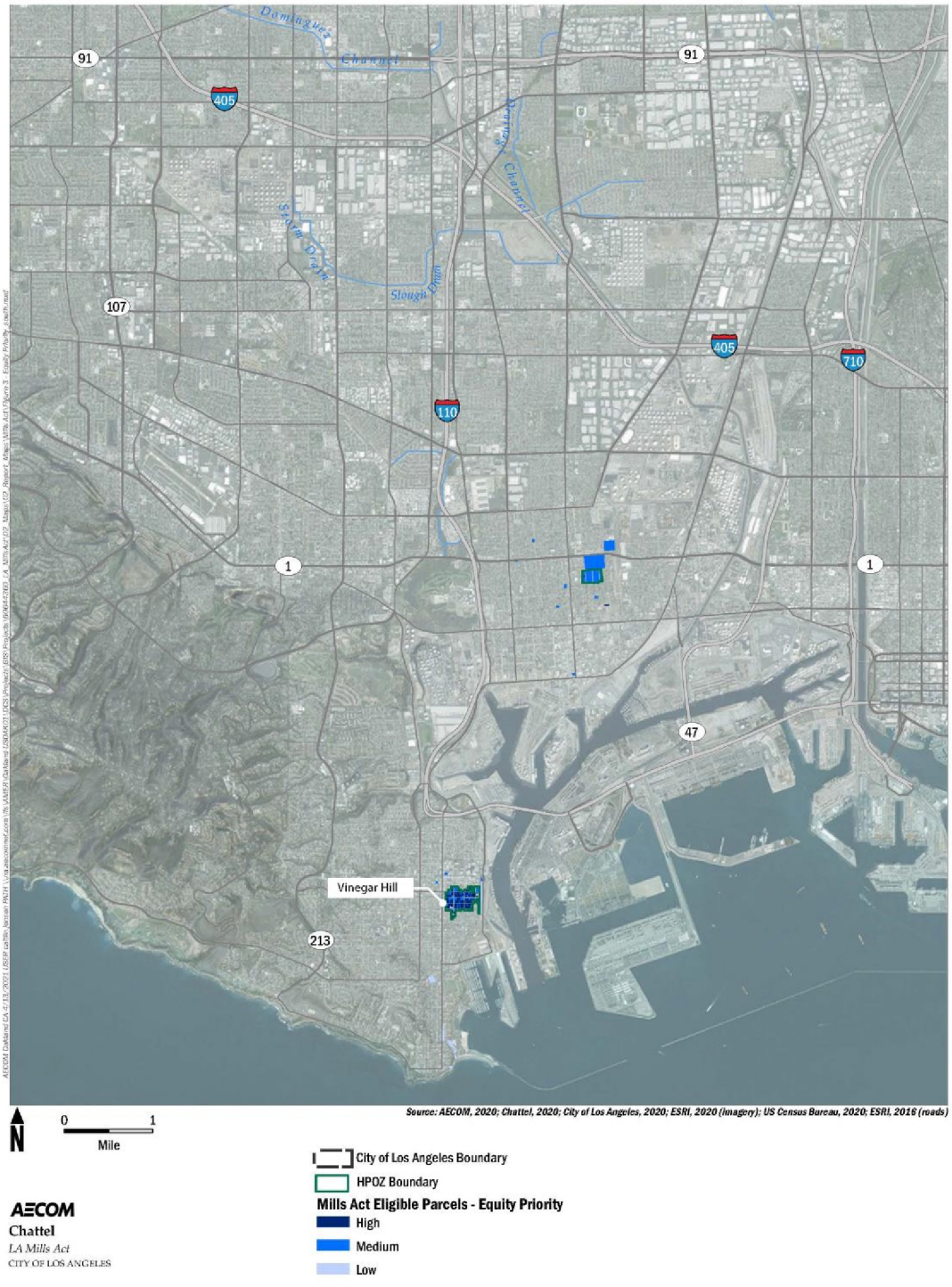


Figure 23: Equity Prioritization of Eligible Parcels Citywide – HPOZ (south)



Appendix

Table A-1: Community Plan Area (CPA) - Participation

CPA	Eligible - No MA	Existing MA	Eligible - Total	Rate	% of total
Wilshire	7773	275	8048	3.4%	28.7%
Hollywood	1701	132	1833	7.2%	13.8%
South Los Angeles	4483	124	4607	2.7%	12.9%
Northeast Los Angeles	6927	100	7027	1.4%	10.4%
West Adams - Baldwin Hills - Leimert	1974	81	2055	3.9%	8.5%
Silver Lake - Echo Park - Elysian Valley	907	73	980	7.4%	7.6%
Central City	250	64	314	20.4%	6.7%
Venice	40	3	43	7.0%	0.3%
Brentwood - Pacific Palisades	63	20	83	24.1%	2.1%
Westlake	1216	12	1228	1.0%	1.3%
Granada Hills - Knollwood	100	10	110	9.1%	1.0%
Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	22	9	31	29.0%	0.9%
Palms - Mar Vista - Del Rey	55	6	61	9.8%	0.6%
Bel Air - Beverly Crest	35	3	38	7.9%	0.3%
Westwood	21	3	24	12.5%	0.3%
San Pedro	459	2	461	0.4%	0.2%
Van Nuys - North Sherman Oaks	324	2	326	0.6%	0.2%
Chatsworth - Porter Ranch	57	2	59	3.4%	0.2%
Central City North	22	2	24	8.3%	0.2%
West Los Angeles	5	2	7	28.6%	0.2%
Boyle Heights	130	1	131	0.8%	0.1%
Canoga Park - Winnetka - Woodland Hills - West Hills	28	1	29	3.4%	0.1%
Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon	19	1	20	5.0%	0.1%
Westchester - Playa del Rey	4	1	5	20.0%	0.1%
Encino - Tarzana*		1	1		0.1%
Sylmar	205		205	0.0%	0.0%
Southeast Los Angeles	165		165	0.0%	0.0%
Wilmington - Harbor City	120		120	0.0%	0.0%
Sun Valley - La Tuna Canyon	117		117	0.0%	0.0%
Mission Hills - Panorama City - North Hills	19		19	0.0%	0.0%
North Hollywood - Valley Village	10		10	0.0%	0.0%
Northridge	5		5	0.0%	0.0%
Outside Designated CPA	5		5	0.0%	0.0%
Reseda - West Van Nuys	2		2	0.0%	0.0%

Table A-2: Community Plan Area (CPA)-Existing Contracts

CPA	High Barriers to opportunity	Medium-High Barriers to opportunity	Low-Medium Barriers to opportunity	Low Barriers to opportunity	Grand Total
Wilshire	1	62	181	31	275
Hollywood		22	92	18	132
South Los Angeles	24	97	3		124
Northeast Los Angeles		46	54		100
West Adams - Baldwin Hills - Leimert	16	62	3		81
Silver Lake - Echo Park - Elysian Valley		56	12	5	73
Central City		10	54		64
Venice			2	1	3
Brentwood - Pacific Palisades				20	20
Westlake	11	1			12
Granada Hills - Knollwood				10	10
Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass				9	9
Palms - Mar Vista - Del Rey			6		6
Bel Air - Beverly Crest				3	3
Westwood			3		3
Central City North			2		2
Chatsworth - Porter Ranch				2	2
San Pedro		2			2
Van Nuys - North Sherman Oaks		1	1		2
West Los Angeles			2		2
Boyle Heights	1				1
Canoga Park - Winnetka - Woodland Hills - West Hills			1		1
Encino - Tarzana				1	1
Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon			1		1
Westchester - Playa del Rey				1	1
	53	359	417	101	930

Table A-3: Community Plan Area (CPA)-Eligible Contracts by Equity Score

CPA	High Barriers to opportunity	Medium-High Barriers to opportunity	Low-Medium Barriers to opportunity	Low Barriers to opportunity	Grand Total
Wilshire		1412	4948	1413	7773
Northeast Los Angeles	15	4547	2365		6927
South Los Angeles	907	3547	29		4483
West Adams - Baldwin Hills - Leimert	530	1440	4		1974
Hollywood	13	157	1304	227	1701
Westlake	1179	35	2		1216
Silver Lake - Echo Park - Elysian Valley	9	838	34	26	907
San Pedro		402	57		459
Van Nuys - North Sherman Oaks	4	317	3		324
Central City	5	104	141		250
Sylmar		3	202		205
Southeast Los Angeles	104	61			165
Boyle Heights	128	2			130
Wilmington - Harbor City		120			120
Sun Valley - La Tuna Canyon		117			117
Granada Hills - Knollwood			1	99	100
Brentwood - Pacific Palisades			3	60	63
Chatsworth - Porter Ranch	1		2	54	57
Palms - Mar Vista - Del Rey			55		55
Venice			24	16	40
Bel Air - Beverly Crest				35	35
Canoga Park - Winnetka - Woodland Hills - West Hills		6	3	19	28
Central City North		20	2		22
Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass			11	11	22
Westwood			16	5	21
Mission Hills - Panorama City - North Hills			19		19
Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon		7	12		19
North Hollywood - Valley Village		2	8		10
Northridge			4	1	5
West Los Angeles			3	2	5
Westchester - Playa del Rey			1	3	4
Reseda - West Van Nuys			2		2
	2895	13137	9255	1971	27258

Table A-4: Council District (CD) Participation

Council District		Eligible - No MA	Existing MA	Eligible - Total	Rate	% of total
10 - Mark Ridley-Thomas		5658	209	5867	3.6%	22.5%
4 - Nithya Raman		6105	201	6306	3.2%	21.6%
1 - Gilbert Cedillo		8458	164	8622	1.9%	17.6%
5 - Paul Koretz		1879	138	2017	6.8%	14.8%
14 - Kevin de Leon		1564	94	1658	5.7%	10.1%
11 - Mike Bonin		155	31	186	16.7%	3.3%
13 - Mitch O'Farrell		295	48	343	14.0%	5.2%
8 - Marqueece Harris-Dawson		1391	18	1409	1.3%	1.9%
12 - John Lee		180	12	192	6.3%	1.3%
2 - Paul Krekorian		215	6	221	2.7%	0.6%
9 - Curren D. Price, Jr.		281	4	285	1.4%	0.4%
15 - Joe Buscaino		581	2	583	0.3%	0.2%
3 - Bob Blumenfield		12	2	14	14.3%	0.2%
7 - Monica Rodriguez		358	1	359	0.3%	0.1%
6 - Nury Martinez		126	0	126	0.0%	0.0%
			958	28216	3.4%	100.0%

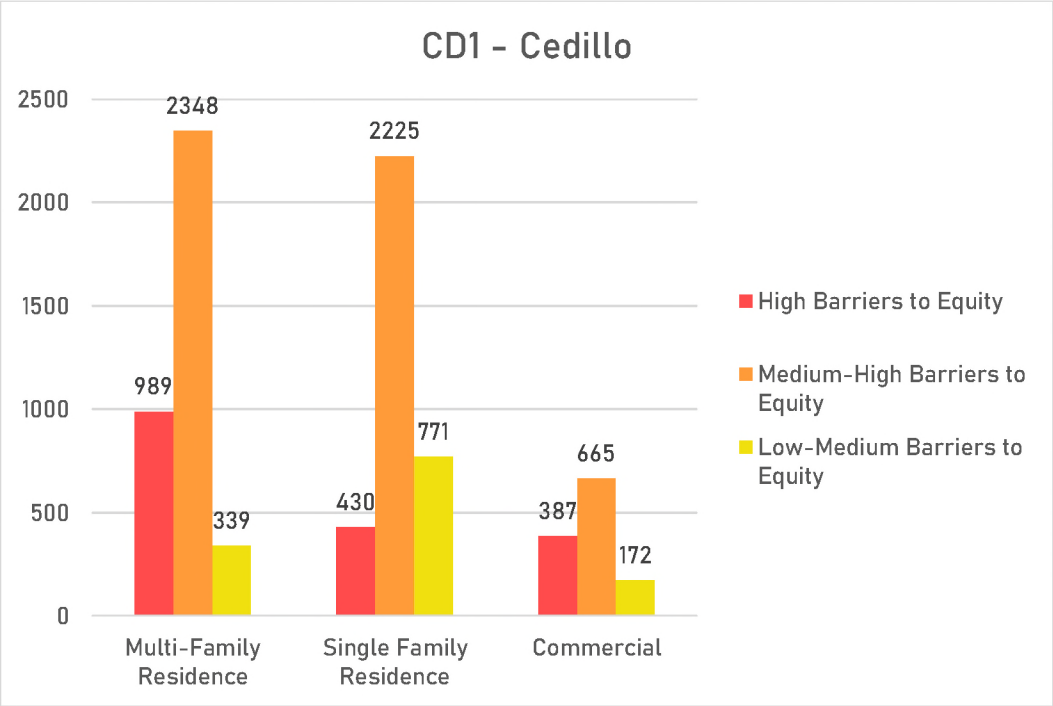
Table A-5: Council District (CD)-Existing Contracts

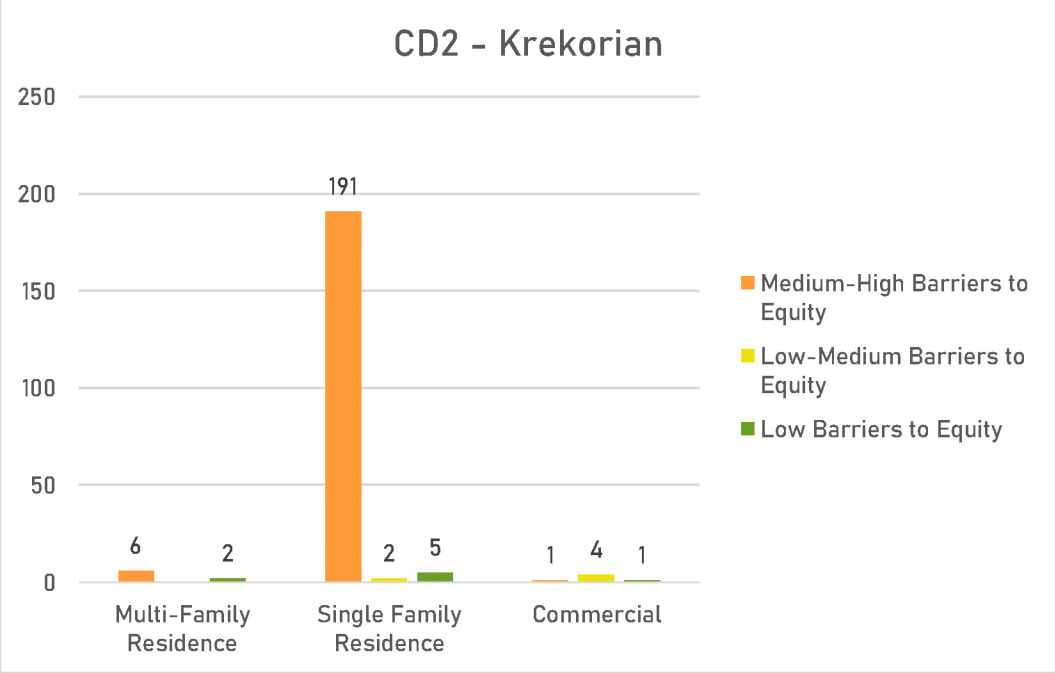
Council District	CD #	High Barriers to opportunity	Medium-High Barriers to opportunity	Low-Medium Barriers to opportunity	Low Barriers to opportunity	Grand Total
10 - Mark Ridley-Thomas	10	17	184	8		209
4 - Nithya Raman	4		18	123	60	201
1 - Gilbert Cedillo	1	33	102	29		164
5 - Paul Koretz	5			136	2	138
14 - Kevin De Leon	14	1	11	82		94
11 - Mike Bonin	11			9	22	31
13 - Mitch O'Farrell	13		25	23		48
8 - Marqueece Harris-Dawson	8	2	15	1		18
12 - John Lee	12				12	12
2 - Paul Krekorian	2		1	1	4	6
9 - Curren D. Price Jr.	9		1	3		4
15 - Joe Buscaino	15		2			2
3 - Bob Blumenfield	3			1	1	2
7 - Monica Rodriguez	7			1		1
6 - Nury Martinez	6					0
		53	359	417	101	930

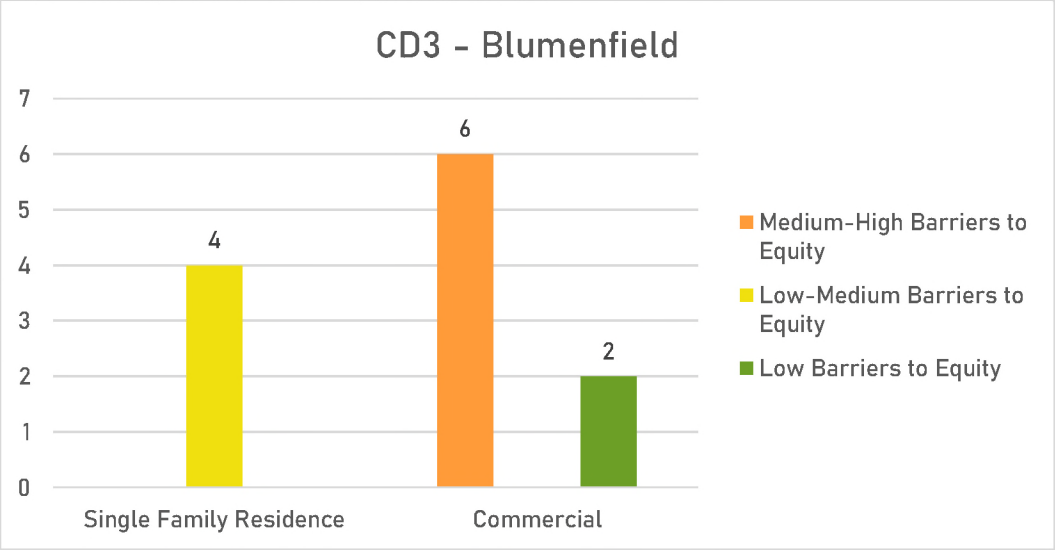
Table A-6: Council District (CD)-Eligible Contracts by Equity Score

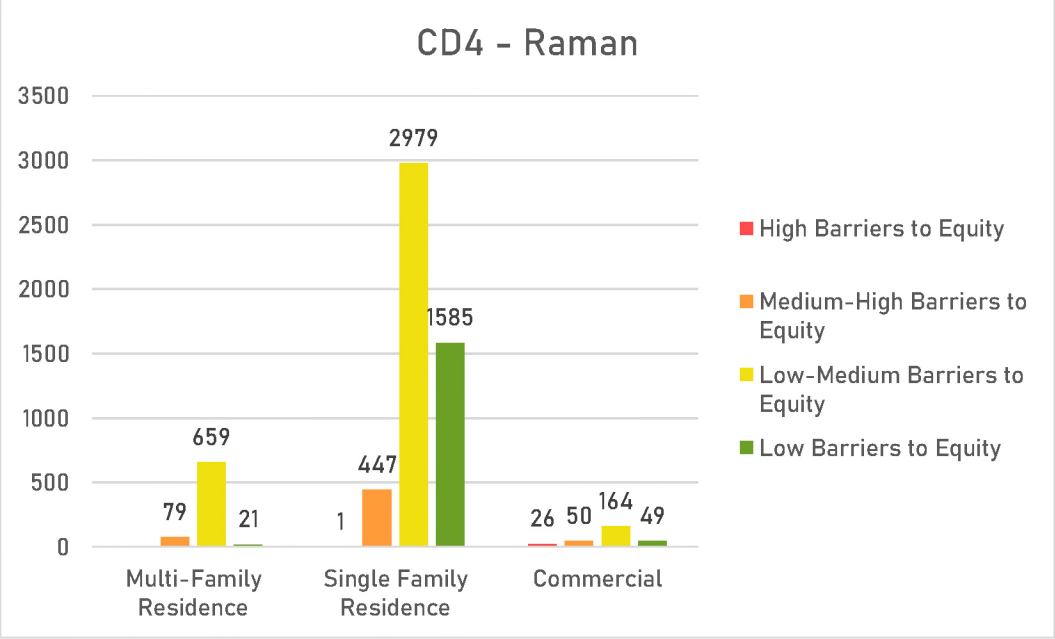
Council District	CD#	High Barriers to opportunity	Medium-High Barriers to opportunity	Low-Medium Barriers to opportunity	Low Barriers to opportunity	Grand Total
1-G. Cedillo	1	1868	5293	1297		8458
4-N. Raman	4	28	577	3836	1664	6105
10-M. Ridley-Thomas	10	528	4555	575		5658
5-P. Koretz	5			1834	45	1879
14-K. De Leon	14	133	229	1202		1564
8-M. Harris-Dawson	8	230	1160	1		1391
15-J. Buscaino	15	2	522	57		581
7-M. Rodriguez	7		126	232		358
13-M. O'Farrell	13		198	95	2	295
9-C.D. Price, Jr.	9	101	151	29		281
2-P. Krekorian	2		199	8	8	215
12-J. Lee	12	1		8	171	180
11-M. Bonin	11			76	79	155
6-N. Martinez	6	4	121	1		126
3-B. Blumenfield	3		6	4	2	12
		2895	13137	9255	1971	27258

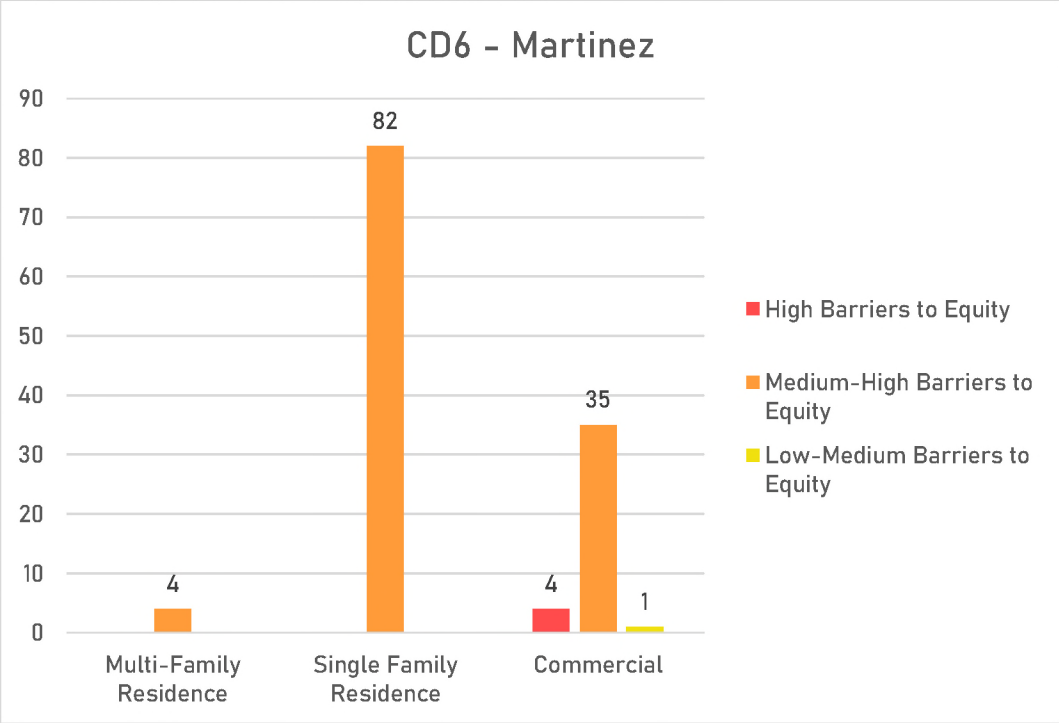
Figure A-1: Council District Eligible Parcels by Equity Score and Property Type

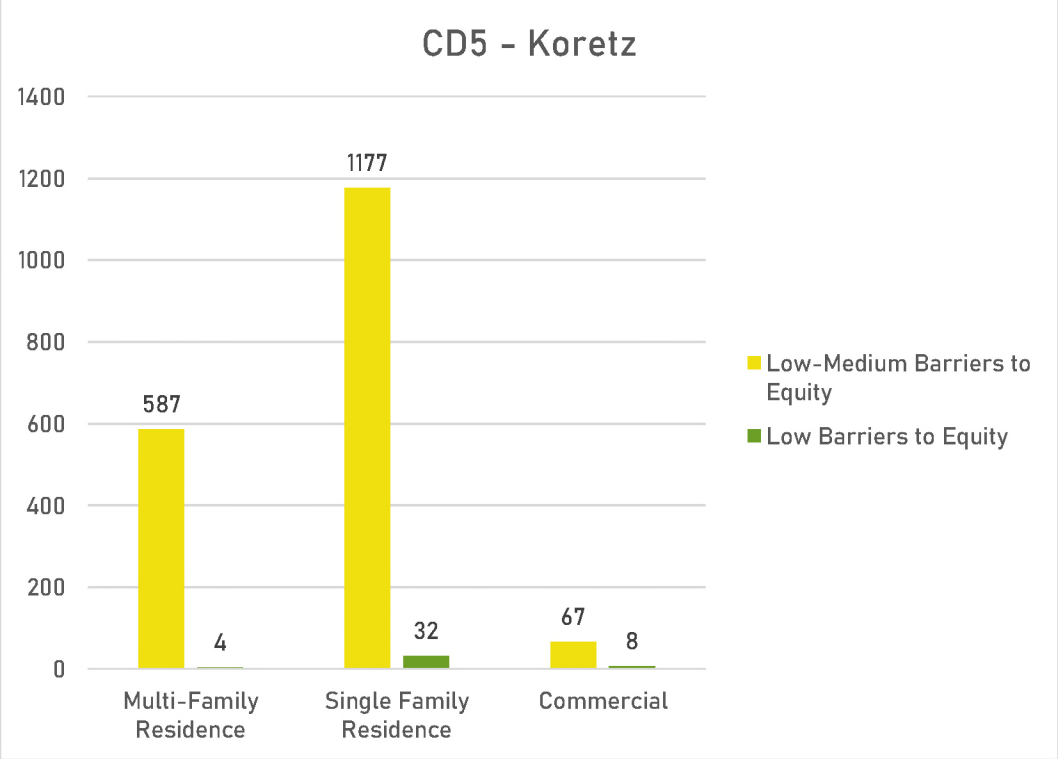


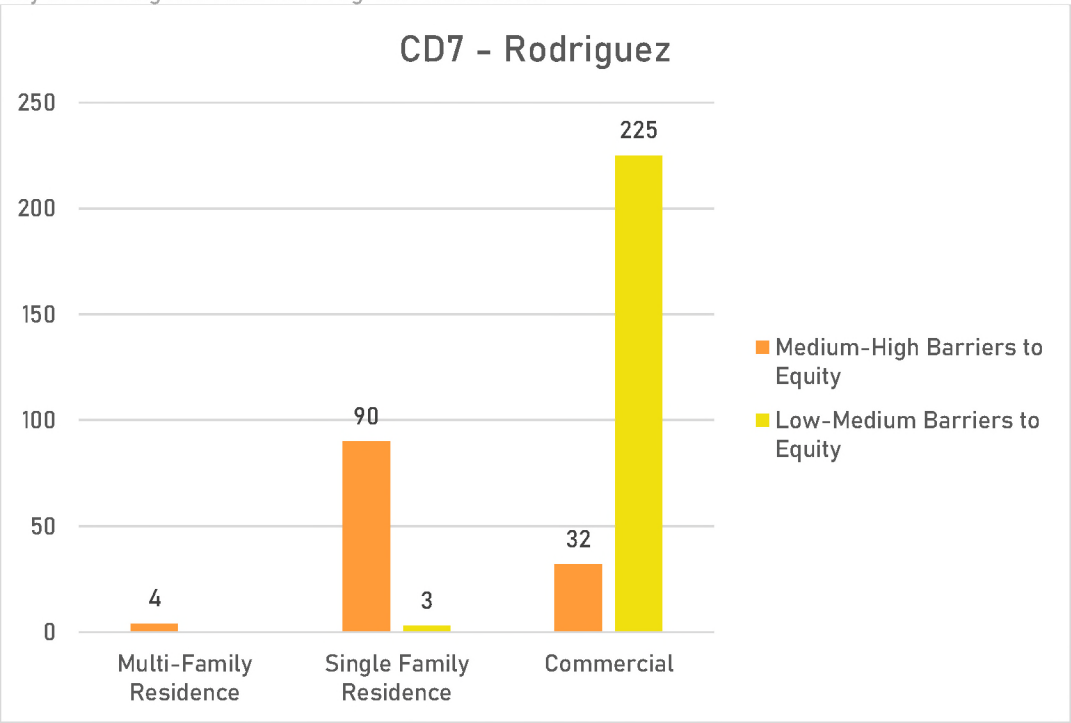


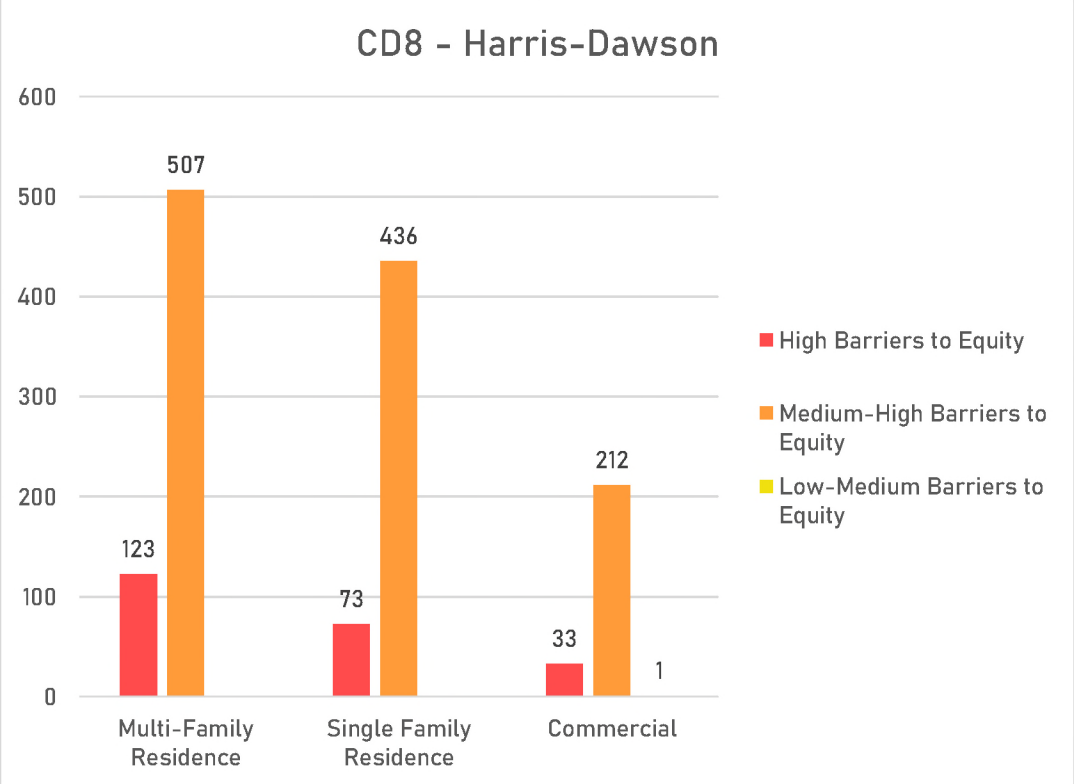

CD3 - Blumenfield
7
6
5
4
3
2
1
0
4
6
2
Single Family Residence
Commercial
Medium-High Barriers to Equity
Low-Medium Barriers to Equity
Low Barriers to Equity

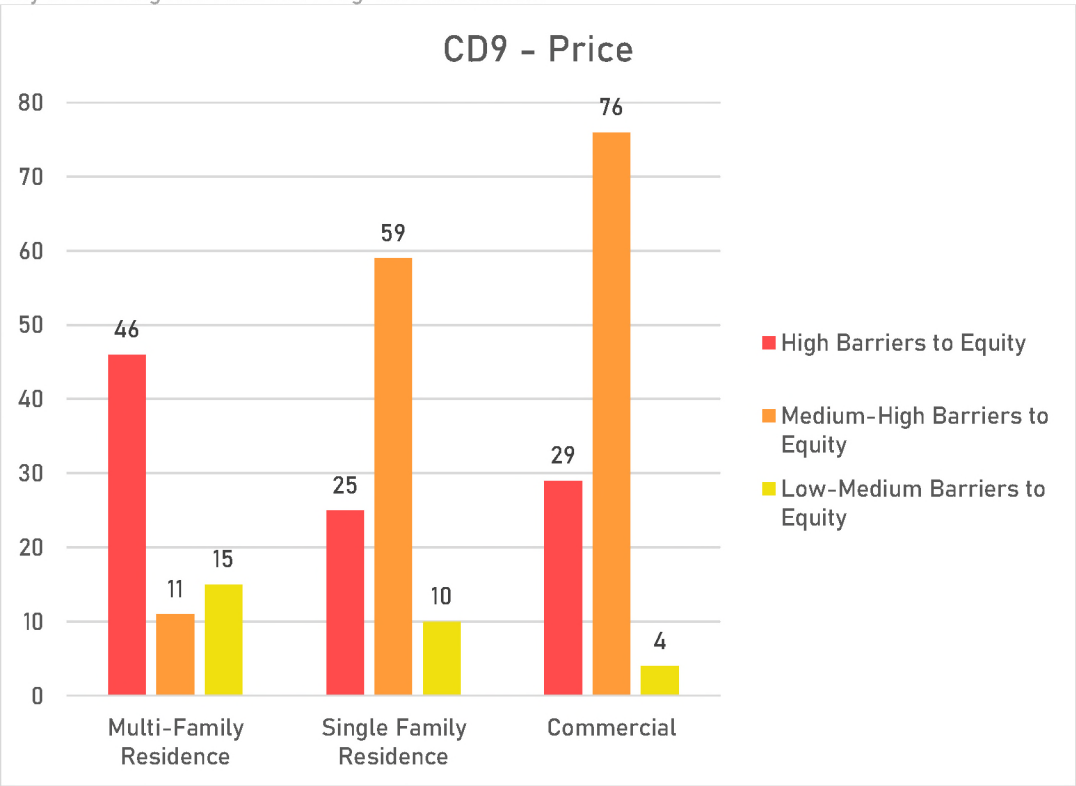

CD4 - Raman
3500
3000
2500
2000
1500
1000
500
0
79
659
21
1
447
2979
1585
26
50
164
49
Multi-Family Residence
Single Family Residence
Commercial
High Barriers to Equity
Medium-High Barriers to Equity
Low-Medium Barriers to Equity
Low Barriers to Equity

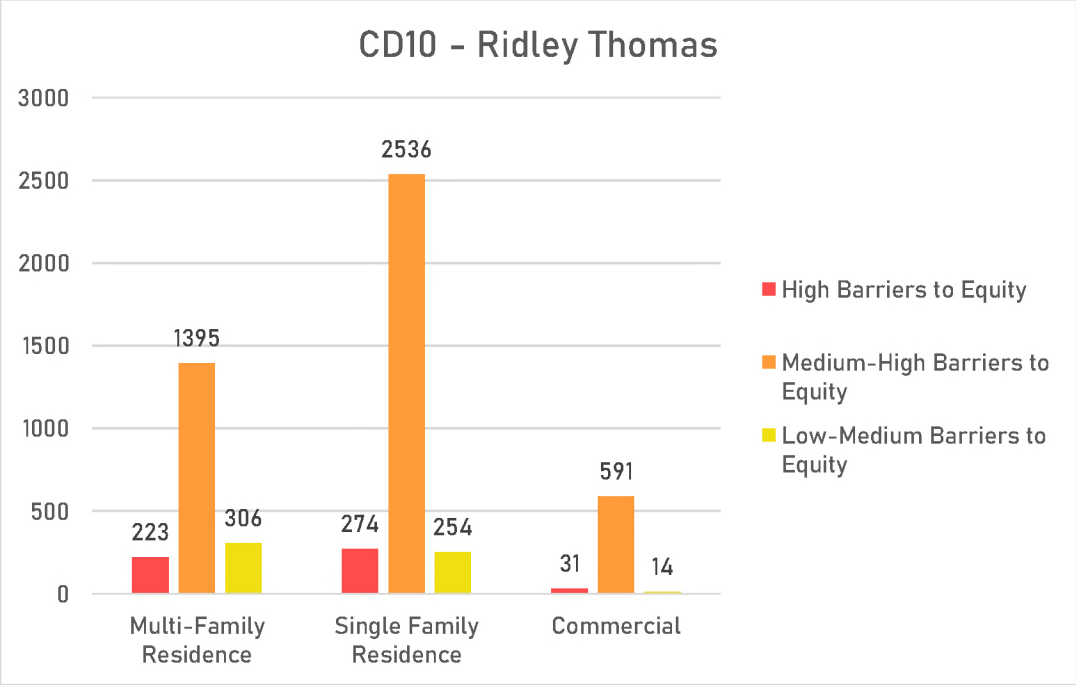

CD6 - Martinez
90
80
70
60
50
40
30
20
10
0
82
35
4
4
1
Multi-Family Residence
Single Family Residence
Commercial
High Barriers to Equity
Medium-High Barriers to Equity
Low-Medium Barriers to Equity

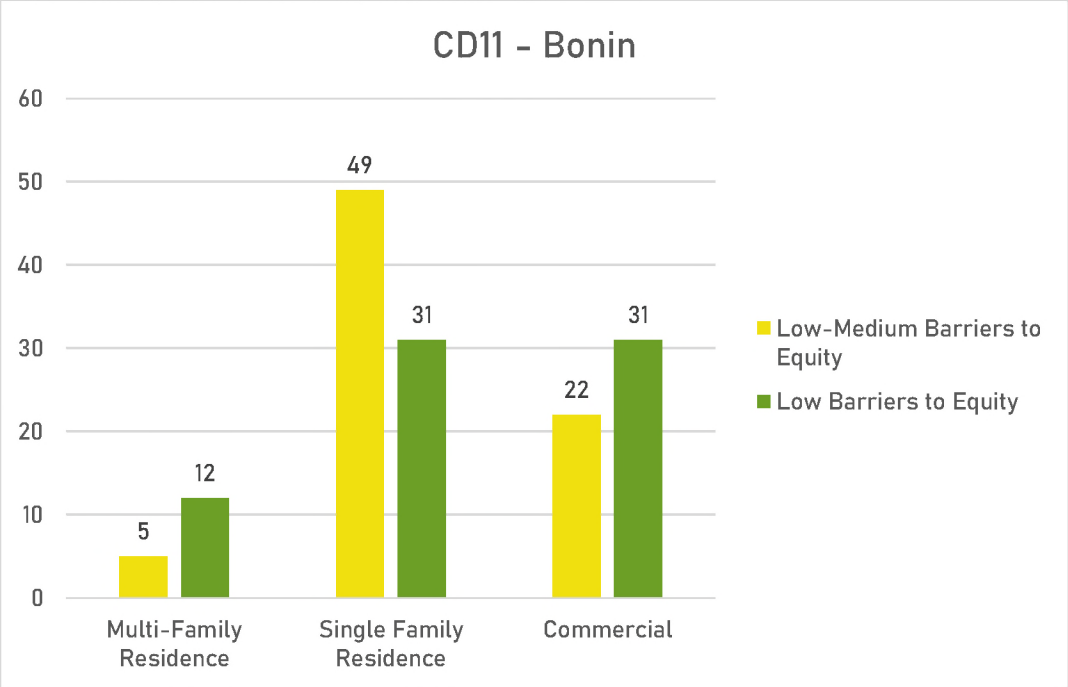

CD5 - Koretz
1400
1200
1000
800
600
400
200
0
1177
587
67
32
8
4
Multi-Family Residence
Single Family Residence
Commercial
Low-Medium Barriers to Equity
Low Barriers to Equity

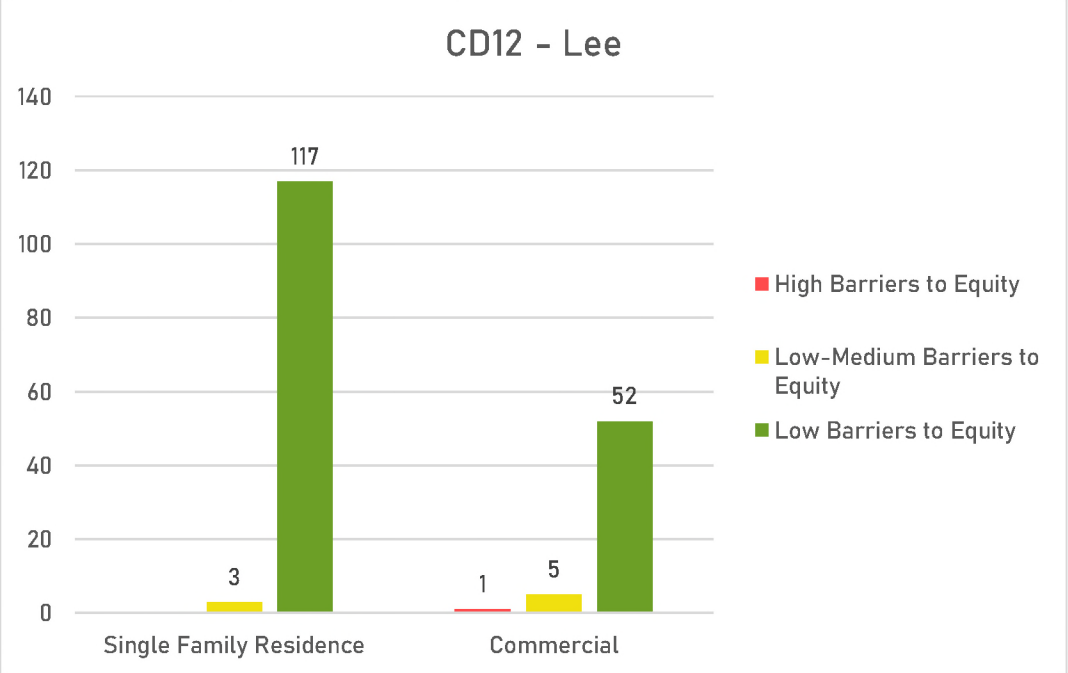

CD7 - Rodriguez
250
200
150
100
50
0
4
90
3
32
225
Multi-Family Residence
Single Family Residence
Commercial
Medium-High Barriers to Equity
Low-Medium Barriers to Equity

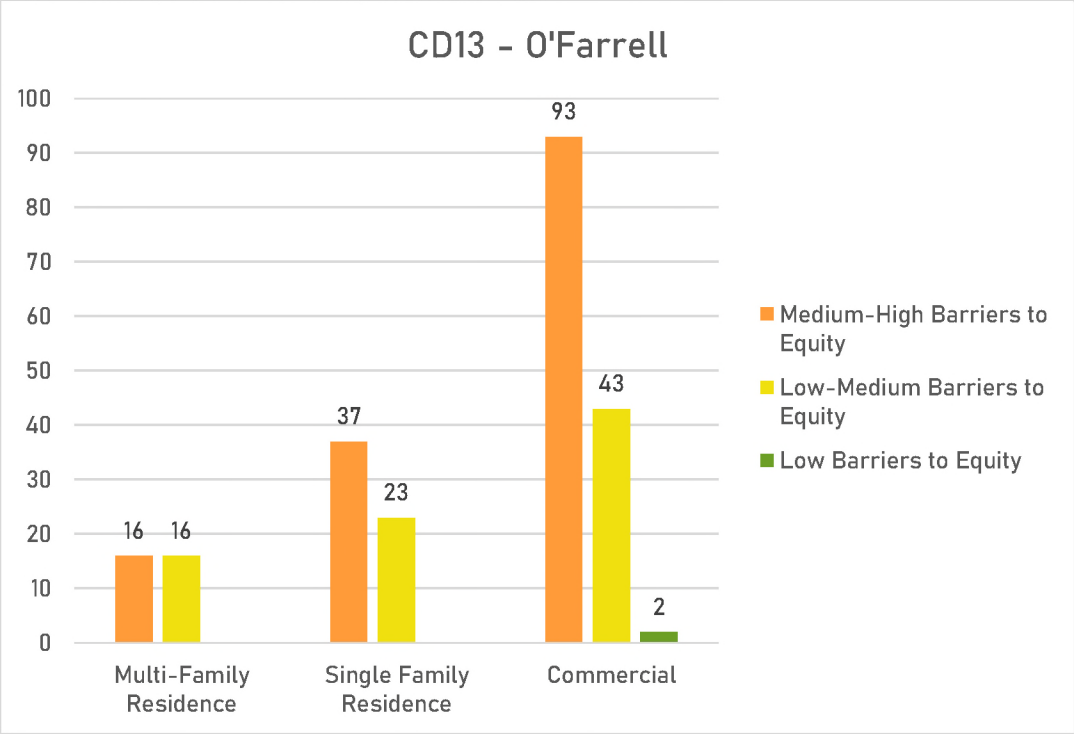

CD8 - Harris-Dawson
600
500
400
300
200
100
0
123
507
73
436
33
212
1
Multi-Family Residence
Single Family Residence
Commercial
High Barriers to Equity
Medium-High Barriers to Equity
Low-Medium Barriers to Equity

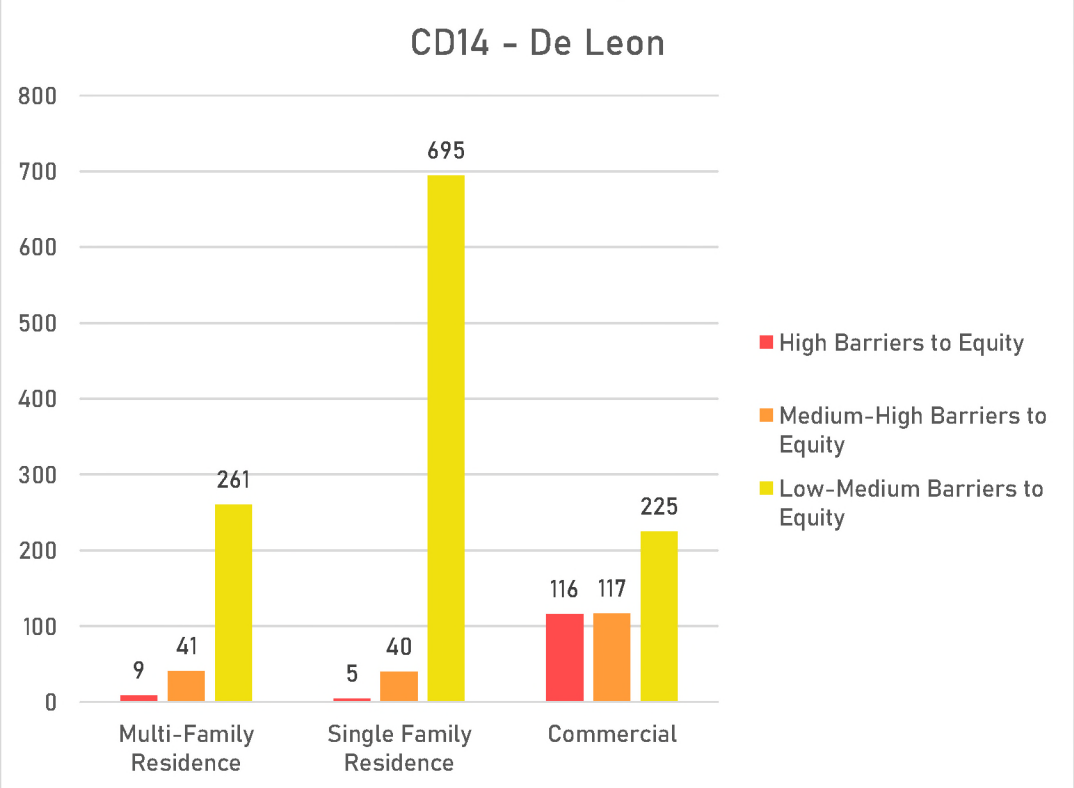

CD9 - Price
80
70
60
50
40
30
20
10
0
46
11
15
25
59
10
29
76
4
Multi-Family Residence
Single Family Residence
Commercial
High Barriers to Equity
Medium-High Barriers to Equity
Low-Medium Barriers to Equity


CD10 - Ridley Thomas
3000
2500
2000
1500
1000
500
0
223
1395
306
274
2536
254
31
591
14
Multi-Family Residence
Single Family Residence
Commercial
High Barriers to Equity
Medium-High Barriers to Equity
Low-Medium Barriers to Equity


CD11 - Bonin
60
50
40
30
20
10
0
49
31
31
22
12
5
Multi-Family Residence
Single Family Residence
Commercial
Low-Medium Barriers to Equity
Low Barriers to Equity


CD12 - Lee
140
120
100
80
60
40
20
0
117
52
3
1
5
Single Family Residence
Commercial
High Barriers to Equity
Low-Medium Barriers to Equity
Low Barriers to Equity


CD13 - O'Farrell
100
90
80
70
60
50
40
30
20
10
0
16
16
37
23
93
43
2
Multi-Family Residence
Single Family Residence
Commercial
Medium-High Barriers to Equity
Low-Medium Barriers to Equity
Low Barriers to Equity


CD14 - De Leon
800
700
600
500
400
300
200
100
0
9
41
261
5
40
695
116
117
225
Multi-Family Residence
Single Family Residence
Commercial
High Barriers to Equity
Medium-High Barriers to Equity
Low-Medium Barriers to Equity

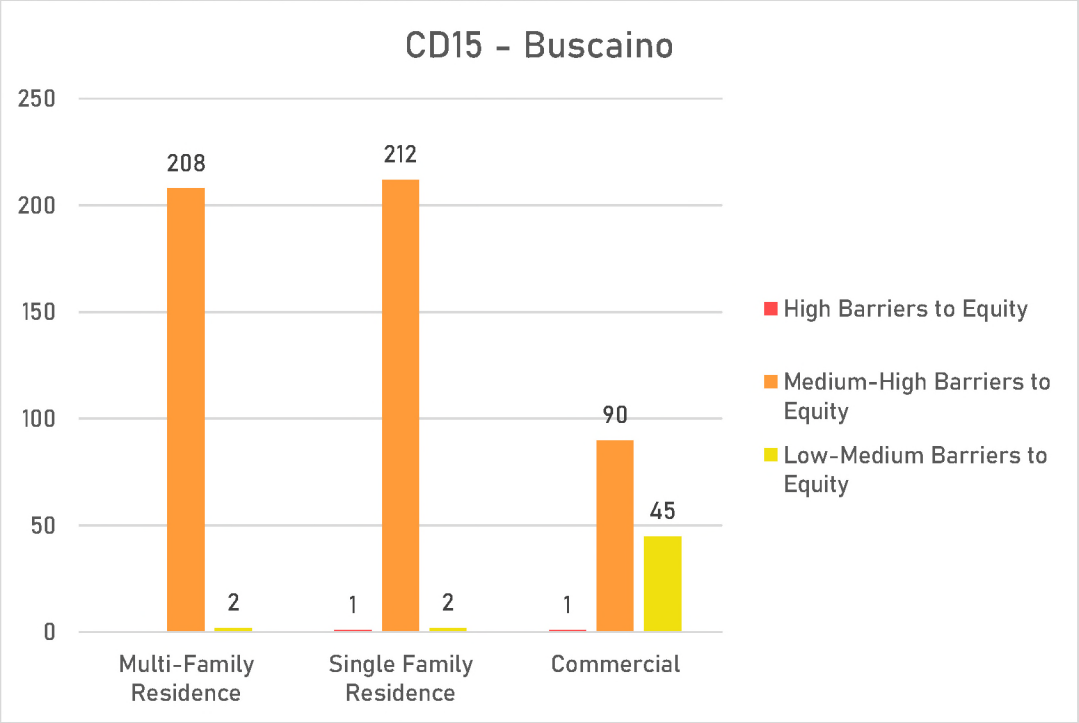

CD15 - Buscaino
250
200
150
100
50
0
208
2
1
212
2
1
90
45
Multi-Family Residence
Single Family Residence
Commercial
High Barriers to Equity
Medium-High Barriers to Equity
Low-Medium Barriers to Equity

Table A- 7: HPOZ Participation

HPOZ	Eligible - No MA	Existing MA	Eligible - Total	Rate	% of total
20 - Highland Park - Garvanza	5265	69	5334	1.3%	7.2%
31 - South Carthay	352	66	418	15.8%	6.9%
19 - Angelino Heights	830	55	885	6.2%	5.7%
12 - La Fayette Square	250	48	298	16.1%	5.0%
9 - Carthay Circle	432	42	474	8.9%	4.4%
17 - Windsor Square	1402	38	1440	2.6%	4.0%
5 - Harvard Heights	1028	37	1065	3.5%	3.9%
16 - Whitley Heights	290	33	323	10.2%	3.4%
29 - Country Club Park	765	30	795	3.8%	3.1%
15 - West Adams Terrace	672	30	702	4.3%	3.1%
10 - University Park	901	23	924	2.5%	2.4%
7 - Western Heights	153	19	172	11.0%	2.0%
23 - Wilshire Park	567	17	584	2.9%	1.8%
21 - Jefferson Park	2203	16	2219	0.7%	1.7%
18 - Hancock Park	1328	16	1344	1.2%	1.7%
4 - Miracle Mile North	594	16	610	2.6%	1.7%
8 - Melrose Hill	36	14	50	28.0%	1.5%
14 - Adams - Normandie	1037	12	1049	1.1%	1.3%
33 - Spaulding Square	152	12	164	7.3%	1.3%
34 - Pico - Union	1140	10	1150	0.9%	1.0%
1 - Balboa Highlands	99	9	108	8.3%	0.9%
6 - Gregory Ain Mar Vista Tract	46	6	52	11.5%	0.6%
35 - Windsor Village	329	5	334	1.5%	0.5%
27 - Miracle Mile	1411	3	1414	0.2%	0.3%
3 - Lincoln Heights	1299	3	1302	0.2%	0.3%
25 - Sunset Square	460	3	463	0.6%	0.3%
28 - Oxford Square	226	2	228	0.9%	0.2%
22 - Hollywood Grove	187	2	189	1.1%	0.2%
13 - Vinegar Hill	397	1	398	0.3%	0.1%
26 - Carthay Square	361	1	362	0.3%	0.1%
2 - Van Nuys	283	1	284	0.4%	0.1%
24 - El Sereno-Berkshire Craftsman	156		156	0.0%	0.0%
32 - Stonehurst	116		116	0.0%	0.0%
11 - Banning Park	88		88	0.0%	0.0%
30 - 52nd Place Tifal Brothers Tract	52		52	0.0%	0.0%

Table A-8: HPOZ-Eligible Parcels by Equity Score

HPOZ	High Barriers to opportunity	Medium-High Barriers to opportunity	Low-Medium Barriers to opportunity	Low Barriers to opportunity	Grand Total
20 - Highland Park - Garvanza		3126	2139		5265
21 - Jefferson Park	171	2032			2203
27 - Miracle Mile			1411		1411
17 - Windsor Square			814	588	1402
18 - Hancock Park			519	809	1328
3 - Lincoln Heights		1299			1299
34 - Pico - Union	1140				1140
14 - Adams - Normandie		1037			1037
5 - Harvard Heights		1028			1028
10 - University Park	901				901
19 - Angelino Heights		830			830
29 - Country Club Park		765			765
15 - West Adams Terrace	355	317			672
4 - Miracle Mile North			594		594
23 - Wilshire Park		544	23		567
25 - Sunset Square			460		460
9 - Carthay Circle			432		432
13 - Vinegar Hill		395	2		397
26 - Carthay Square			361		361
31 - South Carthay			352		352
35 - Windsor Village			329		329
16 - Whitley Heights			290		290
2 - Van Nuys		283			283
12 - La Fayette Square		250			250
28 - Oxford Square			226		226
22 - Hollywood Grove			15	172	187
24 - El Sereno-Berkshire Craftsman			156		156
7 - Western Heights		153			153
33 - Spaulding Square			152		152
32 - Stonehurst		116			116
1 - Balboa Highlands				99	99
11 - Banning Park		88			88
30 - 52nd Place Tifal Brothers Tract		52			52
6 - Gregory Ain Mar Vista Tract			46		46
8 - Melrose Hill		36			36
	2567	12351	8321	1668	24907

Appendix G:
Expanded Savings Analysis and Figures

Appendix G
EXPANDED SAVINGS ANALYSIS AND FIGURES

Overview

This Expanded Savings Analysis Findings and Figures section (Section) is meant to describe the ayalysis and findings associated with property value data provided by the Los Angeles County (County) Assessor and the City of Los Angeles (City) for 2019. The purpose of this Section is to:

1. Provide analysis of the 2019 tax savings for all existing Mills Act (MA) contracts within distribution frameworks.
2. Compare total savings of existing MA contracts within each of the four Equity Index categories using distribution frameworks.
3. Provide findings on increasing equity within the Program.

The Program for the City in 2019 included 930 MA contracts. Our research sought to determine how the contracts are districubted throughout the City, the Equity Index score for the area that each existing MA contract is within, and analyzed the tax savings realized within each Equity Index category. Through analysis, it was determined that 74% of tax savings in 2019 ($14,766,516) went to MA contracts located within areas of low to medium barriers to opportunity within the City, even though all MA contracts within this category only make up 45% of the total Program (415 contracts). The Equity Index category with the largest difference between percentage of savings realized in 2019 and existing MA contracts was the medium to high barriers to opportunity category. With only 16% of total tax savings in 2019 and accounting for 39% (359 contracts) of the Program, this category experienced the largest disparity.

In order to increase total amount of savings within areas of higher barriers to opportunity, more MA contracts in these areas with larger property value would need to be recorded and added to the Program.

The purpose of this Section is to:

- Demonstrate how MA savings is distributed throughout the City using specific frameworks.
- Analyze correlation between total savings and Equity Index categories.
- Prove or disprove that communities facing lower barriers to opportunity experience higher MA savings in the City.
- To supplement equity analysis and findings with further evidence supporting a priority implementation approach for new MA contracts.

Approach

In order to demonstrate trends in savings throughout the City, the approach for evaluation was to apply distribution frameworks for comparison purposes. The following includes different frameworks used:

- Community Plan Area (CPA)
- Property Type
- Historic Preservation Overlay Zone (HPOZ)
- Council District (CD)

Citywide Findings

Figure 1: Total MA Contracts Citywide for Equity Index Categories

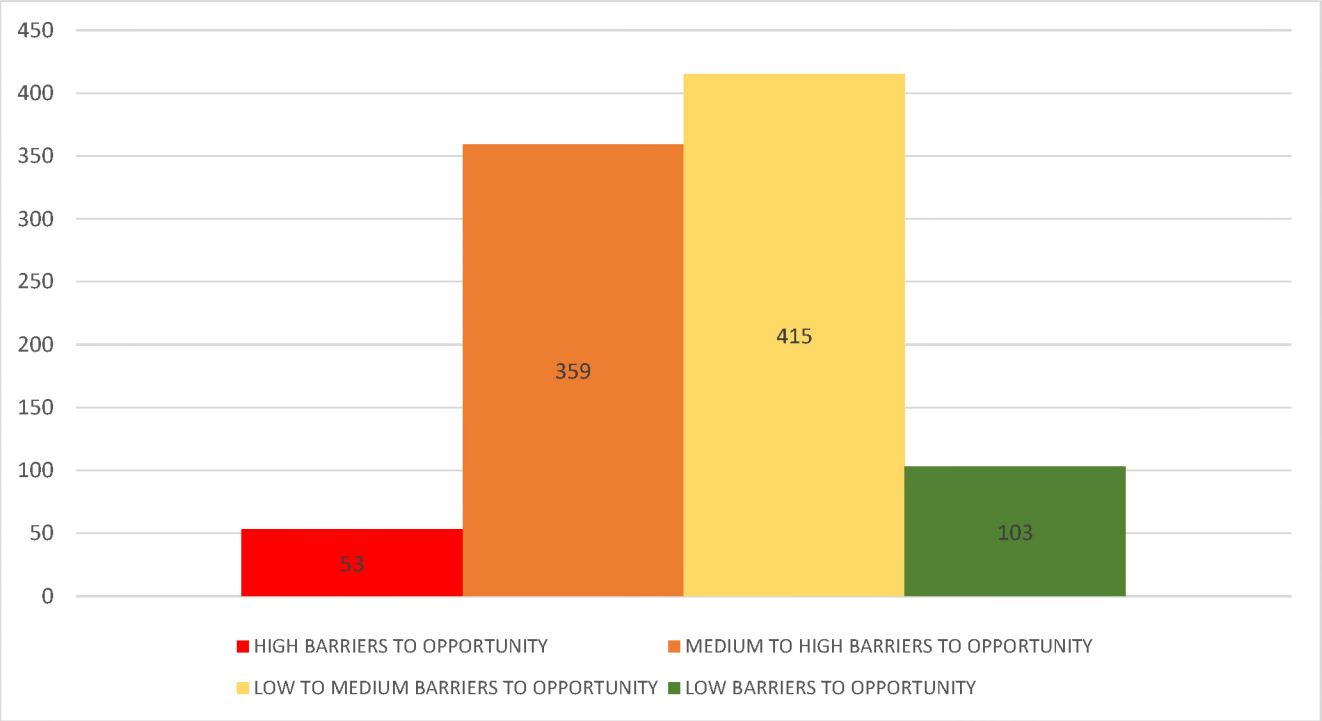


Figure 2: Percentage of Total MA Contracts Citywide for Equity Index Categories

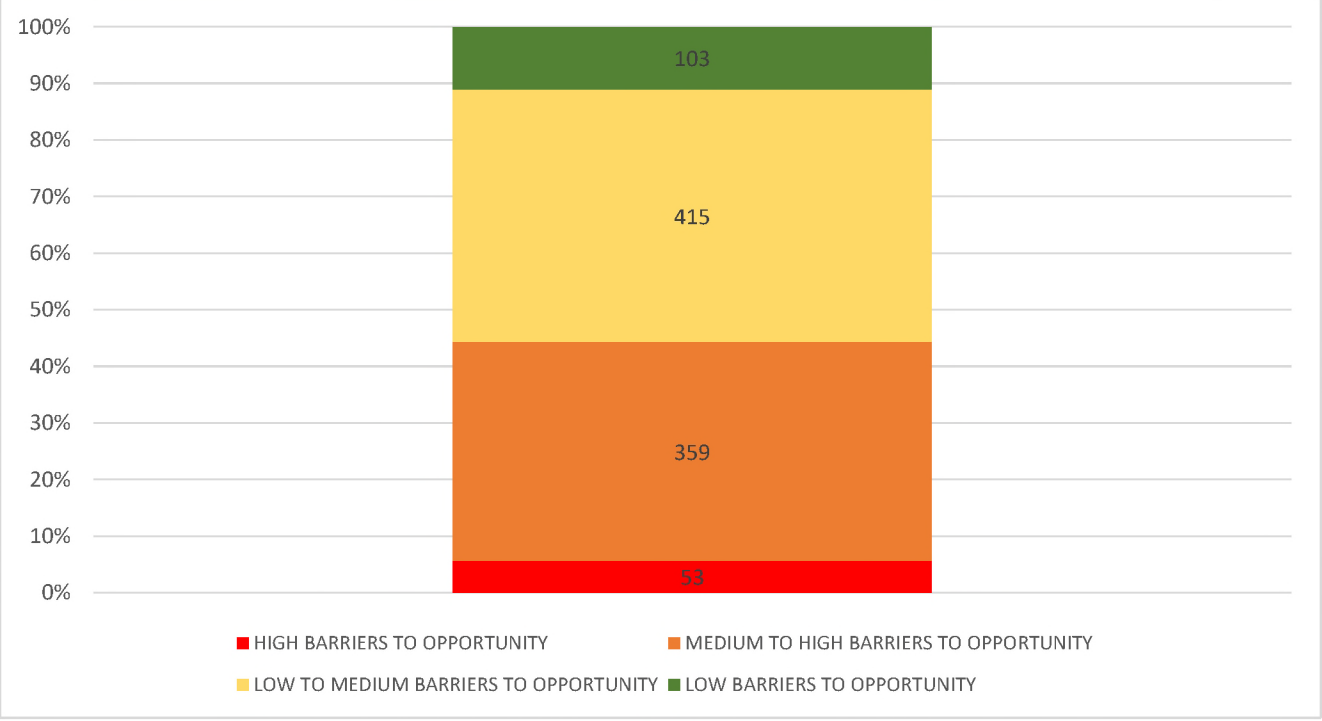


Figure 3: Total Savings Citywide for Equity Index Categories

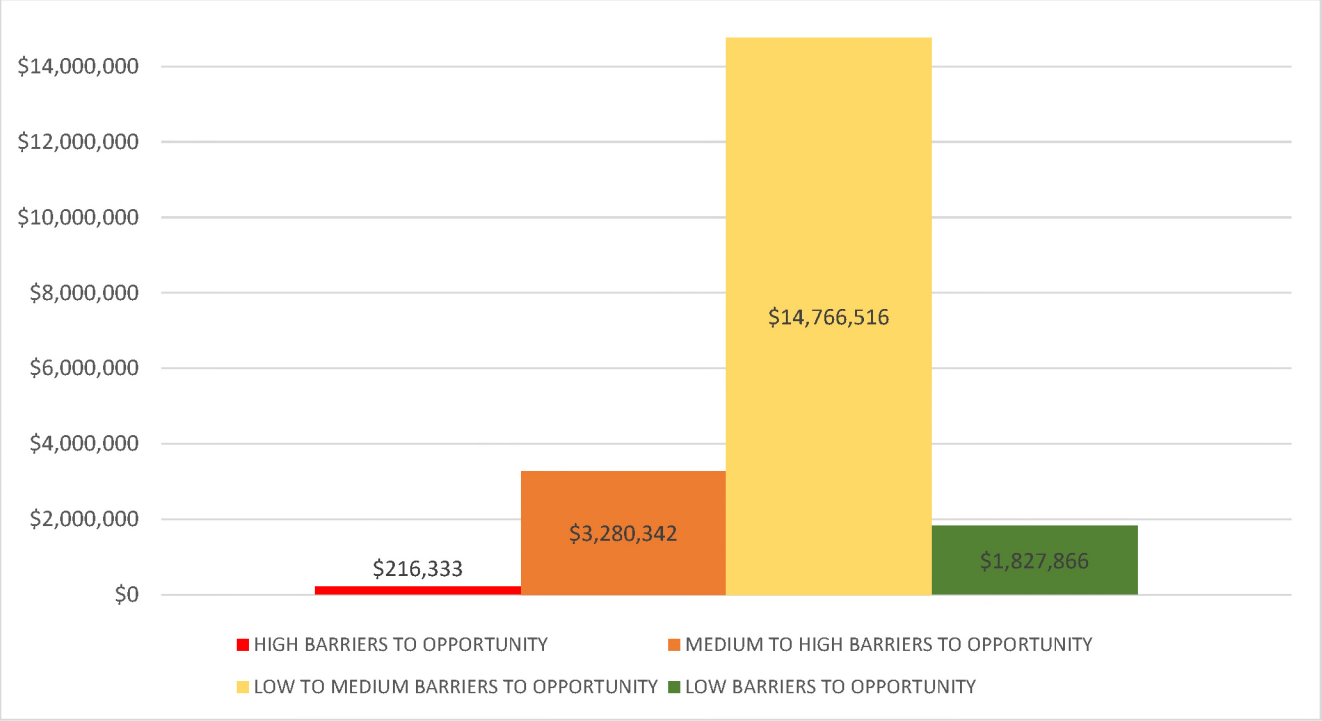
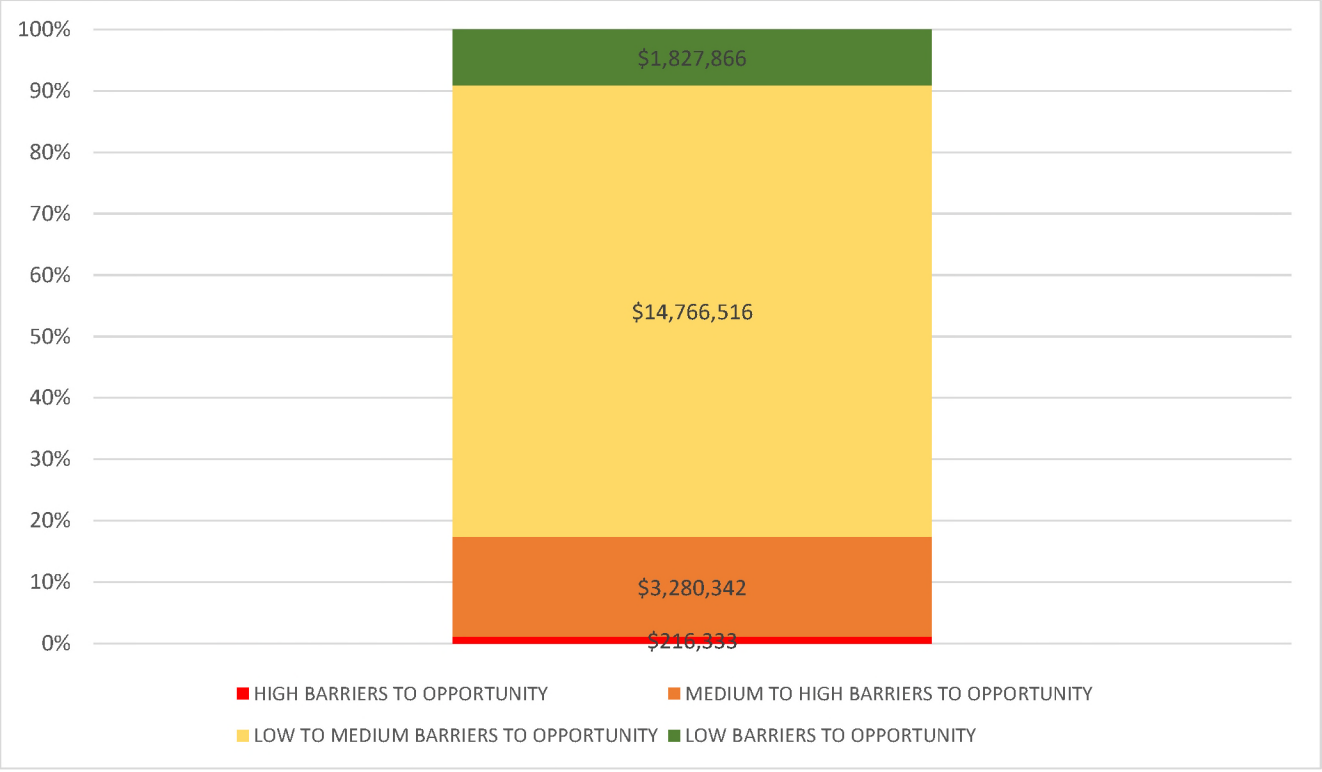


Figure 4: Percentage of Total Savings Citywide for Equity Index Categories



Key Findings:

- The distribution of MA contracts between Equity Index score was skewed with 55.7% of total MA contracts going to communites with low or low to medium barriers to opportunity, and 44.3% to communities with high or medium to high barriers to opportunity. The distribution of savings between Equity Index scores was also skewed, with 82.6% of total savings going to communites with low or low to medium barriers to opportunity, and 17.4% to communities with high or high to medium barriers to opportunity.
- MA contracts located within areas of low to medium barriers to opportunity account for 44.5% of the Program, yet expereince 73.5% of all savings in 2019.
- In 2019, the City total unrealized property tax revenue from the Program was $2,091,057; thus, the City has exceeded the $2,000,000 annual threshold.
- Conservative analysis of Adaptive Reuse Ordinance (ARO) contribution to total unrealized property tax revenue represents approximately $747,051 of the annual threshold
    - AROs within exemption areas received $432,578 and non-exemption areas received $314,993.[1]

Properties with No Savings

- 50% of the properties that received less that $415 in savings in 2019 were MA contracts recorded before 2002.
- There are MA contracts as recent as 2018 that received no savings in 2019.
    - Of MA contracts recorded in the past 10 years (recent MA contracts), total of 21 MA contracts did not receive savings.
    - Majority of the 21 recent MA contracts that received no savings in 2019 were commercial properties.
- 51% of all commercial properties in Program experienced no savings in 2019.
- 36% of commercial properties with recent MA contracts received no savings in 2019.

[1] This assumes MA contracts in ARO areas per ZIMAS are benefitting from the ARO because they have done substantial work under MA.

Community Plan Area

Figure 5: Graph of CPA Data by Equity Score Category

CPA	HIGH BARRIERS TO OPPORTUNITY		MEDIUM - HIGH BARRIERS TO OPPORTUNITY		LOW - MEDIUM BARRIERS TO OPPORTUNITY		LOW BARRIERS TO OPPORTUNITY		TOTALS	
	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019
Wilshire	1	$22,324	62	$511,319	181	$1,595,479	31	$816,305	275	$2,945,427
Hollywood	0	$0	22	$194,312	92	$2,431,196	18	$375,512	132	$3,001,019
South Los Angeles	24	$104,645	96	$354,261	3	$12,062	0	$0	123	$470,969
Northeast Los Angeles	0	$0	46	$140,235	54	$201,296	0	$0	100	$341,530
West Adams - Baldwin Hills - Leimert	16	$81,484	62	$408,579	3	$662,186	0	$0	81	$1,152,249
Silver Lake - Echo Park - Elysian Valley	0	$0	56	$236,896	12	$135,009	5	$61,414	73	$433,319
Central City	0	$0	11	$1,313,074	54	$8,018,775	0	$0	65	$9,331,848
Brentwood - Pacific Palisades	0	$0	0	$0	0	$0	20	$322,133	20	$322,133
Westlake	11	$7,880	1	$57,759	0	$0	0	$0	12	$65,639
Granada Hills - Knollwood	0	$0	0	$0	0	$0	10	$44,416	10	$44,416
Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	0	$0	0	$0	0	$0	9	$102,230	9	$102,230
Palms - Mar Vista - Del Rey	0	$0	0	$0	6	$45,108	0	$0	6	$45,108
Venice	0	$0	0	$0	2	$797,907	1	$7,743	3	$805,650
Westwood	0	$0	0	$0	3	$37,741	0	$0	3	$37,741
Bel Air - Beverly Crest	0	$0	0	$0	0	$0	3	$68,857	3	$68,857
Central City North	0	$0	0	$0	2	$599,853	0	$0	2	$599,853
Van Nuys - North Sherman Oaks	0	$0	1	$2,755	1	$222,577	0	$0	2	$225,332
Chatsworth - Porter Ranch	0	$0	0	$0	0	$0	2	$2,780	2	$2,780
West Los Angeles	0	$0	0	$0	2	$16,801	0	$0	2	$16,801
San Pedro	0	$0	2	$61,152	0	$0	0	$0	2	$61,152

Canoga Park - Winnetka - Woodland Hills - West Hills	0	$0	0	$0	1	$2,694	0	$0	1	$2,694
Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon	0	$0	0	$0	1	$4,634	0	$0	1	$4,634
Boyle Heights	1	$0	0	$0	0	$0	0	$0	1	$0
Westchester - Playa del Rey	0	$0	0	$0	0	$0	1	$0	1	$0
Encino - Tarzana	0	$0	0	$0	0	$0	1	$9,675	1	$9,675
Grand Total	**53**	**$216,333**	**359**	**$3,280,342**	**415**	**$14,783,317**	**103**	**$1,811,065**	**930**	**$20,091,057**

Figure 6: MA Contracts by CPA by Equity Index Category

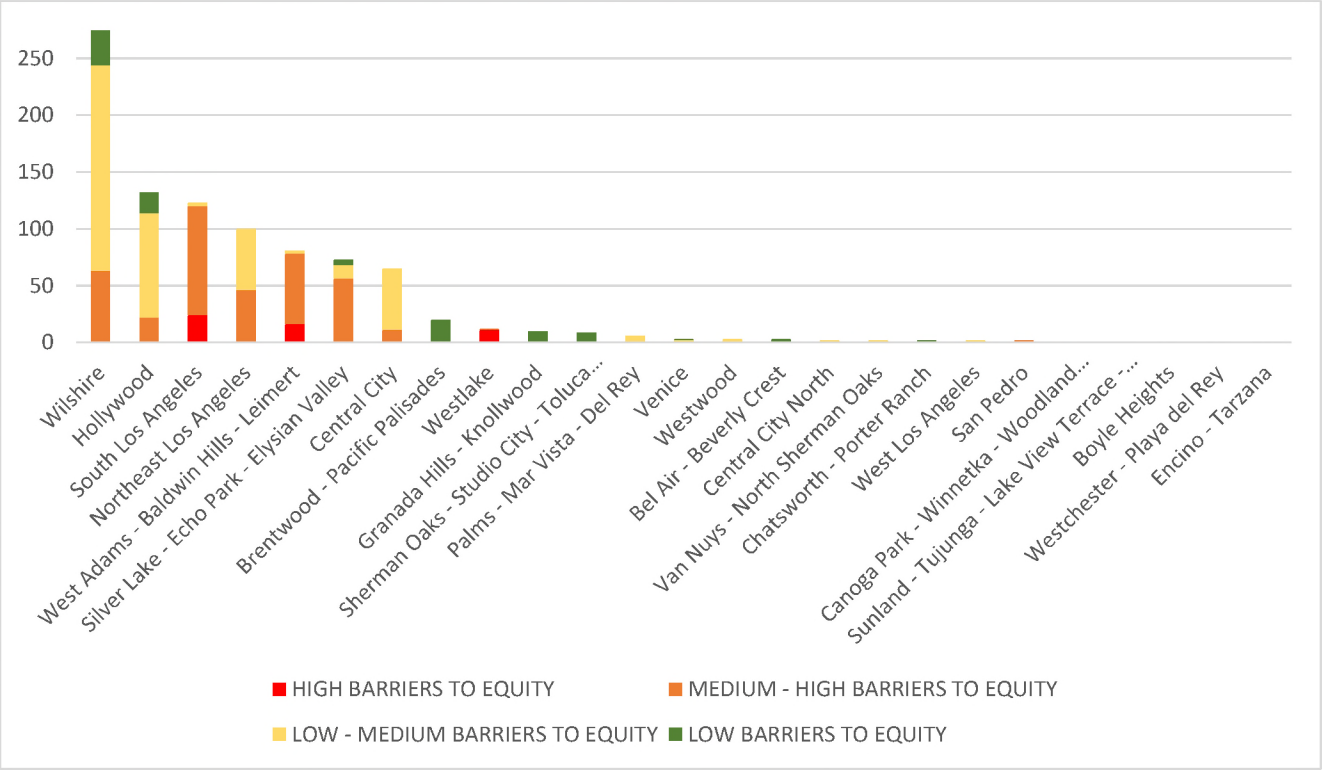


Figure 7: Percentage of MA Contracts by CPA by Equity Index Category



Figure 8: Savings by CPA by Equity Index Category

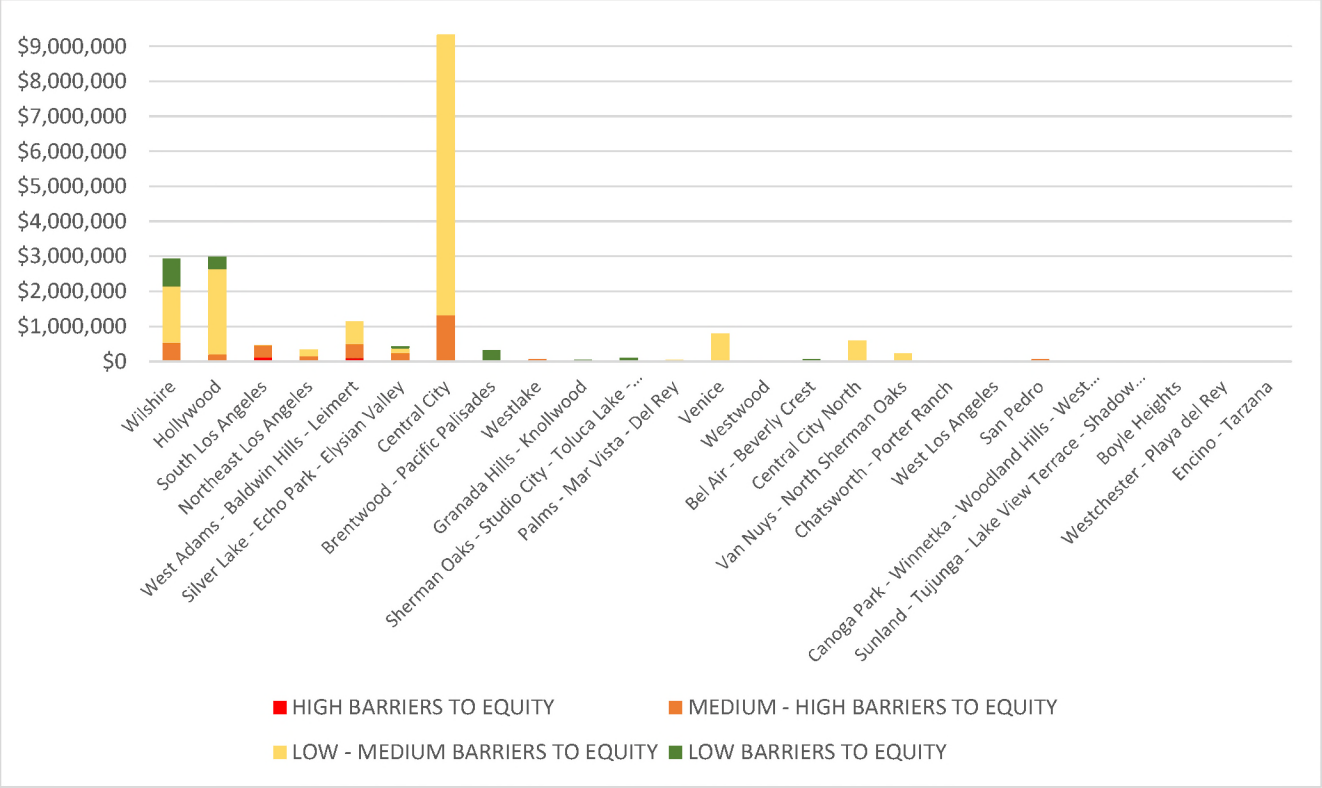


Figure 9: Percentage of Savings by CPA by Equity Index Category



Key Findings:

- The Central City CPA experienced 46% of all savings in 2019 ($$9,331,848); however, it contains only 7% of the Program (65 MA contracts). Also, a majority (83.1%) of all MA contracts in this CPA are located within communities facing low to medium barriers to opportunity.
- The Wilshire CPA contains the highest number of MA contracts, with 275 (30% of the Program); however, it only experienced 15% of the total savings in 2019.
- Areas that have high concentrations of properties with higher property value experience more savings, which is one reason why Central City CPA experienced almost half of all savings in 2019.
- CPAs that have existing MA contracts located in communities facing high barriers to opportunity include South Los Angeles, West Adams-Baldwin Hills-Leimert, Westlake, and Boyle Heights.
- In most cases, MA contracts located in communities facing high barriers to opportunity receive less savings than MA contracts within communities facing lower barriers, which supports our hypotheses.

Property Type

Figure 10: Graph of Property Type Data by Equity Index Category

Property Type	HIGH BARRIERS TO OPPORTUNITY		MEDIUM TO HIGH BARRIERS TO OPPORTUNITY		LOW TO MEDIUM BARRIERS TO OPPORTUNITY		LOW BARRIERS TO OPPORTUNITY		TOTALS	
	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019
Condominium	1	$18,813	7	$708,270	17	$5,846,592	1	$60,737	26	$6,634,413
Single-family	33	$126,458	273	$1,340,234	262	2162277.988	91	$1,412,638	659	$5,041,608
Multi-family	15	$48,739	61	$614,300	100	4009613.064	9	$336,539	185	$5,009,190
Commercial	2	$22,324	15	$539,521	28	$2,665,881	2	$17,952	47	$3,245,678
Industrial	2	$0	3	$78,016	5	$65,077	0	$0	10	$143,093
Recreational	0	$0	0	$0	3	$17,075	0	$0	3	$17,075
Grand Total	**53**	**$216,333**	**359**	**$3,280,342**	**415**	**$14,766,516**	**103**	**$1,827,866**	**930**	**$20,091,057**

Figure 11: MA Contracts by Property Type by Equity Index Category

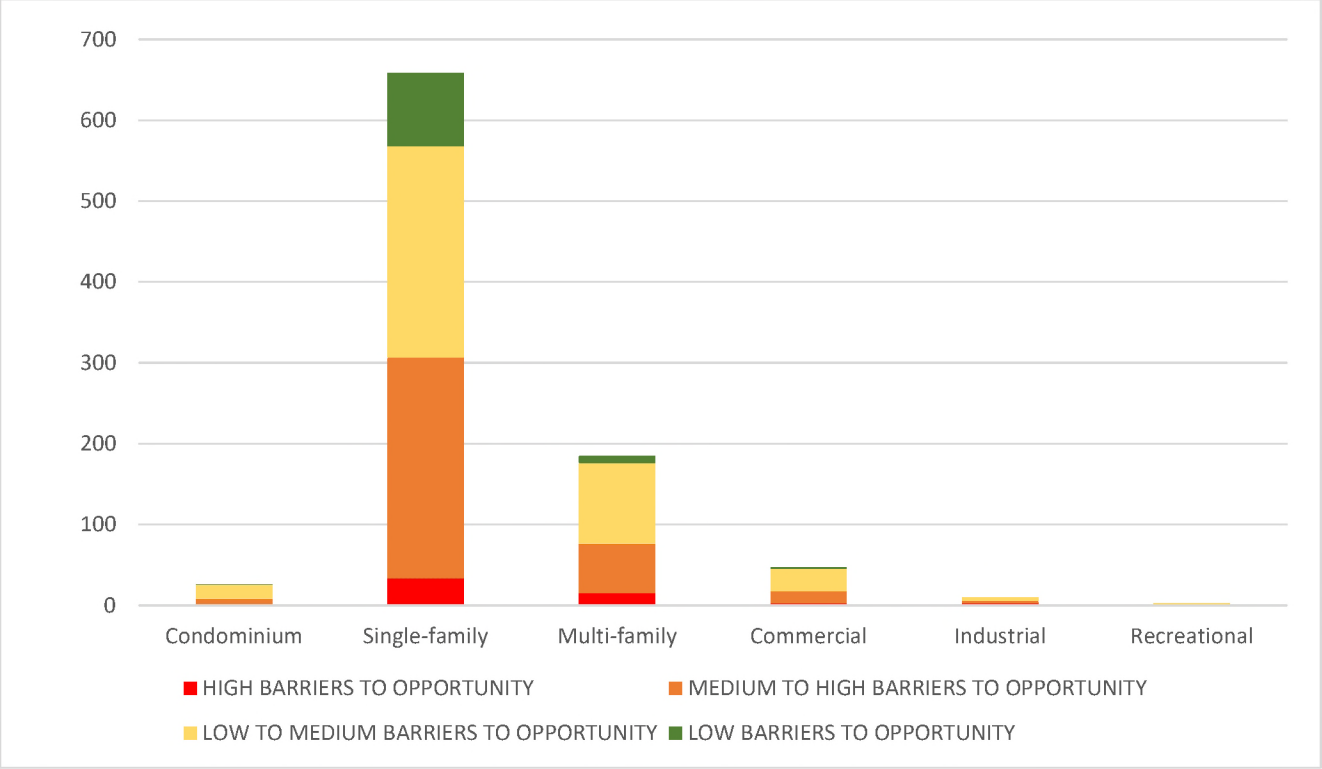


Figure 12: Percentage of MA Contracts by Property Type by Equity Index Category

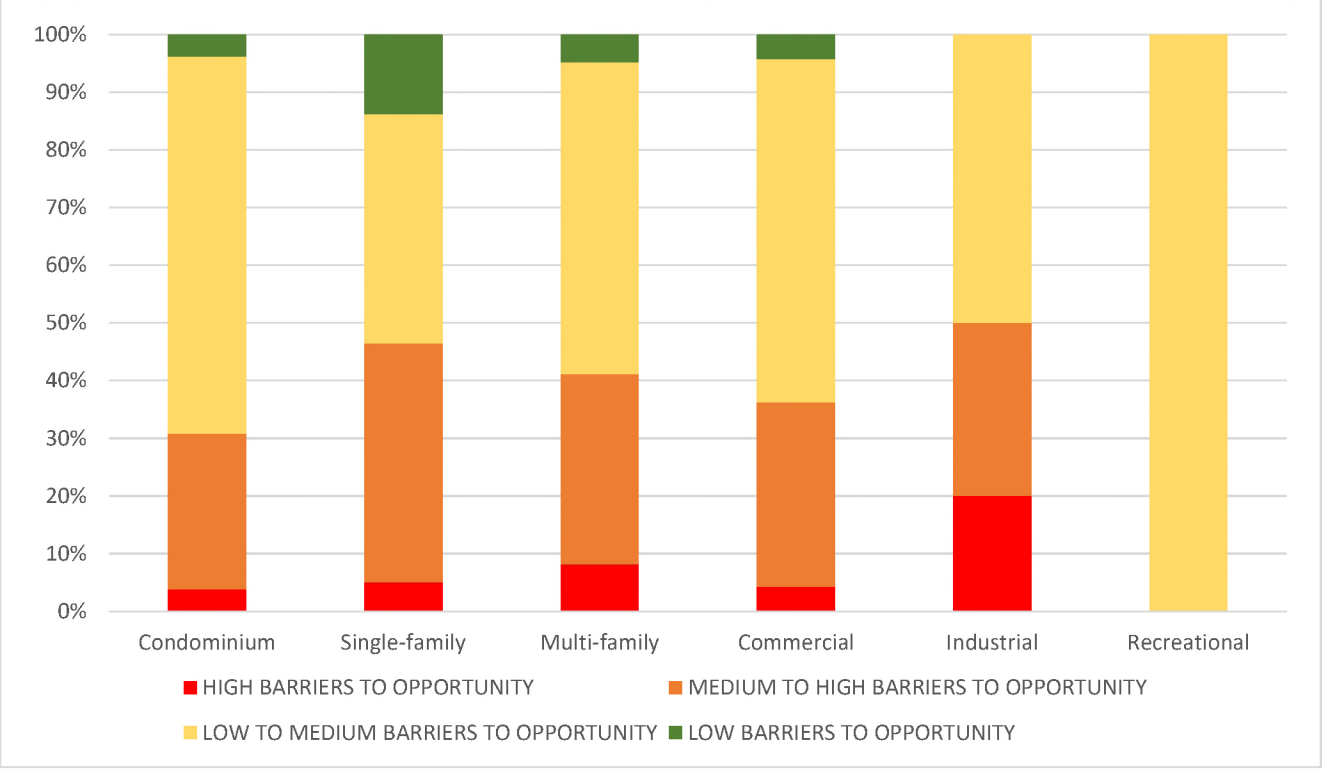


Figure 13: Savings by Property Type by Equity Index Category

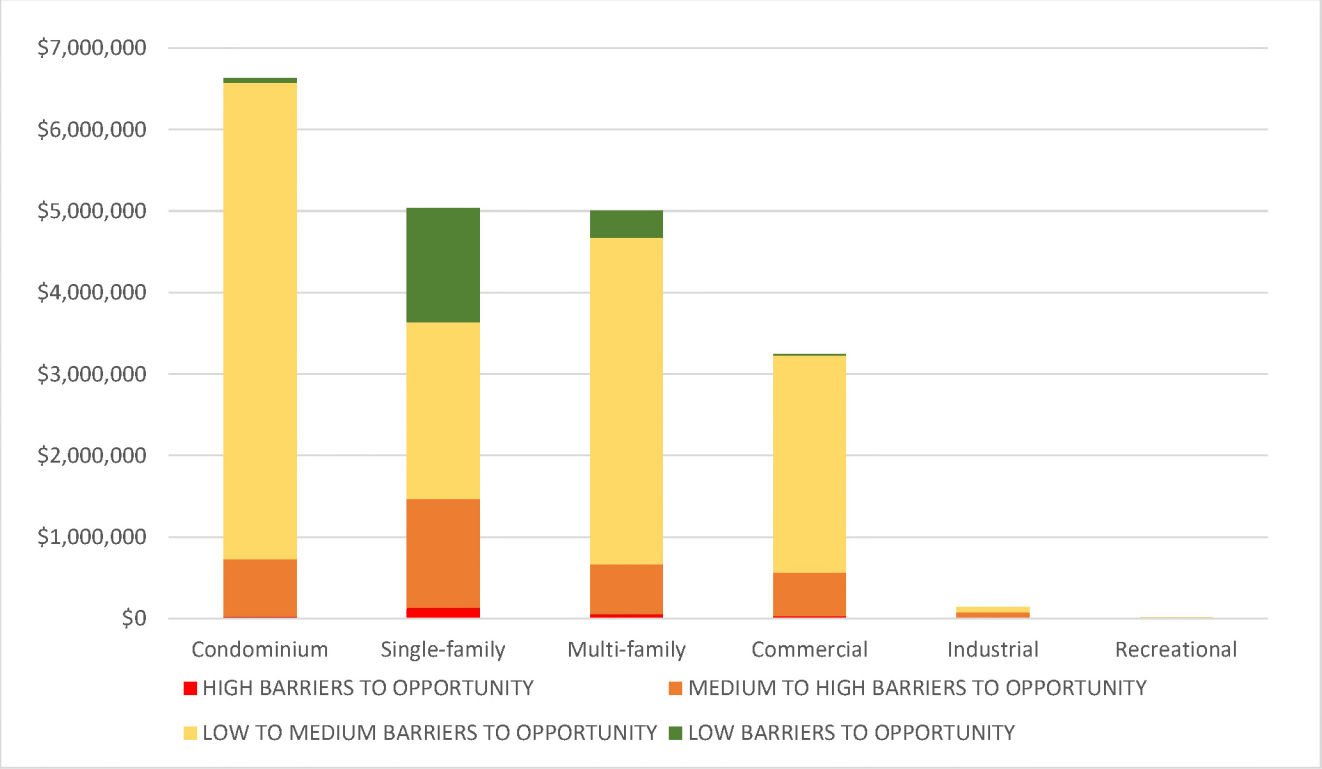
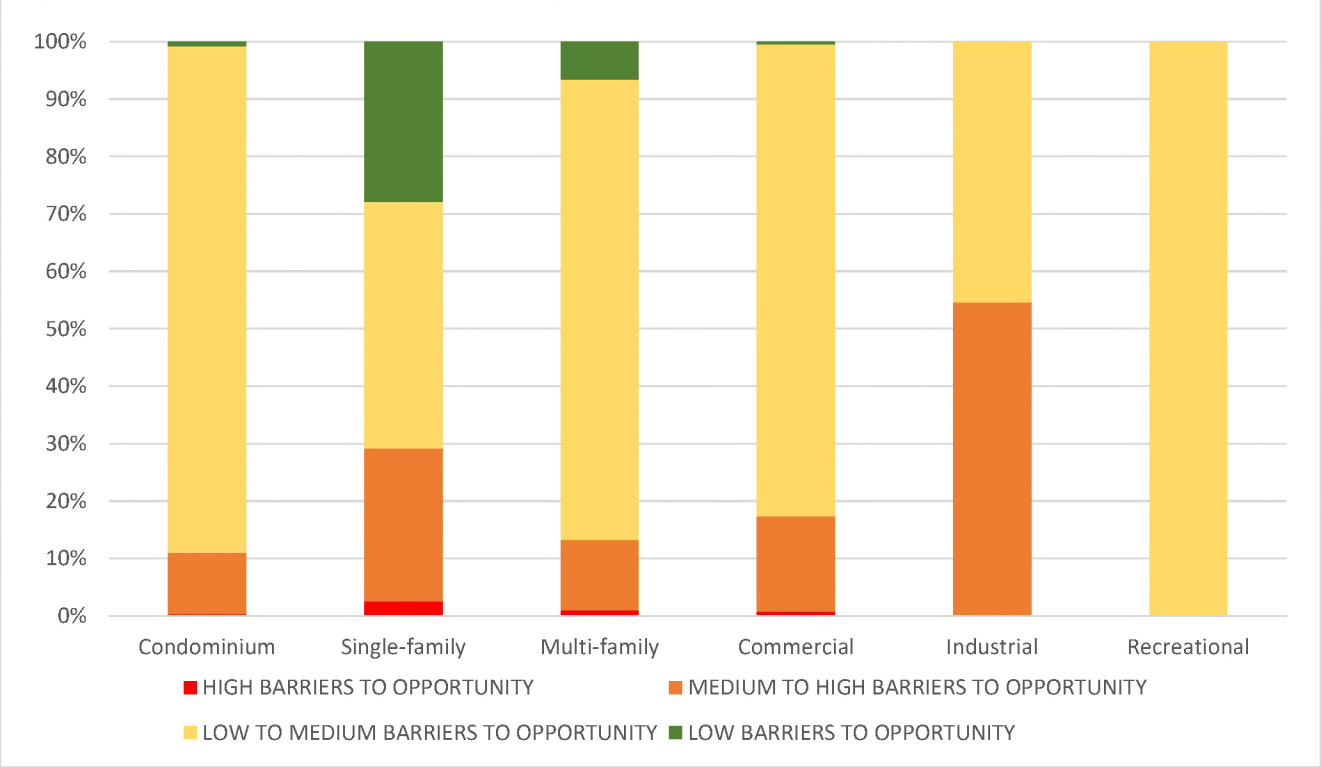


Figure 14: Percentge of Savings by Property Type by Equity Index Category



Key Findings:

- Though there are more single-family residences with MA contracts, with 659 (71%), this propety type receives $5,041,608 (25%) of savings.
- Condominiums account for a third of the total savings, with $6,634,413 (33%), even though there are only 26 of this property type (3%).
- Multi-family residential (MFR) and commercial property types experience larger savings due to property value.
- Top 10 MA contracts with the most savings consisted mostly of Condominiums, including 1 commercial property, and 1 MFR.
- Although there are many more single-family residences with MA contracts, this property type received less savings in total than condominium properties.
- A majority of existing MA contracts that are condominium, single-family residential, multi-family, commercial, and recreational properties are located in communities of low or low-medium barriers to opportunity; whereas half of the industrial properties are located in areas of medium-high or high barriers to opportunity.
- Similarly, only industrial type properties experience more tax savings in areas of higher barriers to opportunity; however, they only make up a small percentave of total savings.
- 90% of total savings for condominiums occured in areas of low barriers to opportunity.

Historic Preservation Overlay Zone

Figure 15: Graph of HPOZ Data by Equity Index Category

HPOZ	HIGH BARRIERS TO OPPORTUNITY		MEDIUM TO HIGH BARRIERS TO OPPORTUNITY		LOW TO MEDIUM BARRIERS TO OPPORTUNITY		LOW BARRIERS TO OPPORTUNITY		Totals	
	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019
Windsor Square (2007)	0	$0	0	$0	26	$465,846	13	$241,067	39	$706,913
South Carthay (1985)	0	$0	0	$0	66	$483,957	0	$0	66	$483,957
Hancock Park (2006)	0	$0	0	$0	5	$38,269	12	$441,843	17	$480,111
La Fayette Square (2000)	0	$0	48	$353,302	1	$9,799	0	$0	49	$363,101
Carthay Circle (1998)	0	$0	0	$0	42	$269,243	0	$0	42	$269,243
Highland Park - Garvanza (2010)	0	$0	40	$127,216	31	$119,411	0	$0	71	$246,627
Angelino Heights (1983, 2008 Expansion)	0	$0	55	$236,896	0	$0	0	$0	55	$236,896
Country Club Park (2010)	0	$0	30	$216,694	0	$0	0	$0	30	$216,694
Whitley Heights (1992)	0	$0	0	$0	34	$191,597	0	$0	34	$191,597
West Adams Terrace (2003)	14	$81,484	17	$104,647	0	$0	0	$0	31	$186,131
Miracle Mile North (1990)	0	$0	0	$0	18	$150,688	0	$0	18	$150,688
Harvard Heights (2000)	0	$0	36	$131,292	0	$0	0	$0	36	$131,292
Wilshire Park (2010)	0	$0	16	$103,318	2	$16,018	0	$0	18	$119,336
University Park (2000)	23	$99,073	0	$0	1	$3,358	0	$0	24	$102,431
Spaulding Square (1993)	0	$0	0	$0	12	$95,683	0	$0	12	$95,683
Melrose Hill (1988)	0	$0	14	$79,054	0	$0	0	$0	14	$79,054
Western Heights (2001)	0	$0	19	$66,881	0	$0	0	$0	19	$66,881
Vinegar Hill (2001, 2015 Expansion)	0	$0	1	$57,273	0	$0	0	$0	1	$57,273
Gregory Ain Mar Vista Tract (2003)	0	$0	0	$0	6	$45,108	0	$0	6	$45,108
Balboa Highlands (2010)	0	$0	0	$0	0	$0	9	$38,345	9	$38,345
Adams - Normandie (2000)	0	$0	12	$34,827	0	$0	0	$0	12	$34,827
Jefferson Park (2011)	0	$0	16	$32,065	0	$0	0	$0	16	$32,065

Windsor Village (2010)	0	$0	0	$0	4	$25,772	0	$0	4	$25,772
Sunset Square (2017)	0	$0	0	$0	2	$23,486	0	$0	2	$23,486
Miracle Mile (2017)	0	$0	0	$0	3	$20,066	0	$0	3	$20,066
Hollywood Grove (2011)	0	$0	0	$0	1	$8,839	1	$4,691	2	$13,530
Oxford Square (2017)	0	$0	0	$0	2	$10,859	0	$0	2	$10,859
Pico - Union (2004)	10	$7,880	0	$0	0	$0	0	$0	10	$7,880
Carthay Square (2017)	0	$0	0	$0	1	$5,914	0	$0	1	$5,914
Lincoln Heights (2004)	0	$0	3	$2,855	0	$0	0	$0	3	$2,855
Van Nuys (2005)	0	$0	1	$2,755	0	$0	0	$0	1	$2,755
HPOZ Sub-total	*47*	*$188,437*	*308*	*$1,549,075*	*257*	*$1,983,912*	*35*	*$725,946*	*647*	*$4,447,371*
Non-HPOZ Subtotal	*6*	*$27,895*	*51*	*$1,731,266*	*158*	*$12,782,604*	*68*	*$1,101,920*	*283*	*$15,643,686*
Grand Total	**53**	**$216,333**	**359**	**$9,291,479**	**415**	**$9,359,022**	**103**	**$772,431**	**930**	**$20,091,057**

Figure 16: MA Contracts by HPOZ by Equity Index Category

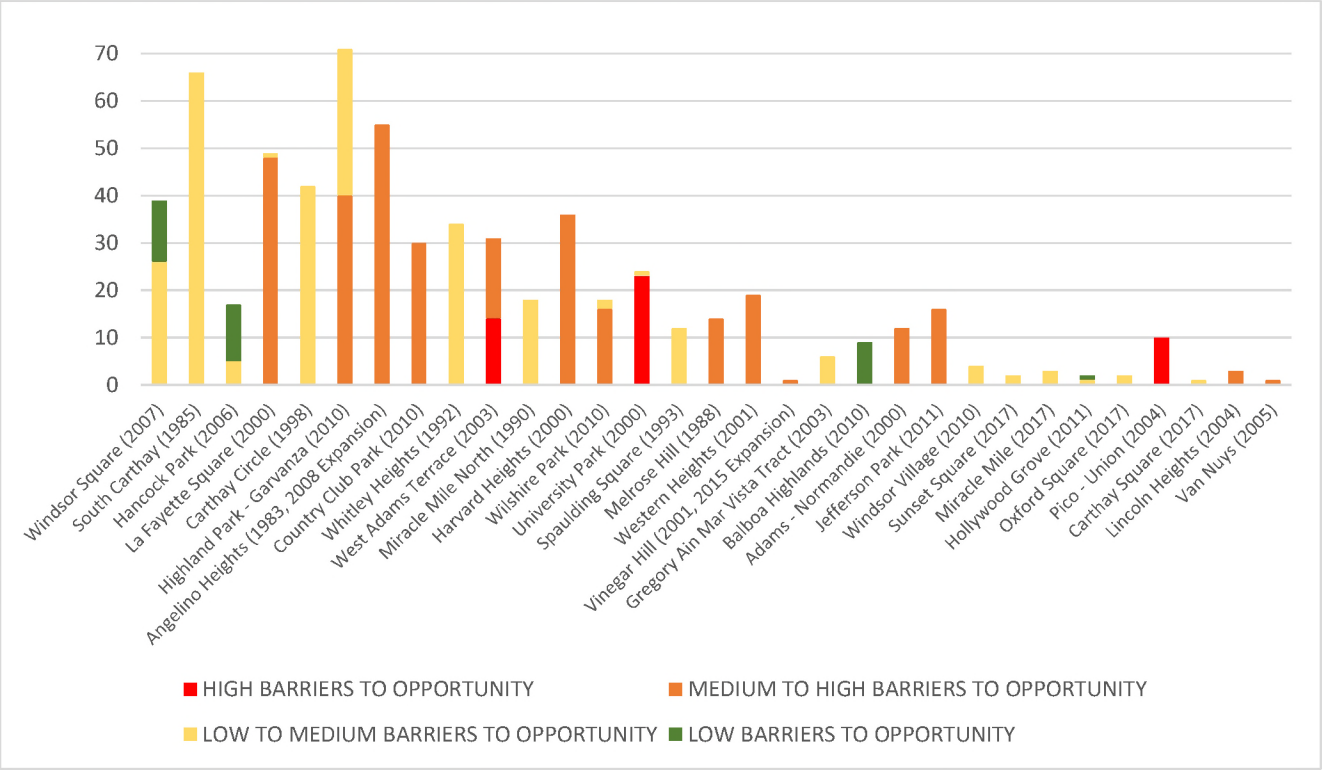


Figure 17: Percentage of MA Contracts by HPOZ by Equity Index Category

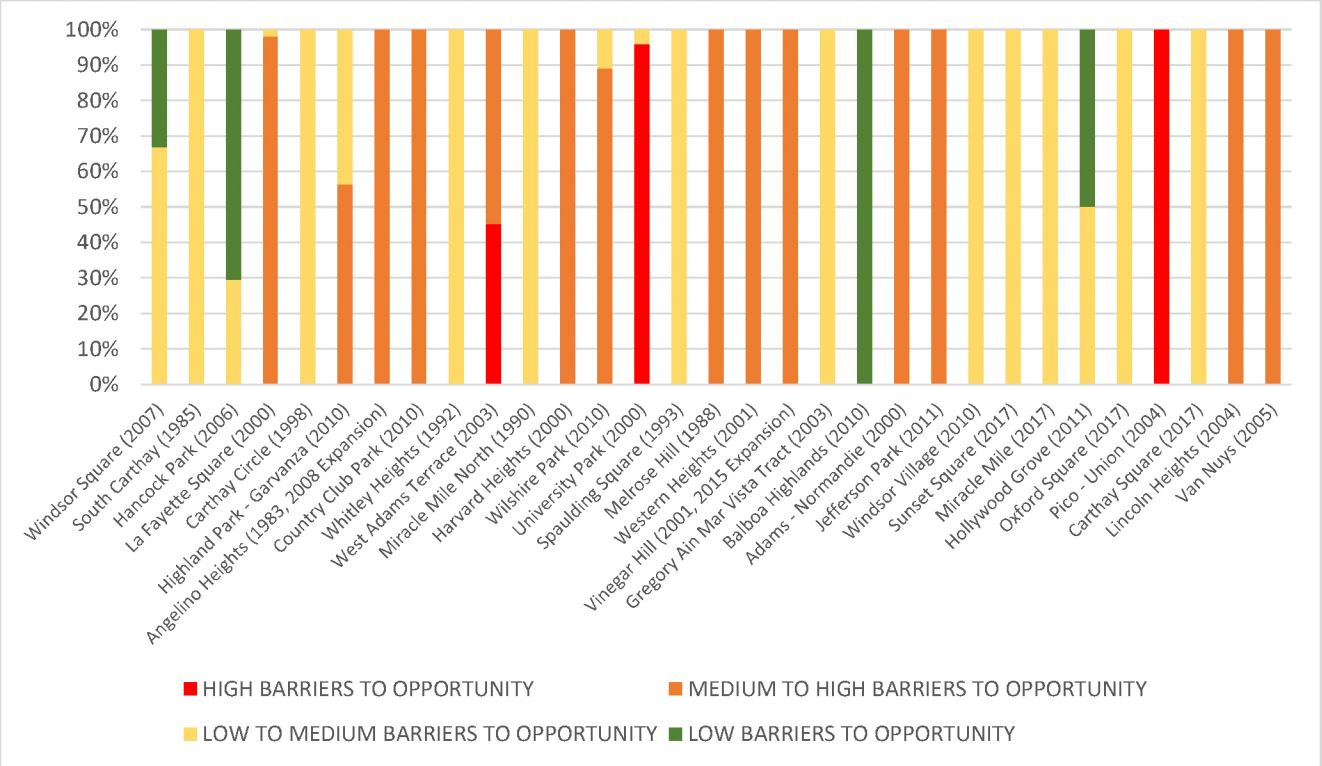


Figure 18: Savings by HPOZ by Equity Index Category

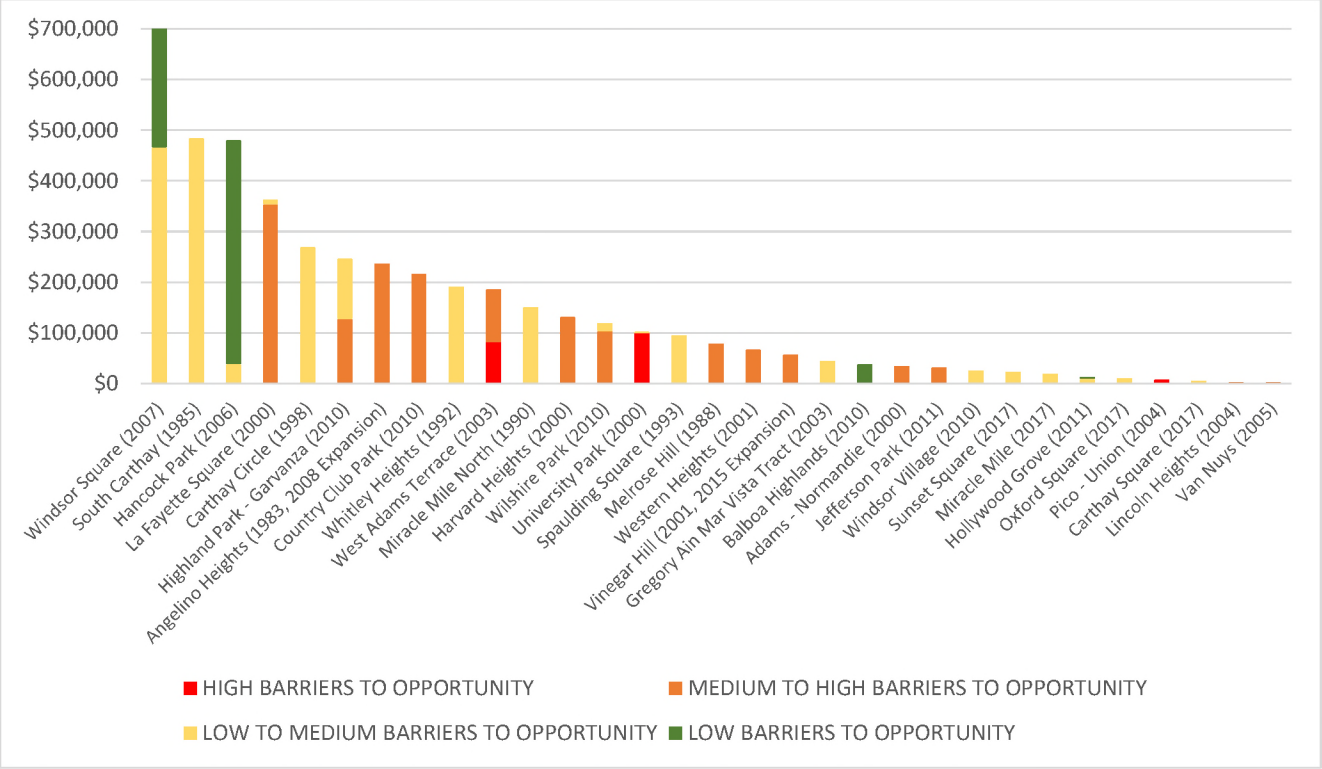


Figure 19: Percentage of MA Contracts by HPOZ by Equity Index Category



Figure 20: MA Contracts by Designation Type by Equity Index Category

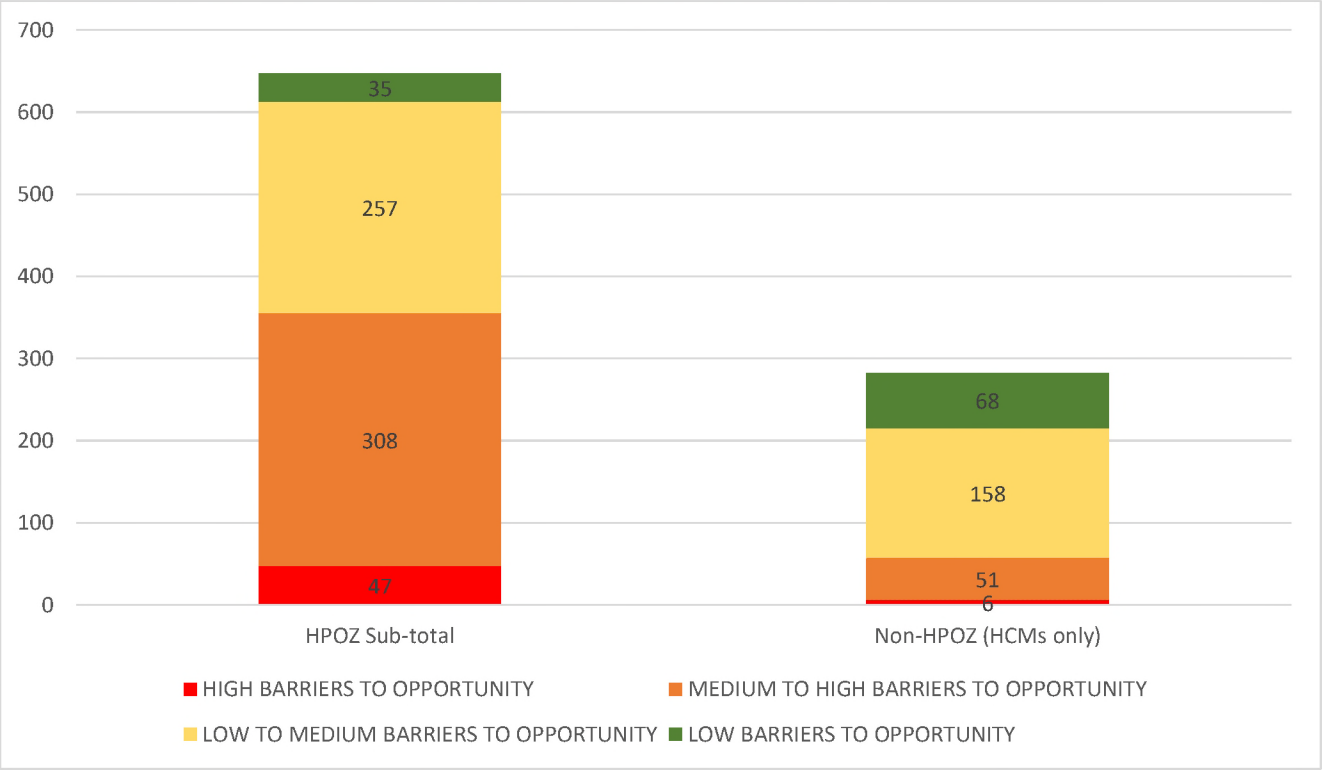


Figure 21: Percentage of MA Contracts by Designation Type by Equity Index Category

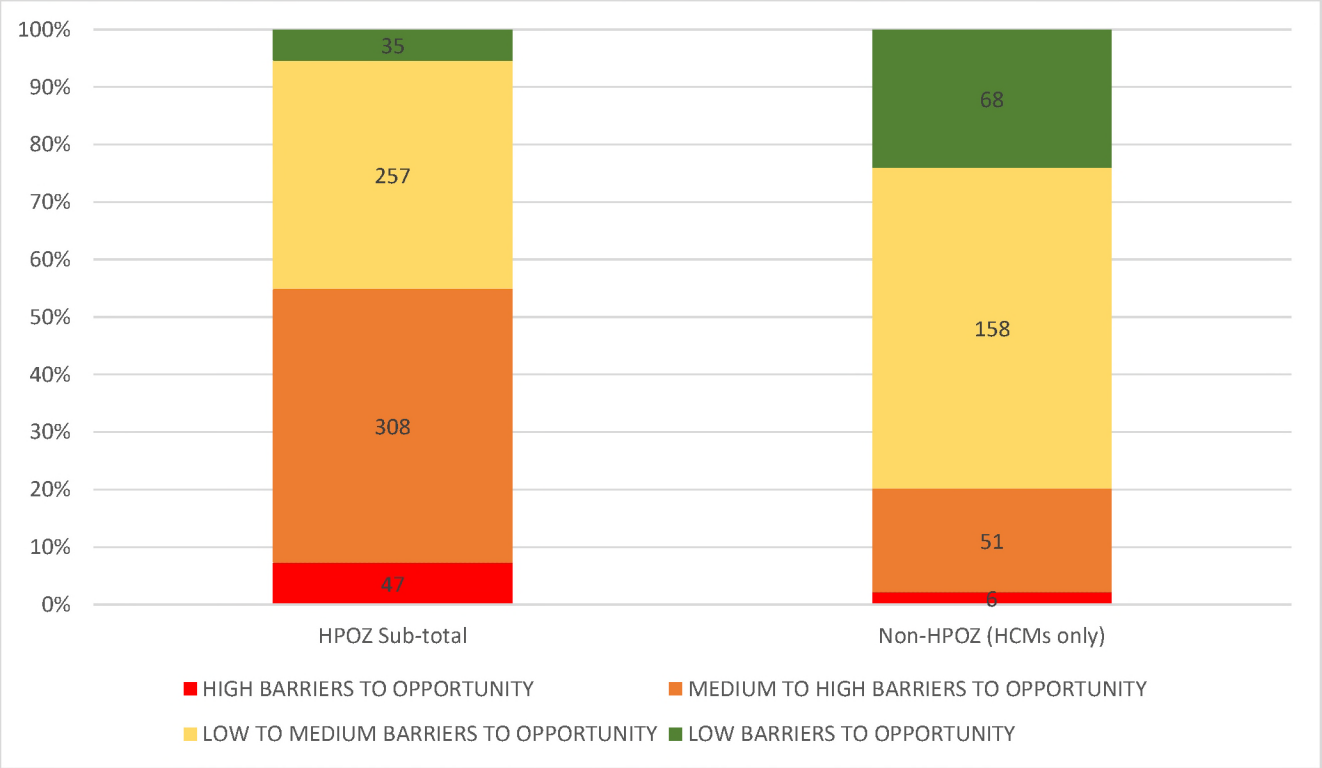


Figure 22: Savings by Designation Type by Equity Index Category

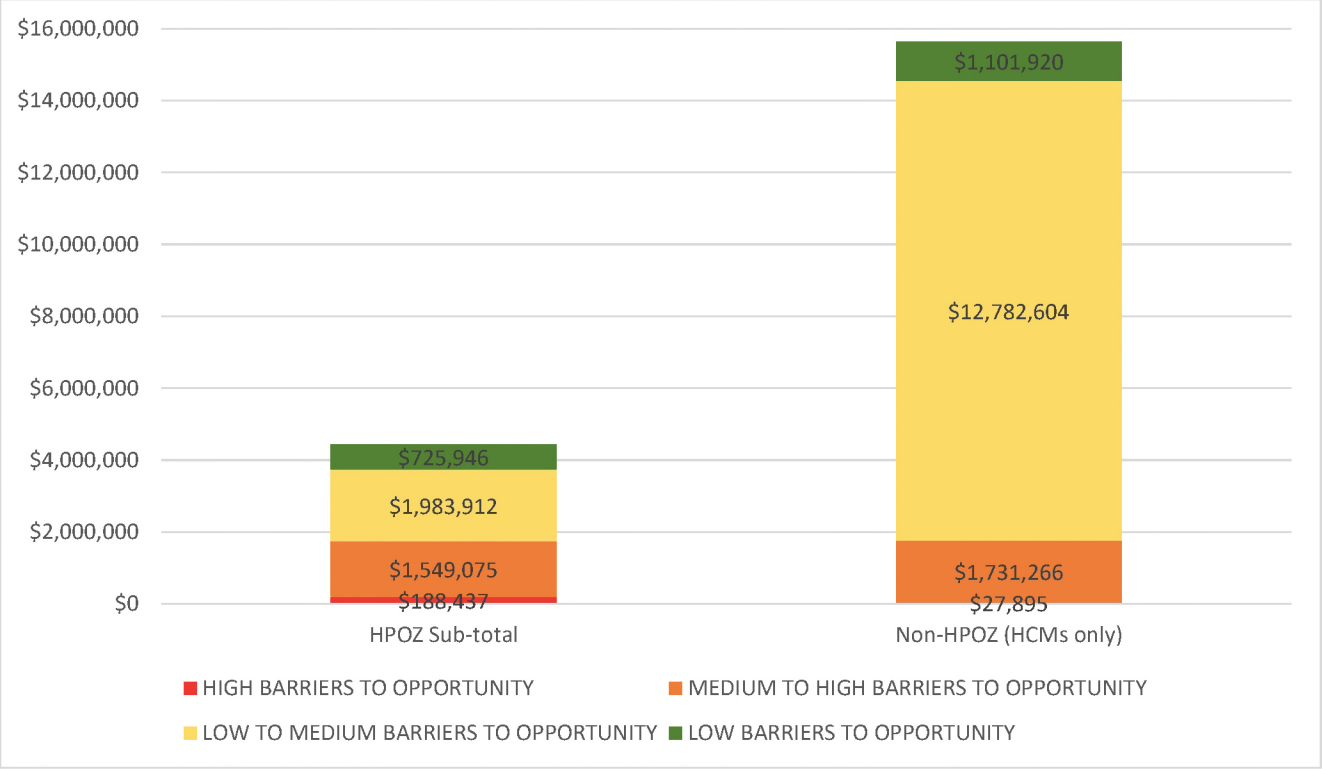
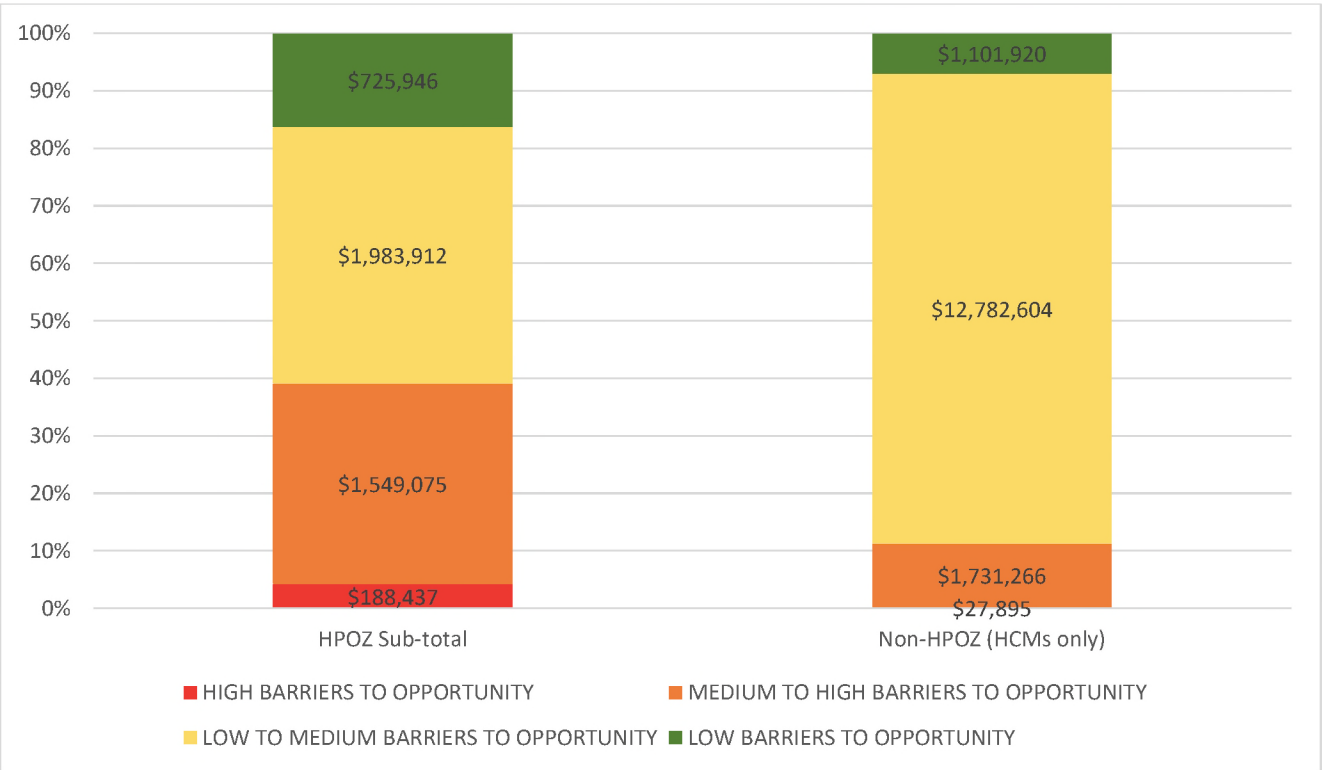


Figure 23: Percentage of Savings by Designation Type by Equity Index Category



Key Findings:

- MA contracts within HPOZs only include single-family, multi-family, and commercial property types.
- The HPOZs that experienced the most savings were typically HPOZs that had the most contracts located in areas of lower barriers to opportunity. The exception being Lafayette Square HPOZ, which has the fourth most amount of savings of all HPOZs, and nearly all MA contracts are within medium to high barriers to opportunity areas.
- The top three HPOZs in terms of total savings experienced 39% of all savings, which are Windsor Square, South Carthay and Hancock Park. None of these HPOZs contain MA contracts within areas of higher barriers to opportunity.
- Although MA contracts within HPOZs account for 70% of all MA contracts within the Program (647 properties), in 2019 only received 22% of total MA savings ($4,447,371).
- 55% of all HPOZ MA contracts are within communities facing higher barriers to opportunity (355 properties) and receive 39% of HPOZ total savings ($1,737,512 of $4,447,371), whereas 20% of all MA contracts outside of HPOZs are within communities facing higher barriers to opportunity (57 properties) and receive 11% of total savings outside of HPOZs ($1,759,162 of $15,643,686). This implies that:
    - MA contracts within HPOZs currently include properties in areas within higher barriers to opportunity that neither have high property value or substantial difference between the enrolled and trended base value.
    - MA contracts outside of HPOZs have a higher rate of high property value or substantial difference between the enrolled and trended base value in areas of higher barriers to opportunity.

Council District

Figure 24: Graph of Council District Data by Equity Index Category

Council District	HIGH BARRIERS TO OPPORTUNITY		MEDIUM TO HIGH BARRIERS TO OPPORTUNITY		LOW TO MEDIUM BARRIERS TO OPPORTUNITY		LOW BARRIERS TO OPPORTUNITY		TOTALS	
	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019	Count of Contracts	Total Savings in 2019
14 - Kevin de Leon	1	$0	11	$1,310,086	82	$8,726,365	0	$0	94	$10,036,450
4 - Nithya Raman	0	$0	18	$116,528	123	$1,433,592	60	$1,344,180	201	$2,894,300
10 - Mark Ridley-Thomas	17	$103,808	184	$1,099,526	8	$703,827	0	$0	209	$1,907,161
13 - Mitch O'Farrell	0	$0	25	$210,635	23	$1,686,749	0	$0	48	$1,897,384
11 - Mike Bonin	0	$0	0	$0	9	$855,606	22	$329,876	31	$1,185,482
5 - Paul Koretz	0	$0	0	$0	134	$994,440	4	$50,130	138	$1,044,570
1 - Gilbert Cedillo	33	$106,205	102	$437,724	29	$123,596	0	$0	164	$667,525
2 - Paul Krekorian	0	$0	1	$2,755	1	$222,577	4	$46,809	6	$272,141
15 - Joe Buscaino	0	$0	2	$61,152	0	$0	0	$0	2	$61,152
8 - Marqueece Harris-Dawson	2	$6,320	15	$41,936	1	$374	0	$0	18	$48,630
12 - John Lee	0	$0	0	$0	0	$0	12	$47,196	12	$47,196
3 - Bob Blumenfield	0	$0	0	$0	1	$2,694	1	$9,675	2	$12,369
9 - Curren D. Price, Jr.	0	$0	1	$0	3	$12,062	0	$0	4	$12,062
7 - Monica Rodriguez	0	$0	0	$0	1	$4,634	0	$0	1	$4,634
6 - Nury Martinez	0	$0	0	$0	0	$0	0	$0	0	$0
Grand Total	**53**	**$216,333**	**359**	**$3,280,342**	**415**	**$14,766,516**	**103**	**$1,827,866**	**930**	**$20,091,057**

Figure 25: MA Contracts by Council District by Equity Index Category

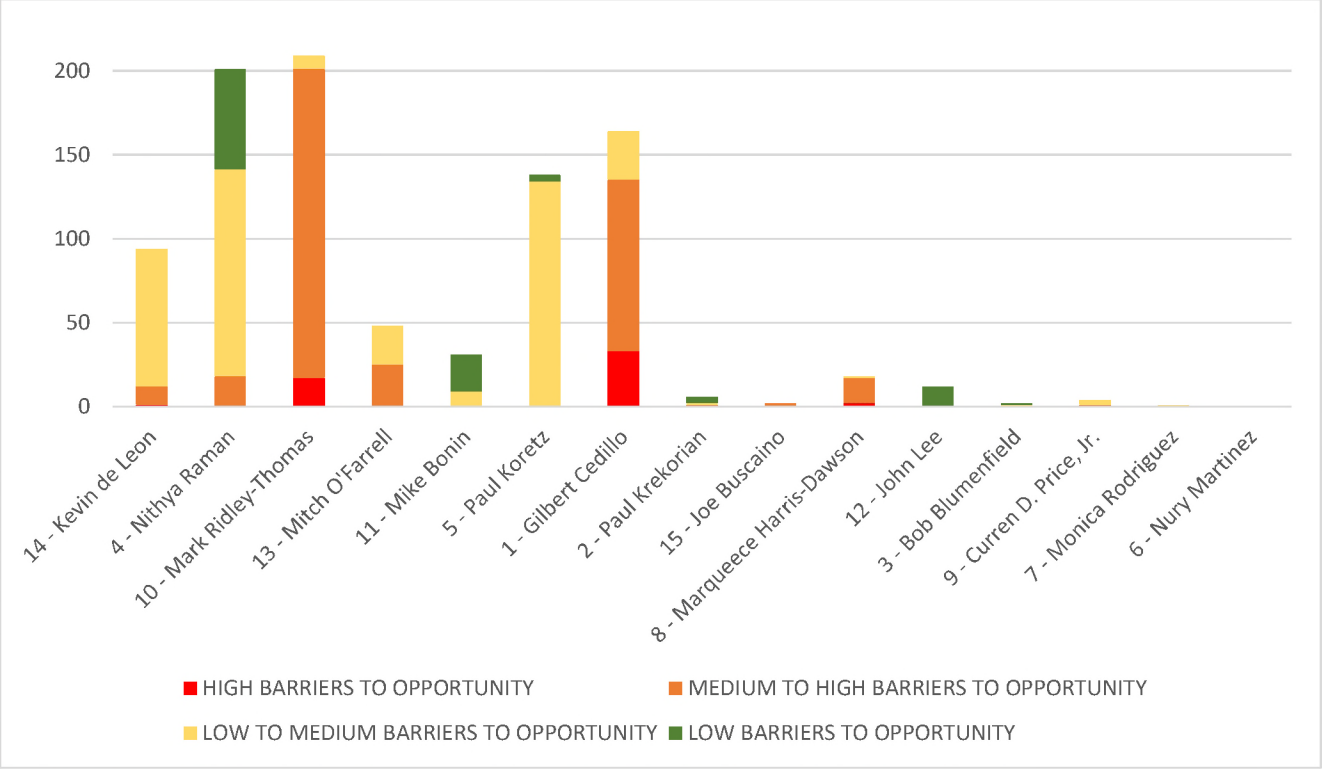


Figure 26: Percentage of MA Contracts by Council District by Equity Index Category

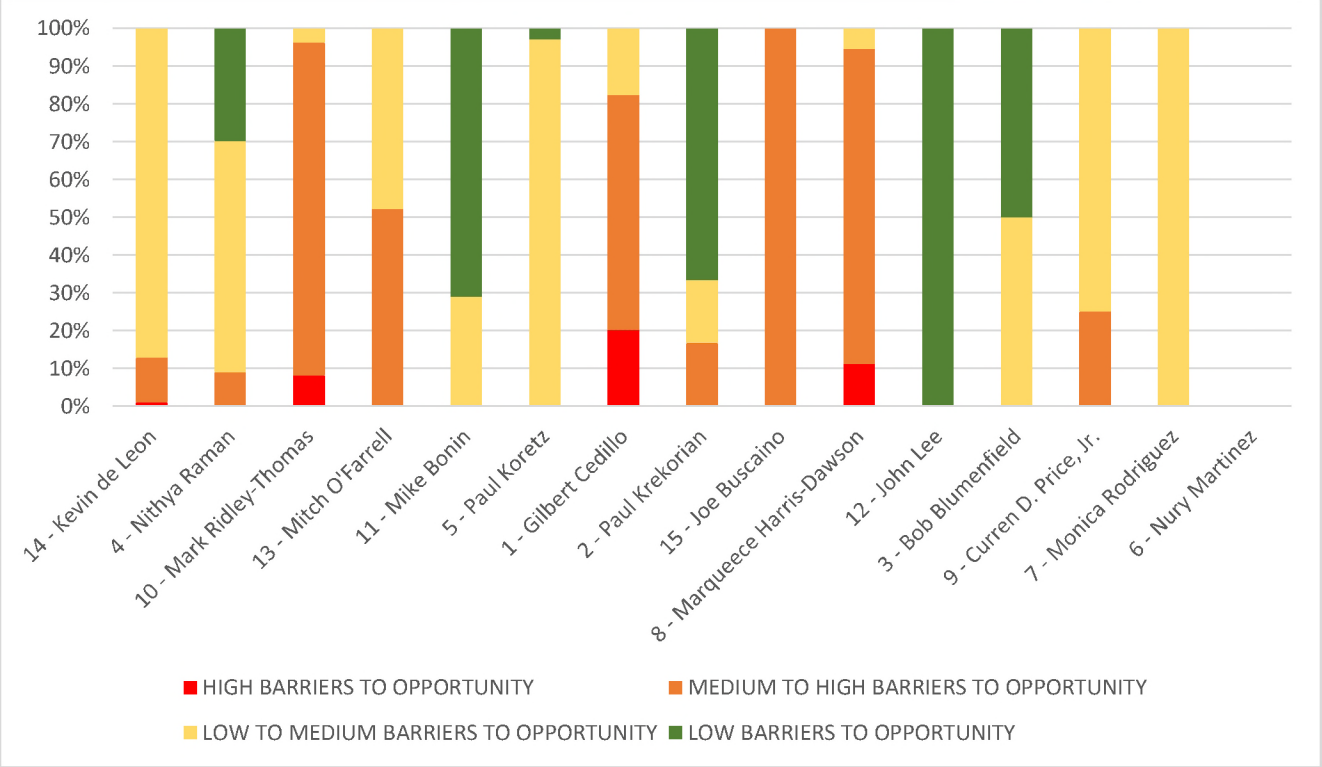


Figure 27: Savings by Council District by Equity Index Category

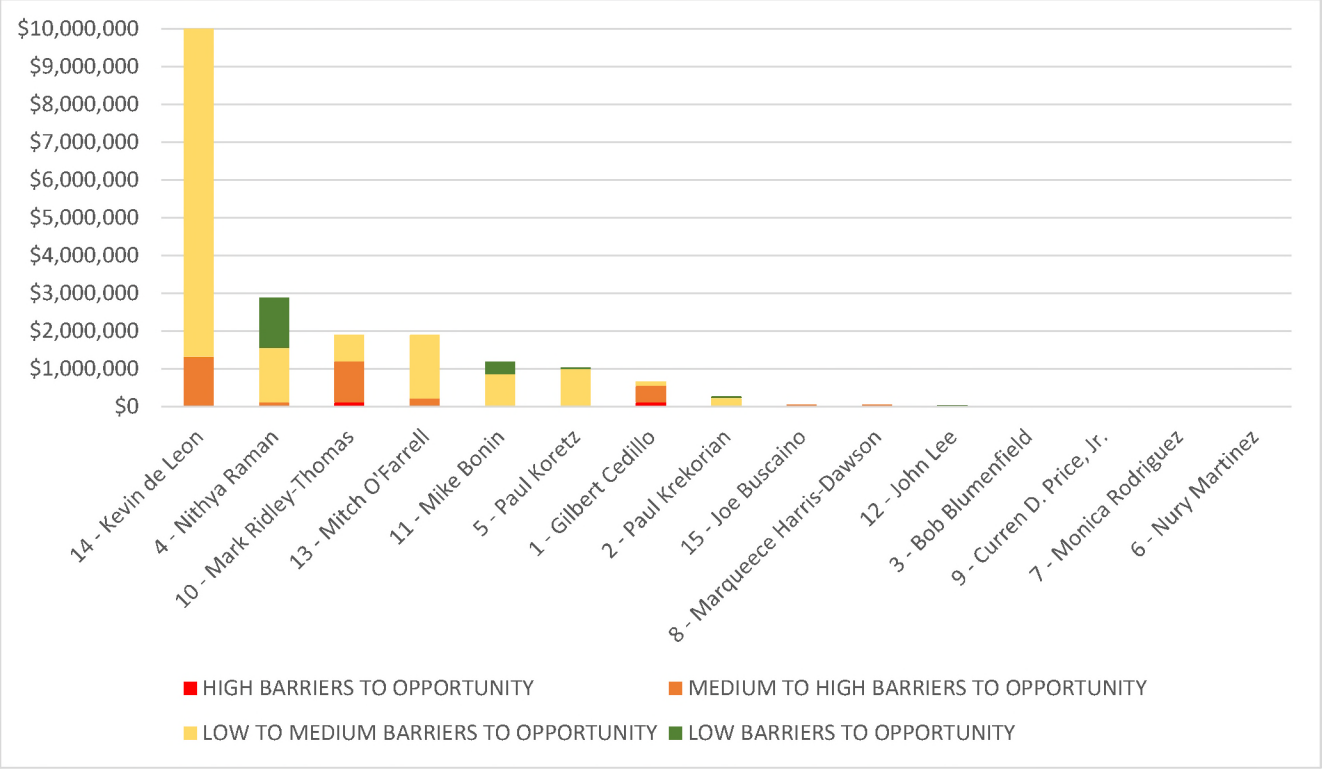
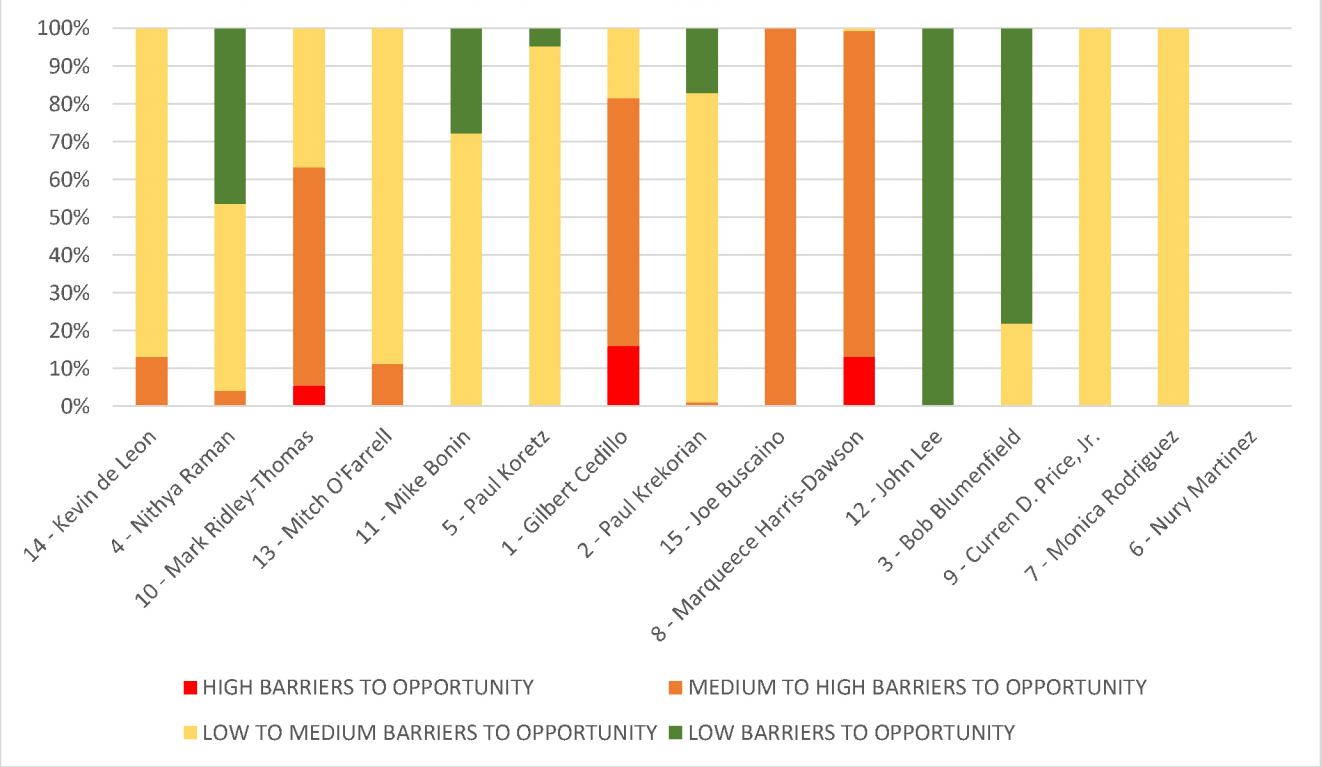


Figure 28: Percentage of Savings by Council District by Equity Index Category



Key Findings:

- The Council District (CD) with the most MA contracts is CD 10 with 209, while CD 6 does not have any.
- Of the 209 MA contracts in CD 10, 201 MA contracts are located within communities facing high and medium to high barriers to opportunity. Similarly, of the 164 MA contracts in CD 1, 135 are located within communities facings high and medium to high barriers to opportunity. However, these MA contracts did not experience a large amount of savings in 2019 as compared to other CDs.
- CD 14 contains 94 MA contracts, yet experienced $10,036,450 total savings in 2019. Only 11 of these MA contracts were located within communities facing medium to high barriers to opportunity. The remainder are located in communities facing low to medium barriers to opportunity.
- CD 14 experienced 50% of the total Program savings in 2019. This was primarily due to the large property values and condominium property types within this district.
- CDs that have a majority of MA contracts in communities facing high or medium to high barriers to opportunity are (in order of amount of MA contracts) CD 10, 1, 13, 8, and 15.

Conclusion

Analysis of savings data demonstrated that the current Program would require more MA contracts from communities facing higher barriers to opportunity in order to ensure equity in the future. Additional MA contracts within these communities that with higher property values would increase the amount of savings within these communities. Since MFR property types have higher value, exist in abundance in HPOZs, and provide housing to people who live within the community, it is reasonable to prioritize adding more of this property type to the Program. In order to increase equity within the distribution of MA contracts and savings throughout the City, propritizing new MA contracts within communities facing higher barriers to opportunity that are MFR property types is necessary.

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 9

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Page 16, LAMC Section 19.05 Citation

SEC. 19.05. FILING FEES FOR ENVIRONMENTAL CLEARANCES.

(Amended by Ord. No. 188,063, Eff. 2/10/24.)

A. **Fees.** For the preparation and processing of required studies, analysis, reports, findings, mitigation measures, certifications, and notices under the California Environmental Quality Act (CEQA), all fees, deposits, and costs provided in Subsections 1. and 2. below, shall be paid. All monies required to be paid in this Section, shall be paid to the City Planning Department at the time the permit application is filed unless otherwise indicated in this Section. The determination of the necessary actions to comply with CEQA is at the City's discretion acting as the lead or responsible agency.

1. **Categorical Exemptions (CEs), Negative Declarations (NDs)/Mitigated Negative Declarations (MNDs), Environmental Assessment Forms (EAFs), and Addenda:**

Table 1. Fees for CEs, EAFs, NDs, and MNDs

Type of Application	Base Fee
Categorical Exemption (Classes 1-31, 33)	$556
Class 32 Categorical Exemption	$4,481
EAF / Initial Study leading to ND or MND or Statutory Exemptions (except Sustainable Communities Project Exemption)	$6,911
MND / Expanded Initial Study, Subsequent Approval Review (CEQA Guidelines Section 15162), or Addendum to ND or MND - Expanded	$12,163
Subsequent Approval Review (CEQA Guidelines Section 15162) or Addendum to ND or MND	$2,692
Publication Fee for Notice of Intent to Adopt ND or MND (pass through of publishing costs)	$1,700

2. **EIRs, SCPEs, and SCEAs:**

(a) **Deposit.** An initial deposit as provided in Table 2 below, is required at the time of an application for an EAF, resulting in an Environmental Impact Report (EIR), Sustainable Communities Project Exemption (SCPE), Sustainable Communities Environmental Assessment (SCEA), or any other environmental clearance available in CEQA that is not otherwise expressly listed in Subsections 1. or 2. (Other CEQA Clearance).

Table 2. Deposits and Fees for EIRs, SCEAs, SCPEs and Other CEQA Clearances

Type of Application	Base Fee
Type of Application	Base Fee
EIRs (includes Focused EIRs) - Initial Deposit	$15,000
SCPE, SCEA, or Other CEQA Clearance - Initial Deposit	$10,000
Subsequent Approval to EIR (CEQA Guidelines Section 15162) - Initial Deposit	$7,500
EIR (including Supplemental, Subsequent, Tiered, Focused, or Addendum to EIR) Review Services (hourly)	$209
SCPE Review Services (hourly)	$209
SCEA Review Services (hourly)	$209
Other CEQA Clearance Review Services (hourly)	$209

(b) **Full Cost Recovery.** For any costs incurred by the City, other than for those CEQA clearances or notices identified in Table 1, above, the applicant is responsible for all of the City's actual costs to comply with CEQA. All other costs shall be paid at the cost invoiced by the City for the City's actual costs.

(c) **Indemnification and Defense.** Applicants are responsible for any and all costs incurred by the City in defense of any and all actions or claims arising in full or in part out of the City's processing of a project application filed under Chapter 1 or Chapter 1A and the City's actions to comply with CEQA. Applicants shall deposit $50,000 (or an amount found necessary by the City Attorney's Office to ensure the City's costs are fully covered) to the City Attorney's Office upon receipt of a tender of defense letter. The Applicant shall pay all invoices from the City Attorney's Office for its costs and ensure that the initial deposit is maintained in full at all times prior to final disposition of the case or action.

B. **Child Care Fees.** No fee shall be charged in connection with the processing of an initial study or filing of an EIR for any child care facility or nursery school which is determined to be nonprofit, including, but not limited to, parent cooperatives and facilities funded by a governmental agency or owned or operated by a philanthropic institution, church, or similar institution. A facility funded by a governmental agency shall indicate the primary current and anticipated source of funds.

Where any uncertainty exists as to the nonprofit status of the facility, the applicant shall file a copy of the articles of incorporation or an affidavit showing, to the satisfaction of a Zoning Administrator, that the child care facility will be nonprofit.

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 10

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 18

ORDINANCE NO. 183893

An ordinance amending Divisions 93 and 95 of Article I of Chapter IX of the Los Angeles Municipal Code to establish mandatory standards for earthquake hazard reduction in existing wood-frame buildings with soft, weak, or open-front walls and existing non-ductile concrete buildings, and amending Sections 152.02, 152.04, 152.05 and 152.08 of Article 2 of Chapter XV of the Los Angeles Municipal Code to grant authority to the Rental Adjustment Commission to modify Tenant Habitability Program requirements for purposes of implementing seismic retrofit mandates.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Division 93 of Article 1 of Chapter IX of the Los Angeles Municipal Code is amended in its entirety to read as follows:

ARTICLE 1, DIVISION 93

MANDATORY EARTHQUAKE HAZARD REDUCTION IN EXISTING WOOD-FRAME BUILDINGS WITH SOFT, WEAK OR OPEN-FRONT WALLS

SEC. 91.9301. PURPOSE.

The purpose of this division is to promote public welfare and safety by reducing the risk of death or injury that may result from the effects of earthquakes on existing wood-frame multi-story buildings with soft, weak or open front walls. In the Northridge Earthquake, many multi-story wood-frame buildings with tuck-under parking performed poorly and collapsed, causing the loss of human life, personal injury and property damage. It has been determined that the structural vulnerability of this building type is typically due to soft, weak or open front walls. This division creates minimum standards to mitigate hazards from these deficiencies. Adherence to these minimum standards will improve the performance of these buildings during earthquakes and reduce, but not necessarily prevent, the loss of life, injury or earthquake-related damage.

SEC. 91.9302. SCOPE.

The provisions of this division shall apply to all existing buildings of wood-frame construction, or wood-frame portions thereof, where:

1. A permit for construction of a new building was applied for before January 1, 1978, or, if no permit can be located, the structure is determined by the Department to have been built under building code standards enacted before January 1, 1978; and

2. The ground floor portion of the structure contains parking or other similar open floor space that causes soft, weak or open-front wall lines, and there exists one or more stories above.

EXCEPTIONS: This division shall not apply to any building containing three dwelling units or less if the building is used solely for residential purposes. Moreover, notwithstanding any provision of this Code, compliance with this division shall not require existing electrical, plumbing, mechanical or fire-safety systems to be altered to comply with existing code unless they constitute a hazard to life or property.

SEC. 91.9303. DEFINITIONS.

The following words and phrases, whenever used in this division, shall be construed as defined in this section. Words and phrases not defined here shall be construed as defined in Division 2 of this Code.

CRIPPLE WALL is a wood-framed stud wall extending from the top of the foundation wall to the underside of the lowest floor framing of the building.

DWELLING UNIT shall include any individual residential unit within either an R-1 or R-2 occupancy building, including a mixed-occupancy building when part of it is either an R-1 or R-2 occupancy. A dwelling unit shall include the area of a building that is occupied as a dwelling unit, whether the building is approved or unapproved for residential use.

GROUND FLOOR is any floor within the wood-frame portion of a building whose elevation is immediately accessible from an adjacent grade by vehicles or pedestrians. The ground floor portion of the structure does not include any floor that is completely below adjacent grades.

OPEN-FRONT WALL LINE is an exterior wall line, without vertical elements of the lateral force-resisting system, which requires tributary seismic forces to be resisted by diaphragm rotation or excessive cantilever beyond parallel lines of shear walls. Diaphragms that cantilever more than 25 percent of the distance between lines of lateral force resisting elements from which the diaphragm cantilevers shall be considered excessive. Exterior exit balconies of six feet or less in width shall not be considered excessive cantilevers.

QUALIFIED HISTORICAL BUILDING is any building designated or currently in the process of being designated as a "qualified historical building" as defined in Part 8, Title 24 of the California Code of Regulations.

RETROFIT is an improvement of the lateral force-resisting system by alteration of existing structural elements or addition of new structural elements.

SOFT WALL LINE is a wall line, the lateral stiffness of which is less than what is required by story drift limitations or deformation compatibility requirements of this division. In lieu of the engineering analysis required by this division to determine whether a wall line's lateral stiffness is less than the aforementioned story drift limitations or deformation compatibility requirements, a soft wall line may be defined as a wall line in a story where the wall stiffness is less than 70 percent of the stiffness of the exterior wall above for the direction under consideration.

STORY is as defined in this Code, but includes any basement or underfloor space of a building with cripple walls exceeding four feet in height.

STORY STRENGTH is the total strength of all seismic-resisting elements sharing the same story shear in the direction under consideration.

WALL LINE is any length of a wall along a principal axis of the building used to provide resistance to lateral loads.

WEAK WALL LINE is a wall line at the ground floor where the wall strength is less than 80 percent of the strength of the wall above in the direction under consideration.

SEC. 91.9304. PRIORITY DESIGNATIONS.

The Department shall prioritize its enforcement of this division as follows:

Priority I.	Buildings containing 16 or more dwelling units.
Priority II.	Buildings with three stories or more, containing fewer than 16 dwelling units.
Priority III.	Buildings not falling within the definition of Priority I or II.

SEC. 91.9305. COMPLIANCE REQUIREMENTS.

91.9305.1. General. The owner of each building within the scope of this division shall cause a structural analysis to be made of the building by a civil or structural engineer or architect licensed by the state of California, and if the building does not meet the minimum earthquake standards specified in this division, the owner shall cause the building to be structurally altered to conform to such standards or, at the owner's option, cause it to be demolished within the time limits stated in Section 91.9305.2.

91.9305.2. Time Limits for Compliance. The owner of a building within the scope of this division shall comply with its requirements within the following time limits:

1. Within one (1) year after service of the order described in Section 91.9306, submit to the Department for review and approval:

a. A structural analysis and plans which shall demonstrate the building, as is, meets or exceeds the requirements set forth in Section 91.9309; or

b. A structural analysis and plans which shall demonstrate that the proposed structural alteration of the building meets or exceeds the requirements set forth in Section 91.9309; or

c. Plans for the demolition of the building.

2. Within two (2) years after service of the order, obtain all necessary permits for rehabilitation or demolition.

3. Within seven (7) years after service of the order, complete construction or demolition work under all necessary permits.

Time limits for compliance shall be based on the service date of the original order from the Department. Transfer of title shall not change compliance dates.

SEC. 91.9306. ADMINISTRATION.

91.9306.1. Issuance of Order. When the Department determines that a building is within the scope of this division, the Department shall issue an order as described in Section 91.9306.4 to the owner of the building.

91.9306.2. Service of Order. The Department shall serve the order in writing, either personally or by certified or registered mail, upon the owner as shown on the last equalized assessment roll. Service by mail shall be deemed complete at the time of deposit in the post office. Proof of giving notice may be made by an affidavit of an employee of the City that shows service in conformity with this division.

91.9306.3. Failure to Receive Order. Failure of the owner to receive an order shall not relieve the owner of any obligation to comply with this division.

91.9306.4. Contents of Order. The order shall specify that the building has been determined by the Department to be within the scope of this division and, therefore, is required to meet the minimum seismic standards described in Section 91.9309. The order shall specify the priority designation of the building and shall be accompanied by a copy of Section 91.9305, which sets forth the owner's alternatives and time limits for compliance.

91.9306.5. Appeal from Order. The owner of any building subject to this division may appeal the Department's initial determination that the building is within the scope of this division to the Board of Building and Safety Commissioners. Such appeal shall be filed with the Board within 60 days from the service date of the order. Any such appeal shall be decided by the Board no later than 60 days after the date that the appeal is

filed. Such appeal shall be made in writing upon appropriate forms provided by the Department, and the grounds of the appeal shall be stated clearly and concisely. Each appeal shall be accompanied by a filing fee as set forth in Table No. 4-A of Division 4 of Article 8 of Chapter IX of the Los Angeles Municipal Code.

Requests for slight modifications from any other determinations, orders or actions by the Department pursuant to this division shall be made in accordance with the procedures established in Section 98.0403.2 of the Los Angeles Municipal Code.

91.9306.6. Recordation. At the time that the Department serves the order described in this section, the Department shall file with the Office of the County Recorder a certificate stating that the subject building has been determined to be within the scope of this division, and that it has been ordered to be structurally analyzed and structurally altered or demolished (if the owner so decides), pursuant to Section 91.9305.2, if the Department determines that it does not conform to the minimum design standards of this division.

The Department shall file with the Office of the County Recorder a certificate terminating the above recorded status of the subject building if the building is thereafter demolished by owner pursuant to Section 91.9305.2, found not to be within the scope of this division, or is determined to be structurally capable of resisting minimum seismic forces as a result of structural alterations or analysis required by this division.

SEC. 91.9307. OCCUPANT AND TENANT ADVISORY.

91.9307.1. Notification to Tenants and Occupants. When the Department determines that a building falls within the scope of this division, the owner shall advise all current and prospective residential and non-residential tenants, subtenants, lessees, sublessees, or any other person(s) entitled to the use and/or occupancy of the building of such determination. With respect to current and prospective residential tenants, subtenants, lessees, sublessees, or other person(s) entitled to the use and/or occupancy of the building, the property owner shall advise such persons of the Department's determination in a method and written format approved and promulgated by the Los Angeles Housing and Community Investment Department. With respect to current and prospective non-residential tenants, subtenants, lessees, sublessees, or other person(s) entitled to the use and/or occupancy of the building, the owner shall advise such persons of the Department's determination in a method and written format approved and promulgated by the Department.

91.9307.2. Tenant Habitability Plan. If required by the Rent Stabilization Ordinance, the property owner shall be required to submit to the Los Angeles Housing and Community Investment Department a Tenant Habitability Plan pursuant to Article 2, Chapter XV of the Los Angeles Municipal Code (L.A.M.C. Section 152.03B). If, upon review of the Tenant Habitability Plan, it is determined by the Los Angeles Housing and Community Investment Department that work required under this division affects the tenantability of any building or residential unit as defined in California Civil Code Section

1941.1, the owner shall be required to pay relocation benefits pursuant to Article 1, Chapter XV of the Los Angeles Municipal Code (L.A.M.C. Section 151.09G) to any tenant, subtenant, lessee, sublessee, or other person(s) entitled to the use and/or occupancy of the building that is affected by the untenantable conditions or displaced from the residential unit. However, the mere undertaking and completion of work performed by the owner pursuant to this division shall not, in and of itself, result in any building or residential unit being deemed untenantable or uninhabitable as defined in California Civil Code Section 1941.1.

SEC. 91.9308. HISTORICAL BULDINGS.

Qualified historical buildings shall comply with requirements of the California Historical Building Code established under Part 8, Title 24 of the California Code of Regulations.

SEC. 91.9309. ENGINEERING ANALYSIS.

91.9309.1. Scope of Analysis. This division requires the alteration, repair, replacement or addition of structural elements and their connections to meet the strength and stiffness in conformance with this Code except as modified herein. The lateral-load-path analysis shall include the resisting elements and connections from the wood diaphragm immediately above any soft, weak or open wall lines to the foundation. Stories above the weak wall line shall be considered in the analysis but need not be modified.

91.9309.2. Design Base Shear and Design Parameters. The design force in a given direction shall be 75% of the design base shear specified in the seismic provision of ASCE 7.

91.9309.3. Lateral Vertical Systems. Strengthening systems with concrete walls or masonry walls, or steel braced frames shall be not be permitted.

91.9309.4. Horizontal Structural Irregularities in Buildings with Three or More Stories. Structures with three or more stories having horizontal structural irregularities of either type 2, 3, 4, or 5 listed in ASCE 7, "Horizontal Structural Irregularities" Table, shall be altered to meet the additional requirements of those sections referenced in the table for the entire story with weak or open wall lines.

91.9309.5. Alternate Analysis, Base Shear and Design Parameters. Pursuant to Section 91.104.2.6, the Department may approve alternate design methodologies that improve the whole first story seismic performance that are at least equivalent to those prescribed by this division and that achieve the life safety objectives established by this division.

91.9309.6. Additional Anchorage Requirements for Buildings on Hillsides. Where any portion of a building within the scope of this division is constructed on or into a

slope steeper than one unit vertical in three units horizontal (33-percent slope), the lateral-force-resisting system, at and below the base level diaphragm, shall also be analyzed for the effects of concentrated lateral loads caused at the building base from the hillside conditions and comply with the provisions of Chapter 94 of the Los Angeles Building Code.

91.9309.7. Story Drift Limitations. The calculated story drift for each retrofitted story shall not exceed the allowable deformation compatible with all vertical load-resisting elements and 0.025 times the story height. The calculated story drift shall not be reduced by the effects of horizontal diaphragm stiffness, but shall be increased when these effects produce rotation. Drift calculations shall be in accordance with ASCE 7 requirements.

91.9309.8. Pole Structures. The effects of rotation and soil stiffness shall be included in the calculated story drift where lateral loads are resisted by vertical elements whose required depth of embedment is determined by pole formulas. The coefficient of subgrade reaction used in deflection calculations shall be based on an approved geotechnical investigation conducted in accordance with approved geotechnical engineering reports.

91.9309.9. P-Delta Effect. The requirements of the Los Angeles Building Code shall apply, except as modified herein. All structural framing elements and their connections not required by the design to be part of the lateral force resisting system shall be designed and detailed to be adequate to maintain support of design dead plus live loads when subject to the expected deformations caused by seismic forces. The stress analysis of cantilever columns shall use an effective length factor of 2.1 for the direction normal to the axis of the beam.

91.9309.10. Ties, Continuity and Collectors. All parts of the structure included in the scope of analysis shall be interconnected and the connection shall be capable of resisting the seismic force created by the parts being connected as required per the Los Angeles Building Code.

SEC. 91.9310. INFORMATION REQUIRED ON PLANS.

91.9310.1. General. For existing and new construction, the plans and specifications shall be of sufficient clarity to indicate the nature, design methodology, and extent of the proposed work and to show in detail that it will conform to the provisions of this division and the Los Angeles Building Code.

91.9310.2. Engineer's or Architect's Statement. The responsible engineer or architect shall provide the following statements on the approved plans:

1. I am responsible for designing this building's seismic strengthening in compliance with the minimum standards of the Mandatory Earthquake Hazard

Reduction In Existing Wood-Frame Buildings with Soft, Weak or Open-Front Walls (Ordinance No. _____)."

SEC. 91.9311. VIOLATION/PENALTY.

Notwithstanding any other provision of this Code to the contrary, it shall be unlawful for any person, firm or corporation to maintain, use or occupy any building within the scope of this division that fails to meet the minimum earthquake standards specified in this division after receiving an order described in Section 91.9306.

Any person who violates or causes or permits another person to violate this division is guilty of a misdemeanor, and shall be subject to prosecution and/or administrative enforcement under the Los Angeles Municipal Code. For purposes of this paragraph, "any person" includes an owner, lessor, sublessor, manager or person in control of a building subject to this division. This term shall not include any person who is merely a tenant or other individual occupying any dwelling unit, efficiency dwelling unit, guest room or suite in a building. The legal owner of a building is that person, firm, corporation, partnership or other entity whose name or title appears on the record with the Office of the County Recorder, as well as all successors or assignees of these persons.

EXCEPTION: This section shall not apply to any building on which work is proceeding in compliance with the time limits set forth in this division, or in compliance with any extensions of time granted by the Department or the Board; or any action, order or determination made by the Department or the Board in the implementation of this division.

SEC. 91.9312. SEVERABILITY.

If any subsection, sentence, clause or phrase of this article is for any reason held to be invalid or unconstitutional by a court of competent jurisdiction or by reason of any preemptive legislation, such decision or legislation shall not affect the validity of the remaining portions of this ordinance. The City Council hereby declares that it would have adopted this section, and each and every subsection, sentence, clause and phrase thereof not declared invalid or unconstitutional, without regard to whether any portion of the ordinance would be subsequently declared invalid or unconstitutional.

Sec. 2. Division 95 of Article 1 of Chapter IX of the Los Angeles Municipal Code is amended in its entirety to read as follows:

ARTICLE 1, DIVISION 95

MANDATORY EARTHQUAKE HAZARD REDUCTION IN EXISTING NON-DUCTILE CONCRETE BUILDINGS

SEC. 91.9501. PURPOSE.

The purpose of this division is to promote the public welfare and safety by reducing the risk of death or injury that may result from the effects of earthquakes on existing concrete buildings. In the Northridge Earthquake, many concrete buildings constructed prior to the 1976 Los Angeles City Building Code provisions performed poorly and collapsed, causing loss of human life, personal injury and property damage. Similar loss of life, injury and property damage occurred in the Great Hanshin Earthquake, Mexico City Earthquake, and Christchurch New Zealand Earthquake due to the outdated building codes in those communities. The poor performance of these older concrete buildings is typically due to deficiencies in the lateral force resisting system (beams, columns and joints) that render the building incapable of sustaining gravity loads when the building is subjected to earthquake-induced lateral displacements. This division creates minimum standards to mitigate hazards from these structural deficiencies. Adherence to these minimum standards will improve the performance of these buildings during earthquakes and reduce, but not necessarily prevent, the loss of life, injury or earthquake-related damage.

SEC. 91.9502. SCOPE.

The provisions of this division shall apply to any existing concrete building built pursuant to a permit application for a new building that was submitted before January 13, 1977, or, if no permit can be located, the structure is determined by the Department to have been built under building code standards enacted before January 13, 1977.

EXCEPTIONS: This division shall not apply to detached single-family dwellings or detached duplexes. Moreover, notwithstanding any provision of this Code, compliance with this division shall not require existing electrical, plumbing, mechanical or fire-safety systems to be altered to comply with existing code unless they constitute a hazard to life or property.

SEC. 91.9503. DEFINITIONS.

The following words and phrases, whenever used in this division, shall be construed as defined in this section. Words and phrases not defined here shall be construed as defined in Division 2 of this Code.

CONCRETE BUILDING is a building having concrete floors and/or roofs, either with or without beams, supported by concrete walls and/or concrete columns, and/or concrete frames with or without masonry infills, or any combination thereof.

DUPLEX is a building containing only two single-family dwelling units.

DWELLING UNIT shall include any individual residential unit within either an R-1 or R-2 occupancy building, including a mixed-occupancy building when part of it is either an R-1 or R-2 occupancy. A dwelling unit shall include the area of a building that is occupied as a dwelling unit, whether the building is approved or unapproved for residential use.

QUALIFIED HISTORICAL BUILDING is any building designated or currently in the process of being designated as a "qualified historical building" as defined in Part 8, Title 24 of the California Code of Regulations.

MASONRY INFILL is the unreinforced or reinforced masonry wall construction within a reinforced concrete frame.

RETROFIT is an improvement of the lateral force-resisting system by alteration of existing structural elements or addition of new structural elements.

SINGLE-FAMILY DWELLING is any building with one dwelling unit which contains living facilities, including provisions for sleeping, eating, cooking and sanitation, as required by this Code.

SEC. 91.9504. COMPLIANCE REQUIREMENTS.

91.9504.1. General. The owner of each building within the scope of this division shall cause a structural analysis to be made of the building by a civil or structural engineer or architect licensed by the state of California, and if the building does not meet the minimum engineering standards specified in this division, the owner shall cause the building to be structurally altered to conform to such standards or, at the owner's option, cause it to be demolished within the time limits stated in Section 91.9504.2.

91.9504.2. Time Limits for Compliance. The owner of a building within the scope of this division shall comply with its requirements by completing the following actions within the time limits stated below:

1. Within three (3) years after service of the order described in Section 91.9505, submit on the form provided by the Department a completed checklist for the Department to review and approve.

2. If the building is determined to be a non-ductile concrete building pursuant to Subdivision (1), within ten (10) years after service of the order,

submit a detailed evaluation of the building documenting whether the building meets or exceeds the requirements set forth in Section 91.9508. The evaluation shall include one of the following:

(a) Proof that the building was previously retrofitted in conformity with the provisions in either Chapter 85 or former Chapter 95 (Ordinance No. 171,260; No. 179,324; No. 172,592; and No. 182,850) of the Los Angeles Building Code; or

(b) Proof that the building was previously retrofitted in conformity with the engineering requirements of this division; or

(c) A report consisting of a structural analysis that shows the building meets the engineering requirements of this division; or

(d) A report consisting of a structural analysis and plans for the proposed structural alteration of the building to comply with the engineering requirements of this division; or

(e) Plans for demolition of the building.

3. Within twenty-five (25) years after service of the order, complete all necessary demolition or retrofit work on the building.

Time limits for compliance shall be based on the service date of the original order from the Department. Transfer of title shall not change compliance dates.

SEC. 91.9505. ADMINISTRATION.

91.9505.1. Issuance of Order. When the Department determines that a building is within the scope of this division, the Department shall issue an order to the owner as described in Sections 91.9505.2 and 91.9505.4.

91.9505.2. Service of Order. The Department shall serve the order in writing, either personally or by certified or registered mail, upon the owner as shown on the last equalized assessment roll. Service by mail shall be deemed complete at the time of deposit in the post office. Proof of giving notice may be made by an affidavit of an employee of the City that shows service in conformity with this division.

91.9505.3. Failure to Receive Order. Failure of the owner to receive an order shall not relieve the owner of any obligation to comply with the provisions of this division.

91.9505.4. Contents of Order. The order shall specify that the building has been determined by the Department to be within the scope of this division and, therefore, is required to meet the minimum seismic standards described in Section 91.9508. The

order shall be accompanied by a copy of Section 91.9504, which sets forth the owner's alternatives and time limits for compliance.

91.9505.5. Appeal from Order. The owner of any building subject to this division may appeal the Department's initial determination that the building is within the scope of this division to the Board of Building and Safety Commissioners. Such appeal shall be filed with the Board within 60 days from the service date of the order. Any such appeal shall be decided by the Board no later than 60 days after the date that the appeal is filed. Such appeal shall be made in writing upon appropriate forms provided by the Department, and the grounds of the appeal shall be stated clearly and concisely. Each appeal shall be accompanied by a filing fee as set forth in Table No. 4-A of Division 4 of Article 8 of Chapter IX of the Los Angeles Municipal Code.

Requests for slight modifications from any other determinations, orders or actions by the Department pursuant to this division shall be made in accordance with the procedures established in Section 98.0403.2 of the Los Angeles Municipal Code.

91.9505.6. Recordation. At the time that the Department serves the order described in Section 91.9505.1, the Department shall file with the Office of the County Recorder a certificate stating that the subject building has been determined to be within the scope of this division, and that it has been ordered to be structurally analyzed and structurally altered or demolished (if the owner so decides), pursuant to Section 91.9504.2, if the Department determines that it does not conform to the minimum design standards of this division.

The Department shall file with the Office of the County Recorder a certificate terminating the above recorded status of the subject building if the building is thereafter demolished by owner pursuant to Section 91.9504.2, found not to be within the scope of this division, or is determined to be structurally capable of resisting minimum seismic forces as a result of structural alterations or analysis required by this division.

SEC. 91.9506. OCCUPANT AND TENANT ADVISORY.

91.9506.1. Notification to Tenants and Occupants. When the Department determines that a building falls within the scope of this division, the owner shall advise all current and prospective residential and non-residential tenants, subtenants, lessees, sublessees, or any other person(s) entitled to the use and/or occupancy of the building of such determination. With respect to current and prospective residential tenants, subtenants, lessees, sublessees, or other person(s) entitled to the use and/or occupancy of the building, the property owner shall advise such persons of the Department's determination in a method and written format approved and promulgated by the Los Angeles Housing and Community Investment Department. With respect to current and prospective non-residential tenants, subtenants, lessees, sublessees, or other person(s) entitled to the use and/or occupancy of the building, the owner shall

advise such persons of the Department's determination in a method and written format approved and promulgated by the Department.

91.9506.2. Tenant Habitability Plan. If required by the Rent Stabilization Ordinance, the property owner shall be required to submit to the Los Angeles Housing and Community Investment Department a Tenant Habitability Plan pursuant to Article 2, Chapter XV of the Los Angeles Municipal Code (L.A.M.C. Section 152.03B). If, upon review of the Tenant Habitability Plan, it is determined by the Los Angeles Housing and Community Investment Department that work required under this division affects the tenantability of any building or residential unit as defined in California Civil Code Section 1941.1, the owner shall be required to pay relocation benefits pursuant to Article 1, Chapter XV of the Los Angeles Municipal Code (L.A.M.C. Section 151.09G) to any tenant, subtenant, lessee, sublessee, or other person(s) entitled to the use and/or occupancy of the building that is affected by the untenantable conditions or displaced from the residential unit. However, the mere undertaking and completion of work performed by the owner pursuant to this division shall not, in and of itself, result in any building or residential unit being deemed untenantable or uninhabitable as defined in California Civil Code Section 1941.1.

SEC. 91.9507. HISTORICAL BUILDINGS.

Qualified historical buildings shall comply with requirements of the California Historical Building Code established under Part 8, Title 24 of the California Code of Regulations.

SEC. 91.9508. ENGINEERING ANALYSIS.

91.9508.1. Scope of Analysis. This division requires the alteration, repair, replacement or addition of structural elements and their connections to meet the following requirements in this section.

91.9508.2. Building Structural Analysis, Design and Evaluation. The building shall meet one of the following criteria:

1. Strength of the lateral-force resisting system shall meet or exceed seventy-five percent (75%) of the base shear specified in the current Los Angeles Building Code seismic provisions. Elements not designated to be part of the lateral-force resisting system shall be adequate for gravity load effects and seismic displacement due to the full (100%) of the design story drift specified in the current Los Angeles Building Code seismic provisions.

2. Meet or exceed the requirements specified for "Basic Safety Objectives" using ground motions and procedures established by the Department based on ASCE 41.

3. Pursuant to Section 91.104.2.6, other methods approved by the Department deemed to be equivalent to the standards set forth in Subdivisions 1 and 2 of this subsection.

SEC. 91.9509. INFORMATION REQUIRED ON PLANS.

91.9509.1. General. For existing and new construction, the plans and specifications shall be of sufficient clarity to indicate the nature and extent of the proposed work and to show in detail that it will conform to the provisions of this division and the Los Angeles Building Code.

91.9509.2. Engineer's or Architect's Statement. The responsible engineer or architect shall provide the following statements on the approved plans:

1. "I am responsible for designing this building's seismic strengthening in compliance with the minimum standards of Chapter 95 of the Los Angeles Building Code using the design criteria of (75% of ASCE 7 or ASCE 41)."

and when applicable:

2. "The Registered Deputy Inspector, required as a condition of the use of structural design stresses requiring continuous inspection, will be responsible to me as required by Section 1704 of the Los Angeles Building Code."

3. "Structural Observation will be performed in accordance with the current Los Angeles Building Code."

SEC. 91.9510. VIOLATION/PENALTY.

Notwithstanding any other provision of this Code to the contrary, it shall be unlawful for any person, firm, or corporation to maintain, use, or occupy any building within the scope of this division that fails to meet the minimum earthquake standards specified in this division after receiving an order described in Section 91.9505.

Any person who violates or causes or permits another person to violate this division is guilty of a misdemeanor, and shall be subject to prosecution and/or administrative enforcement under the Los Angeles Municipal Code. For purposes of this paragraph, "any person" includes an owner, lessor, sublessor, manager or person in control of a building subject to this division. This term shall not include any person who is merely a tenant or other individual occupying any dwelling unit, efficiency dwelling unit, guest room or suite in a building. The legal owner of a building is that person, firm, corporation, partnership or other entity whose name or title appears on the record with the Office of the County Recorder, as well as all successors or assignees of these persons.

EXCEPTION: This section shall not apply to any building on which work is proceeding in compliance with the time limits set forth in this division, or in compliance with any extensions of time granted by the Department or the Board; or any action, order or determination made by the Department or the Board in the implementation of this division.

SEC. 91.9511. SEVERABILITY.

If any subsection, sentence, clause or phrase of this article is for any reason held to be invalid or unconstitutional by a court of competent jurisdiction or by reason of any preemptive legislation, such decision or legislation shall not affect the validity of the remaining portions of this ordinance. The City Council hereby declares that it would have adopted this section, and each and every subsection, sentence, clause and phrase thereof not declared invalid or unconstitutional, without regard to whether any portion of the ordinance would be subsequently declared invalid or unconstitutional.

Sec. 3. Section 152.02 of Article 2 of Chapter XV of the Los Angeles Municipal Code is amended to read as follows:

SEC. 152.02. DEFINITIONS.

Notice of Primary Renovation Work. Written notice, served by the landlord upon a tenant or tenant household at least 60 days, or as otherwise modified pursuant to Section 152.04, prior to the commencement of any Primary Renovation Work or Related Work and using a form established by the Department, advising the tenant of forthcoming Primary Renovation Work and Related Work, the impact of such work on the tenant, and measures the landlord will take to mitigate the impact on the tenant.

Sec. 4. A second paragraph is added to Section 152.04 of Article 2 of Chapter XV of the Los Angeles Municipal Code to read as follows:

For purposes of the Mandatory Earthquake Reduction requirements in LAMC Sections 91.9301, et seq., and 91.9501, et seq., and as authorized by Section 152.08 of this article, the Commission shall have the authority by regulation to modify the service and notice requirements.

Sec. 5. Subsection A to Section 152.05 of Article 2 of Chapter XV of the Los Angeles Municipal Code is amended and Subsection D is added to read as follows:

A. If the Primary Renovation Work and any Related Work will impact the **tenantability** of a rental unit for 30 days or more, any tenant affected by the Primary Renovation Work and Related Work shall have the option to voluntarily terminate the tenancy in exchange for permanent relocation assistance pursuant to Section 151.09G of this Code and the return of any security deposit that cannot be retained by the landlord under applicable law. If the Primary Renovation Work and Related Work continues for 30 days longer than the projected completion date set forth in the later of

either the Tenant Habitability Plan or any modifications thereto accepted by the Department, the tenant's option to accept permanent relocation assistance shall be renewed.

D. For purposes of the Mandatory Earthquake Reduction requirements in LAMC Sections 91.9301, et seq., and 91.9501, et seq., and as authorized by Section 152.08 of this article, the Commission shall have the authority by regulation to extend the time provisions by up to the maximum of an additional 180 days.

Sec. 6. Section 152.08 of Article 2 of Chapter XV of the Los Angeles Municipal Code is amended to read as follows:

SEC. 152.08. AUTHORITY OF COMMISSION TO REGULATE.

A. The Commission shall be responsible for carrying out the provisions of this article and shall have the authority to issue orders and promulgate policies, rules and regulations to effectuate the purposes of this article. All such rules and regulations shall be published once in a daily newspaper of general circulation in the City of Los Angeles, and shall take effect upon such publication. The Commission may make such studies and investigations, conduct such hearings, and obtain such information as it deems necessary to promulgate, administer and enforce any regulation, rule or order adopted pursuant to this article.

B. In order to provide sufficient time for owners to comply with the Mandatory Earthquake Hazard Reduction requirements in LAMC Sections 91.9301, et seq., and 91.9501, et seq., the Commission may do the following:

1. Modify the service and notice requirements set forth in Section 152.04 this article; and/or

2. Grant, upon request by owner, an extension of up to 180 days beyond the original project completion date without triggering the permanent relocation assistance requirements set forth at Section 151.09G of this Code. Prior to granting an owner's request to extend project completion dates, the Commission shall notify the Department of Building and Safety of the request. If work performed pursuant to Mandatory Earthquake Hazard Reduction Requirements is not completed by the original project completion date or by a subsequent date authorized by RAC, any tenant, subtenant, lessee, sublessee, or other person(s) entitled to use and/or occupy the building or residential unit affected by such work shall have the option to voluntarily terminate the tenancy in exchange for permanent relocation assistance, pursuant to Section 151.09G, and the return of any security deposit that cannot be retained by the owner under applicable law.

C. Before modifying service and notice requirements and/or granting time extensions under its authority in subparagraph B of this section, the Commission shall find that the modifications and/or time extensions are necessary to carry out the purpose of the Mandatory Earthquake Hazard Reduction requirements of this Code.

Sec. 7. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, at its meeting of OCT 09 2015.

HOLLY L. WOLCOTT, City Clerk

By _____
Deputy

Approved 09 OCT 2015

_____
Mayor

Approved as to Form and Legality

MICHAEL N. FEUER, City Attorney

By _____
MONICA D. CASTILLO
Deputy City Attorney

Date 10-8-15

File No. CF 14-1697-S1

m:\muni counsel\reports\mandatory earthquake hazard reduction ordinance (10.8.15 - final).docx

DECLARATION OF POSTING ORDINANCE

I, VERONICA COLEMAN-WARNER, state as follows: I am, and was at all times hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and a Deputy City Clerk of the City of Los Angeles, California.

Ordinance No.183893 – Amending Division 93 and 95 of Article I of Chapter IX of the LAMC to establish mandatory standards for earthquake hazard reduction in existing wood-frame buildings with soft, weak, or open–front walls and existing non-ductile concrete buildings, and amending Sections 152.02, 152.04, 152.05 and 152.08 of Article 2 of Chapter XV of the LAMC to grant authority to the Rental Adjustment Commission to modify Tenant Habitability Program requirements for purposes of implementing seismic retrofit mandates - a copy of which is hereto attached, was finally adopted by the Los Angeles City Council on **October 9, 2015**, and under the direction of said City Council and the City Clerk, pursuant to Section 251 of the Charter of the City of Los Angeles and Ordinance No. 172959, on **October 13, 2015** I posted a true copy of said ordinance at each of the three public places located in the City of Los Angeles, California, as follows: 1) one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; 2) one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; 3) one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

Copies of said ordinance were posted conspicuously beginning on **October 13, 2015** and will be continuously posted for ten or more days.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this **13th** day of **October, 2015** at Los Angeles, California.

Veronica Coleman-Warner

Veronica Coleman-Warner, Deputy City Clerk

Ordinance Effective Date: November 22, 2015 **Council File No. 14-1697-S1**

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 11

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 19

ORDINANCE NO. 184081

An ordinance amending Subsections 91.9305.2, 91.9309.2 and 91.9309.3 of Article I of Chapter IX of the Los Angeles Municipal Code to adjust time limits to comply with mandatory seismic retrofitting of existing wood-frame buildings with soft, weak or open-front walls; and clarify engineering analysis terms and specifications.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Subsection 91.9305.2 of Section 91.9305 of Article 1, Chapter IX of the Los Angeles Municipal Code is amended to read as follows:

91.9305.2. Time Limits for Compliance. The owner of a building within the scope of this division shall comply with its requirements within the following time limits:

1. Within two (2) years after service of the order described in Section 91.9306, submit to the Department for review and approval:

   a. A structural analysis and plans which shall demonstrate the building, as is, meets or exceeds the requirements set forth in Section 91.9309; or

   b. A structural analysis and plans which shall demonstrate that the proposed structural alteration of the building meets or exceeds the requirements set forth in Section 91.9309; or

   c. Plans for the demolition of the building.

2. Within three and a half (3.5) years after service of the order, obtain all necessary permits for rehabilitation or demolition.

3. Within seven (7) years after service of the order, complete construction or demolition work under all necessary permits.

Time limits for compliance shall be based on the service date of the original order from the Department. Transfer of title shall not change compliance dates.

Sec. 2. Subsection 91.9309.1 of Section 91.9309 of Article 1, Chapter IX of the Los Angeles Municipal Code is amended to read as follows:

91.9309.2. Design Base Shear and Design Parameters. The design force in a given direction shall be 75% of the design base shear specified in the seismic provision of ASCE 7. The value of response modification coefficient, R, need not be less than 3.5, provided the strengthening systems are not cantilevered column systems and the

strengthened structure will not have vertical structural irregularities of either type 1a, 1b, 5a or 5b listed in ASCE 7, "Vertical Structural Irregularities" Table.

Sec. 3. Subsection 91.9309.1 of Section 91. 9309 of Article 1, Chapter IX of the Los Angeles Municipal Code is amended to read as follows:

91.9309.3. Lateral Vertical Systems. Strengthening systems with concrete walls or masonry walls, or steel braced frames shall not be permitted.

Sec. 4. **Urgency Clause.** The City Council finds that the inevitable occurrence of a major earthquake in the City of Los Angeles poses a current and immediate threat to the public peace, health, and safety. Pre-1978 wood-frame, soft first-story buildings are among the most susceptible to collapse in a major earthquake due to their structural deficiencies. According to a report, *Resilience by Design*, that Dr. Lucy Jones presented to City Council on January 14, 2015, these buildings, if left in their current condition, will very likely suffer extensive property damage and cause substantial physical harm if a major earthquake were to strike. Moreover, damage to these buildings would result in a significant loss of affordable housing units in a rental market where such units are already extremely scarce. This ordinance shall therefore take effect upon publication so that the seismic retrofit of the City's most vulnerable buildings may commence as soon as possible in order to protect building inhabitants and the public at large.

Sec. 5. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, **by a vote of not less than three-fourths of all of its** members, at its meeting of FEB 10 2016.

HOLLY L. WOLCOTT, City Clerk

By _____
Deputy

Approved 12 FEB 2016

_____
Mayor

Approved as to Form and Legality

MICHAEL N. FEUER, City Attorney

By _____
MONICA D. CASTILLO
Deputy City Attorney

Date 1/28/16

File No. CF 14-1697-S2

m:\real prop_env_land use\land use\monica castillo\ordinances\seismic retrofit technical amendments\soft-story retrofit amendments - ordinance (1.22.16).docx

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 12

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 20 & 21

GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that "compliance" means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at **http://planning.lacity.org**, by selecting "Commissions & Hearings" and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **"Initial Submissions"**: Compliant submissions received no later than by 4:00 p.m. Thursday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report.

- **"Secondary Submissions"**: Compliant submissions received after the Initial Submission deadline up to 24-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.

- **"Day of Hearing Submissions"**: Compliant submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARKS ONLINE:

**If you are using Explorer, you will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS

BOARD OF
BUILDING AND SAFETY
COMMISSIONERS

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CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

DEPARTMENT OF
BUILDING AND SAFETY
201 NORTH FIGUEROA STREET
LOS ANGELES, CA 90012

RAYMOND S. CHAN, C.E., S.E.
GENERAL MANAGER

FRANK BUSH
EXECUTIVE OFFICER

March 1, 2016

Exhibit A

**********3-DIGIT 900 31
NBACTMC II PARTNERSHIP AND 5735
PO BOX 55007
LOS ANGELES CA 90055-2007

NOTIFICATION

RE: APN #4404-025-008, 11973 W SAN VICENTE BLVD

This notice is to inform you that the Department of Building and Safety has determined that the building(s) at the location referenced above meets the criteria for mandatory compliance with seismic retrofit Ordinance #183893 (Mandatory Earthquake Hazard Reduction in Existing Wood Frame Buildings with Soft, Weak or Open Front Walls), otherwise known as the Soft-Story Retrofit Program.

This Ordinance shall apply to all existing buildings having all of the following criteria:

I. Wood frame construction with two or more stories;

II. Built under building code standards enacted before January 1, 1978;

III. Ground floor parking or other similar open floor space that causes soft, weak or open wall lines.

An Order to Comply will be sent out in the near future warranting compliance.

Please see attachments for guidance and information regarding the Soft-Story Retrofit Program.

Log No. #14433

Exhibit B

To: Tenants of the Barry Bldg.
From: Building Ownership
Date: May 1, 2016

After careful consideration, we have decided to close the Barry Bldg. as soon as reasonably possible and no later than December 31, 2016. Why now? Many of you are perhaps aware that the City of Los Angeles has a major earthquake preparedness effort underway to identify so called "soft buildings" and to force their structural shortcomings to be addressed. Such buildings, due to open construction on the ground floor and obsolete building techniques and engineering assumptions, are deemed to lack adequate support and in an earthquake might fold up. Some may recall photographs of apartment buildings where the "soft" ground floor garages folded in the last major earthquake. We have recently received a letter from the City identifying the Barry Bldg. as a "soft" structure. This notice starts the clock running on a legal process that will ultimately require the Barry Bldg. to be reinforced to code or demolished. Either of these events will require the building to be vacated. More importantly, and the cause of our decision to close the building immediately, the clear import of the City's letter is that the building has been determined to be substandard for earthquakes, meaning that all users of the Barry Bldg. could be at potential risk. We are unwilling to operate under this cloud.

At days' end, we all know the Barry Bldg. has been beyond its useful life for years. All good things do come to an end, and that time is now. While we have no obligation to you beyond following legal procedures, we wish to accomplish this sad task without fuss and rancor, and to assist you financially to make the process go more easily for you.. To this end, we have decided to offer an incentive to tenants in good standing who: (1) vacate by June 30, in which case we will refund all 2016 rent paid; or (2) vacate after June 30 and prior to November 30, in which case we will refund one month's 2016 rent paid for each full calendar month by which the tenant has vacated prior to December 31. For example, a tenant who vacates by August 31 would receive a refund of four months 2016 paid rent. No rent refunds will be made to tenants in possession after November 30, nor to tenants in default. Rent refunds, in addition to any security deposit, will be paid upon our being handed the keys, with the surrendered space left broom clean and free of all tenant fixtures, furnishings, equipment, debris, etc. To qualify for this program, a lease termination agreement must be agreed and signed between us by June 30. Please call Ms. Phyllis Bell at 323-930-9498 if you wish to participate, and an agreement will be prepared and sent to you for consideration and execution.

Our decisions are final. We will not negotiate for more money or more time. We can and will resort to legal process if we are forced to, and plan to start eviction proceedings after June 30 with tenants who have not signed lease termination agreements, and immediately as to any tenants now in default. We hope that a mutual spirit of acceptance and good will can guide us all to a successful and early closure of the Barry Bldg., and we wish you all the best in the future.

Sincerely,

Building Ownership

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 13

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 22

Case Summary & Documents

Case Number | Ordinance | Zoning Information | CPC Cards | ZA Cards

Case Number: ENV-2019-6645-EIR Search

Approved Documents | Initial Submittal Documents

0 Approved Documents found for Case Number: ENV-2019-6645-EIR

Type	Scan Date	Signed

No Approved Documents Found

Case Number: ENV-2019-6645-EIR

Case Filed On: 11/06/2019

Staff Assigned: JASON MCCREA

EIR Notice of Prep. Start Date: 11/18/2020

EIR Notice of Prep. End Date: 12/21/2020

Scoping Meeting Date:

Draft EIR Notice of Completion Date: 02/16/2023

Draft EIR Circulation Start Date: 02/16/2023

Draft EIR Circulation End Date: 04/18/2023

Final EIR Distribution Date: 09/11/2023

Termination Date:

End of Appeal Period: 12/04/2025

Appealed: Yes

Case on Hold?: Yes

Primary Address

Address	CNC	CD
11973 W SAN VICENTE BLVD	None	CD 11

View All Addresses

Project Description: DEMOLITION OF AN EXISTING TWO-STORY APPROXIMATELY 13,300 SQUARE FOOT BUILDING. THE PROJECT DOES NOT INCLUDE ANY PLANS BEYOND DEMOLITION.

Applicant: ANDREA WARREN [Company: ALSTON & BIRD]

Representative: Kathleen Hill [Company: Alston & Bird LLP]

View Related Cases

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HELPFUL LINKS

City of Los Angeles
City Departments, Agencies, and Bureaus
Community Resource Guide
Site Map

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 14

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 33

LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

11973 San Vicente Boulevard Project

Case Number: ENV-2019-6645-EIR

Project Location: 11973-11975 San Vicente Boulevard, Los Angeles, California, 90049

Community Plan Area: Brentwood-Pacific Palisades

Council District: 11—Bonin

Project Description: The approximately 26,586 square foot (0.61-acre) Project Site is currently improved with an existing two-story, approximately 13,956 square foot commercial building commonly referred to as the Barry Building and a surface parking lot. The existing building is a City of Los Angeles Historic-Cultural Monument (HCM) that has been vacant and fenced since 2017. The Project consists solely of the demolition of the Barry Building, the surface parking lot would not be demolished as part of the Project. Three on-site palms would be removed, however the fourth on-site palm and two street trees located along San Vicente Boulevard would remain. No future development of the Site is proposed and/or considered as part of the Project. Demolition of the building would result in the removal of approximately 4,174 cubic yards of debris from the Project Site.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
CAJA Environmental Services, LLC

APPLICANT:
11973 San Vicente, LLC

November 2020



Legend

Project Site

Source: Google Maps 2020.

Figure 3-2
Aerial Photograph

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 15

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 35

DIV. 2C.4. FLOOR AREA RATIO & HEIGHT

SEC. 2C.4.1. FLOOR AREA RATIO (FAR)

Floor area ratio or FAR is defined as the measurement of the total floor area of all buildings on a lot in relation to the size of the lot.

A. Intent

The intent of the standards of this *Section (Floor Area Ratio (FAR))* is to regulate the bulk and massing of buildings on a lot.

B. Applicability

Floor area ratio standards apply to new construction or a lot modification. When the floor area ratio standards apply, they apply to all buildings and structures located on a lot.

C. Standards

1. Base

A lot shall not exceed the maximum base floor area ratio without meeting the requirements of *Article 9. (Public Benefit Systems)*, or an applicable Specific Plan, Supplemental District, or Special Zone.

2. Tier 1 Bonus

a. A lot may exceed the base floor area ratio up to the maximum tier 1 bonus floor area ratio of the applied *Form District (Part 2B.)* as allowed in *Div. 9.3. (Community Benefits Program)* if the participating project provides the required restricted affordable units.

b. Projects participating in incentive programs intended to implement State law, including the *State Density Bonus Program (Sec. 9.2.1.)*, the *Affordable Housing Incentive Program (Sec. 9.2.2.)*, the *Opportunity Corridors Housing Incentive Program (Sec. 9.2.3.)*, the *Corridor Transitions Incentive Program (Sec 9.2.4.)*, *Transit Oriented Incentive Program (Sec. 9.2.5.)*, the *Permanent Supportive Housing Incentive Program (Sec. 9.4.1.)*, or the *Accessory Dwelling Unit Incentive Program (Div. 9.5.)*, may exceed the maximum tier 1 bonus floor area ratio of the applied *Form District (Part 2B.)*.

3. Tier 2 Bonus

a. A lot may exceed the base floor area ratio up to the maximum tier 2 bonus floor area ratio as allowed in *Div. 9.3. (Community Benefits Program)*, or an applicable Specific Plan, Supplemental District, or Special Zone, if the participating project provides the required restricted affordable units and additional public benefits.

b. Projects participating in incentive programs intended to implement State law, including the *State Density Bonus Program (Sec. 9.2.1.)*, the *Affordable Housing Incentive Program (Sec. 9.2.2.)*, the *Opportunity Corridors Housing Incentive Program (Sec. 9.2.2.)*, the *Corridor*

Transitions Incentive Program (Sec 9.2.3.), *Transit Oriented Incentive Program (Sec. 9.2.4.)*, the *Permanent Supportive Housing Incentive Program (Sec. 9.4.1.)*, or the *Accessory Dwelling Unit Incentive Program (Div. 9.5.)*, may exceed the maximum tier 2 bonus floor area ratio of the applied *Form District (Part 2B.)*.

D. Measurement

1. FAR is calculated by dividing the total floor area on a lot by the lot area.
2. For the measurement of floor area, see *Sec. 14.2.7. (Floor Area)*.
3. For the purpose of calculating FAR, portions of a lot designated for private streets may be counted as lot area. For the measurement of lot area, see *Sec. 2C.1.1. (Lot Area)*.
4. For the purpose of calculating FAR, lot area is the same as buildable area referred to in the *City of Los Angeles Charter, Article I. (Incorporation and Powers), Sec. 104. (e) (Floor Area Restriction)*.
5. The *Downtown Community Plan Implementation Overlay* may define and measure buildable area differently than outlined in *Paragraph 4.* above for the purpose of calculating the maximum floor area using bonus FAR.

E. Exceptions

For existing nonconforming building exceptions, see *Sec. 12.2.2. (Floor Area Ratio & Height Exceptions)*.

F. Relief

1. Additional FAR may be granted as a variance in accordance with *Sec. 13B.5.3. (Variance)*.
2. For projects that include multiple parcels having different applied *Form Districts (Part 2B.)*, floor area averaging across the development site may be granted, in accordance with *Sec. 13B.2.2. (Class 2 Conditional Use Permit)*.

a. Supplemental Findings

In addition to the findings in *Sec. 13B.2.2. (Class 2 Conditional Use Permit)*, the Zoning Administrator shall also find that the project meets the following conditions:

i. The project meets the definition of unified development,

ii. All lots included in the project have a *Commercial-Mixed Use District (Div. 5B.5.)*, *Industrial-Mixed Use District (Div. 5B.6.)*, or *Industrial Use District (Div. 5B.7.)* applied, or the project is located entirely in the *Downtown Community Plan Area* and all lots included in the project have a *Residential-Mixed Use District (Div. 5B.4.)*, *Commercial-Mixed Use District (Div. 5B.5.)*, *Industrial-Mixed Use District (Div. 5B.6.)*, or *Industrial Use District (Div. 5B.7.)* applied.

iii. The total floor area of all structures on an individual lot may only exceed the FAR allowed pursuant to the applied *Form District (Part 2B.)* if the total floor area across all lots in the unified development does not exceed the sum of the maximum FAR calculated based on the maximum FAR specified by each applied *Form District (Part 2B.)*.

b. Supplemental Procedures

If the Zoning Administrator approves floor area averaging, then prior to the issuance of any building permits the property owner shall file with the Department of Building and Safety a covenant running with the land that specifies the following:

i. The operation and maintenance of the development as a unified development is continued into perpetuity;

ii. The floor area used and the remaining unbuilt floor area, if any, is allocated to each lot;

iii. The unifying design elements are maintained and continued into perpetuity;

iv. The covenant is binding on all assigns and successors in interest; and

v. An individual or entity is specified to be responsible and accountable for compliance and the fee for the annual inspection of compliance by the Department of Building and Safety, required pursuant to *Sec. 15.3.12. (Annual Inspection of FAR Averaging & Density Transfer Covenants)*.

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 16

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 36

SEC. 14.2.7. FLOOR AREA

Floor area is defined as the cumulative amount of interior floor space on a lot, within a room, or within a covered and enclosed space.

A. Measurement

1. General

a. Floor area is calculated as the sum of all interior floor space for each story of a building.

b. The following areas are included in the calculation of floor area:

i. All areas within the exterior walls of a building; or

ii. All areas within the exterior walls of any structure that is both enclosed and covered.

c. Exceptions

The following areas and structures shall not be considered in determining floor area:

i. Exterior walls;

ii. Bicycle parking areas;

iii. All interior floor space dedicated to automobile parking, except as specified in *Paragraph 2. (House Form Districts)* below and *Paragraph 3. (Development Standards District 5)* below;

iv. Spaces with ceiling heights less than seven feet measured from finished floor, including floored attic space;

v. Basements including underground parking and cellars, with the exception of storage, indoor: self-service use areas;

vi. Stairways and elevator shafts;

vii. Areas dedicated to housing mechanical equipment or machinery utilized for the operation of on-site buildings, provided that the equipment does not serve any off-site buildings;

viii. Waste enclosures dedicated to waste receptacles that are integral or incidental to the operation of on-site buildings, provided that the waste receptacles do not serve any off-site buildings; and

ix. Outdoor dining areas that have not been subject of a wage claim under *Chapter XVIII. (Employee Wages and Protections), Article 8. (Los Angeles Office of Wage Standards Ordinance)* of this Code.

2. House Form Districts

In a lot with an applied *House Form District (Div. 2B.3.)*, the following rules apply:

a. Any floor or portion of a floor with a ceiling height greater than 14 feet counts as twice the square footage of that area.

b. Up to 400 square feet of a detached garage is exempt from the calculation of floor area, provided the structure is:

i. Separated from the primary structure a minimum of 10 feet; and

ii. Located a minimum of 40 feet from a primary street lot line.

c. Up to 200 square feet of an attached garage is exempt from the calculation of floor area.

d. No more than 400 square feet of garage floor area per lot shall be exempt.

e. Detached accessory buildings that do not exceed 18 feet in height and 200 square feet in floor area are exempt from the calculation of floor area, provided that the total combined area exempted of all the detached accessory buildings on a lot does not exceed 400 square feet in floor area.

3. Development Standards District 5

In a lot with an applied *Development Standards District 5 (Sec. 4B.2.2.)*, the following rules apply:

a. All covered, above-grade parking areas located on a lot zoned with *Development Standards District 5 (Sec. 4B.2.2.)* are included in the calculation of floor area.

b. Active spaces with a minimum depth of 30 feet measured from the street-facing facade and located on the ground story are exempt from the calculation of floor area.

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 17

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 43.1

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Research Article

Vacant Properties and Violence in Neighborhoods

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Objectives. Violence remains a significant public health issue in the United States. To determine if urban vacant properties were associated with an increased risk of assaultive violence and if this association was modified by important neighborhood institutions (e.g., schools, parks/playgrounds, police stations, and alcohol outlets). *Methods*. Longitudinal ecologic study of all 1816 block groups in Philadelphia. Aggravated assault and vacant property data were compiled yearly from 2002 to 2006 and linked to block groups. A mixed effects negative binomial regression model examined the association of vacant properties and assaults between and within block groups. *Results*. Among all block groups, 84% experienced at least one vacant property, 89% at least one aggravated assault, and 64% at least one gun assault. Between block groups, the risk of aggravated assault increased 18% for every category shift of vacant properties (IRR 1.18, 95% CI: 1.12, 1.25, $P < 0.001$). Parks/playgrounds and alcohol outlets potentially modified the association between vacant properties and aggravated assaults but only at low levels of vacancy. *Conclusions*. Increasing levels of vacancy were associated with increased risk of assaultive violence in urban block groups.

1. Introduction

Despite declining rates since the 1990s [1], violence remains a significant public health issue in the United States. As evidence of this, many major cities, such as Philadelphia, have seen consistently increasing rates of aggravated assault despite national trends to the contrary [2]. Leadership continue to seek evidence-based violence reduction strategies that can be readily implemented and that resonate with community members.

Various factors that may influence violence have been well researched [3–10], in particular behavioral risk factors. While some of these factors have been tied to intervention strategies, the relationship of physical structures to rates of violence has been less well proven as a potential modifiable target for intervention. Indeed neighborhood physical disorder remains a consistent concern for community leaders and residents [11, 12] and may be associated with aggravated assault [13].

Vacant properties have been alluded to as key, highly modifiable, and easily palpable signs of physical disorder that may also be specifically related to the commission of aggravated assault [14]. Vacant lots and buildings potentially offer refuge to criminal and other illegal activity and very visibly symbolize that a neighborhood has deteriorated, that no one is in control, and that violent or criminal behavior is welcome to proceed with little if any supervision [15]. This Broken Windows theory [16] has led to initiatives that have sought to reduce violence by restoring deteriorating neighborhoods and sealing or removing vacant buildings [17, 18].

The study of violence and associated behavioral and environmental risk factors has a long history and is certainly multidisciplinary. Empirical evidence, however, has been sparse and limited in its ability to strongly connect vacant properties and aggravated assault. Prior studies have been either cross-sectional, have been limited in studying causality, or have bundled vacant properties into other indices of physical disorder without specifically studying it as an independent factor [14, 19–22]. In order to better quantify the relationship between vacant properties and aggravated assault, we obtained multi-year small-area data in a major USA city under the hypotheses that the locations of vacant properties and aggravated assaults

would be strongly associated and that changes in vacant properties within neighborhoods over time would impact the risk of assault. We also hypothesized that the relationship between vacant properties and aggravated assault might be modified by other neighborhood institutions, such as schools, parks/playgrounds, police stations, and alcohol outlets, which have been noted in prior studies to influence the likelihood of violence or criminal activity [23–26].

2. Methods

Longitudinal data on aggravated assault and vacant properties within neighborhood units of Pennsylvania's Philadelphia County (synonymous with the city of Philadelphia) were obtained between 2002–2006. This time period was chosen based on the availability of vacant property data within the city. The Cartographic Modeling Laboratory [27] at the University of Pennsylvania provided the data used in the analysis. The Institutional Review Board at the University of Pennsylvania approved the study.

Philadelphia County was chosen as the site for the study in part because of its violence rates that exceed national rates [2, 28–30]. The unit of analysis was the Census block group. Block groups are smaller geographic units than Census tracts [31] and can be considered geographic markers of neighborhood subunits or "pockets". Although geographically larger than blocks, block groups may still afford greater precision in studying spatial relationships than larger Census tracts [22]. The average land area of a block group in Philadelphia is 0.07 square miles. The study sample consisted of all 1816 block groups in Philadelphia County. The completeness of data allowed us to include all block groups, thereby reducing the likelihood of selection bias, improving the power of the study by increased sample size, and increasing the potential generalizability of the study.

2.1. Primary Independent Variable: Vacant Properties. The USA Postal Service was the source of data on vacant properties. Vacant properties included residential and commercial properties, as well as vacant lots and parcels of land. Any property which was uninhabited or at which mail service was not collected for a period of 90 days was classified as vacant by the Postal Service in its records [32]. The USA Postal Service provides locations of vacant properties to the Cartographic Modeling Laboratory (CML) on at least an annual basis, and the CML then uses geographic information systems technology to geocode these data. Vacant property data were calculated yearly from 2002–2006.

2.2. Dependent Variables: Aggravated Assaults, Gun Assaults, Nongun Assaults. Aggravated assaults between 2002–2006, provided by the Philadelphia Police Department to the CML, were defined as "an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury." [33] The primary outcome was the number of total aggravated assaults geocoded within block groups. Given the predominance of firearms as the method of nonfatal and fatal injuries [34], subanalyses of gun assaults and nongun assaults were also performed.

2.3. Other Independent Variables. We considered many demographic and socioeconomic characteristics of block groups that could potentially act as confounders to the association between vacant properties and aggravated assault based on previous violence and crime studies. The variables considered were geographic size (land area) [22], population (total population and population density) [14, 22, 35–37], age (median age) [14, 38, 39], gender (male to female ratio) [37, 38, 40], race (number of white residents, number of black residents) [30, 36, 41, 42], ethnicity (number of Hispanic residents) [36, 38], racial segregation (diversity index) [14, 43], economic disadvantage (median household income, poverty level, and unemployment) [39, 42, 44], education (high school diploma rate and bachelor degree rate) [45], family structure (single-parent households) [14, 39, 42], residential tenure (number of owner versus renter-occupied properties) [9, 20, 42], and land use (number of residential versus commercial properties) [36, 44, 46]. The variables were compiled using 2004 U.S. Census Bureau estimates, the midpoint of the study period. These variables were encoded as time invariant over the study period.

In order to determine the independent variables that would be included in the regression model, four steps were performed. First, significance testing ($P < 0.10$) of each independent variable with aggravated assault was performed. Second, Spearman correlation coefficients between the independent variables were calculated to test for collinearity (defined as $\rho > 0.70$). Third, variance inflation factor analysis was performed to test for collinearity (defined as VIF $>$ 10) [47]. Finally, theoretical justification based on evidence from previous studies and our judgment was also used to determine the variables included in the final model. If two variables were collinear, only one variable was selected for the final regression model based on its statistical association with aggravated assault and theoretical plausibility of acting as a confounder. Land area and male to female ratio had P-values greater than 0.10 ($P = 0.778$ and $P = 0.938$, resp.). Male to female ratio was maintained in the multivariable model given gender differences in violence rates [30]. The following variables were collinear: (1) the number of white residents and black residents, (2) the number of Hispanic residents and the diversity index, and (3) poverty level and median household income ($\rho > 0.70$). We selected black residents, Hispanic residents, and median household income for the multivariable model given their use in previous studies. Using this method of independent variable selection, we decided upon 11 block group-level variables for analysis: (1) year, (2) population, (3) median age, (4) male to female sex ratio, (5) number of black residents, (6) number of Hispanic residents, (7) median household income, (8) number of unemployed residents, (9) number of residents with a Bachelor's degree, (10) number of single parent households, and (11) number of residential properties.

2.4. Interaction Effects. In order to address whether the association between vacant properties and aggravated assault was modified by institutional factors, we studied the impact of schools (measured as schools, colleges, universities, and libraries), parks/playgrounds (measured

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as parks, playgrounds, recreation centers, and cemeteries), police/fire stations (measured as police stations, fire stations, hospitals, and health centers), houses of worship, and alcohol outlets. We were interested in exploring whether the presence of schools, parks/playgrounds, and police/fire stations would reduce the risk of aggravated assault, postulating that the presence of these institutions might promote increased surveillance of the areas around the institutions and deter violent incidents due to the increased likelihood of being caught. We hypothesized that alcohol outlets would increase the risk of aggravated assault by having a synergistic effect with vacant properties that would facilitate violent or criminal behavior [48]. Each of the neighborhood institutions was studied as a dichotomous variable (presence or absence of each institution).

2.5. Data Analysis. We initially calculated summary statistics for each variable in the regression model. We examined both the cumulative summary statistics (2002–2006) and the yearly statistics for the dependent and primary independent variables. We further visualized the distribution of the variables by generating histograms, box plots, and stem-and-leaf plots of each variable. The assault variables were classified as a count, that is, the number of assaults per block group.

To further describe our data, we examined the spatial distribution of aggravated assault and vacant properties using kernel density estimation. Kernel density estimation offered visual analysis of the spatial patterns of aggravated assaults and vacant properties. It took into account the spatial proximity of observations (i.e., assaults or vacant properties) without the constraint of the geographic boundaries of block groups. The method estimated a probability density function from the number of observations and when mapped depicted the spatial intensity of the observations (those with higher intensity are termed "hot spots" to denote clustering of an observation) [49]. In addition, to describe the unadjusted relationship between vacant properties and aggravated assault, we constructed a scatterplot, in which the average number of aggravated assaults within block groups sharing the same number of vacant properties were plotted across all values of vacant properties observed in the city. Individual points were displayed as circles, in which the area was proportional to the number of block groups contributing data for a specific vacancy value.

Given that the dependent variable of assault was a count variable and right skewed, we specified our multivariable models using negative binomial regression. We conducted a population-averaged analysis using generalized estimating equations (GEEs) to examine longitudinally the association of vacant properties and aggravated assault, incorporating time as a fixed effect [50]. We decided upon this method because the data were a panel of subjects (i.e., block groups) for which we had repeated measures of events (i.e., assaults and vacant properties) over a five-year period. The final regression model included the aforementioned 10 independent variables and time expressed as a categorical year variable. Other model specifications were a negative binomial family structure, an unstructured correlation which imposed no preconceived notions about the correlations of the assaults within block groups over time [51], and a robust command which produced valid standard errors even if the specified correlation structure was not correct [50].

Given the skewness of the primary independent variable of vacant properties, we first categorized it according to pentile cutpoints. We examined the estimates of the coefficients by including it as a nominal variable and discovered a linear trend in the coefficients. We therefore included the categorized variable as an ordinal covariate in the final analysis. A mean ordinal variable was created which represented the mean of the ordinal vacant property variable of a block group over the five-year study period. Each block group therefore had five values of the ordinal vacant property variable for each year of the study and one value of the mean ordinal vacant property variable. The ordinal vacant property variable allowed us to measure the within block group effect of changes in vacancy, as the value of this variable could change year to year within a block group. However, the mean ordinal variable allowed between block group comparisons because it represented the average vacancy category for an individual block group over the study period, thereby removing the potential within block group changes. Both the ordinal vacant property variable and the mean ordinal variable were included in the regression model. Finally, after model specification, potential effect modifiers (i.e., schools, parks/playgrounds, houses of worship, police/fire stations, and alcohol outlets within block groups) were tested sequentially in individual models to determine their relationship to the association between vacant properties and aggravated assault.

3. Results

The study sample consisted of all 1816 block groups in Philadelphia County. The demographic and socioeconomic characteristics of the block groups are depicted in Table 1. During the five-year study period, the majority of block groups in Philadelphia County had aggravated assaults and vacant properties; 89% of the block groups experienced one or more aggravated assaults, with a median of 4. Gun assaults, although lower in frequency than nongun assaults, still occurred in the majority of block groups; 64% of block groups experienced one or more gun assaults, with a median of 1. Vacant properties were also widely present; 84% of the block groups had one or more vacant properties, with a median of 6.

Examining the unadjusted relationship between vacant properties and aggravated assault revealed a significant overlap of higher aggravated assault rates in block groups with higher levels of vacant properties. Comparing the kernel density maps of vacant properties, total aggravated assaults, and gun assaults provided a spatial visualization of the distribution of vacant properties and aggravated assaults, with the darker color intensity signifying a higher density of vacant properties or assaults (Figure 1). Furthermore, there was a near linear correlation between vacant properties and aggravated assaults in unadjusted analysis ($P < 0.001$, Figure 2).

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Table 1: Summary statistics and years of data pertaining to the 1816 blockgroups in Philadelphia County.

	Mean (SD)	Median (IQR 25%, 75%)
All assaults (2002–2006)	5.28 (4.97)	4 [2, 7]
Gun assaults (2002–2006)	1.77 (2.25)	1 [0, 3]
Nongun assaults (2002–2006)	3.51 (3.50)	3 [1, 5]
No. of vacant properties (2002–2006)	12.53 (16.67)	6 [1, 18]
Total population (2004)	792.45 (507.09)	711.5 [455.5, 1003.5]
Median age (2004)	34.85 (8.35)	35 [30.6, 38.85]
Male : female ratio (2004)	0.89 (0.52)	0.9 [0.8, 0.9]
No. of black residents (2004)	353.22 (353.42)	248 [55.5, 575.5]
No. of Hispanic residents (2004)	69.18 (136.70)	20 [7, 62]
Median household income (2004)	35297 (20046)	33213 [22281, 44645]
No. of unemployed (2004)	42.18 (40.65)	31 [13, 61]
No. of with bachelor's degree (2004)	78.88 (105.31)	43.84 [14.80, 100.84]
No. of single parent households (2004)	90.94 (60.56)	83 [46, 125]
No. of residential properties (2004)	253.40 (158.70)	238 [143, 340]

* SD: standard deviation; IQR: interquartile range.

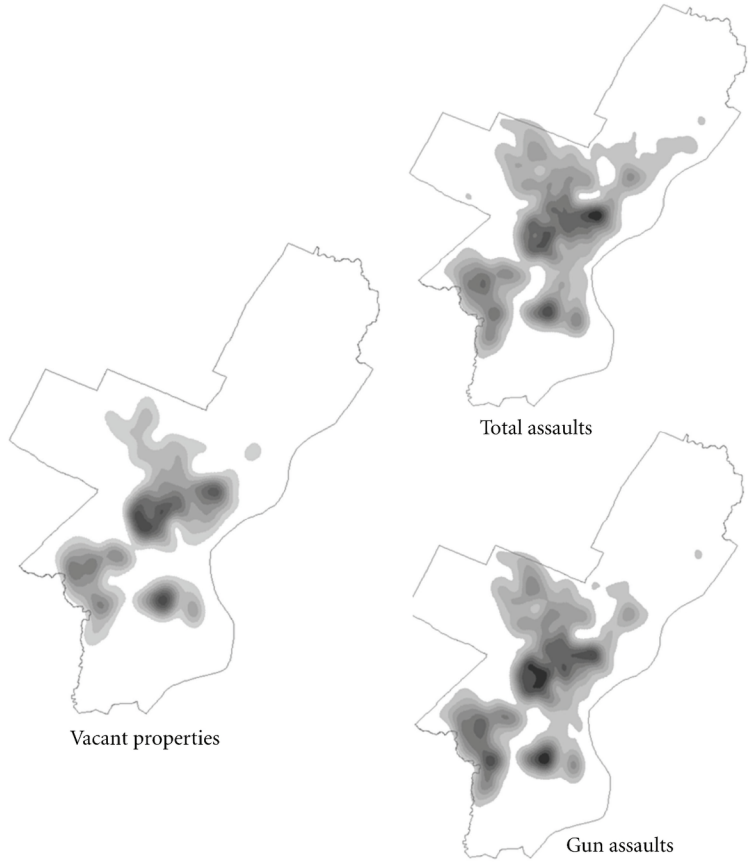


Figure 1: Kernel density maps of vacant properties and aggravated assaults.

After adjusting for the demographic and socioeconomic covariates, vacant properties remained associated with the risk of aggravated assault (Table 2). Moreover, although many of the covariates had a statistically significant association, vacant properties had the strongest association, both in effect size and P value. There was also a dose-response relationship between vacant properties and the expected number of assaults (Figure 3). Although there was an association between vacant properties and the risk of aggravated assault between block groups over time, there

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Table 2: Multivariable analyses of the relationships between vacant properties and assaults in Philadelphia County from 2002–2006.

	All assaults	Gun assaults	Nongun assaults
Vacant properties	0.1678§ [0.1135, 0.2222]	0.2055§ [0.1297, 0.2813]	0.1359§ [0.0787, 0.1931]
Total population	0.0004§ [0.0002, 0.0006]	0.0001§ [−0.0001, 0.0002]	0.0005139§ [0.0003, 0.0007]
Median age	−0.0080† [−0.0151, −0.0008]	−0.0075 [−0.0159, 0.0010]	−0.0077† [−0.0143, −0.0010]
Male : female ratio	0.1162‡ [0.0337, 0.1988]	0.0046 [−0.0362, 0.0455]	0.1573§ [0.0688, 0.2457]
No. of black residents	0.0001 [−8.63e − 06, 0.0003]	0.0004§ [0.0002, 0.0005]	0.0000204 [−0.0002, 0.0002]
No. of Hispanic residents	0.0005§ [0.0003, 0.0007]	0.0005§ [0.0003, 0.0008]	0.0005§ [0.0003, 0.0007]
Median household income	−9.17e − 06§ [−0.00014, −4.36e − 06]	−0.0000103§ [−0.000153, −5.36e − 06]	−9.02e − 06§ [−0.00014, −4.07e − 06]
No. of unemployed	0.0010† [0.0001, 0.0019]	0.0009† [0.0000415, 0.0017]	0.0011† [0.0001, 0.0022]
No. of with bachelors degree	−0.0010‡ [−0.0016, −0.0004]	−0.0006 [−0.0011, 0.0000327]	−0.0011‡ [−0.0018, −0.0004]
No. of single-parent households	0.0027§ [0.0014, 0.0040]	0.0048§ [0.0037, 0.0059]	0.0017† [0.0001, 0.0034]
No. of residential properties	−0.0008§ [−0.0012, −0.0004]	−0.0008§ [−0.0012, −0.0004]	−0.0007§ [−0.0011, −0.0003]

* Shown in brackets are 95% confidence intervals; † $P < 0.05$; ‡ $P < 0.01$; § $P < 0.001$.

was no statistically significant association between changes in vacant properties within block groups and the risk of assault within those block groups over time. However, less than 5% of block groups actually changed from one category of vacant properties to another during the five-year period.

In tests for interactions, alcohol outlets and parks/playgrounds within block groups appeared to modify the relationship between vacant properties and aggravated assault, while schools, houses of worship, and police/fire stations did not ($P < 0.001$, Figure 4). For alcohol outlets and parks/playgrounds, the interaction effects were similar: block groups with these attributes had higher rates of aggravated assaults than block groups without these attributes, but only at lower levels of vacant properties. At higher levels of vacant properties, aggravated assaults were both higher and indistinguishable between the two groups. With a higher baseline of assaults in block groups with these attributes, the rate of increase in aggravated assault as one moved between each category of vacant properties was therefore less steep.

4. Discussion

In this analysis of violence in neighborhoods, we found a significant association between vacant properties and the risk of aggravated assault—and particularly gun assaults—even after controlling for important demographic and socioeconomic characteristics of the neighborhoods. Vacant properties also had the strongest effect size, prevailing over almost a dozen well-known indicators of disadvantage. Furthermore, there was evidence of a dose-response relationship, in that the risk of aggravated assault in block groups with higher levels of vacant properties was greater than in block groups with lower levels of vacant properties. Finally, we noted that in block groups with parks/playgrounds or alcohol outlets there were higher adjusted rates of aggravated assault comparatively at lower levels of vacancy that was washed out in block groups with higher levels of vacancy, for which assault rates were universally high.

These data potentially identify vacant properties as a modifiable target for intervention to reduce assaults in disadvantaged neighborhoods. However, we would urge caution in interpreting the data given the need to demonstrate generalizability of the findings to other cities and regions of the USA and the limited ability from our observational design to infer causality. For example, the possibility of unmeasured confounders that could explain the association between vacant properties and aggravated assault remains plausible, particularly without within-block group changes to strengthen causal inference. However, the proportion of the model variance explained by vacant properties far outweighed the contribution of all other factors in the model, and upon more detailed analysis, our study period was not

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of sufficient length to study the within-block group effect. In fact, less than 5% of block groups experienced a change in the category of vacant properties during the study period. A longer study period in which more change in the number of vacant properties within block groups may have occurred could potentially improve the likelihood of observing an association and would be an important area for future research. Aside from concerns of unobserved confounding, spillover effects of vacant properties and aggravated assault that may have occurred between block groups might also have biased our results and were unmeasured in this analysis. While spillover was certainly possible, we believe it less likely that it would have erased the strong association found between vacant properties and aggravated assault. Finally, we recognize that there is heterogeneity in the types of vacant properties which this study did not examine (e.g., sealed versus open properties, buildings versus lots/parcels of land, properties littered with trash and graffiti versus properties with clean surrounding areas, commercial building, or brownfield versus residential building). Further study can be performed to determine whether the different types of vacant properties have the same relationship to aggravated assault.

Despite these limitations, our findings add to the quality of evidence on the relationship between vacant properties and aggravated assault. Previous studies have supported the association between neighborhood physical disorder and violence [19, 20, 52–57]. Skogan found an association between disorder and crime; however, much of the analyses were correlational and cross-sectional [19]. Taylor's work on Baltimore neighborhoods challenged that it was neighborhood disadvantage rather than an index of physical incivilities which included vacant properties that predicted later crime [21]. While his work was important because of its longitudinal design, vacant properties were not studied as an independent variable. Spelman examined vacant properties independently and found that blocks with abandoned buildings had twice the drug and property crime rates than blocks without abandoned buildings [20]. However, his design may have been prone to overmatching and was of limited generalizability since he only studied one, low-income neighborhood in Austin, TX, USA. Accordino's work documented the problem posed by vacant and abandoned properties; however, it was a survey of local officials to the economic and social revitalization of central cities [17]. Finally, Fullilove's ethnographic study was designed specifically to examine the social impact on residents who moved from neighborhoods deteriorated by the loss of housing and abandonment to redeveloped communities [18].

An added strength of our study was that beyond the association we observed, we also began to consider the influence of other institutional factors within neighborhoods that may influence the relationship between vacant properties in aggravated assault. In so doing, we found an interaction among block groups that had open spaces (parks/playgrounds) and among those with alcohol outlets. Compared to block groups without these factors, there was a greater risk of aggravated assault, but only when levels of vacancy were low. Their relationship to aggravated assault was attenuated at higher levels of vacancy.

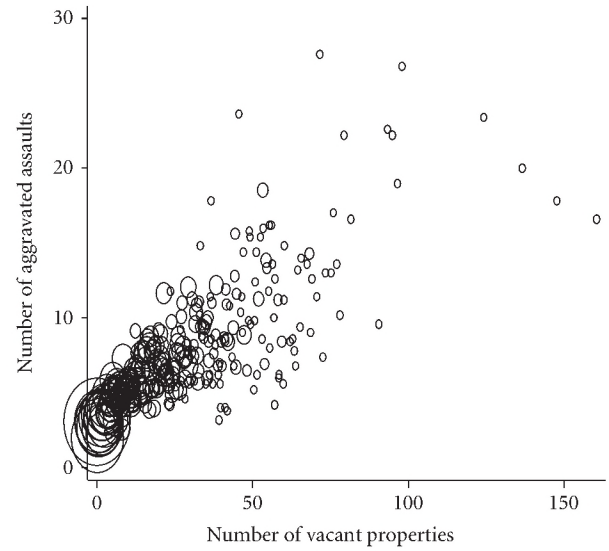
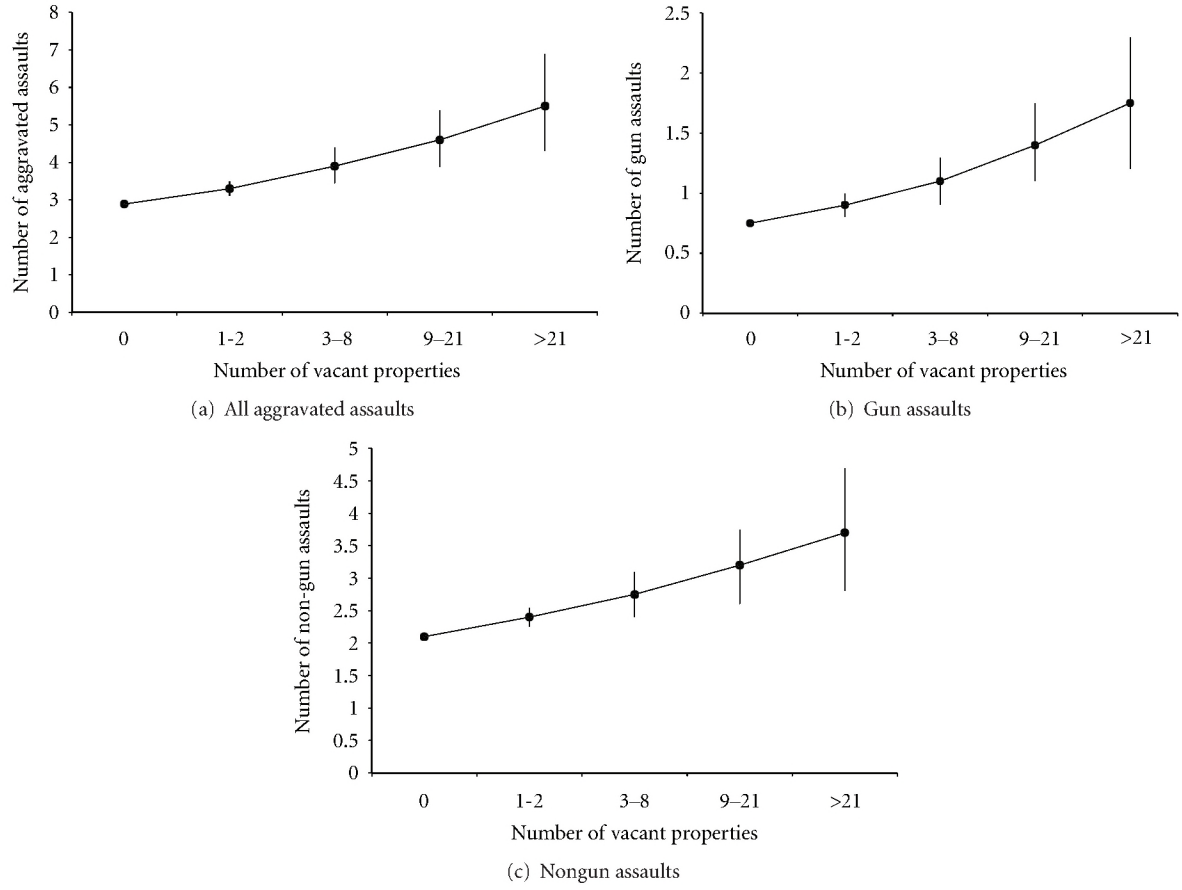


Figure 2: Unadjusted association between vacant properties and aggravated assaults across 1816 block groups in Philadelphia County between 2002–2006*. *Area of circles proportional to the number of block groups with level of vacant properties.

One potential explanation for the higher rates of assaults in block groups with parks/playgrounds might be the potential for criminal or violent activity in unsupervised open space, and alcohol outlets have been studied as facilitating violent behavior [14, 48, 58]. Yet, our results would suggest that the presence of police stations alone in block groups with these attributes is unlikely to mitigate the intensity of aggravated assault in our most disadvantaged neighborhoods, without a concurrent strategy to reduce the physical disorder that may be a source for increased violence. The lack of significant findings with other neighborhood institutions (i.e., schools, houses of worship, and police/fire stations) may be that the frequency of assaults is related not only to these physical structures within the block groups but also the surveillance strategies around these particular institutions. For example, the policing strategies of the block groups were not examined in this study (e.g., street cameras, park, and walk patrol strategies). An additional limitation of these interaction findings is that time of day was not accounted for and may influence the role of these other neighborhood institutions. Further study would be warranted to understand these potential relationships.

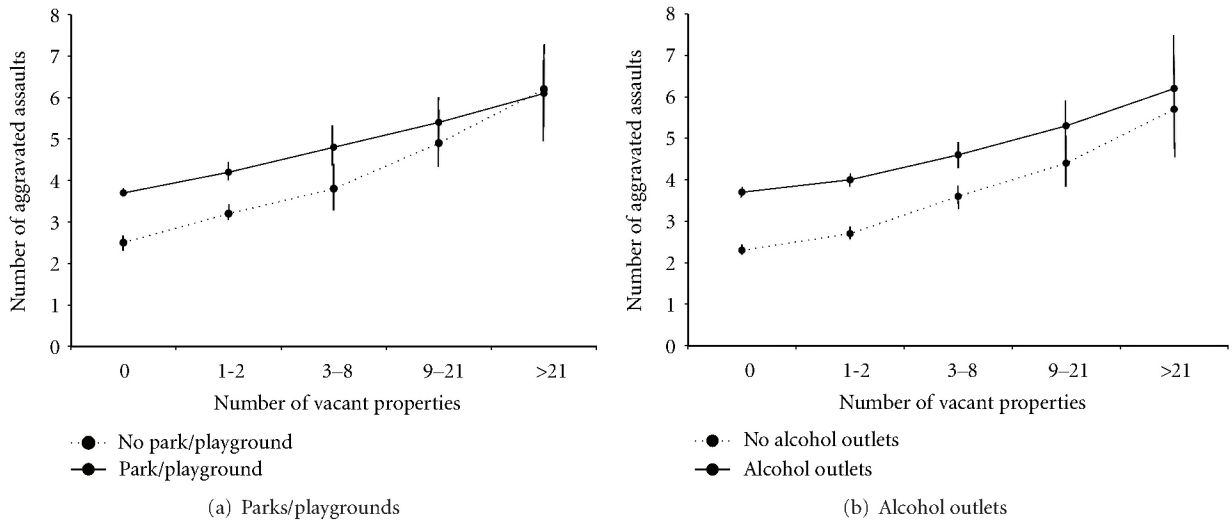
This growing body of evidence on physical disorder in neighborhoods may justify the support of interventions to address this type of disorder, such as the abatement of vacant properties. While enhancing the cohesion among residents in neighborhoods [9] is an important effort, it is challenging, especially in areas with high levels of residential transiency. Initiatives to reduce the physical disorder of neighborhoods may complement these efforts as a holistic approach to reducing violence in neighborhoods. Vacant properties are often permanent structures of the built environment that if addressed may impact the vitality of neighborhoods and populations at large.

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(a) All aggravated assaults (b) Gun assaults (c) Nongun assaults

Figure 3: Adjusted assault rates across categories of vacant properties in Philadelphia County between 2002 and 2006*.



(a) Parks/playgrounds (b) Alcohol outlets

Figure 4: Influence of neighborhood institutions on the relationship between vacant properties and assaults in Philadelphia County from 2002–2006*.

5. Conclusion

Several vacancy abatement strategies exist, such as demolition, restoration/rehabilitation, property stabilization (i.e., cleaning and sealing vacant properties), and neighborhood beautification (e.g., greening areas around vacant properties) [59–61]. Partnership between city agencies and community members is critical in devising a strategic plan for vacant

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property management and oversight. Furthermore, affected cities need to be prepared to address the cost and time associated with abatement programs, the potential for eminent domain disputes, and the goal of avoiding neighborhood gentrification [15, 17]. In light of the economic recession, it may be worthwhile to focus discussion on the management of vacant properties as the foreclosure crisis is changing the landscape of not only disadvantaged but also previously stable neighborhoods [62–64]. An evidence-based understanding that urban vacant properties and neighborhood violence are fundamentally associated is an important first step before any of such management strategies can be reasonably supported on a large scale by policymakers.

Authors' Contribution

Dr. C. C. Branas contributed to the design, analysis, drafting, and review of the paper. Drs. D. Rubin and W. Guo contributed to the analysis and review of the paper.

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February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 18

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 43.3



Impacts of Local Ownership of Vacant Land on Crime

December 8, 2020 · **Jenni Collings**

Last Updated on January 24, 2023 by Chicago Policy Review Staff

Demographic and economic trends like suburbanization, deindustrialization, white flight, and foreclosures have resulted in an increase in vacant properties in cities like Chicago. High vacancy rates pose many challenges for cities and residents, including decreasing tax revenues and real estate values, while simultaneously increasing costs to the city and, potentially, crime rates.

Many cities across the United States have taken steps to address high vacancy rates. Examples include building affordable housing units, encouraging owners to improve distressed properties, and selling city-owned vacant land to neighbors. Mathew Stern and T. William Lester recently conducted an assessment of one such program in Chicago called the Large Lots Program. They found that the Large Lots Program is effective in reducing crime rates, with larger effect sizes for locally owned lots.

As a response to population decline and greater vacancy, Chicago created the Adjacent Neighbors Land Acquisition Program in the 1980s to allow owner-occupants of adjacent city-owned property to buy a single vacant lot below market value. After realizing that the restriction to adjacent residents reduced potential participation in ANLAP, the City created an updated program called the Large Lots Program in 2014. This program allowed owners instead of owner-occupants to purchase the land. As a result, the lots had more potential buyers, including block clubs and churches. Buyers could also purchase up to two lots per program cycle for $1 each.

Stern and Lester used 2013 data on lot availability and sales from the Chicago Department of Planning and Development, land use data from the Chicago Metropolitan Agency for Planning, tax assessment data from Cook County, and transaction data from Zillow Inc.'s ZTRAX national data set to identify buyers' mailing addresses. They used these mailing addresses to determine whether the buyers lived in their lot's neighborhood. While the loosened restrictions allowed for more residents to participate, the authors found that same-block purchasers only made up 63.6% of the studied sales in the Large Lots Program. Another 5.4% were purchasers who lived in the neighborhood, while 31% had addresses outside the neighborhood altogether. These findings suggest that a substantial proportion of people using the program live outside the neighborhood and could potentially be less invested in the neighborhood's outcomes.



Stern and Lester also investigated the impact of the Large Lots Program on crime rates and the relationship between length of ownership and physical changes to the lots. They did this by comparing rates before and after the sale of vacant lots. Since changes to a neighborhood don't happen immediately after a lot is purchased, they focused on crime rates in the first quarter after purchase and one year later. They found statistically significant evidence that a block where at least one Large Lot sale occurred had an average 3.5% lower crime rate one year after purchase compared with similar blocks that did not have any sales. Moreover, blocks with local buyers had a higher crime reduction of 6.8%. While this was not included in their study, these statistics could mean that a local purchase may also affect how quickly a decrease in crime may happen. Someone who lives on the same block may make alterations to the property sooner than someone who doesn't live nearby, which could result in an earlier reduction in crime.

While private ownership of vacant land may lead to a reduction in crime rates, more needs to be studied about the effects of these kinds of programs. This study does not observe what changes were made to the lots or any other potential benefits that could come from local private ownership. It does not answer questions about increased generational wealth, property values, and the potential for gentrification. Even though the Large Lots Program affects mostly minority neighborhoods, race and disparate impact of the program isn't considered in this study. Stern and Lester's methodology warrants further scrutiny; they may have underestimated buyers' proximity to their purchased lots by mistaking primary home addresses for the addresses of lawyers, family members, or second homes.

Vacant land provides both challenges and opportunities for cities and residents. While vacancy can lower property values, cause cyclical disinvestment, and increase crime rates, it can also provide benefits for communities. It can

create new green spaces, provide an opportunity for increased family wealth, and allow local residents to have more control over their communities. While further assessment is warranted, the results of Stern and Lester's study are promising. They show that cities can reinvest in and reimagine neighborhoods with large numbers of vacant lots through programs like Large Lots in Chicago.

Stern, Matthew, and T. William Lester. 2020. "Does Local Ownership of Vacant Land Reduce Crime?: An Assessment of Chicago's Large Lots Program." *Journal of the American Planning Association*. https://doi.org/10.1080/01944363.2020.1792334.

Chicago, crime, sideyards, vacantland

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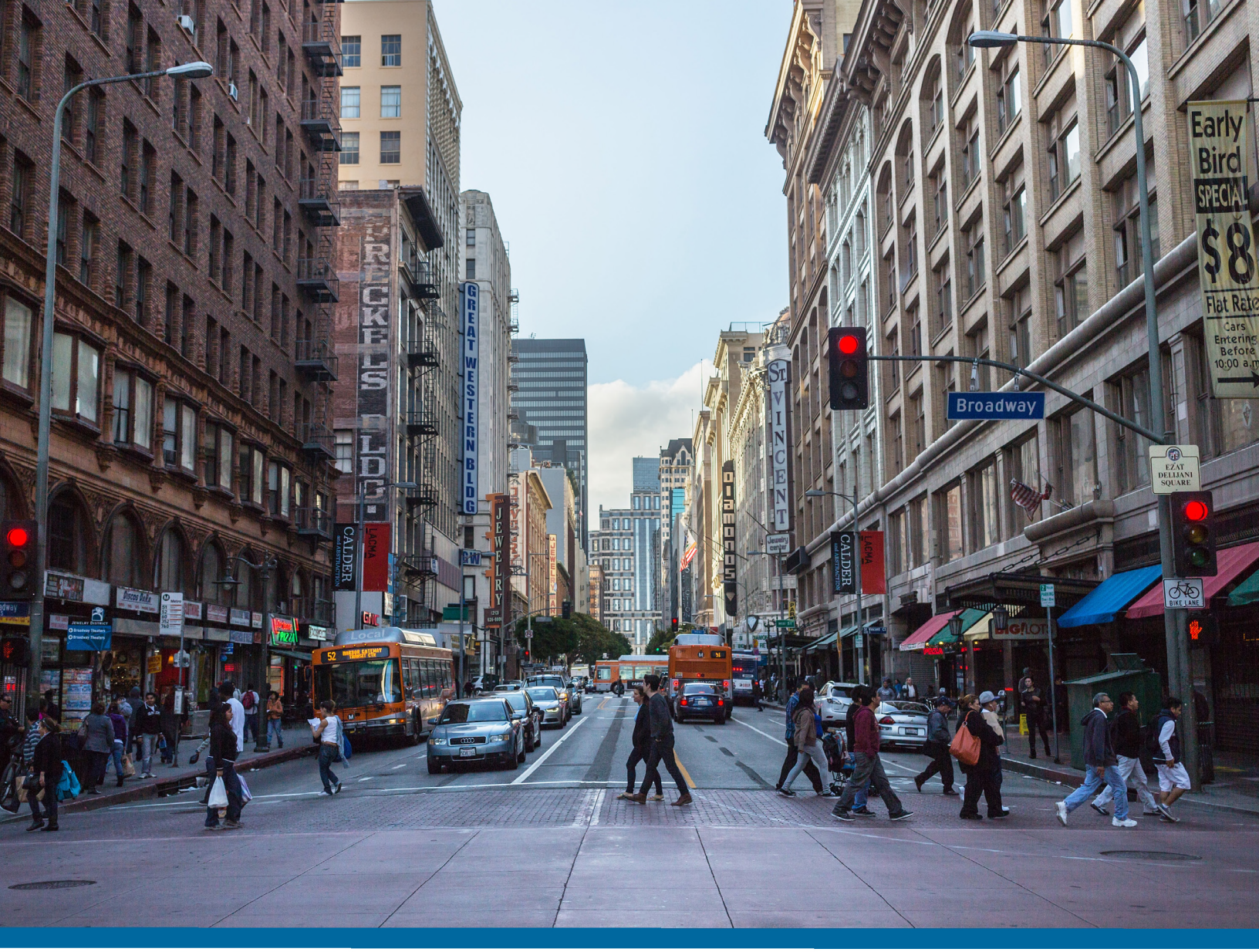
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EXHIBIT 19

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 44



Untapped Potential:

Strategies for Revitalization and Reuse

October 2017

National Trust *for* Historic Preservation
Preservation Green Lab

About the Partnership

THE PARTNERSHIP FOR BUILDING REUSE

Recognizing the environmental, economic, and community benefits of the reuse of vacant and blighted property, the National Trust for Historic Preservation formed the Partnership for Building Reuse in conjunction with the Urban Land Institute in 2012 to enhance opportunities for reuse in major U.S. cities. The Partnership for Building Reuse brings together community groups, preservation advocates, real estate professionals, and civic leaders around the common goal of making it easier to reuse and retrofit these valuable assets.

ABOUT THE PARTNERS

THE NATIONAL TRUST FOR HISTORIC PRESERVATION is a privately funded nonprofit organization that works to save America's historic places. From our headquarters in Washington, D.C. and our regional offices, we take direct, on-the-ground action when historic sites are threatened. Our work helps build vibrant, sustainable communities. We facilitate public participation in the preservation of sites, buildings, and objects of national significance or interest. We advocate with governments to save America's heritage, and we strive to create a cultural legacy that is as diverse as the nation itself so all of us can take pride in our part of the American story.

The National Trust's **PRESERVATION GREEN LAB** strengthens communities by integrating historic preservation and sustainability. Founded in Seattle and now with staff across the country, the Preservation Green Lab conducts research, delivers policy innovations, and promotes adaptive reuse to ensure healthy, equitable, and resilient communities.

THE URBAN LAND INSTITUTE (ULI) is a global, member-driven organization comprising more than 40,000 real estate and urban development professionals dedicated to advancing the Institute's mission of providing leadership in the responsible use of land and creating and sustaining thriving communities worldwide.

ULI's interdisciplinary membership represents all aspects of the industry, including developers, property owners, investors, architects, urban planners, public officials, real estate brokers, appraisers, attorneys, engineers, financiers, and academics. Established in 1936, the Institute has a presence in the Americas, Europe, and Asia Pacific regions, with members in 76 countries.

Cover Image:

Downtown Los Angeles has experienced increased investment and growth since the passage of an Adaptive Reuse Ordinance in 1999.

CREDIT: ISTOCK.COM/IMANTSU

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View of downtown Detroit skyline from the El Moore lodge, a sustainable rehabilitation project in Midtown.

CREDIT: MICHELLE AND CHRIS GERARD

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Executive Summary

Neighborhood commercial corridors with a mix of uses and housing types. Thriving local businesses both new and old. These are the places that make a city distinct, provide hidden density, and cultivate diversity—and they are nearly impossible to encourage without the inclusion of older, smaller buildings.

Yet in many places, older buildings remain underutilized assets, sitting fully or partially vacant due to financial or regulatory barriers. With the knowledge that older buildings contribute measurably to the health and performance of neighborhoods, what can be done to bring the benefits of reuse to more places?

With the knowledge that older buildings contribute measurably to the health and performance of neighborhoods, what can be done to bring the benefits of reuse to more places?

This report reflects the lessons learned from a multiyear partnership between the National Trust for Historic Preservation and the Urban Land Institute. Based upon city-specific engagements in Baltimore, Chicago, Detroit, Los Angeles, and Philadelphia, this report summarizes the technical, market, financial, and regulatory barriers to building reuse, and offers best practices for policymakers, developers, and community advocates interested in building reuse as a tool to create healthy, equitable, and resilient communities. Key takeaways include the following:

- **A consistent set of barriers hinders building reuse.** While market conditions, regulations, and development patterns are unique in every city, this study revealed a common set of challenges that block the reuse of older buildings. The most frequently cited barriers include outdated or inflexible zoning and building codes, the presence of one-size-fits-all parking requirements, and a lack of adequate financing opportunities for new or small developers.

- **There is a need to map and inventory built assets.** In many places, fragmented, incomplete, and difficult-to-access information about the stock of older buildings limits the impact of reuse efforts. Mapping tools and spatial analysis should be used to develop and target incentive programs to have the most impact in neighborhoods with older resources.

- **Comprehensive programs are the most powerful.** An adaptive reuse ordinance, such as the Los Angeles ordinance adopted in 1999, demonstrates the power of packaging regulatory relief, flexibility, and technical assistance to unlock the potential of vacant urban spaces. Recognizing the transformative power of this comprehensive approach, this report provides a model adaptive reuse ordinance that can be customized and adopted in any city.

- **There is momentum on the ground.** City leaders across the country recognize the connection between older buildings and healthy neighborhoods and want to more effectively steward their historic assets. City staff and elected officials are already implementing innovative solutions to strengthen building reuse, many of which are reflected in this report.

A complete list of solutions and strategies to promote reuse is detailed in the pages ahead and can be found, along with additional resources, at **savingplaces.org/green-lab.**



A celebration in Hemming Park, Downtown Jacksonville, Florida.

CREDIT: RYAN KETTERMAN, VISIT JACKSONVILLE

Introduction

Our older buildings and neighborhoods are precious resources—as valuable to cities as parks, schools, or public transit. They often provide architecturally rich, human-scaled spaces for a diversity of residents, businesses, and services. Yet in many cities, thousands of older buildings languish empty, their productive and ongoing use hindered by outdated regulations and a lack of financial tools needed to spur investment and revitalization.

This report summarizes work in five major U.S. cities through a first-of-its-kind partnership between the National Trust for Historic Preservation and the Urban Land Institute. It offers insights into the barriers to building reuse and offers examples and best practices for how cities can unlock the potential of vacant and underutilized structures to help create healthier and more sustainable cities.

This report summarizes the lessons learned from work in Baltimore, Chicago, Detroit, Los Angeles, and Philadelphia, capturing common barriers, innovative solutions, and best practices to promote building reuse in cities across the country.

Research from the National Trust's Preservation Green Lab shows the contribution that older buildings make to healthy, equitable, and resilient cities. Older buildings and blocks contribute to an area's economic vitality. Old commercial corridors are home to more jobs in new and small businesses, more non-chain businesses, and more women and minority-owned businesses. These corridors harbor more affordable space and different types of housing, allowing for a greater diversity of residents and businesses. Recycling older buildings also advances environmental sustainability, reducing carbon emissions and material waste. Finally, reuse of older buildings strengthens municipal fiscal health by adding long-vacant structures to the tax rolls. In summary, old buildings are invaluable assets that cities cannot afford to waste.

With these benefits in mind, the National Trust for Historic Preservation and the Urban Land Institute launched a joint effort in 2012 to foster building reuse in cities across the country. The Partnership for Building Reuse brought together practitioners in five major cities—Baltimore, Chicago, Detroit, Los Angeles, and Philadelphia—to identify the challenges that can make reuse projects difficult and to develop solutions to overcome these barriers.

This report summarizes the lessons learned from five years of work, capturing common barriers, innovative solutions, and best practices to promote building reuse in cities across the country. It also includes a summary of the process along with snapshots of findings from each of the five cities.

LEARNING FROM FIVE CITIES: AN INTERDISCIPLINARY FRAMEWORK

The Partnership for Building Reuse leverages the national networks of both the National Trust for Historic Preservation and the Urban Land Institute, including local preservation organizations, ULI District Councils, community development organizations, and city staff. The goals of the Partnership are to:

- **Identify and understand** the common barriers to building reuse.
- **Accelerate** rates of building reuse and rehabilitation.
- **Support** community revitalization in diverse neighborhoods.
- **Decrease** building demolition and resource waste.
- **Document** best practices that encourage building reuse.
- **Create** a methodology to advance building reuse in other cities.

In each city—Baltimore, Chicago, Detroit, Los Angeles, and Philadelphia—we formed an Advisory Committee to guide the process locally. Committee members conducted interviews with key building reuse practitioners, reviewed Preservation Green Lab mapping and analysis, and identified community stakeholders for larger group discussions. We identified key barriers in four categories:

- **Market** barriers related to the supply and demand for various building types and uses.
- **Financial** barriers involving project costs, sources of capital, lending practices, and financial incentives.
- **Technical** barriers that arise related to building location, site, design, construction, and materials.
- **Regulatory** barriers such as zoning and development standards, building codes, seismic codes, and other review processes.

Following additional research and consultation with city staff, the stakeholders reconvened to develop a set of solutions to overcome barriers to reuse. Many of the solutions focused on the regulatory and financial barriers as those could most meaningfully be addressed through the expertise of the convening partners. Though market barriers can be overcome through reuse interventions—such as the City of Baltimore's programs that focus investment in neighborhoods with an excess of vacant properties—specific recommendations to influence market conditions remain outside the scope of this report. The Advisory Committee led a process to refine and prioritize these recommendations into a Citywide Action Agenda for building reuse. More information about the recommendations for each city can be found on the pages ahead.

REUSE AND MARKET OPPORTUNITY

Repurposed older buildings offer growing opportunities across the market spectrum. Housing and hotel conversions abound in American downtowns, bringing new life to once-vacant office buildings, department stores, and warehouses. Federal tax credits have helped create hundreds of thousands of affordable housing units in repurposed historic buildings. Older buildings provide distinctive, affordable spaces for small, locally-owned retail businesses and top-ranked restaurants. Many tech and start-up companies gravitate to flexible, open plan workspaces in older buildings with distinctive features, layers of history, and a built-in marketing story.

In each of these market sectors, the reuse alternative offers potential for greater speed-to-market than new construction and the ability to adapt quickly to changing market conditions. But while the market demand for older buildings is increasing, significant barriers continue to block investment. Thousands of older buildings sit empty or underused in cities across the country.

THE PARTNERSHIP FOR BUILDING REUSE PROCESS

The chart below outlines the process developed through the Partnership for Building Reuse. City leaders and community development advocates can forge their own paths to repurposing underused older structures using this framework.

Start-up

1 month

- Create Advisory Committee, led by ULI member volunteer, including preservation organization and other key partners

Research and mapping:

2-3 months

- Data collection, identification of related research and programs
- Gather and map data related to demolition and development trends
- Analyze and map social, economic, and cultural vitality metrics
- Research impact of overlay zones, protection mechanisms, and incentives

Identify barriers and opportunities

2-3 months

- Interview local stakeholders and leaders; survey members
- Convene first stakeholder meeting
- Identify market, financial, technical, regulatory barriers

Develop solutions

2-3 months

- Convene second stakeholder meeting
- Identify priority strategies and recommendations
- Create Citywide Action Plan to implement recommendations

Implementation

6-18 months

- Identify and work through quick wins in collaboration with city staff
- Local working groups and task forces advance long-term recommendations
- Reconvene advisory committee periodically to review progress and/or recommendations



The Philadelphia Neighborhood of Fishtown is home to many smaller buildings that house new and small business.

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Top Barriers to Building Reuse

Foundational to the Partnership for Building Reuse process is the identification of barriers that create an unnecessary impediment or place an undue burden on reuse and rehabilitation projects. With a local Advisory Committee, the Preservation Green Lab convened stakeholders and practitioners from a variety of fields to discuss issues faced in redevelopment in each of the five partnership cities. The barriers ranged from the specifics of local policies to larger issues within the lending or insurance industries. Many barriers were found to impact projects across the board. This report highlights four barriers that consistently emerged throughout this process: issues with the zoning code, the burden of parking requirements, the ability to find financing for building reuse, and inflexibility and complexity in a city's building, energy, and seismic codes. Local stakeholders in the five cities also identified market and technical barriers that may impact the ability for a developer to reuse a building—such as lower rents in cooler markets or difficulty meeting code in a structure with a larger floorplate. Though these barriers can impact reuse potential as much as those in the regulatory arena, the stakeholders and convening partners primarily focused on solutions related to regulation and financing.

The pages ahead detail the variety of ways these barriers are manifested in U.S. cities, as well as effective solutions that could be adopted more widely to support building reuse and strengthen cities.



Baltimore Design School / Ziger Snead Architects

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As an expression of local policy, zoning is a powerful land use tool that can be used to actively facilitate or inadvertently hinder building reuse. Zoning regulations govern building use, level of occupancy, height, scale, parking, setbacks, open space, signage, and more. Following New York City's pioneering 1916 zoning ordinance, most cities adopted their first zoning regulations in the 1920s. Many of these early, so-called "Euclidean" zoning codes were rewritten in the 1950s and 60s. New provisions encouraged low-density, residential-only subdivisions and accommodated the growing number of cars. Despite various amendments and modifications, these "second generation" zoning codes remained in place in most cities until very recently.

Cities are now adopting new "third generation" zoning codes. The cities in the Partnership for Building Reuse reflect this evolution. Chicago replaced a 1957 zoning code in 2004. In 2012, Philadelphia adopted its first new code in 50 years. In 2016, Transform Baltimore was approved, replacing a 1971 zoning code. Work is underway in Los Angeles to replace a 1946 code. Even in cities not undertaking complete code rewrites, planners are devising new zone districts and updating development standards to encourage denser, mixed-use development.

This interest in zoning reform presents a once-in-a-generation opportunity to make zoning more compatible and supportive of building reuse. Conversations with local practitioners in the five Partnership for Building Reuse cities point to specific barriers to reuse that could be reduced or removed through changes to zoning codes:

- **Use limitations.** Older zoning codes separate urban neighborhoods by use: typically residential, commercial, industrial. Converting older structures to alternative uses or mixing uses within a single building can require time-consuming approvals.
- **Incompatible development standards.** Development standards typically reflect an assumption that new development will eventually replace older structures. Requirements for setbacks, parking, unit sizes, and open space can be impossible to achieve with an existing structure.
- **Non-conforming properties.** Many codes define structures that do not meet current development standards as "non-conforming," which can discourage investment. Defining small lots or historic uses as non-conforming may also block rehabilitation of existing structures.
- **Zoning mismatches.** When zoning allows new construction that is much larger than what currently exists, small buildings become vulnerable to disinvestment and demolition. Some of these structures may contribute to economic and social diversity.
- **Process complexity.** Zoning codes gain complexity with each new overlay, revised standard, and additional definition. As a result, zoning approval in many cities has become highly transactional, requiring time-consuming "one-off" solutions for each project.

SOLUTIONS TO ZONING BARRIERS

Zoning code reform offers an opportunity to align this key regulatory tool with goals for more diverse, walkable, and sustainable cities. Many planners are choosing "form-based" approaches for new zoning codes. Form-based codes focus on the physical character of buildings and how they relate to streets and public spaces. Uses are less strictly segregated in form-based codes. Analysis of existing development patterns informs development standards that are better aligned with valued older buildings and blocks. Each of the five Partnership for Building Reuse cities is using or considering aspects of form-based zoning.

Specific examples of ways that zoning changes can facilitate building reuse include:

1. **Adopt context-sensitive, form-based zoning** that recognizes the diverse contexts and building patterns found in cities, from dense downtown cores to lower density neighborhoods. Examples of citywide form-based codes include Baltimore, Denver, and Miami.

2. **Create new zone districts** to allow a greater mix of uses and reduce the need for variances and changes in use. Align open space, setback, and minimum lot sizes to reflect valued historic patterns. Examples include districts that allow limited commercial use in Baltimore and live/work industrial districts in Philadelphia.

3. **Reduce or eliminate non-conforming provisions** to encourage investment in properties constructed before zoning codes. Examples include using a "compliant" rather than non-comforming status for these properties in the Denver zoning code.

4. **Use transfer of development rights (TDR) approaches** to retain valued smaller structures in areas where policy encourages and zoning allows higher density. San Francisco and New York City have well-established TDR programs. Chicago's Neighborhood Opportunity Fund uses fees from development rights purchased in the downtown core to support commercial corridors in underserved neighborhoods.

No technology has transformed American cities as radically as the automobile. Today's cities still bear the scars of efforts to accommodate cars, and parking continues to occupy large swaths of land in urban centers across the country. As car ownership rates soared after 1945, a cultural expectation developed, reinforced by public policy, that parking should be free (or at least cheap) and easy to find. The requirements to provide parking for reuse projects was the single most cited barrier in the Partnership for Building Reuse process.

Parking barriers are both regulatory and market-driven. The vast majority of zoning codes include minimum off-street parking requirements for most development projects outside downtown areas, adding construction and land acquisition costs that small reuse projects often can't bear. In addition, abundant parking is still viewed by many lenders as necessary for a successful project, even where code requirements are reduced or eliminated.

Specific ways in which parking can impact redevelopment include:

- **High parking minimums.** Many zoning codes include formulas requiring a minimum amount of parking based on the allowable use. Given recent mobility trends, many of these formulas may be outdated.
- **Inflexible parking requirements.** Parking demands will differ between neighborhoods or commercial corridors depending on context, availability and quality of transit infrastructure, and proximity to residential areas. Parking requirements that are one-size-fits-all eliminate the opportunity for context-sensitive development.
- **Neighborhood concerns.** Parking for projects in or near residential areas can be controversial. Neighborhood groups often protest reduced parking requirements based on the assumption that parking will overflow onto neighborhood streets.
- **Market and lender demand.** The perception that parking is universally in high demand persists among lenders, commercial tenants, and some retailers, which ignores the success of many projects with lower amounts of on-site parking.

SOLUTIONS TO PARKING BARRIERS

UCLA parking expert Donald Shoup has called minimum parking requirements "a fertility drug for cars," noting that underpriced parking leads to more cars—a feedback loop that wastes resources and hinders reinvestment in historic commercial corridors and older urban neighborhoods. Seeking diversity, density, and accessibility, many cities are now focusing on multi-modal transit, and enhanced bike and pedestrian infrastructure. The prevalence of shared-use mobility and the future of the autonomous vehicle market further drive down the need for excessive parking availability. Given these trends, many parking formulas may be outdated. Accordingly, planners are seeking to reduce or eliminate parking requirements for projects in proximity to certain areas. Some cities are taking the shift a step further and establishing parking maximums to prevent over-parking and devote more space to people and businesses.

Specific solutions for parking include:

1 **Allow shared and off-site parking.** Multiple properties on the same block may have differing peak parking needs and should be allowed to share use of a single parking facility located within a reasonable distance. San Diego and Seattle have both allowed for this alternative to on-site parking requirements.

2 **Eliminate minimum parking requirements.** Many cities have removed parking requirements in their downtowns. This approach can be extended to other areas as well. In Chicago, parking requirements are reduced near transit and on designated "Pedestrian Streets." Other places, such as Buffalo, have eliminated requirements citywide.

3 **Develop parking maximums.** Changing a minimum to a maximum allows for parking to be created where it will be valued by the market. London created maximums in 2004 and, since then, only 17 percent of projects have parking that meets the old minimum—illustrating how required minimums exceed actual market demand.

4 **Provide exemptions for older buildings.** Subject to review, the city of Baltimore waives parking requirements for structures over 50 years old or properties that have received historic tax credits. Removal of parking requirements has also been a large part of the success of the Los Angeles Adaptive Reuse Ordinance.

5 **New forms of neighborhood parking management.** Revenue from street meters in Old Pasadena is dedicated to improvements within the district. Not only is pricing managed locally, this income provides additional local funding within the commercial corridor. Philadelphia, which eliminated parking requirements in Center City, surveys parking use every five years to monitor supply and demand.

6 **Unbundle Parking.** Separating the cost of parking from the development itself allows market desire for parking to be met while decreasing the price of housing for those who do not require parking. San Francisco's zoning code mandates buildings with 10 or more residential units to separate the cost of parking from that of the housing for both new construction and reuse projects.

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In all five Partnership for Building Reuse cities, local developers and preservation advocates noted the challenges involved in accessing capital for reuse projects, and in identifying and leveraging financial incentives that may be available. In addition, financing opportunities for small scale and reuse projects are more limited compared to large, new projects. The ability to finance reuse projects is further complicated in weaker real estate markets, where traditional lenders may lack experience with multi-layered financing or have concerns about unanticipated rehab costs.

Interviews with stakeholders and local practitioners in the five Partnership for Building Reuse cities point to specific financing barriers that could be removed to facilitate more reuse projects:

- **Weak markets.** Investing in areas suffering from poor economic conditions or population loss may be a tough sell for traditional lenders, who calculate return on investment based on established markets. The reality of high development costs and low returns means that many projects in weak markets are not feasible without subsidy.
- **Lender risk aversion.** Lenders often gravitate towards developers who can use reliable formulas to determine project cost or an expected loan-to-value ratio. These formulas are a poor fit for many reuse projects, as each project is unique.
- **Incentives that do not fit small projects.** Many available incentives (tax credits or abatements, for example) are oriented toward large projects, require expertise to assemble, and can be confusing and time-consuming for smaller developers.
- **Difficulty with property acquisition.** In some markets, property owners may hold title to older buildings and have no intention of investing or unrealistic expectations for the property's sale price. Many vacant properties are burdened with tax liens. Carrying costs associated with larger vacant buildings are also seen as a barrier.

SOLUTIONS TO FINANCING BARRIERS

Increased access to capital and additional financial incentives for reuse projects are needed to attract new and small developers to reuse opportunities. These changes would also encourage larger, more established developers to enter weaker markets. With tightening state and local budgets, many municipalities are turning towards alternative financial incentives, such as connecting to socially responsible investing, extending property tax abatement programs, or identifying ways to provide gap financing for smaller projects.

Specific solutions to support financing of building reuse projects include:

1 **Retain and enhance tax incentives.** Federal historic tax credits are a proven way to spur investment in older buildings and neighborhoods and can be paired with New Markets and Low Income Housing tax credits, as well as state credits, for even greater impact. South Carolina's Abandoned Buildings Revitalization Act illustrates a creative approach, providing a 25 percent credit for development of a building that has been at least two-thirds vacant for five or more years, regardless of age or historic status. Baltimore's property tax incentive for designated historic structures has spurred thousands of small rehabilitations.

2 **Provide innovative sources of financing.** Revolving loan funds or community capital corporations can provide gap or other much-needed financing for smaller development or reuse projects. The Buffalo Building Reuse Loan Fund provides low interest gap financing for adaptive reuse and new construction projects in downtown Buffalo. Chicago's Neighborhood Opportunity Fund uses fees from development rights purchased in the downtown core to support projects on commercial corridors in underserved neighborhoods.

3 **Package new and existing incentives.** An adaptive reuse ordinance or program is a way to offer targeted access to financial and regulatory incentives. Phoenix's Adaptive Reuse Program offers a streamlined regulatory process, faster permitting, and financial savings for adaptive reuse projects—including fee reductions.

4 **Leverage available underutilized property.** Affordable access to older and historic properties that are ripe for development can alleviate the barrier of acquisition costs. Land banking authorities—as seen in Philadelphia, Atlanta, Detroit, and other municipalities—can provide access to properties for a nominal fee if the developer commits to rehabilitating the property within a specific time period.

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Successful building reuse requires compliance with complex building, energy, and seismic codes. Disasters such as the 1871 Chicago Fire, the 1906 San Francisco Earthquake and Fire, and the 1911 Triangle Shirtwaist Fire in New York City prompted early adoption of fire and safety codes. Seismic codes and energy codes emerged later, as supplements to building codes. Modern seismic codes may require retroactive improvements to existing buildings. Energy codes are becoming increasingly stringent and influential for both new construction and rehabilitation projects.

Many states and municipalities are experimenting with "outcome-based" compliance, which allows a project sponsor to meet the desired intent of the code using a flexible, holistic approach to ensure overall performance requirements. While life-safety concerns are always paramount, a more tactical approach that allows flexibility in meeting life-safety standards would likely bolster opportunities for building reuse. California's Historical Building Code sets the gold standard for regulation of historic and older buildings through code enforcement. It customizes solutions to life-safety issues that allow buildings to retain their historic fabric.

Despite their laudable objectives and clear public purpose, these codes can sometimes have unanticipated consequences. In addition, navigation of a complex codes regime can be particularly challenging to new or small developers. Major code issues identified through the Partnership for Building Reuse process include:

- **Process complexity.** Building, energy, and seismic codes are often managed by different municipal departments, which can make plan approval time consuming, confusing, and expensive.
- **Code conflicts.** Code requirements may conflict with historic preservation standards, especially those triggered by historic tax credit programs. Overly restrictive historic preservation review of designated historic structures can sometimes slow or derail creative solutions to code requirements.
- **Opaque or inconsistent approval process.** In many municipalities, permit approval depends on the judgment of code officials, some of whom may lack expertise in building reuse projects. Additionally, a developer may not be able to meet code on a project, depending on interpretation and the willingness of the code official to allow alternative solutions.
- **Challenging building types.** Some building types pose specific reuse challenges. The vast size of industrial floorplates are conducive to open offices, but may impede residential uses. Energy codes may require insulation of distinctive masonry walls. Many small commercial buildings in older neighborhoods are left with vacant upper floors due to the challenge of providing a second upstairs exit.
- **Upgrades triggered by change of use.** Changing the use of a structure can trigger expensive upgrades. See section on zoning (pages 12-13) for more detail.

SOLUTIONS TO CODE BARRIERS

Adopting a flexible approach to codes and providing technical assistance to help developers navigate complex regulatory environments allows cities to unlock the development potential of their older and underutilized buildings. By reducing uncertainty, granting flexibility, and leveraging city staff who are familiar with the challenges faced by adaptive reuse projects, building reuse becomes a more compelling option for a developer, architect, or investor considering development options. Model building codes prescribe specific design, construction, and materials choices that are often difficult to meet when rehabilitating an older building. With publication of the first International Existing Building Code (IEBC) in 2000, alternative compliance paths became available for existing and historic buildings. Still, code compliance remains challenging for many rehabilitation projects.

Specific approaches for supporting building reuse through permitting, plan review, and code reform include:

1 **Write new code for rehabilitation and reuse.** Facing the barrier posed by codes head on, many municipalities are adopting building and energy codes specifically for reuse projects. New Jersey wrote a first-in-the-nation Rehabilitation Subcode providing specific paths for reuse projects to meet code. California's Historical Building Code provides similar paths for reuse of historic buildings.

2 **Catalog proven ways to meet existing code.** Given that many developers and practitioners have found success in creatively overcoming complex code problems, cities should create and promote a database of known solutions to challenges that may be encountered in reuse projects.

3 **Create flexibility in the existing code.** In many instances, code officials can provide flexibility in meeting code. Code officials in Duluth, Minnesota are encouraged to be open to 'acceptable alternative solutions' to code compliance when it comes to existing buildings so as not to create an undue financial burden on the developer. Outcome-based or performance-based code alternatives, such as Seattle's Outcome-Based Energy Code, can afford representatives of building reuse projects opportunities for flexible and creative solutions to code requirements.

4 **Provide coordinated technical assistance.** Provide a central place where developers can get help navigating complex regulatory processes, including guidance on addressing complex code challenges through examples and case studies. As a component of the city's Adaptive Reuse Program, Phoenix's Office of Consumer Advocacy provides development assistance and dedicated case managers for customers new to the land development and building permit processes. Similarly, Los Angeles established a task force for permitting adaptive reuse projects, cultivating expertise in the challenges building reuse projects face and leveraging that expertise to expedite and facilitate permitting and plan review.

Top Strategies to Promote Reuse

Cities across the country are coming up with creative and innovative approaches to make building reuse easier and more likely. The following list of strategies and best practices for strengthening building reuse draws from the five-city Partnership for Building Reuse as well as Preservation Green Lab research conducted in Jacksonville, Florida; Tucson, Arizona; and Louisville, Kentucky.



1 **Leverage data and mapping tools to understand reuse opportunities.** Knowing a city's built assets is the first step to being able to target incentives, programs, and infill development. Spatial analysis can help identify needs and develop programs that are targeted for the greatest impact.



2 **Eliminate, reduce, or recalibrate parking requirements.** Reducing or eliminating parking requirements in pedestrian-friendly areas and areas near transit can incentivize investment in older buildings. Shared parking in nearby locations can also fill this need.



5 **Update zoning codes to meet the needs of the 21st century.** Promote new uses, greater diversity of uses, accessory dwelling units and other tools that heighten residential density, and other context-sensitive zoning changes to provide more opportunities for reuse and infill development.



6 **Retain and strengthen existing incentive programs for building reuse.** Support ongoing advocacy for the federal Historic Tax Credit and new and strengthened state historic tax credits. Revitalization tax credits, transfer of development rights, and incentives for vacant properties are also important.



3 **Remove key barriers that prevent change of use in existing vacant and underutilized buildings.** Establishing provisions within the zoning code for appropriate and compatible "sister uses" can ease the transition to a new use by creating more certainty and reducing red tape.



4 **Develop a "Solutions Database" to track and promote ways to overcome building code challenges.** Daylighting creative solutions, successful projects, and paths to navigate complex redevelopment problems can be invaluable to small scale infill and adaptive reuse projects.



7 **Develop new sources of public and private capital for smaller projects, or projects in weaker markets.** Leverage new and existing funds to cover gap financing, pre-development costs, and other expenses that may keep small scale developers out of business, hinder investment in weaker markets, or discourage reuse of underutilized buildings.



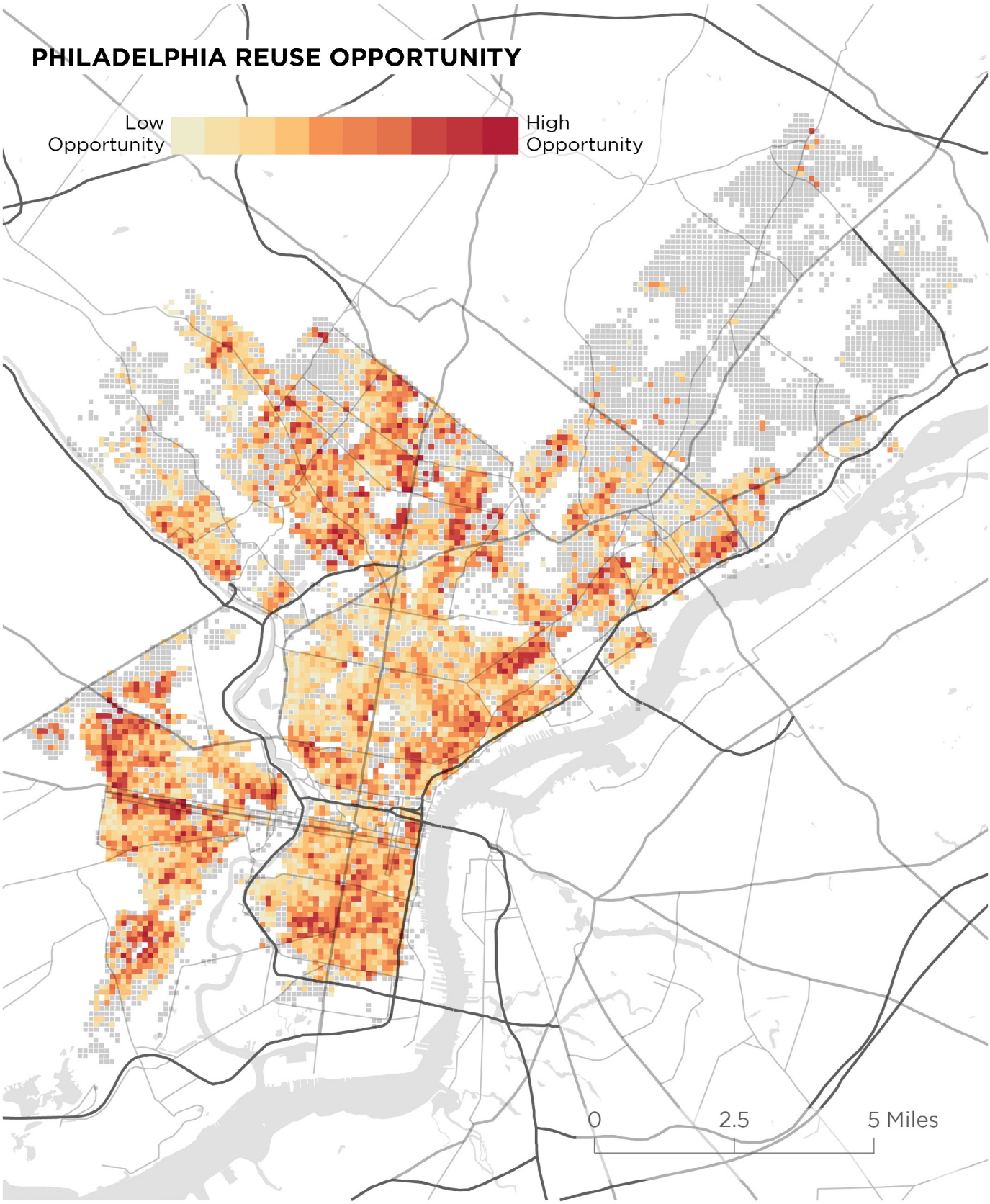
8 **Adopt a comprehensive adaptive reuse program.** Adaptive reuse ordinances, whether applied citywide or adopted as an overlay, bring together incentives along with flexibility in building and zoning codes, removing unnecessary barriers to reuse projects. The Model Adaptive Reuse Ordinance (outlined on pages 24-31) can be adapted and adopted in any municipality, and builds upon the "gold standard" policy supporting building reuse established in Los Angeles in 1999.

Leveraging Data and Mapping Tools: The Reuse Opportunity Model

As part of the Partnership for Building Reuse in Baltimore, Chicago, Detroit and Philadelphia, the Preservation Green Lab used a variety of data and spatial analysis to spotlight areas of these cities where building reuse could have the greatest catalytic impact and a higher likelihood of success. The Reuse Opportunity Modeling focused on areas with concentrations of older, smaller buildings and mixed-age blocks. The Preservation Green Lab research team analyzed these areas using data on transit accessibility, public school assessment data, property values, vacancy rates, and information about the characteristics and movement of the residents, jobs, and businesses, among other metrics.

The Preservation Green Lab method for Reuse Opportunity Modeling has evolved with each new Partnership for Building Reuse city. For Baltimore and Philadelphia, completed in 2014-2015, the model revealed "high opportunity" blocks in neighborhoods throughout the city using a single set of metrics. In Chicago and Detroit, completed in 2015-2016, Preservation Green Lab researchers developed more sophisticated modeling—mapping strong opportunities for building reuse in "hot markets" and "cool markets" as separate models in Chicago, and residential and commercial reuse opportunities as separate models in Detroit. The Reuse Opportunity Modeling provides new insights for real estate developers, investors, and community development organizations interested in reusing existing buildings. It offers a data-centered framework for city officials and policymakers interested in piloting and targeting new policies or programs strategically.

Reuse Opportunity Modeling offers one path in responding to market barriers by spotlighting areas of cities where strategic investment of technical assistance, regulatory relief, and capacity building could help build a market incrementally. Spurring reinvestment and revitalizing distressed neighborhoods requires partnership and coordinated effort with nonprofit developers, community development organizations, and others. In such places, building reuse could represent one small element of a revitalization strategy, but may make little difference without long-term reinvestment and deeper engagement.



In the first phase of Reuse Opportunity Modeling, the Preservation Green Lab used a single set of metrics to understand what parts of Philadelphia (above) and Baltimore may have the strongest potential for building reuse. A second phase of Reuse Opportunity Modeling explored Chicago and Detroit, using segmented models based on important dimensions of the cities' geographies and varied markets. More information about the metrics included in each model can be found in their respective Partnership for Building Reuse report.

Model Adaptive Reuse Ordinance

Inspired by successful adaptive reuse policies in Los Angeles, Phoenix, and other cities, the Preservation Green Lab has developed this model ordinance for policymakers interested in spurring revitalization through reuse in their own communities. Adaptive reuse ordinances can help cities unlock the potential of older buildings.

This model adaptive reuse ordinance is comprised of two parts: model guidance policies and a model zoning overlay ordinance. The ordinance can complement existing preservation policies and programs by creating a framework to incentivize adaptive reuse of historic and non-historic older buildings alike. In most jurisdictions, this ordinance should be administered by local zoning and building officials, coordinating with historic preservation staff and commissions when designated properties are affected.

Lengthy permit review time can pose a barrier to reuse projects; therefore, in addition to the model policies and regulations, jurisdictions should consider creating a multi-departmental team that will become familiar with the adaptive reuse code and coordinate to provide efficient review of proposed projects. Jurisdictions considering an adaptive reuse ordinance should also adopt supportive policies, such as those listed on the following page, into their local comprehensive or general plan.

The model ordinance has been written as a standalone chapter that can be adopted into an existing zoning code. It should be considered in tandem with zoning map amendments to delineate and specify the extent and applicability of the proposed adaptive reuse overlay zones. The purpose of this adaptive reuse ordinance is to reduce regulatory barriers to building reuse and to simplify and facilitate the permitting process.

MODEL GUIDING POLICIES: ADAPTIVE REUSE

Policy 1: Promote adaptive reuse as part of broader goals supporting historic preservation, economic development, and environmental sustainability and resilience

Policy 2: Recognize the social, economic, and environmental value of older buildings

Policy 3: Incentivize building reuse at a neighborhood scale to encourage activation of a cohesive district of older buildings

Policy 4: Eliminate or allow nonconformance with certain development regulations that would make adaptive reuse of eligible buildings infeasible, including such standards related to parking and loading, height, density, floor-area ratio, and open space

Policy 5: Encourage adaptive reuse projects to provide space for a mix of uses

Policy 6: Prioritize the review of adaptive reuse projects through interdepartmental coordination

Policy 7: Allow alternative building and fire code compliance for eligible adaptive reuse projects able to demonstrate an alternative means or method of protecting public health, safety, and welfare

Policy 8: Allow alternative compliance with public works standards, where alternative compliance will protect public health, safety, and welfare

Policy 9: Adopt a zoning overlay outlining specific provisions to incentivize adaptive reuse

Policy 10: [Add policy identifying in general terms areas of the jurisdiction where adaptive reuse incentives could be applied]

MODEL ZONING OVERLAY, ADAPTIVE REUSE ORDINANCE

1. **Purpose.** The purpose of this Adaptive Reuse Ordinance is to provide a more efficient way for eligible buildings and adaptive reuse projects to meet zoning, building, fire protection, and public utility standards. The provisions of this program can apply to all or portions of eligible buildings located in a designated adaptive reuse overlay zone, where the building's current use is being changed to a different use.

2. Definitions.

2.1. *Adaptive reuse overlay zone* – An area designated on the [local zoning map] where adaptive reuse projects in eligible buildings are incentivized.

> ***Comment:*** *We have chosen to present this model ordinance as a zoning overlay because it can be integrated as a cohesive chapter into most zoning regimes rather than a complex series of text amendments impacting many zoning code chapters. Jurisdictions wishing to implement this model ordinance would simply adopt this zoning overlay as a chapter in their zoning code, identify districts or neighborhoods where adaptive reuse is desired, and amend the zoning map to show the overlay areas. Adoption of both the text and mapping amendments will require approval by the local legislative authority, such as the city council.*

2.2. *Adaptive reuse prcject* – Any change of use from a building's current use to a new use in all or a portion of any eligible building.

2.3. *Eligible building* – Any building within an Adaptive Reuse Overlay Zone that is at least 50 years old and that was constructed in accordance with building and zoning codes in effect at the time of construction.

3. Applicability.

3.1. The provisions of this Adaptive Reuse Ordinance apply to adaptive reuse projects taking place in eligible buildings within an adaptive reuse overlay zone. The change of use of an existing vacant or underutilized building to new uses that promote community goals is permitted subject to compliance with the standards found in this chapter.

> ***Comment:*** Jurisdictions may choose differing criteria for eligibility based on the jurisdiction's overall building stock and its goals for the adaptive reuse program. For instance, a city with majority prewar buildings may want to set a more restrictive building age criterion. Or, alternatively, if a city is dealing with challenges involving a particular type of building (e.g., vacant schools, churches, or warehouses), the original building use could be included as a criterion.

3.2. The provisions of this chapter can also apply to buildings that are listed or eligible for historic designation located in an adaptive reuse overlay zone; however, additional regulation under [local historic preservation program reference] and any other related

historic guidelines, including the Secretary of the Interior Standards may apply.

3.3. Expansions to the floor area of an eligible building must comply with the development standards of the underlying zone and are not eligible for the incentives provided in Section 7.

3.4. The provisions of this zoning overlay are intended to modify the standards otherwise applied to the site by its underlying zone. Unless specifically modified by this chapter, all other standards adopted for this site shall apply.

Comment: *A jurisdiction may consider allowing expansions to existing buildings to qualify for some or all of the incentives in this ordinance. Expansions could be allowed in exchange for specified community benefits, such as added affordable housing units. At a minimum, projects adding new floor area to old buildings should be able to use the alternative compliance options available in Sections 8, 9, and 10.*

4. **Eligibility.** Projects must meet the following criteria to be an eligible adaptive reuse project:

4.1. Project site shall be located in an Adaptive Reuse Overlay Zone.

4.2. The building must be an eligible building, as defined in Section 2.3.

4.3. The project results in a change of use for the existing building.

5. **Development Standards.** Adaptive reuse projects shall, at a minimum, comply with the following development standards. [Insert development standards appropriate to local conditions and priorities]

Comment: *A jurisdiction may choose to require certain development standards meant to balance the development incentives with local goals. Some examples could be minimum unit size, on-site amenity area, or ground floor commercial use requirements. Furthermore, if a jurisdiction has an inclusionary housing policy or otherwise requires affordable housing to be included in new development projects, the jurisdiction may also consider specifying if and how many housing units in adaptive reuse projects must be affordable to low- or moderate-income households.*

6. **Incentives.**

6.1. *Density.* The project can exceed the maximum density established by [the local zoning code] for the site provided the adaptive

reuse project is in compliance with any minimum residential unit size standards established by this code.

6.2. *Setbacks.* Existing building setbacks may remain and shall be considered legally nonconforming, but no further encroachments shall be permitted into any nonconforming setback.

6.3. *Height.* The height of the structure, if it exceeds the maximum height of the zoning district, may remain and shall be considered legally nonconforming. Any rooftop construction needed for building circulation, drainage, ventilation, utilities, or passive recreation shall be included within the height exemption. This height exemption does not include new residential or commercial floor area.

6.4. *Loading Zone.* A new loading zone shall not be required if the existing building does not have an existing loading zone.

6.5. *Parking.* New parking spaces shall not be required for any converted use within the existing footprint of the building, but expansions to floor area shall be required to provide parking according to [local jurisdiction parking rules].

> ***Comment:*** *Parking requirements pose one of the most common and most significant barriers to building reuse. If parking requirement waiver or reduction is appropriately targeted and specified, this incentive can have a powerful effect on development patterns, including reuse. If a full waiver of parking requirements for the portion of the building that has a converted use is seen as overly generous given the development climate of a jurisdiction, the jurisdiction may opt to reduce parking requirements or allow off-site parking at a specified distance as a more limited incentive.*

6.6. *Transfer of Development Rights Program.* This section authorizes a program through which building owners choosing to reuse older, smaller buildings, may transfer unused zoned development potential to an approved receiving site in exchange for payment. [Insert specific provisions of a Transfer of Development Rights program, or reference a locally adopted TDR program]

> ***Comment:*** *Jurisdictions with robust real estate markets can use a transfer of development rights program to incentivize building owners to reuse older, smaller buildings, in areas where many such buildings are being demolished and replaced with larger structures. This program would function like a typical transfer of development rights program by identifying eligible receiving sites where additional development capacity is desired and could be accommodated. Because of the variation in how such*

programs could be established and the differences in state law, no model language is provided.

7. **Approved Land Uses.** Subject to the limitations of section 9.2, a broad range of land uses or mix of uses shall be allowed in the Adaptive Reuse Incentive Overlay Zone, irrespective of the underlying zoning, as part of an adaptive reuse project. However, no new uses that emit noxious odors or excessive noise shall be allowed, unless the applicant demonstrates the use will not negatively impact nearby residences.

   Comment: *A broad range of permitted uses will provide the greatest incentive for adaptive reuse. However, if specific land uses are preferred or undesired, a jurisdiction can define these here. For example, Los Angeles' adaptive reuse overlay is intended only for conversions of non-residential uses into residential use (including hotels).*

8. **Alternative Building Code Regulations**

   8.1. *Applicability.* The alternative building code regulations adopted in this section are applicable to eligible buildings located in an adaptive reuse zone.

   8.2. In permitting repairs, alterations, and additions necessary to accommodate adaptive reuse projects, the alternative building regulations shall impose requirements that will, in the determination of the Building Official, protect the public health, safety, and welfare.

   8.3. Nothing in this section shall be construed to allow the reduction of existing seismic or fire and life-safety elements of an eligible building where such elements provide a greater level of protection than the minimum requirements established by this section.

   8.4. *Procedure.*

      8.4.1. The applicant must submit an Alternative Methods and Materials application to the [local building department]. Upon review of such application, the Building Official is authorized to grant approval when the proposed design is found satisfactory and complies with the intent of the provisions of current building codes in effect, and that the material, method or work offered is justified by current accepted performance-based engineering and analysis in assessing quality, strength, effectiveness, fire resistance, durability, and safety.

      8.4.2. The Building Official shall review adaptive reuse project proposals on a case by-case basis, and may require pre-submittal

meetings at his or her discretion.

9. Alternative Fire Code Regulations

9.1. *Applicability.* The alternative fire code regulations adopted in this section are applicable to eligible buildings located in an adaptive reuse zone.

9.2. *Uses and Occupancies.* Subject to the approval of the Fire Official, the use or occupancy type of an eligible building shall be allowed to be changed as part of an adaptive reuse project without conforming to all requirements of the [locally adopted version of Existing Building Code], provided the new or proposed occupancy is equally or less hazardous, based on life and fire risk, than the existing use.

> ***Comment:*** *Many jurisdictions who have adopted the International Existing Building Code will have similar provisions in place offering flexibility when renovating existing buildings, when the use does not change. This model code provides relief when uses or occupancies change. Note these provisions only apply when the building occupancy is not becoming more hazardous. Jurisdictions may wish to provide allowance and flexibility for some common changes of use where occupancy hazards are increased, such as converting commercial space to restaurant (assembly) space. Providing guidance and examples of solutions to common code issues can also facilitate building reuse.*

9.3. *Modifications.* Whenever there are practical difficulties involved in carrying out the provisions of the [local fire code], the Fire Official shall have the authority to grant modifications for individual cases, provided the Fire Official shall first find that special individual reasons make the strict letter of the [local fire code] impractical and the modification is in compliance with the intent and purpose of the [local fire code] and that such modification does not lessen health, life and fire safety requirements.

9.4. *Procedure.*

9.4.1. The applicant must submit an Alternative Methods and Materials application to the [local fire authority]. Upon review of the application, the [local fire official] is authorized to grant approval when the proposed design is found satisfactory and complies with the intent of the provisions of the current fire codes in effect, and that the material, method or work offered is at least equivalent of that prescribed in the [local fire code] in quality, strength, effectiveness, fire resistance, durability and safety.

9.4.2. The applicant must submit a Fire Life Safety (FLS) Report which shall identify the eligible building's existing features and evaluate existing fire and life-safety features against the current code requirements. The Fire Official will review the FLS report and evaluate the proposal for final recommendations.

9.5. The Fire Official shall review adaptive reuse project proposals on a case-by-case basis, and may require pre-submittal meetings at its discretion.

10. Alternative Public Works Standards

10.1. *Applicability.* The alternative public works standards adopted in this section are applicable to eligible buildings located in an adaptive reuse overlay zone.

10.2. The [local public works department(s)] may adopt alternate standards for projects within adaptive reuse overlay zones. The [local public works department] shall impose such requirements as will, in the determination of the [Public Works Director], protect the public health, safety, and welfare.

10.3. The [Public Works Director] shall review adaptive reuse project proposals on a case by-case basis, and may require pre-submittal meetings at his or her discretion.

Comment: *Jurisdictions may choose to adopt incentives specific to their local infrastructure and streetscape. For example, a jurisdiction could choose to relax street tree regulations, or sidewalk improvement requirements for adaptive reuse prcjects, or allowing existing nonconforming driveways, alleys, or rights-of-way to remain unchanged.*

11. Severability

11.1. If any section, subsection, sentence, clause, phrase or portion of this ordinance is for any reason held to be invalid or unconstitutional by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this ordinance. The [legislative body] of the [local jurisdiction] hereby declares that it would have adopted this ordinance and each section, subsection, sentence, clause, phrase or portion thereof irrespective of the fact that any one or more sections, subsections, sentences, clauses, phrases, or portions be declared invalid or unconstitutional.

Conclusions and Next Steps

The Partnership for Building Reuse was established to foster reuse as a strategy for revitalization in cities across the country. By delving into the barriers to reuse in five cities—Baltimore, Chicago, Detroit, Los Angeles, and Philadelphia—the Partnership revealed shared frustrations about the reuse process and enthusiasm for finding solutions.

The Partnership worked with a range of stakeholders, including real estate developers, financial experts, preservationists, community leaders, and city planners, who demonstrated an eagerness to move toward creative solutions to longstanding issues. All were eager to explore new approaches, streamline processes, and consider small tweaks to policy that might have outsized impacts.

Implementation is underway. City staff and advocates in Baltimore have undertaken the task of rewriting their zoning code to better reflect contemporary needs and priorities, including the need to reuse older buildings and encourage mixed-use, neighborhood-scale development. Partnership participants in Chicago have worked to implement modifications to the city's building code, parking requirements, and zoning appeal process, which will make building reuse easier and more likely. Partners in Philadelphia are incorporating aspects of the Partnership for Building Reuse work into new planning efforts. Where market and technical barriers persist, broad coalitions can join forces to help revitalize especially distressed neighborhoods and activate challenging buildings.

This bodes well for the future of reuse and revitalization in cities, and demonstrates the catalytic nature of the Partnership for Building Reuse process of multi-disciplinary discussions among diverse stakeholders. The Partnership has identified the top policies and best practices and has developed a Model Adaptive Reuse Ordinance as tools to overcome long-standing barriers.

THE NEXT STEP

This report provides a snapshot of the barriers that are holding back building reuse and how to overcome them. Learning how each Partnership for Building Reuse city approached the barriers and solutions relative to its market may provide policymakers and urban advocates with ideas for moving similar policies forward in their own municipality. Engaging local stakeholders will be key to this work, including partners at the ULI District Council, the National Trust for Historic Preservation, and local preservation and community development partners.

Knowledge about the built environment, its performance, and areas of opportunity is critical for strengthening building reuse and informing policy change and code reform. The Preservation Green Lab can provide the data, analytics, and mapping to demonstrate the value of cities' older buildings and highlight areas where reuse will have the greatest impact.



One of Chicago's many active older commercial corridors, Pilsen neighborhood.

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Case Study: Los Angeles

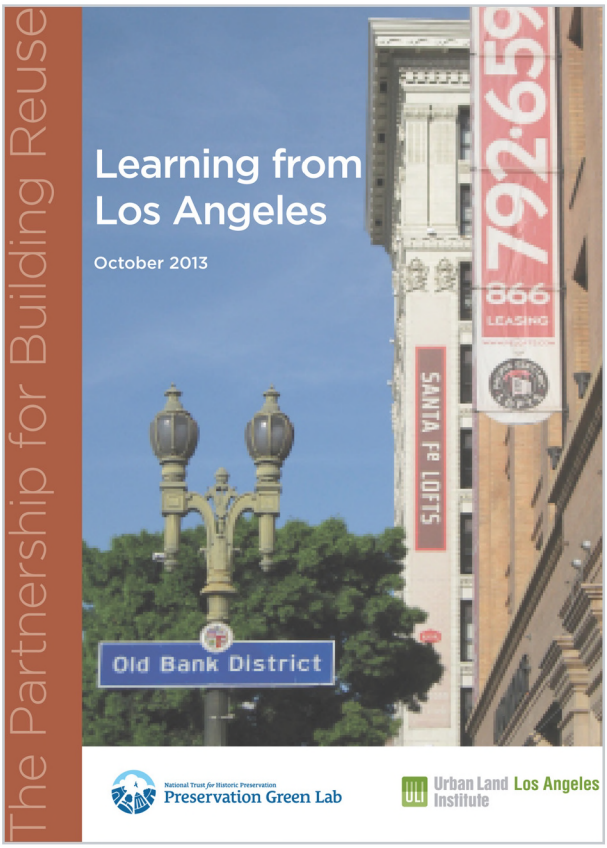
QUICK STATS

3,976,322 PEOPLE

676,764 BUILDINGS

MEDIAN YEAR BUILT: **1950**

39% BUILT BEFORE 1945



LOS ANGELES' OLDER BUILDINGS

In Los Angeles, character-rich blocks of older, smaller, mixed-age buildings—compared to areas with large, new structures—contain:

» **More than twice** as many units of affordable rental housing

» **More than twice** the number of women and minority-owned businesses

» **More diverse residents** in terms of race, country of origin, and sexual orientation

LOCAL BARRIERS TO BUILDING REUSE

The inventory of pre-World War II buildings suitable for reuse is running low in some areas of Los Angeles. Buildings constructed in the 1940s through the 1970s are now being considered for reuse. Some suitable properties languish on the **market** because of high asking prices.

Projects in weaker market locations may not fit lender formulas. The complex layering of **financing** sources, as well as a lack of comparable projects, leads some lenders to assign higher risks to reuse projects. The loss of redevelopment authorities statewide and the lack of a state rehabilitation tax credit also hinder reuse projects.

On the **regulatory** side, the city's zoning code and parking standards discourage reuse and are out of sync with the new vision for a denser and more transit-oriented city. The entitlement and permitting processes are time-consuming and unpredictable, resulting in increased costs and risks for developers, lenders, and potential tenants.

Post-World War II structures with curtain-wall construction present a new set of **technical** reuse challenges, including low floor-to-ceiling heights, large floorplates, less durable building materials, and a lack of natural light and ventilation. Convenient parking is difficult to provide for many building types and uses.

ACTIONS TO OVERCOME BARRIERS:

The Partnership for Building Reuse report and action plan was presented in tandem with Mayor Eric Garcetti's announcement of his Great Streets Initiative. This helped focus attention on the opportunity for adaptive use of smaller buildings along the city's older commercial corridors. Key strategies from the Learning from Los Angeles report include:

» **Integrate** building reuse as a goal in the update of the Los Angeles zoning code to align land use regulations with the city's vision for reurbanization, including infill and reuse. A ULI member serves on the Advisory Committee for re:Code LA, which is the first comprehensive rewrite of the city's zoning code since 1946.

» **Streamline** the building permitting and approval process by aligning three city departments: Planning, Building and Safety, and Fire. A proposal to simplify and condense the review process is included in the zoning code update.

» **Share** reuse success stories and gain support for new reuse incentives at the state level, such as a rehabilitation tax credit and credits for reuse through the California Cap-and-Trade Program. Local and state preservation partners developed a state rehabilitation tax credit proposal, AB 1999, that made it to the Governor's desk, but was vetoed.

HIGHLIGHT FROM LOS ANGELES

The Los Angeles Partnership for Building Reuse Report included a summary of the groundbreaking Los Angeles Adaptive Reuse Ordinance (ARO), which, following its adoption in 1999, has helped facilitate conversion of many historic and underutilized buildings—resulting in more than 14,000 new downtown residential housing units. The ARO initially applied only to downtown LA, but, in 2003, it was amended to cover an additional five mixed-use areas of the city. It was further amended in 2005 to establish fire and life-safety provisions. The ARO applies to any building constructed before 1974 as well as a select number built after that time. Conversions must be for new residential uses (condo, apartment, live/work, hotel) and incentives are offered to mitigate the cost of conversion and streamline approvals. The result of this ordinance has been the creation of thousands of units of housing as well as the adaptive reuse of dozens of notable vacant and underutilized buildings, including numerous banks, lofts, warehouses, and factories.

Case Study: Baltimore

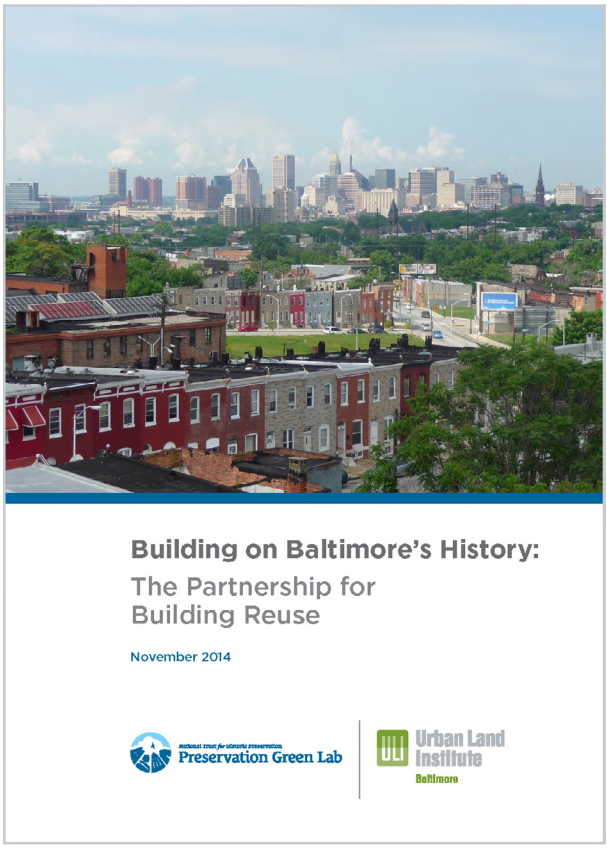
QUICK STATS

614,664 PEOPLE

201,238 BUILDINGS

MEDIAN YEAR BUILT: **1924**

70% BUILT BEFORE 1945



BALTIMORE'S OLDER BUILDINGS

In Baltimore, character-rich blocks of older, smaller, mixed-age buildings—compared to areas with large, new structures—contain:

» **More than twice** the population density

» **About twice** the number of jobs in small and new businesses

» **80 percent more** women and minority-owned businesses

LOCAL BARRIERS TO BUILDING REUSE

Once a city of close to one million residents and now home to closer to 600,000, Baltimore struggles with insufficient demand for most of its 16,000 vacant buildings. As one Partnership participant put it: "Reuse isn't going to happen unless there is a **market**."

Reusing older and historic buildings in Baltimore often exceeds the cost of new construction, and developers taking on adaptive reuse projects depend on **financial** incentives to overcome steep project costs and high property taxes.

Regulatory barriers in Baltimore frustrated Partnership participants. Baltimore developers viewed the requirement of a secondary means of egress in the building code as an insurmountable barrier in "all but the largest multi-family and commercial projects." New stormwater requirements for the provision of pervious surfaces were also seen as a particularly tough challenge for small scale reuse projects. One significant barrier, the city's 1971 zoning code, was recently overcome following the passage of Transform Baltimore, an entirely new zoning code that simplifies and streamlines development review and supports many of the Partnership's goals.

Though there are a variety of building types, such as banks, churches, and theaters, in Baltimore that pose **technical** challenges for potential reuse, Baltimore's iconic single-family rowhouse

is the predominant building type, and is relatively simple to repurpose. Like Philadelphia, Baltimore has thousands of very small commercial buildings that are of little interest to national restaurants and retailers, and the upper floors of such small commercial buildings are often vacant or underused.

ACTIONS TO OVERCOME BARRIERS:

Leadership from the Baltimore Partnership for Building Reuse project met regularly with a "building reuse implementation team" within the city government. Volunteer participants from the Partnership also continued to meet to discuss pathways to strengthen the city's existing built fabric and remove barriers to building reuse. Key milestones and proposed actions include:

» **Most** critically, leading members of the Partnership successfully advocated for the adoption of Transform Baltimore, the city's updated zoning code, which was passed in December 2016 and went into effect in June 2017.

» **Promote** creative building and energy code solutions by developing a "code solutions database" for common code compliance issues associated with building reuse, and creating "code innovation zones" to model creative building and energy code solutions and facilitate reuse.

» **Improve** and promote incentive programs, including the Maryland Heritage Structure Tax Credit. Explore the potential for use of federal demolition mitigation funding to support the creative use of older buildings in areas with relatively strong reuse potential.

Case Study: Philadelphia

QUICK STATS

1,567,872 PEOPLE

493,217 BUILDINGS

MEDIAN YEAR BUILT: **1925**

68% BUILT BEFORE 1945



PHILADELPHIA'S OLDER BUILDINGS

In Philadelphia, character-rich blocks of older, smaller, mixed-age buildings—compared to areas with large, new structures—contain:

» **More than twice** the population density

» **Twice** the number of jobs in small and new businesses

» **Nearly two billion** dollars in private investment through the federal historic tax credit

LOCAL BARRIERS TO BUILDING REUSE

In many **markets** outside of Center City and its adjacent neighborhoods, rents and resale prices remain too low to justify the costs of building acquisition and rehabilitation. Some owners are holding land with little intention of developing it themselves. Complex title histories and questions about ownership can be significant barriers to redevelopment.

In discussions of **financing**, many cited "New York development costs and Baltimore rents" for building reuse projects in Philadelphia. Privately owned, tax delinquent properties are often difficult to acquire. "The cost of paying delinquent liens exceeds the market value of the property, discouraging potential redevelopers," said one participant. Incentive programs exist, but can be complex and difficult to use, particularly for smaller projects.

Regulatory issues include conflicts between different codes (life-safety, zoning, or energy codes) and the unique circumstances of older buildings and historic preservation regulations. There is not enough "regulatory encouragement for adaptive uses," said one participant. The lack of staff capacity in the Department of Licenses & Inspections and at the Philadelphia Historical Commission was also cited as a key barrier.

There are **technical** obstacles preventing reuse of specific building types for new uses. These

challenges range from industrial buildings and warehouses with large floor plates that make it difficult to access natural light to small Main Street commercial buildings that are too small for some retailers. Special purpose buildings with large assembly spaces, such as churches, require creative approaches.

ACTIONS TO OVERCOME BARRIERS:

In 2017, Mayor James Kenney created a Historic Preservation Task Force that is using the Retrofitting Philadelphia report as a resource for data and ideas to spur building reuse. Strategies from the report include:

» **Direct** technical assistance to selected areas of opportunity, using the data and modeling developed by the Preservation Green Lab for the report. Create adaptive use innovation zones to test creative approaches to common zoning, building, and energy code issues in these opportunity areas.

» **Launch** a citywide survey to identify additional areas that could benefit from historic preservation programs and increase the number of National Register districts to facilitate greater use of federal rehabilitation tax credits.

» **Support** creation of a new citywide revolving fund to assist key reuse projects.

» **Increase** staffing capacity at the Commission for Historical and Architectural Preservation (CHAP).

Case Study: Chicago

QUICK STATS

2,704,958 PEOPLE

489,588 BUILDINGS

MEDIAN YEAR BUILT: **1925**

65% BUILT BEFORE 1945



CHICAGO'S OLDER BUILDINGS

In Chicago, character-rich blocks of older, smaller, mixed-age buildings—compared to areas with large, new structures—contain:

» **65 percent** greater population density

» **Higher** proportions of jobs in small businesses and new businesses

» **25 percent** more units of affordable rental housing

LOCAL BARRIERS TO BUILDING REUSE

The intensity of **market** demand in Chicago varies widely, with strong development pressures experienced in the city's near north and northwest neighborhoods and vacancy and disinvestment challenges in some parts of the city's south and west sides.

While large, established real estate development groups have an easier time **financing** projects, small scale developers, community development organizations, and inexperienced newer developers face major hurdles. Banks and institutional investors are reluctant to work in neighborhoods with weak real estate markets or take on risky reuse projects with smaller developers without an established track-record.

On the **regulatory** side, there is a perception that permitting and plan review for projects can be unpredictable, cause delays, and add substantial cost to development projects. The complexity and complications of reuse projects make them particularly susceptible to extended delays and large cost overruns. Parking requirements represent a significant barrier for reuse projects in already dense neighborhoods.

Chicago has multiple building typologies that face considerable **technical** barriers, with vacant schools, churches, and theaters presenting particular challenges as adaptive reuse projects. Many

building typologies have ground floors that are two or three steps above street level, requiring sometimes costly and complex alterations to achieve ADA-compliant accessibility.

ACTIONS TO OVERCOME BARRIERS:

In Chicago, the Partnership for Building Reuse leadership is continuing to work on overcoming the barriers to building reuse on a variety of fronts. One group of volunteer professionals took on challenges related to parking and zoning, while a second group explored opportunities to update the Chicago Building Code and align it more closely with the International Existing Building Code. Key proposed actions include the following:

- **Modify** Chicago Building Code thresholds so that minor changes to existing buildings are less likely to trigger the requirement to abide by new construction standards.

- **Produce** and promote a compilation of common challenges and workarounds that come up as developers make additions, alterations, and repairs to older and historic buildings.

- **Make** it easier and cheaper to provide ramps in the public right-of-way to provide ADA-compliant access to buildings with raised entrance levels.

- **Allow** greater integration of performance-based methods to meet health and life-safety requirements with reuse projects.

- **Provide** a clearer path for taking advantage of existing policies that support reuse of older buildings by authorizing the Zoning Administrator to:

    - **Make** past-use determination of buildings more than 50 years old when records search does not yield adequate evidence of prior use, which allows lower parking requirements based on the original use of the property.

    - **Grant** administrative adjustments for reducing required off-street parking and allowing minor increases in the floor-area ratio for reuse projects.

- **Extend** benefits of Transit Oriented Development incentives to areas with high bus ridership and provide greater benefits for reuse than new development.

- **Extend** allowed distance of off-site parking for reuse projects to provide more flexibility, especially in denser, stronger-character areas.

Case Study: Detroit

QUICK STATS

672,795 PEOPLE

379,446 BUILDINGS

MEDIAN YEAR BUILT: **1938**

67% BUILT BEFORE 1945



DETROIT'S OLDER BUILDINGS

In Detroit, character-rich blocks of older, smaller, mixed-age buildings—compared to areas with large, new structures—contain:

» **25 percent** more women and minority-owned businesses

» **Higher** proportions of foreign-born residents

» **32 percent** more units of affordable rental housing

LOCAL BARRIERS TO BUILDING REUSE

The **market** for building reuse varies widely across the city of Detroit, with neighborhoods including Downtown, Midtown, and Corktown seeing resurgent investment while other areas have received very little investment or redevelopment in recent decades. Some Detroiters expressed concerns that uneven demand may cause displacement, as rents rise in desirable areas and disinvestment and decay persist in weak-market areas. Partnership participants also pointed to a mismatch between the single-family detached housing stock that dominates Detroit and the increasing demand for mixed-use development and multi-family housing.

Though many large, established developers have been actively rehabilitating historic office buildings downtown in recent years, small and mid-scale developers face serious challenges in **financing** potential redevelopment projects. Many rely heavily on subsidies and tax abatements, creating a multi-layered financing process which can be difficult to navigate or confusing to lenders. There is also a lack of reliable sources of financing needed to "pencil out" many deals, such as gap financing, tax credits for rehabilitation, and traditional financing for home or small business owners. Insurance is nearly impossible to come by in less established neighborhood markets.

On the **regulatory** side, stakeholders noted that developers and property owners face an overly complicated permitting process that requires navigation between the multiple agencies that deal with permitting and plan review, as well as a keen understanding of the existing overlay and incentive programs and how to utilize them.

In Detroit, a lack of education around reuse and historic preservation was cited as a major **technical** barrier. A lack of tradespeople skilled in rehabilitation can make budgeting and planning unpredictable. Deciding when to rehabilitate versus demolish a building or when to enlist a professional to help abate environmental hazards can be confusing to new developers. The state of public infrastructure, such as schools, street, water, or sewer, also dampens the potential for new investment in many areas.

ACTIONS TO OVERCOME BARRIERS:

In Detroit, the leadership from the Partnership for Building Reuse discussed a range of ideas for overcoming these barriers.

» **Streamline** and expedite permitting and plan review for small scale adaptive reuse projects. Create a 'solutions database' that daylights successful strategies for resolving complex challenges with building and zoning code and life-safety review.

» **Update** building and zoning code regulations to make them more flexible to the challenges of reuse, removing barriers, such as parking requirements, and adopting more flexible use categories.

» **Combine** Detroit's large amount of public data with new mapping tools to identify priority areas for targeting numerous programs or incentives.

» **Pilot** implementation of adaptive reuse policies and code changes in targeted districts, such as Innovation Zone areas, priority corridors, and other select neighborhoods.

HIGHLIGHT FROM DETROIT

Older, vacant commercial buildings throughout Detroit have benefited from Motor City Match, an innovative program led by the Detroit Economic Growth Corporation, in partnership with the City of Detroit, the Economic Development Corporation of the City of Detroit, and the U.S. Department of Housing and Urban Development. Motor City Match brings together owners of vacant commercial buildings with entrepreneurs aiming to open or expand businesses. To date, the program has supported more than 750 businesses in about 2.5 million commercial square feet spread across more than 300 spaces throughout the city. With just under $4 million in grants drawn from Community Development Block Grants (CDBGs), about $24 million in matching grants have been leveraged from a variety of philanthropic partners.

Acknowledgments

This report is the result of a multi-year effort between the National Trust's Preservation Green Lab, ULI, ULI District Councils, and the hundreds of volunteers who live and work in the Partnership cities. In each of the cities, the Preservation Green Lab leaned on key convening partners, including representatives from ULI Los Angeles, ULI Philadelphia, ULI Baltimore, ULI Chicago, Detroit Future City, and ULI Michigan. Furthermore, the Partnership in each city involved leadership from a Building Reuse Advisory Committee and volunteer hours from ULI members, local preservationists, city and state representatives, community development groups, university partners, and many others. Summarized by Preservation Green Lab staff, this national report builds upon the insights of these partners. Tom Eitler and Ed McMahon, along with other ULI staff, were instrumental in the production of this report.

Leadership for the projects in the five Partnership for Building Reuse are listed below:

- **Los Angeles (2012-2013).** Advisory Committee chair: Jonathan Curtis (California Golden Fund). ULI Los Angeles: S. Gail Goldberg, Executive Director.
- **Philadelphia (2013-2014).** Advisory Committee co-chairs: John H. Cluver (Voith & Mactavish Architects) and Michael Sklaroff (Ballard Spahr). ULI Philadelphia: Susan Baltake, former Executive Director.
- **Baltimore (2013-2014).** Advisory Committee co-chairs: Jon Laria (Ballard Spahr) and Tom Liebel (Marks, Thomas Architects). ULI Baltimore District Council: Sean Davis (former Chair), Kelly Cantley (former Vice Chair for Mission Advancement), and Lisa Norris (Coordinator).
- **Chicago (2015-2016).** Advisory Committee chair: Alicia Berg (University of Chicago). ULI Chicago District Council: Cynthia McSherry (Executive Director) and Swasti Shah (Director of Community Engagement).
- **Detroit (2015-2016).** Advisory Committee co-chairs and convening partners: Gregory McDuffee (Director of Detroit-Wayne Joint Building Authority; former Chair of ULI Michigan), Shannon Sclafani (Director of ULI Michigan), and Victoria Olivier (Detroit Future City Implementation Office).

Special thanks to Katie Cote and Allied8 Architecture + Design for their assistance in developing the Model Adaptive Reuse Ordinance, as well as Hunter Quintal, of Brown University, who contributed to the research on national best practices as a Preservation Green Lab intern.

Generous financial support for the Partnership for Building Reuse was provided to the National Trust for Historic Preservation by the Jessie Ball duPont Fund, the Kresge Foundation, and the Richard H. Driehaus Foundation.



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Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 20

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 46

Cultural Heritage Commission Meeting of September 5, 2024 Audio:
https://planning.lacity.gov/plndoc/Audio/CHC/2024/09-05-2024/4_CHC_2007_1585.mp3

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 21

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 48

DEPARTMENT OF THE INTERIOR

National Park Service

The Secretary of the Interior's Historic Preservation Professional Qualification Standards

AGENCY: National Park Service, DOI.

ACTION: Proposed renaming of and revisions to "the Secretary of the Interior's Professional Qualification Standards."

SUMMARY: The National Park Service (NPS) proposes to rename and revise "the Secretary of the Interior's Professional Qualification Standards" which are part of the larger "Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation." The statutory authority for the Secretary's development of these can be found in sections 101(g), 101(h), 101(i), and 101(j)(2)(A) of the National Historic Preservation Act, as amended (16 U.S.C. 470 *et seq.*). These Standards and Guidelines (including the Professional Qualification Standards) were published in the **Federal Register** in 1983 (48 FR 44716, September 29) as the Secretary's best guidance for historic preservation practice nationally. This remains their preeminent function.

The Standards are renamed "the Secretary of the Interior's Historic Preservation Professional Qualification Standards." This change reflects the fact that the Standards are designed to apply to each discipline as it is practiced in historic preservation; e.g., in the identification, evaluation, documentation, registration, and treatment of historic properties.

The proposed revisions update the standards for the five disciplines included in the 1983 publication and add standards for seven other disciplines mentioned in the National Historic Preservation Act as being important to historic preservation. The proposed revisions also provide (for the first time) published guidance on how to use and interpret the Standards.

These revisions are necessary because the old professional qualification standards had become out-of-date, did not include many disciplines important in the practice of historic preservation, and provided no guidance on their use and interpretation. This absence of national guidance led to confusion and inconsistency in the application of the Standards by Federal, State, Tribal, and local government agencies and other organizations and individuals. The Standards are designed to be a tool to help recognize the minimum expertise generally necessary for performing professionally credible historic preservation work.

The Standards are not designed to identify the best or ideal person for any position. The effective application of any of these national Standards will require the development of a detailed job description containing additional information to suit a particular situation and need. These Standards do not apply to "entry-level" applicants or to preeminent professionals in the field. Rather, they outline the minimum education and experience and products that together provide an assurance that the applicant, employee, consultant, or advisor will be able to perform competently on the job and be respected within the larger historic preservation community.

All responses to this notice will be summarized as part of the publication of the official issuance of the "Secretary's Historic Preservation Professional Qualification Standards." All comments will also become a matter of public record.

DATES: Comments on this notice must be received by August 19, 1997 to be assured of consideration.

ADDRESSES: Send comments to: Mr. Joe Wallis, Chief, Branch of State, Tribal, and Local Programs, Heritage Preservation Services, National Center for Cultural Resource Stewardship and Partnership Programs, National Park Service, U.S. Department of the Interior, 1849 C Street, NW., Washington, DC 20240. Comments may be hand-delivered or overnight mailed to 800 North Capitol Street, NW., Suite 200, Washington, DC 20002. Comments may be sent by fax to 202–343–6004 or by E-mail to John_Renaud@nps.gov.

FOR FURTHER INFORMATION CONTACT: Mr. John Renaud, Branch of State, Tribal, and Local Programs, Heritage Preservation Services Division, National Center for Cultural Resource Stewardship and Partnership Programs, National Park Service, 202–343–1055, FAX 202–343–6004, or John_Renaud@nps.gov (E-mail).

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Introduction

Background

The identification, evaluation, protection, and preservation of America's important historic and cultural properties depends upon the participation of all citizens; however, certain decisions must involve individuals who meet nationally accepted professional standards in order to assure credibility in the practice of historic preservation at the Federal, State, and local levels, as well as in the private sector.

The Secretary of the Interior is responsible for establishing standards for all programs under Departmental authority. In accordance with this responsibility, "the Secretary of the Interior's Professional Qualification Standards" were developed by the National Park Service (NPS) 20 years ago to ensure that a consistent level of expertise would be applied nationally to the identification, evaluation, documentation, registration, treatment, and interpretation of historic and archeological resources.

The National Historic Preservation Act of 1966 (Pub. L. 89–665) gave the Secretary authority to set criteria for State grants, surveys, and plans. The National Park Service administratively required State Historic Preservation Officers (SHPOs) to maintain professionally qualified staff (in 1976), and to appoint qualified individuals as advisors to serve on State Review Boards (in 1977). The professional qualification standards have not changed since then. The 1980 Amendments to the National Historic Preservation Act (Pub. L. 96–515) statutorily affirmed the previous regulatory requirement for professionally qualified staff. Congress also reiterated the regulation's requirement that State Review Boards include a majority of members qualified in one of the professional disciplines which met minimum Professional

Qualification Standards defined in regulation in 36 CFR part 61 (Architecture, Architectural History, Prehistoric Archeology or Historic Archeology, and History). In addition, the 1980 amendments created the Certified Local Government (CLG) program to recognize the role of local governments in the national partnership, and stipulated that the CLG Review Commission membership needed to be adequate and qualified. The Congressional Committee Report for the 1980 amendments (H.R. Rept. 96–1457) called for ''professional bodies which can objectively evaluate the historic significance of properties and provide professional advice on historic preservation matters.'' Finally, States, local governments, Federal agencies, and the private sector often require that proposals from historic preservation contractors or work submitted by them meet these same professional practice Standards.

How To use the Historic preservation professional qualification standards provides background and general information in a question and answer format about the three basic components of each Standard: academic or comparable training; professional experience; and products and activities that demonstrate proficiency in the field of historic preservation.

Discipline and historic preservation proficiencies consists of a series of general proficiencies (knowledge, skills, and abilities) that are needed by historic preservation program applicants, employees, consultants, and advisors. The first set of proficiencies is related to disciplines; the second, to historic preservation.

Following the standard for each discipline is guidance about meeting the standard for that specific discipline, including a list of some of the most common ''closely related fields'' within academic degree programs; information on documenting professional experience; and a list of typical products and activities that may be used to document acquired proficiencies in the field of historic preservation.

Finally, a list of Professional Organizations is included to assist users in obtaining additional information about the disciplines, college and university departments, and publications on the practice of each discipline.

Program Evolution/Current Changes

In its 1992 amendments to the Act (Pub. L. 102–575), Congress recognized the evolution and growth of the professional practice of historic preservation, and an expanded role for Indian tribes in implementing the National Historic Preservation Act. Accordingly, the number of disciplines acknowledged as key to the responsible practice of historic preservation has been increased by the Act and therefore by the National Park Service from the five identified almost 20 years earlier to 12, now including Archeology (Prehistoric and Historic), Architectural History, Conservation, Cultural Anthropology, Curation, Engineering, Folklore, Historic Architecture, Historic Landscape Architecture, Historic Preservation, Historic Preservation Planning, and History.

As a result, NPS consulted at length with Federal agencies, SHPOs, CLGs, and professional societies involved in historic preservation about issuing updated and expanded Professional Qualification Standards that recognize the evolution and development of the disciplines in the field.

''The Secretary of the Interior's Historic Preservation Professional Qualification Standards'' are designed to be national measures for determining minimum requirements for professionals practicing in the field of historic preservation. The format for the Standards provides a consistent, yet flexible, framework for establishing sound professionalism in the twelve disciplines. There is one Standard for each of the disciplines.

Each Standard defines:

- Academic degrees or comparable training
- Professional experience; and
- Products and activities that demonstrate proficiency in historic preservation.

These Standards do not apply to ''entry-level'' applicants or to preeminent professionals in the field. Rather, they outline the minimum education and experience and products that together provide an assurance that the applicant, employee, consultant, or advisor will be able to perform competently on the job and be respected within the larger historic preservation community. The effective application of any of these national Standards will require the development of a detailed job description containing additional information to suit a particular situation and need.

Note: In each discipline, the most common method of meeting that Professional Qualifications Standard is discussed first. Less common alternatives follow. Typically, a graduate degree or professional license is listed first.

Applicability

It should be emphasized that the ''Historic Preservation Professional Qualification Standards'' that follow are, in most instances, advisory in nature and may thus be used by anyone hiring personnel or consultants or appointing advisory boards or commissions. Because use of the Standards can help ensure appropriate, informed decisions about protecting and preserving our nation's historic and archeological resources, NPS strongly encourages their adoption and implementation.

However, under well-defined circumstances discussed below, ''the Secretary's Historic Preservation Professional Qualification Standards'' are requirements by statute and regulation. In those instances, a note is added at the end of the required Standard.

First, the National Historic Preservation Act, Section 101, requires that a professionally qualified staff be appointed or employed by State Historic Preservation Offices. Indian tribes that have executed a Memorandum of Agreement with NPS and assumed responsibilities pursuant to Section 101(d) of the Act also must employ or consult with professionally qualified individuals in carrying out those responsibilities. The performance and supervision of Historic Preservation Fund grant-assisted work must be performed and/or supervised by professionally qualified staff and/or contractors. In accordance with 36 CFR part 61 and NPS policy, three of twelve disciplines are required for State program staff and for staff of Tribes with Section 101(d) status: History, Archeology, and Architectural History. States and Tribes with 101(d) status may propose an alternative minimum staff composition for NPS concurrence if their historic resources, needs, or circumstances would be better served or met. States and Tribes with 101(d) status are expected to obtain the services of other qualified professionals as needed for different types of resources.

Second, section 101(b)(1)(B) and section 301(12) of the Act requires that a majority of State Review Board members be professionally qualified. As specified in 36 CFR part 61, this majority must include, but need not be limited, to the required disciplines of History, Archeology, and Architectural History. One person may meet the Standards for more than one required discipline.

Third, section 101(c)(1)(B) and section 301(13) of the Act requires that State programs encourage CLG Review Commissions to include individuals who are professionally qualified, to the extent that such individuals are

available in the community. The State may specify the minimum number of Commission members that must meet the Standards and decide which, if any, of the disciplines listed in the Standards need to be represented on the Commission.

An accompanying guidance section, Applying the Historic Preservation Professional Qualification Standards, has been prepared to assist the consistent application of the "Historic Preservation Professional Qualification Standards" when selecting an employee, consultant, or advisor. As such, the guidance provides additional information and recommendations, but never constitutes a requirement.

How To Use the Historic Preservation Professional Qualification Standards

There are three basic components of each Historic Preservation Professional Qualification Standard: academic degrees or comparable training; professional experience; and products and activities that demonstrate proficiency in the field of historic preservation. A number of commonly asked questions about the design and content of the Standards, as well as their application and implementation, are answered below in order to assist anyone applying for a position or anyone charged with obtaining the services of a professional in the field of historic preservation.

1. *Under what authority are these Standards developed?* "The Secretary of the Interior's Historic Preservation Professional Qualification Standards and Guidance" are part of the larger "Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation." The statutory authority for the Secretary's development of these can be found in sections 101(g), 101(h), 101(i), and 101(j)(2)(A) of the National Historic Preservation Act, as amended. These Standards and Guidance (including the Professional Qualification Standards) were published in the **Federal Register** in 1983 as the Secretary's best guidance for historic preservation practice nationally. This remains their preeminent function.

2. *What about the requirements in Section 112 of the National Historic Preservation Act?* Section 112 is not the statutory authority for the "Secretary of the Interior's Historic Preservation Professional Qualification Standards and Guidance" (see the preceding paragraph). Section 112 splits Federal agency requirements for meeting "professional standards" into two parts. Section 112(a)(1)(A) mandates that Federal "actions" meet professional standards; it is not directed at establishing professional qualification requirements. It is section 112(a)(1)(B) that requires the Federal Office of Personnel Management (OPM) to devise professional qualification requirements for Federal employees and contractors in seven disciplines. OPM is required by statute to consult with the National Park Service (NPS) and others in creating these requirements. When completed, NPS will offer the Professional Qualification Standards and Guidance as its best advice to OPM for their use.

3. *Are the Standards regulatory or are they advisory?* The Standards are not in and of themselves regulatory. A separate regulation or other official action which references or otherwise adopts part or all of them is necessary to give any force to any language in the Standards. In a number of instances, this has occurred. For example, the Standards for Rehabilitation are regulatory in the Federal Preservation Tax Incentives program through 36 CFR part 67. Likewise, the Professional Qualification Standards are regulatory for States, local historic preservation programs, and participating tribes through 36 CFR part 61. The guidance ("Academic Background" and "Documenting Professional Experience") accompanying the Professional Qualification Standards is intended to assist users in the application of the Standards; the guidance is not regulatory.

4. *How were these Standards developed? Who was consulted?* Consultation has been extensive over the four years of this project. The wide range of constituents that use the Standards dictates a broad consultation process, which, not surprisingly, results in widely varying opinions and recommendations. To date, NPS has consulted with: (1) Federal, tribal, State, and local government historic preservation programs as well as related organizations; (2) professional societies and organizations of professional societies; (3) academic programs in historic preservation and organizations of such programs; (4) individuals and companies in the private practice of historic preservation as well as related organizations; and, (5) individuals working in the public sector as well as organizations of such people.

5. *Why did the National Park Service choose the disciplines it did?* These disciplines were selected because each is specifically mentioned in the National Historic Preservation Act. [See sections 112(a)(1)(A), 112(a)(1)(B), 201(a)(9), 301(12)(B), 301(13), and 401(c)(3).]

6. *How are these Standards to be used?* The Standards are designed to be a tool to help recognize the minimum expertise generally necessary for performing professionally credible historic preservation work. The Standards are not designed to identify the best or ideal person for any position or the preeminent practitioners in any discipline, nor are they developed to qualify apprentice or entry level workers. The Standards are designed to describe the typical expertise held by credible mid-level journeymen working in historic preservation.

7. *Do the Standards apply to "entry level" or "technician" level positions?* Although the work of "entry-level" or "technician-level" personnel is critical to the success of historic preservation projects, these professional levels are not addressed in the Secretary's Standards. The Standards apply only to the "journeyman" professional and define the minimum level of expertise necessary to provide reliable technical opinions relating to historic properties (without in-depth oversight or review by another professional in the discipline).

8. *Do Federal agencies have to meet these Professional Qualification Standards?* For Federal employees and Federal contractors, the Historic Preservation Professional Qualification Standards are regulatory only if they are specifically adopted by: (1) The Federal Office of Personnel Management (OPM) pursuant to its responsibility under Section 112(a)(1)(B) of the Act; (2) a Federal agency in its own agency-wide regulations, requirements, or policy; or (3) a Federal agency as part of a program or project agreement with another party.

9. *How are general Standards applied in specific situations?* General standards are intended to define minimum professional qualifications for identifying, evaluating, registering, treating, and interpreting historic properties nationwide; however, the best historic preservation professional for a particular office, program, project, or property depends upon the situation. Different skills and expertise are needed for different geographical areas and resource types. In most cases where the Standards are applied in hiring or contracting, job descriptions and qualifications will have to be tailored to specific situations and locations so that experience and training are relevant to the needs of the resources and the work to be done. Where there is a need for specialized expertise in a project, application of the Standards will necessarily focus upon specialized training and demonstrated experience and products. For example, a person may be highly skilled in restoring a

particular kind of resource (such as covered bridges), but that person would not be an appropriate choice to work on other types of resources.

10. *Do all staff, consultants, and appointed advisors need to meet the Standards?* SHPOs, CLGs, and tribes hire staff, select consultants, and appoint advisors to perform historic preservation work. However, it is NPS policy that historic preservation activity supported by the Historic Preservation Fund must be conducted, supervised, overseen, evaluated, or signed off by someone who meets the appropriate Professional Qualification Standard. Therefore, NPS requires the use of some of these Standards in certain circumstances by State Historic Preservation Offices, State Review Boards, and Certified Local Government Commissions (see 36 CFR part 61). Consequently, in some offices there could be no staff meeting the Professional Qualification Standards as long as there is access somewhere along the line to the appropriate expertise. For offices (e.g., States) required to have professionally qualified staff and Review Board membership, the requirement is usually to have at least one qualified individual in the three specified core disciplines. States and Tribes with 101(d) status are expected to obtain the services of professionals qualified in other disciplines as needed. It is possible that an individual may meet the Professional Qualification Standards for more than one discipline. Other staff members working in the discipline do not have to meet the Standards.

11. *What about professionals who were hired under the old Standards?* For programs administered by the National Park Service, each State staff, State Review Board member and Certified Local Government Commission member approved by the Secretary as meeting the Professional Qualification Standards will retain that status, regardless of any subsequent changes in the Standards, until such time as that individual no longer is employed by the State office, serves on the State Review Board, or serves on the Certified Local Government Commission with which that individual was affiliated as of the date of that individual's approval. Contractors qualified in a specified discipline under the old requirements will be deemed qualified in that discipline by NPS under the new rules as long as the contract, cooperative agreement, or other third-party agreement remains in effect. New contractual agreements would apply the new standards. Other organizations using the Professional Qualification Standards are encouraged to adopt a similar approach.

12. *Why aren't the Standards for each discipline exactly the same?* Because each discipline is different and makes its own distinct contribution to historic preservation, the Professional Qualification Standards differ somewhat according to discipline. Each set of Standards includes educational and experience equivalencies to assure fairness in hiring practices; thus, a graduate or undergraduate degree, or other certification, registration, or professional license or training is given full consideration, when combined with differing periods of full-time professional experience. Documenting a record of high quality products and activities during past employment is required in every Standard; however, the type of products and activities will necessarily differ within each discipline.

13. *Why does one have to demonstrate proficiency in a specific discipline as well as in historic preservation?* When decision makers lack the expertise required to make informed decisions, historic and cultural resources can be overlooked, mis-identified, mis-evaluated, damaged, or lost. Partial expertise can be just as harmful, whether a person is well-grounded in historic preservation, but lacks professional discipline skills, or, alternatively, is an expert in a professional discipline, but fails to understand its important connection to historic preservation. Involvement of people with expertise in both a professional discipline and historic preservation will greatly improve the reliability of decisions affecting our nation's heritage.

14. *What constitutes full-time professional experience?* Full-time professional experience generally refers to experience received after the degree was awarded or education was completed. Full-time professional experience can be acquired in blocks of time that, together, add up to the number of years called for in the Standard. In some disciplines, a portion of this experience must have been earned under the direct supervision of a recognized professional. It is possible that some education and experience received outside the United States is relevant to the identification, evaluation, documentation, registration, treatment, and interpretation of United States historic and cultural properties.

15. *Does the required experience have to occur subsequent to obtaining the requisite educational or licensing credentials?* Although it is preferable to have the practical experience after obtaining the academic training in a particular discipline, there is no such national requirement. The hiring, choosing, selecting, or contracting office must determine for itself how much experience, of what sort, and in what sequence, is appropriate for the job or position.

16. *How many and what types of products and activities are routinely used to document the quality of professional experience?* The applicant, employee, consultant, or advisor may cite products such as peer-reviewed articles and publications, audio-visual materials, awards, and National Register documentation. Activities could include teaching the theory or practices of a specific discipline; administrative, project review, or supervisory experience in a historic preservation program or office; and field or laboratory work. In any event, products and activities should demonstrate the appropriate use of the applicable "Secretary of the Interior's Standards for Archeology and Historic Preservation." Examples are provided in the Documenting Professional Experience section of the guidance for Applying the Standard for each discipline.

17. *In determining academic qualifications, what is a "closely related field of study?"* To provide flexibility in determining academic credentials, the Standards recognize that a graduate or undergraduate degree may have been attained in either the identified discipline or in a related discipline. Thus a candidate for the position of Architectural Historian may have an undergraduate degree in a closely related field of study, such as Art History or Historic Preservation.

Merely having a degree in a closely related field does not automatically meet the Standard. The course work taken to earn a degree in a related field should be weighed against the course requirements in the Standard's "main" discipline. For example, a degree in Art History does not necessarily, on its own, meet the Standard for Architectural History, unless course work relevant to the Standard can be documented, such as American architectural history. (See the Academic Background guidance given after each Standard, which discusses the typical closely related fields of study for each historic preservation discipline.)

18. *How much and what kind of course work in a "closely related field" is required to meet the Professional Qualifications Standards?* There is no set amount of credit hours. The office hiring or selecting must make a determination that the person with course work in a closely related field has enough relevant education to be

equivalent to that necessary for the standard degree in that discipline, and to enable that person to make judgments about the identification, evaluation, documentation, registration, or treatment of historic or archeological properties in the United States and its Territories.

19. *When is "exceptional experience" a factor?* In general, an applicant, employee, consultant, contractor, or advisor who does not possess a combination of education or training, experience, and products would not meet the Standards. However, in some cases, a person's experience and contributions have been so exceptional that he or she demonstrates the level of expertise that meets the Standards. In particular, this may apply in those situations where persons embarked upon their careers before recognized academic programs were established, and their education or training was thus attained in alternative ways. In such instances, exceptional experience would be substituted for an academic degree or other training. It is up to the organization with administrative oversight responsibility for the program or project to determine whether the individual meets the Standards. For example, in a program under the purview of 36 CFR part 61, the State Historic Preservation Office would request an exception from the National Park Service for the person under consideration for a "professional" position on the State staff or Review Board. Otherwise, the organization doing the hiring or selecting of personnel would determine whether the individual meets the Standards.

Discipline and Historic Preservation Proficiencies

The Historic Preservation Professional Qualification Standards call for an understanding of the general principles, procedures, and practices in the discipline as they are applied to historic preservation. This type of expertise is necessary for historic preservation programs in which the employee, consultant, or advisor is expected to deal with a range of historic resources and issues. Proficiencies in the disciplines and in the practice of historic preservation are outlined below.

Recommended Discipline Proficiencies

The following discipline proficiencies (knowledge, skills, and abilities) should be possessed by applicants, employees, consultants, and advisors:

- Knowledge of the history of the discipline.
- Knowledge of current theories, principles, practices, methods, and techniques of the discipline.
- Familiarity with diverse specializations within the discipline.
- Skills in applying the discipline's techniques of practice, including critical analysis skills.
- Understanding of the discipline's relationships with other disciplines and the ability to design and carry out interdisciplinary projects.
- Understanding of complex research questions.
- Ability to place a specific project in a broader context.
- Knowledge of current scholarly research and its applicability to a given issue.
- Familiarity with the process of rigorous professional peer review that occurs before work is published.

Recommended Historic Preservation Proficiencies

The following historic preservation proficiencies (knowledge, skills, and abilities) should be possessed by applicants, employees, consultants, and advisors:

- Familiarity with the origins and development of the historic preservation movement.
- Knowledge of the field of historic preservation as it is practiced in the United States, including its philosophies, theories, practices, laws, regulations, policies, and standards, and relationship to the discipline as a whole.
- Ability to apply Federal and relevant State and local historic preservation laws, regulations, policies, and standards in the public and private sectors, including Federal, State, and local government agencies, and private organizations.
- Ability to apply the appropriate set(s) of the "Secretary of the Interior's Standards for Archeology and Historic Preservation," and/or the National Register of Historic Places criteria.

In consideration of the foregoing, the "Secretary of the Interior's Professional Qualification Standards" are proposed to read as follows:

Historic Preservation Professional Qualification Standards

Archeology
(A) Prehistoric Archeology
(B) Historic Archeology
Architectural History
Conservation
Cultural Anthropology
Curation
Engineering
Folklore
Historic Architecture
Historic Landscape Architecture
Historic Preservation Planning
Historic Preservation
History

Archeology; Historic Preservation Professional Qualification Standards

Archeology is the study of past human lifeways through the systematic observation, analysis, and protection of the material remains of human activities.

Standard for Archeologist

(A) Prehistoric

The applicant, employee, consultant, or advisor will have a graduate degree in Anthropology with a specialization in Prehistoric Archeology, or a graduate degree in Archeology with a specialization in Prehistoric Archeology, or a graduate degree in a closely related field (see Academic Background for Archeology), PLUS a minimum of two and one-half (2½) years of full-time professional experience in applying the theories, methods, and practices of Archeology that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of prehistoric archeological properties in the United States and its Territories (at least six months of experience must have been acquired in the performance of field and analytical activities under the supervision of a professional prehistoric archeologist, and one year of experience in the study of the archeological resources of the prehistoric period must have been at a supervisory level); and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Archeologists).

(B) Historical

The applicant, employee, consultant, or advisor will have a graduate degree in Anthropology with a specialization in Historical Archeology, or a graduate degree in Archeology with a specialization in Historical Archeology, or a graduate degree in a closely related field (see Academic Background for Archeology), plus a minimum of two and one-half (2½) years of full-time professional experience applying the theories, methods, and practices of Archeology that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic archeological properties in the United States and its Territories (at least six months of experience must have been acquired in

the performance of field and analytical activities under the supervision of a professional Historical Archeologist, and one year of experience in the study of the archeological resources of the historic period must have been at a supervisory level); and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Archeologists).

(**Note:** Pursuant to 36 CFR part 61, a person meeting this Standard (either Prehistoric or Historic Archeology) is required as part of the core staff for each State Historic Preservation Office (SHPO) and as part of each State Review Board. Expertise described by this standard is also needed for Tribal Preservation Office staff or consultants of tribes that have executed a Memorandum of Agreement to implement Section 101(d) of the National Historic Preservation Act. It also may be needed for consultants hired with HPF grant funds and for members of Certified Local Government Commissions.)

Archeology—Academic Background

Closely related fields: Anthropology, with a specialization in Archeology, is the typical degree discipline for archeologists practicing in the United States. One of the usual requirements for receiving the degree is completion of an archeological field school in which the student learns about techniques of survey, excavation, and laboratory processing. However, degree programs have also been established in Archeology, Cultural Resources Management, Historical Archeology, and Public Archeology. Some Historical Archeology programs are housed in History, Public History, or American Studies Departments. For these degrees, a list of courses taken should be reviewed to determine if the program is equivalent to that typically provided for a degree in Anthropology with a specialization in Archeology, including course work in archeological methods and theory, archeology of a geographic region (e.g., North America), and the field school.

Discipline specializations: The most prevalent specializations in Archeology include Historical Archeology or Prehistoric Archeology, i.e., the specialization in resources of either the prehistoric period or the historic period. These specializations necessarily require expertise in different types of sites and different sources of information about past human activities. For example, a prehistoric archeologist usually requires a knowledge of environmental sciences, while a historical archeologist needs to understand the techniques of archival research. Additional specialized training and experience is also required for those specializing in, for example, underwater archeology, physical anthropology (human bones and burials), forensic archeology, or zooarcheology (non-human bones). In addition, archeologists typically specialize in the archeological resources of a particular time period, geographic region, resource type, or research subject.

Applying the Standard for Archeologist—Documenting Professional Experience

A professional archeologist typically has experience in field survey, site testing, site excavation, artifact identification and analysis, documents research, and report preparation. Supervised field experience as a graduate student may be counted as part of the overall 2½ year professional experience requirement.

A Prehistoric Archeologist meeting this Standard would document one year of supervisory experience in the study of prehistoric archeological sites; a Historical Archeologist would document one year of supervisory experience in the study of sites of the historic period.

The two archeologist specializations of Prehistoric Archeology and Historic Archeology are not interchangeable. Documentation to show that someone qualifies in both Prehistoric and Historic Archeology should include a minimum of one additional year of supervisory experience on resources of the other specialty, for a total of 3½ years of experience, with products and activities in both specializations.

Products and Activities.

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." Products and activities that meet the appropriate Secretary Standards for Archeology and Historic Preservation may include:

- Survey and excavation reports of cultural resource management or Section 106 (or other compliance) projects. These reports are typically called "grey literature;" they often have multiple authors and are usually produced in limited quantities by consulting firms.
- National Register documentation resulting in property listings or Determinations of Eligibility.
- Materials such as presentations, booklets, brochures, lesson plans, or videos that interpret the results of archeological investigation for the general public.
- Publications including articles in professional journals, monographs, books, or chapters in edited books, related to the preservation of historic or archeological properties.
- Presentations at regional, national, or international professional conferences related to the preservation of historic or archeological properties.
- Professional service on boards or committees of regional, national, or international professional organizations concerned with the preservation of historic or archeological properties.
- Awards, research grants, research fellowships, or invitations to teaching posts.

This list is not comprehensive. Furthermore, it is not expected that all of these products and activities will need to be documented in order to meet the Standard; rather, a combination of several of these products and activities would be more typical. However, if the applicant were documenting professional experience in one of the specializations, the majority of products and activities should reflect that specialization.

Architectural History; Historic Preservation Professional Qualification Standards

Architectural History is the study of the development of building practices through written records and design and the examination of structures, sites, and objects in order to determine their relationship to preceding, contemporary, and subsequent architecture and events.

Standard for Architectural Historian

(a) The applicant, employee, consultant, or advisor will have a graduate degree in Architectural History or a closely related field of study (see Academic Background for Architectural History), plus a minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of Architectural History that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Architectural Historians); or * * *

(b) An undergraduate degree in Architectural History or a closely

related field of study (see Academic Background for Architectural History), plus a minimum of four (4) years of full-time professional experience applying the theories, methods, and practices of Architectural History that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historians).

(**Note:** Pursuant to 36 CFR part 61, a person meeting this Standard is required as part of the core staff for each State Historic Preservation Office (SHPO) and as part of each State Review Board. Expertise described by this standard is also needed for Tribal Preservation Office staff or consultants of tribes that have executed a Memorandum of Agreement to implement Section 101(d) of the National Historic Preservation Act. It also may be needed for consultants hired with HPF grant funds and for members of Certified Local Government Commissions.)

Architectural History—Academic Background

Closely related fields: Professional Architectural Historians typically receive their formal training through Architectural History, Art History, or Historic Preservation programs, which include course work in American Architectural History. Other fields of study may offer relevant training, provided that course work in American Architectural History is taken. These other fields may include American Studies, American Civilization, Architecture, Landscape Architecture, Urban and Regional Planning, American History, Historic Preservation, and Public History.

Discipline specializations: Architectural Historians tend to be generalists, although specializations within Architectural History are typically based on time periods (such as 18th century), on a particular architectural style (such as Georgian or vernacular), or a combination of these (such as plantation architecture in the antebellum South).

Applying the Standard for Architectural Historian—Documenting Professional Experience

Products and Activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." A professional Architectural Historian typically has expertise in research, survey, documentation, and evaluation, of architectural resources, including buildings, structures, objects, and districts. Documentation of such experience is desirable. Products and activities that meet the appropriate Secretary's Standards for Archeology and Historic Preservation may include:

- Survey reports assessing the significance of historic properties.
- Historic structure reports.
- National Register documentation resulting in property listings or Determinations of Eligibility.
- Documentation that meets HABS/HAER standards for recording historic properties.
- Publications, which might include articles in regional, national, or international professional journals, monographs, books, or chapters in edited books, related to the preservation of historic structures.
- Presentations at regional, national, or international professional conferences related to the preservation of historic structures.
- Professional service on boards or committees of regional, national, or international professional organizations concerned with the preservation of historic structures.
- Awards, research grants, research fellowships, or invitations to teaching posts.

This list is not comprehensive. Furthermore, it should be understood that not all of these products and activities are needed in order to meet the Standard; rather, a combination of several products and activities would be more typical. If the applicant were documenting professional experience in one of the specializations, however, the majority of products and activities would naturally reflect that specialization.

Conservation; Historic Preservation Professional Qualification Standards

Conservation is the practice of prolonging the physical and aesthetic life of prehistoric and historic material culture through documentation, preventive care, treatment, and research.

Standard for Conservator

(a) The applicant, employee, consultant, or advisor will have a graduate degree in Conservation or a graduate degree in a closely related field of study with a certificate in Conservation (see Academic Background for Conservation), plus a minimum of three (3) years of full-time professional experience applying the theories, methods, and practices of Conservation that enables professional judgments to be made about the identification, evaluation, documentation or treatment of objects associated with historic and prehistoric properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Conservators); or * * *

(b) An undergraduate degree in Art History, or Natural or Physical Science, or another closely related field to Conservation (see Academic Background for Conservation), with an additional (3) years of full-time enrollment in an apprenticeship program equivalent to graduate studies in Conservation and supervised by a professional Conservator; plus a minimum of three (3) years full-time professional experience applying the theories, methods, and practices of Conservation that enables professional judgments to be made about the identification, evaluation, documentation, or treatment of objects associated with historic and prehistoric properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Conservators).

Conservation—Academic Background

Closely related fields: Since Conservators tend to specialize in a particular class of objects, closely related fields will be diverse, and could include Art, Art Conservation, Art History, Architecture, Historic Preservation, Museum Studies, Chemistry, Physics, Engineering (or a related scientific field), Archeology, Anthropology, or other fields related to the conservation specialization. If a closely related field is being claimed, the degree in the closely related field should be accompanied by a certificate in Conservation, or the completion of course work equivalent to that typically offered in graduate Conservation programs. This course work should include examination, documentation, and treatment of objects; history and technology of objects; and conservation science. In addition, such a program should include the completion of a two-semester internship.

Discipline specializations: Professional conservators specialize in the treatment and maintenance of a

specific class of objects or materials, such as archeological artifacts, architectural elements or fragments, or collections, books, ceramics, glass, decorative arts, ethnographic objects, furniture, metals, paintings, paper, photographs, sculpture, and textiles. Some conservators have studied more than one specialty, and have accumulated experience which allows them to practice in several of these specialties (although they are often closely related, such as books, drawings, prints or paper; decorative arts and furniture; sculpture and archeological artifacts). In these cases, the time period that distinguishes the materials is often the specialty. Each of these specialties requires focused training and experience, since each represents unique problems which are not always necessarily shared with other materials or time periods. Hence, a professional conservator should be able to perform according to professional standards of practice within the claimed area of specialty and should be both capable and willing to recognize his or her limitations. The professional conservator, moreover, should be generally knowledgeable about the issues of other specialties and the benefit of effective communication among the specialties. A broad understanding of the general principles of the conservation discipline is paramount as well, particularly in the area of technological and philosophical concerns that govern the ethics of the profession.

A note on Conservation education: Many professional Conservators received their training by serving apprenticeships with professional Conservators. For some time, however, graduate conservation programs have been established in academic institutions; these require an internship in recognition of the critical importance of hands-on training and experience in preparing students for professional practice.

Applying the Standard for Conservator—Documenting Professional Experience

A professional Conservator typically possesses specialized technical skills and has experience in the examination, analysis, documentation, treatment, and preventive care of a specific class, or classes, of objects.

Products and Activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." Products and activities that meet the appropriate Secretary's Standards for Archeology and Historic Preservation may include:

- A portfolio of current and past conservation work, including written and photographic documentation.
- Reports of examination, condition, or treatment of objects.
- Publications, which might include articles in professional journals, monographs, books, or chapters in edited books, related to the care and treatment of objects.
- Presentations at regional, national, or international professional conferences, workshops or other educational venues related to the care and treatment of objects.
- Professional service on boards or committees of regional, national, or international professional organizations concerned with the conservation of objects.
- Awards, research grants, research fellowships, or invitations to teaching posts.

This list is not comprehensive. Futhermore, it should be understood that not all of these products and activities are needed in order to meet the Standard; rather, a combination of several products and activities would be more typical. If the applicant were documenting professional experience in one of the specializations, however, the majority of products and activities would naturally reflect that specialization.

Cultural Anthropology; Historic Preservation Professional Qualification Standards

Cultural anthropology is the description and analysis of cultural systems, which include systems of behaviors (economic, religious, social), values, ideologies, and social arrangements.

Standard for Cultural Anthropologist

(a) The applicant, employee, consultant, or advisor will have a graduate degree in Anthropology with a specialization in Applied Cultural Anthropology, or a closely related field (see Academic Background for Cultural Anthropology), plus a minimum of two (2) years of full-time professional experience (including at least six months of field work supervised by a professional Cultural Anthropologist) applying the theories, methods, and practices of Cultural Anthropology that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic, prehistoric, or traditional cultural properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Cultural Anthropologists); or * * *

(b) An undergraduate degree in Anthropology or a closely related field (see Academic Background for Cultural Anthropology), with a specialization in Applied Cultural Anthropology, plus a minimum of four (4) years of full-time professional experience (including at least twelve months of field work supervised by a professional Cultural Anthropologist) applying the theories, methods, and practices of Cultural Anthropology that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic, prehistoric, or traditional cultural properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (See Documenting Professional Experience for Cultural Anthropologists).

Cultural Anthropology—Academic Background

Closely related fields: A degree in Anthropology with a specialization in Applied Cultural Anthropology is the typical degree discipline for Cultural Anthropologists practicing in the United States. Closely related fields of study may include Sociology, Cultural Geography, Folklife, History, and American Studies.

Discipline specializations: Specializations in this discipline include Applied Cultural Anthropology, and Social Anthropology (which may be considered the most closely related to Cultural Anthropology; some academic programs even combine them, referring to Sociocultural Anthropology). Departments of Anthropology typically provide training in Archeology, Physical Anthropology, Ethnography, and Sociocultural Anthropology, and they may offer Applied Anthropology concentrations in one or more of these fields. Professional Cultural Anthropologists tend to specialize geographically (such as in the Southwest United States, Micronesia or New England) or topically (such as Medical Anthropology or Urban Anthropology), or in working with particular cultural or linguistic groups (such as fishermen, Irish immigrants, or Northwest Coast Indians).

Applying the Standard for Cultural Anthropologist—Documenting Professional Experience

A professional Cultural Anthropologist typically has experience in the use of ethnohistoric and ethnographic techniques, including participant observation field work among one or more contemporary ethnic groups. The typical Cultural Anthropologist would also have performed field survey to identify and assess ethnographic resources, which can include, in addition to historic and cultural places of value, environmental features and places that have symbolic and other cultural value for Native American and/or other ethnic communities. A Cultural Anthropologist engaged in substantial ethnographic field work should demonstrate professional experience in the relevant geographic area and/or among the New World peoples, immigrant, ethnic, or minority communities with whom they will work.

Products and Activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." Products and activities that meet the appropriate Secretary's Standards for Archeology and Historic Preservation may include:

- Ethnographic field studies and survey reports, oral histories, or social impact assessments.
- National Register documentation of ethnographic resources or traditional cultural properties resulting in property listings or Determinations of Eligibility.
- Publications, which might include articles in regional, national, or international professional journals, monographs, books, or chapters in edited books, related to the documentation and preservation of historic and archeological resources, and/or traditional cultural properties.
- Presentations at regional, national, or international professional conferences, symposia, workshops or exhibits related to the documentation and preservation of historic and archeological resources, and/or traditional cultural properties.
- Professional service on boards or committees or regional, national, or international professional organizations concerned with the documentation and preservation of historic and archeological resources.
- Awards, research grants, research fellowships, or invitations to teaching posts.

This list is not comprehensive. Futhermore, it should be understood that not all of these products and activities are needed in order to meet the Standard; rather, a combination of several products and activities would be more typical. If the applicant were documenting professional experience in one of the specializations, however, the majority of products and activities would naturally reflect that specialization.

Curation; Historic Preservation Professional Qualification Standards

Curation is the practice of documenting, managing, preserving, and interpreting museum collections according to professional museum and archival practices.

Standard for Curator

(a) The applicant, employee, consultant, or advisor will have a graduate degree in Museum Studies or a closely related field of study (see Academic Background for Curation), plus a minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of Curation that enables professional judgments to be made about the identification, evaluation, documentation, preventive care, or interpretation of collections associated with historic and prehistoric properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Curators); or

* * *

(b) An undergraduate degree in Museum Studies or a closely related field of study (see Academic Background for Curation), plus a minimum of four (4) years of full-time professional experience applying the theories, methods, and practices of Curation that enables professional judgments to be made about the identification, evaluation, documentation, preventive care, or interpretation of collections associated with historic and prehistoric properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Curator).

Curation—Academic Background

Closely related fields: A degree program called Museum Studies in one academic institution might be called Museum Science or Museology in another institution. Since Curators often specialize in particular disciplines, those fields of study would be relevant provided that theoretical as well as hands-on training was also obtained in museum methods and techniques, including collections care and management. Examples of relevant fields could include American Studies, Anthropology, Archeology, Art History, Archival or Library Science, History, Biology, Botany, Chemistry, Physics, Engineering, Geology, Zoology, and other similar fields of study, depending upon the nature of the collections to be curated.

Discipline specializations: Professional Curators tend to be specialists in a particular academic discipline relevant to the collections held by their institution or museum, which could include, for example, 19th-century Hudson Valley School paintings, Southwest Pueblo pottery, Civil War military uniforms, site-specific archeological materials, or natural history specimens.

Applying the Standard for Curator—Documenting Professional Experience

A professional Curator typically has experience in managing and preserving a collection according to professional museum and archival practices. Cultural training should involve experience with the chemical and physical properties of material culture, as well as practical and legal aspects of health and safety, an understanding of climate control systems, security, and conservation methods. The Curator is directly responsible for the care and academic interpretation of all objects, materials, and specimens belonging to or lent to the museum; recommendations for acquisition, de-accession, attribution and authentication; and research on the collections and the publication of the results of that research. The Curator also may have administrative and/or exhibition responsibilities.

Products and Activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." Products and activities that meet the appropriate Secretary's Standards for Archeology and Historic Preservation may include:

- Exhibit catalogs and other scholarly reports.
- Field or laboratory work that demonstrates ability to conserve, document, or interpret archeological,

archival, or material culture objects or collections.

• Plans or finding aids for the preservation or documentation of museum collections.

• Publications, which might include articles in regional, national, or international professional journals, monographs, books, or chapters in edited books, related to the care and treatment of archeological, archival, or material culture objects or collections.

• Presentations at regional, national, or international professional conferences, symposia, workshops, or exhibits related to the care and treatment of archeological, archival, or material cultural objects or collections.

• Professional service on boards or committees or regional, national, or international professional organizations concerned with the care and treatment of archeological, archival, or material culture objects or collections.

• Awards, research grants, research fellowships, or invitations to teaching posts.

This list is not comprehensive. Furthermore, it should be understood that not all of these products and activities are needed in order to meet the Standard; rather, a combination of several products and activities would be more typical. If the applicant were documenting professional experience in one of the specializations, however, the majority of products and activities would naturally reflect that specialization.

Engineering; Historic Preservation Professional Qualification Standards

Engineering is the practice of applying scientific principles to the research, planning, design, and management of structures and machines such as roads, bridges, canals, dams, docks, locomotives, and buildings, including their structural, electrical, or mechanical systems. Historic Engineering involves specialized training in engineering principles, theories, concepts, methods, and technologies of the past, and appropriate methods of interpreting and preserving historic engineered structures or machinery.

Standard for Engineer

(a) The applicant, employee, consultant, or advisor will have a State Government-recognized license to practice civil or structural engineering, plus, a minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of engineering that enables professional judgments to be made about the documentation or treatment of historic structures and machines in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Engineers); or * * *

(b) A Masters of Civil Engineering degree with demonstrable course work in Historic Preservation, for historic structures rehabilitation, plus a minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of Engineering that enables professional judgments to be made about the documentation or treatment of historic structures and machines in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Engineers); or * * *

(c) A Bachelors of Civil Engineering degree with at least one year of graduate study in History of Technology, Historic Preservation, Engineering History, or a closely related field (see Academic Background for Engineers), plus a minimum of two (2) years of full-time professional experience applying the theories, methods and practices of Engineering that enables professional judgments to be made about the documentation or treatment of historic structures and machines in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Engineers).

(**Note:** Only persons who are licensed to practice Engineering in that State may prepare and seal plans and specifications in order to obtain construction permits, authorize payments to contractors, and certify that the work is complete. However, State staff, State Review Board members, and CLG staff or Commission members who are not licensed, but who meet the Standard for Engineer under (b) or (c) above, can review proposed and completed work for compliance with the applicable Secretary's Standards for Tax Act, HPF Grant, or other related programs.)

Engineering—Academic Background

Closely related fields: The Bachelor of Civil Engineering degree is a five-year degree that is unlikely to include historic preservation course work. The same is true of a Masters of Civil Engineering degree. An Engineer with an Engineering degree is well grounded in all aspects of engineering practice, including design, planning, construction specifications, and contract administration. Although this background is essential, additional training is needed in order to understand and work with historic structures, sites, and machines, with their complex material evolution and treatment problems. Specialized training, to supplement that provided by the professional Engineering program, should be acquired in such areas as American Architectural and Engineering History, History of Technology, Architectural Preservation, Conservation, Historic Construction Technologies, Historic Building Materials, Historical Archeology, and Historic Preservation.

Discipline specializations: Civil Engineering, Electrical Engineering, Mechanical Engineering, and Structural Engineering are typical specializations within the broader discipline of Engineering. The two specializations most often used in historic preservation projects are Civil and Structural Engineering. Occasionally, there may be the need for a Mechanical Engineer to address issues concerning historic machinery such as locomotives, steam engines, water turbines, electric generators, and similar machines and equipment, or particularly complex mechanical systems in a historic structure.

Applying the Standard for Engineer—Documenting Professional Experience

To be licensed by a State Government as a professional Engineer, an individual must pass a written exam and successfully fulfill education, training, and experience requirements. In addition, a professional Historical Engineer has both theoretical knowledge and technical skill associated with preserving historic structures and machines, and with the application of Engineering theories, methods, and practices that enables professional judgments to be made about the evaluation, documentation, or treatment of historic structures and machines in the United States and its Territories. A professional Historical Engineer typically has gained experience on structural preservation projects, which have included research and detailed investigations of historic structures or mechanical artifacts and preparation of recommendations for the treatment of such properties in order to preserve them in accordance with the appropriate Secretary's Standards for Archeology and Historic Preservation (particularly the Secretary's Standards for the Treatment of Historic Properties).

Products and Activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." Products and activities that meet the Secretary Standards for Archeology and Historic Preservation may include:

- Plans and Specifications for the preservation, rehabilitation, or restoration of historic structures, such as bridges, dams, canal locks, and for the structural rehabilitation or seismic stabilization of buildings.
- Adaptive reuse or feasibility studies that make recommendations for preserving or structurally stabilizing historic structures, including bridges.
- Historic Structure Reports or Condition Assessments of historic structures or machines.
- Documentation that meets HABS/HAER standards for recording historic structures or machines.
- Experience applying the Secretary of the Interior's Standards for the Treatment of Historic Properties to the review of work on historic structures, sites or machines.
- Awards for historic structure preservation, rehabilitation, or restoration received from local, regional, national, or international professional organizations.
- Publications, which might include articles in regional, national, or international professional journals, monographs, books, or chapters in edited books about the preservation of historic structures or machines.
- Presentations at regional, national, or international professional conferences, symposia, workshops, or exhibits about the preservation of historic structures or machines.
- Professional service on boards or committees or regional, national, or international professional organizations concerned with the preservation of historic structures or machines.

This list is not comprehensive. Furthermore, it should be understood that not all of these products and activities are needed in order to meet the Standard; rather, a combination of several products and activities would be more typical.

Folklore; Historic Preservation Professional Qualification Standards

Folklore is the study and documentation of traditional, expressive culture shared within various ethnic, familial, occupational, religious, and regional groups.

Standard for Folklorist

(a) The applicant, employee, consultant, or advisor will have a graduate degree in Folklore, Folklife Studies, Anthropology or a closely related field of study (see Academic Experience for Folklore), with a specialization in Folklore or Folklife Studies, plus a minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of Folklore that enables professional judgments to be made about the identification, evaluation, or documentation of folk cultures or lifeways associated with historic or prehistoric properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Folklorists); or * * *

(b) An undergraduate degree in Anthropology or a closely related field of study (see Academic Experience for Folklore), plus a minimum of four (4) years of full-time professional experience applying the theories, methods, and practices of Folklore that enables professional judgments to be made about the identification, evaluation, or documentation of folk cultures or lifeways associated with historic or prehistoric properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation. (see Documenting Professional Experience for Folklorists).

Folklore—Academic Background

Closely related fields: Typically, a professional Folklorist has a graduate degree in Folklore or Folklife Studies, or from highly specialized study within other disciplines such as Anthropology, English, Linguistics, or Sociology, provided that such study included training in theory, research and fieldwork techniques, and in the diverse categories of expressive culture.

Discipline specializations: A graduate degree in Anthropology may be combined with a specialization in Folklore and Folklife Studies. Other specializations may include: English, Cultural Anthropology, Ethnohistory, Ethnobotany, Ethnozoology, Ethnoarcheology, Cultural Geography, Sociology, and Oral History.

A professional Folklore specialist, or Folklorist, may specialize in any of the categories of traditional expressive culture, such as music (ethnomusicology), spoken word traditions, material culture, customs, or religious and belief systems; or specialization may focus on the study of a particular contemporary group (such as the Pennsylvania Amish) or region of the United States (such as Appalachia).

Applying the Standard for Folklorist—Documenting Professional Experience

A professional Folklorist typically demonstrates professional knowledge and skills in established methods and techniques of folklore and folklife research in the collection, evaluation, documentation, analysis, and/or presentation of grassroots and traditional cultural expression, including folk music, spoken word, dance, craftsmanship and artistic traditions, folkways, customs, belief systems, traditional foodways, and regional and/or occupational groups and communities. Experience would typically include fieldwork, with on-site interviews, observation, and documentation of contemporary human cultural activities.

Products and Activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." Products and activities that meet the appropriate Secretary's Standards for Archeology and Historic Preservation may include:

- Field studies and survey reports, oral histories, or assessments of the significance of historic properties.
- Publications, which might include articles in regional, national, or international professional journals; monographs, books, or chapters in edited books, related to assessing the significance of historic or traditional cultural properties.
- Presentations at regional, national, or international professional conferences, symposia, workshops, exhibitions, or other educational venues related to analyzing cultural traditions in evaluating the significance of historic or traditional cultural properties.
- Professional service on boards or committees of regional, national, or international professional organizations concerned with documenting and analyzing cultural traditions.
- Awards, research grants, research fellowships, or invitations to teaching posts.

This list is not comprehensive. Furthermore, it should be understood that not all of these products and activities are needed in order to meet

the Standard; rather, a combination of several products and activities would be more typical. If the applicant were documenting professional experience in one of the specializations, however, the majority of products and activities would naturally reflect that specialization.

Historic Architecture; Historic Preservation Professional Qualification Standards

Historic Architecture is the practice of applying artistic and scientific principles to the research, planning, design, and management of the built environment with specialized training in the principles, theories, concepts, methods, and techniques of preserving historic buildings and structures.

Standard for Historical Architect

(a) The applicant, employee, consultant, or advisor will have a State Government-recognized license to practice Architecture, plus, a minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of Architecture that enables professional judgments to be made about the evaluation, documentation, or treatment of historic structures in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historical Architects); or * * *

(b) A Masters of Architecture degree with demonstrable course work in Architectural Preservation, Architectural History, Historic Preservation, Historic Preservation Planning, or a closely related field (see Academic Background for Historic Architecture), plus a minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of Historic Architecture that enables professional judgments to be made about the evaluation, documentation, or treatment of historic structures in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historical Architects); or * * *

(c) A Bachelors of Architecture degree with at least one year of graduate study in Architectural Preservation, Architectural History, Historic Preservation, Historic Preservation Planning, or a closely related field (see Academic Experience for Historic Architecture), plus a minimum of two (2) years of full-time professional experience applying the theories, methods and practices of Historic Architecture that enables professional judgments to be made about the evaluation, documentation, or treatment of historic structures in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historical Architects).

(**Note:** Only persons who are licensed to practice Architecture in that State may prepare and seal plans and specifications in order to obtain construction permits, authorize payments to contractors, and certify that the work is completed. However, State staff, State Review Board members, and CLG staff or Commission members who are not licensed, but who meet the Standard for Historical Architect under (b) or (c) above, can review proposed and completed work for compliance with the applicable Secretary's Standards for Tax Act, HPF Grant, or other related programs.)

Historic Architecture—Academic Background

Closely related fields: The Bachelor of Architecture degree is a five-year degree that does not always include historic preservation course work. The same may be true of a Masters of Architecture degree. An Historical Architect is first an Architect and, as such, is well grounded in all aspects of architectural practice, including architectural design, planning, construction specifications, and contract administration. Although this background is essential, additional training is needed in order to understand and work with historic structures, with their complex material evolution and treatment problems. Specialized training, to supplement that provided by the professional Architecture program, should be acquired in such areas as American Architectural History, Architectural Preservation, Conservation, Historic Construction Technologies, Historic Building Materials, and Historic Preservation.

Discipline specialization: Historic Architecture is a specialization within the broader discipline of Architecture.

Applying the Standard for Historical Architect—Documenting Professional Experience

To be licensed by a State Government as a professional Architect, an individual must pass a written exam and successfully fulfill education, training, and experience requirements. In addition, a professional Historical Architect has both theoretical knowledge and technical skill associated with preserving historic structures, and with the application of Architecture theories, methods, and practices that enables professional judgments to be made about the evaluation, documentation, or treatment of historic properties in the United States and its Territories. A professional Historical Architect typically has gained experience on structural preservation projects, which have included research and detailed investigations of historic structures and preparation of recommendations for the treatment of properties in order to preserve them in accordance with the appropriate Secretary's Standards for Archeology and Historic Preservation (particularly the Secretary's Standards for the Treatment of Historic Properties).

Products and activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." Products and activities that meet the Secretary Standards for Archeology and Historic Preservation may include:

- Plans and Specifications for the preservation, rehabilitation, or restoration of historic structures.
- Adaptive reuse or feasibility studies that make recommendations for preserving historic structures.
- Historic Structure Reports or Condition Assessments of historic structures.
- Documentation that meets HABS/HAER standards for recording historic structures.
- Experience applying the Secretary of the Interior's Standards for the Treatment of Historic Properties to the review of work on historic structures.
- Awards for historic structure preservation, rehabilitation, or restoration received from local, regional, national, or international professional organizations.
- Publications, which might include articles in regional, national, or international professional journals, monographs, books, or chapters in edited books about the preservation of historic structures.
- Presentations at regional, national, or international professional conferences, symposia, workshops, or exhibits about the preservation of historic structures.
- Professional service on boards or committees or regional, national, or international professional organizations

concerned with the preservation of historic structures.

This list is not comprehensive. Furthermore, it should be understood that not all of these products and activities are needed in order to meet the Standard; rather, a combination of several products and activities would be more typical.

Historic Landscape Architecture; Historic Preservation Professional Qualification Standards

Historic Landscape Architecture is the practice of applying artistic and scientific principles to the research, planning, design, and management of both natural and built environments with specialized training in the principles, theories, concepts, methods, and techniques of preserving cultural landscapes.

Standard for Historical Landscape Architect

(a) The applicant, employee, consultant, or advisor will have a State Government-recognized license to practice Landscape Architecture, plus, a minimum of two (2) years full-time professional experience applying the theories, methods, and practices of Landscape Architecture that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historic Landscape Architects); or

* * *

(b) A Masters degree in Landscape Architecture with demonstrable course work in the principles, theories, concepts, methods, and techniques of preserving cultural landscapes, plus a minimum or two (2) years of full-time professional experience applying the theories, methods, and practices of Landscape Architecture that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historic Landscape Architects); or

* * *

(c) A four-year or five-year Bachelors degree in Landscape Architecture, plus a minimum of three (3) years of full-time professional experience applying the theories, methods, and practices of Landscape Architecture that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historic Landscape Architects).

(**Note:** Only persons who are licensed to practice Landscape Architecture in that State may prepare and seal plans and specifications in order to obtain construction permits, authorize payments to contractors, and certify that the work is completed. However, State staff, State Review Board members, and CLG staff or commission members who are not licensed, but who meet the Standard for Historical Landscape Architect under (b) or (c) above, can review proposed and completed work for compliance with the applicable Secretary's Standards for Tax Act, HPF Grant, Grant, or other related programs.)

Historic Landscape Architecture—Academic Background

Closely related fields: Landscape Architecture is the typical professional Bachelors degree, which is awarded after successful completion of a four-year or five-year undergraduate program. However, the Bachelors or Masters in Landscape Architecture may not always include historic preservation course work. While the standard Landscape Architecture degree program addresses all general aspects of landscape architectural practice (including design, planning, construction specifications, and professional practice), additional training is needed for Historical Landscape Architects. They may need training in landscape research, documentation, analysis, evaluation, and treatment techniques. This additional training is achieved through additional course work and/or professional experience.

Graduate study: The Masters in Landscape Architecture degree is the typical graduate degree, which is awarded after successful completion of a two-year or three-year graduate program. This degree should include studies in the principles, theories, concepts, methods, and techniques of preserving cultural landscapes. Course work may include cultural geography; landscape history; archival research techniques; historic preservation theory, principles, and practice; and preservation technologies.

Discipline specialization: Historic Landscape Architecture is a specialization within the broader field of Landscape Architecture. Historical Landscape Architects should have completed training in the principles, theories, concepts, methods, and techniques of preserving cultural landscapes. Cultural landscape preservation focuses on preserving a landscape's physical attributes, biotic systems, and use (especially when that use contributes to its historical significance). Graduate study and/or professional experience provides the specialized training needed by the Historical Landscape Architect.

Applying the Standard for Historical Landscape Architect—Documenting Professional Experience

To be licensed by a State Government as a professional Landscape Architect, an individual typically must pass a written exam and successfully fulfill education, training, and experience requirements. In addition, an Historical Landscape Architect must have two years of experience in the application of Landscape Architecture theories, methods, and practices to the identification, evaluation, documentation, registration, or treatment of historic properties in the United States and its Territories. A professional Historical Landscape Architect has both theoretical knowledge and technical skill associated with the preservation of cultural landscapes in accordance with the Secretary's Standards for Archeology and Historic Preservation. Cultural landscapes include historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes.

Products and Activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." Products and activities that meet the appropriate Secretary's Standards for Archeology and Historic Preservation may include:

- Surveys and inventories of cultural landscapes.
- Documentation of cultural landscapes that meets the Secretary's Standards for Documentation.
- National Register nominations or Determinations of Eligibility for cultural landscapes.
- Cultural Landscape treatment and maintenance plans.
- Cultural Landscape Reports.

• Publications, which might include articles in regional, national, or international professional journals, monographs, books, or chapters in edited books about cultural landscape preservation.

• Presentations at regional, national, or international professional conferences, symposia, workshops, or exhibits about cultural landscape preservation.

• Professional service on boards or committees or regional, national, or international professional organizations concerned with cultural landscape preservation.

• Awards, research grants, research fellowships, or invitations to teaching posts associated with cultural landscape preservation.

This list is not comprehensive. Furthermore, it should be understood that not all of these products and activities are needed in order to meet the Standard; rather, a combination of several products and activities would be more typical.

Historic Preservation Planning; Historic Preservation Professional Qualification Standards

Historic Preservation Planning, a specialization within Planning, is the practice of identifying and carrying out particular goals and strategies to protect historic and archeological resources at the local, regional, State, or national level.

Standard for Historic Preservation Planner

(a) The applicant, employee, consultant, or advisor will have a State Government-recognized certification or license in Land-use Planning, plus, minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of Historic Preservation Planning that enables professional judgments to be made about the identification, evaluation, documentation, registration, protection, or treatment of historic and archeological properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historic Preservation Planner); or

* * *.

(b) A graduate degree in Planning with demonstrable course work in Historic Preservation, or a graduate degree in a closely related field of study with demonstrable course work in Historic Preservation (see Academic Background for Historic Preservation Planning), plus a minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of Historic Preservation Planning that enables professional judgments to be made about the identification, evaluation, documentation, registration, protection, or treatment of historic and archeological properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historic Preservation Planner); or

* * *.

(c) An undergraduate degree in Planning with demonstrable course work in Historic Preservation or an undergraduate degree in a closely related field of study with demonstrable course work in Historic Preservation (see Academic Background for Historic Preservation Planning), plus a minimum of four (4) years of full-time professional experience applying the theories, methods, and practices of Historic Preservation Planning that enables professional judgments to be made about the identification, evaluation, documentation, registration, protection, or treatment of historic and archeological properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historic Preservation Planner).

Historic Preservation Planning—Academic Background

Closely related fields: Professional Historic Preservation Planners typically receive their education through academic Planning programs, although increasingly Historic Preservation programs are offering Historic Preservation Planning as a concentration in which degrees are awarded. Other fields that may be closely related, provided that training relevant to Historic Preservation Planning is obtained, include Historical or Cultural Geography, Architecture, Urban Design, and Historic Preservation.

Discipline specializations: Historic Preservation Planning is a specialization within the broader discipline of Planning. Other specializations include Urban, City, Town, or Community Planning; Regional Planning; Land Use Planning; Environmental Planning; Recreation Planning; Transportation Planning; and Housing Planning.

Applying the Standard for Historic Preservation Planner—Documenting Professional Experience

In order to receive a license or be registered or certified as a professional Planner, an individual typically must pass a written exam and have completed a specified number of years of experience. A professional Historic Preservation Planner typically has gained experience in data collection and analysis; survey and evaluation of existing conditions; consultation with elected and appointed officials and the general public; identification of alternative strategies; enforcement or administration of relevant statutes and regulations; and the preparation of planning documents.

Products and Activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." Products and activities that meet the appropriate Secretary's Standards for Archeology and Historic Preservation may include:

• Preservation plans adopted by government officials; and/or results of preservation planning studies incorporated into the local comprehensive or master plan.

• Ordinances for the protection of historic and/or archeological resources.

• Economic Feasibility Studies that make recommendations for preserving historic or archeological properties.

• Publications, which might include articles in regional, national, or international professional journals, monographs, books, or chapters in edited books, related to preservation planning.

• Presentations at regional, national, or international professional conferences, symposia, workshops, or exhibits related to preservation planning.

• Professional service on boards of committees or regional, national, or international professional organizations concerned with preservation planning.

• Planning awards received from local, regional, national, or international professional organizations.

This list is not comprehensive. Furthermore, it should be understood that not all of these products and activities are needed in order to meet the Standard; rather, a combination of several products and activities would be more typical. If the applicant were documenting professional experience in one of the specializations, however, the

majority of products and activities would naturally reflect that specialization.

Historic Preservation; Historic Preservation Professional Qualification Standards

Historic Preservation is the application of strategies that promote the identification, evaluation, documentation, registration, protection, treatment, continued use, and interpretation of prehistoric and historic resources.

Standard for Historic Preservationist

(a) The applicant, employee, consultant, or advisor will have a graduate degree in Historic Preservation or a closely related field of study (see Academic Background for the Historic Preservation discipline), plus a minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of Historic Preservation that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic and prehistoric properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historic Preservationists); or * * *.

(b) An undergraduate degree in Historic Preservation or a closely related field of study (see Academic Background for the Historic Preservation discipline), plus a minimum of four (4) years of full-time professional experience applying the theories, methods, and practices of Historic Preservation that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic and prehistoric properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historic Preservationists).

Historic Preservation—Academic Background

Closely related fields: Various fields of study may be considered closely related to Historic Preservation, such as American Studies, Architecture, Architectural History, Archeology, History, and Historical or Cultural Geography, provided that such programs of study include course work in the history of the designed environment, history and theory of preservation, historic preservation methods, techniques, and legislation (Federal, State and local), plus a formal supervised practicum or internship for hands-on application of knowledge and technical skills in the field.

Discipline specializations: While most Historic Preservationists tend to be generalists, many specialize in such areas as Architectural, Landscape, and Community Design, Historic Building Technology, Preservation Economics, Preservation Law, Historic Preservation Planning, and Site Interpretation and Management.

Applying the Standard for Historic Preservationist—Documenting Professional Experience

A professional Historic Preservationist typically has experience that demonstrates a well-grounded understanding of the principles, practices, laws and regulations, and diverse resources of historic preservation.

Products and Activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation of historic or archeological resources." Products and activities that meet the appropriate Secretary's Standards for Archeology and Historic Preservation may include:

- National Register documentation that has resulted in property listings or Determinations of Eligibility.
- Survey reports assessing the significance of historic properties.
- Historic Structure Reports.
- Adaptive reuse plans or feasibility studies that make recommendations for preserving historic properties.
- Written opinions that have been accepted that assess the impact that an undertaking will have on historic or archeological properties.
- Historic District Ordinances that have been adopted by a local government.
- Documentation that meets HABS/HAER standards for recording historic properties.
- Publications, which might include articles in regional, national, or international professional journals, monographs, books, or chapters in edited books, related to historic preservation.
- Presentations at regional, national, or international professional conferences, symposia, workshops, or exhibits related to historic preservation.
- Professional service on boards or committees or regional, national, or international professional organizations concerned with historic preservation.
- Awards, research grants, research fellowships, or invitations to teaching posts.

This list is not comprehensive. Furthermore, it should be understood that not all of these products and activities are needed in order to meet the Standard; rather, a combination of several products and activities would be more typical. If the applicant were documenting professional experience in one of the specializations, however, the majority of products and activities would naturally reflect that specialization.

History; Historic Preservation Professional Qualification Standards

History is the study of the past through written records, oral history, and material culture and the examination of that evidence within a chronological or topical sequence in order to interpret its relationship to preceding, contemporary and subsequent events.

Standard for Historian

(a) The applicant, employee, consultant, or advisor will have a graduate degree in History or a closely related field of study (see Academic Background for History), plus a minimum of two (2) years of full-time professional experience applying the theories, methods, and practices of History that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation (see Documenting Professional Experience for Historians); or * * *

(b) An undergraduate degree in History or a closely related field of study (see Academic Background for History), plus a minimum of four (4) years of full-time professional experience applying the theories, methods, and practices of History that enables professional judgments to be made about the identification, evaluation, documentation, registration, or treatment of historic properties in the United States and its Territories; and products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the

practice of historic preservation (see Documenting Professional Experience for Historians).

(**Note:** Pursuant to 36 CFR part 61 a person meeting this Standard is required as part of the core staff for each State Historic Preservation Office (SHPO) and as part of each State Review Board. Expertise described by this standard is also needed for Tribal Preservation Office staff or consultants of tribes that have executed a Memorandum of Agreement to implement Section 101(d) of the National Historic Preservation Act. It also may be needed for consultants hired with HPF grant funds and for members of Certified Local Government Commissions.)

History—Academic Background

Closely related fields: For this Standard, the professional degree is typically awarded in History, American History, or Public History. Relevant training can be obtained in programs of American Studies, American Civilization, Historical or Cultural Geography, Anthropology, Ethnohistory, and Historic Preservation, providing that course work is offered in historical research methods and techniques. Education in the social and cultural history of countries other than North America may be relevant when dealing with the histories of immigrant, ethnic or minority groups in the United States.

Discipline specializations: Professional Historians tend to concentrate their education and experience in one of the many chronological, regional, and topical specializations within American History (such as colonial history, southern history, community history, women's history, military history, history of technology, or industrial history).

Applying the Standard for Historian—Documenting Professional Experience

A professional Historian has experience in archival and primary documents research, evaluating and synthesizing this information, and preparation of scholarly narrative histories. Historic research experience in countries other than North America may be relevant when researching the histories of immigrant, ethnic or minority groups in the United States of America.

Products and Activities

Professional experience and expertise must be documented through "products and activities that demonstrate the successful application of acquired proficiencies in the discipline to the practice of historic preservation." Products and activities that meet the appropriate Secretary's Standards for Archeology and Historic Preservation may include:

- National Register documentation that has resulted in property listings or Determinations of Eligibility.
- Documentation that meets HABS/HAER standards for recording historic properties.
- Survey reports assessing the significance of historic properties.
- Publications, which might include articles in regional, national, or international professional journals, monographs, books, or chapters in edited books, related to documenting and evaluating the significance of historic properties.
- Presentations at regional, national or international professional conferences, symposia, workshops, or exhibits related to documenting and evaluating historic properties.
- Professional service on boards or committees of regional, national, or international professional organizations concerned with documenting and evaluating the significance of historic properties.
- Awards, research grants, research fellowships, or invitations to teaching posts.

This list is not comprehensive. Furthermore, it should be understood that not all of these products and activities are needed in order to meet the Standard; rather, a combination of several products and activities would be more typical. If the applicant were documenting professional experience in one of the specializations, however, the majority of products and activities would naturally reflect that specialization.

Sources of Additional Information—Professional Organizations

The following organizations may be contacted to request additional information about the specific disciplines, college and university departments, workshops, and conferences and publications about the practice of each discipline.

American Anthropological Association, 4350 North Fairfax Drive, Suite 630, Arlington, VA 22203–1621
American Association of Museums, P.O. Box 4002, Washington, D.C. 20042–4002
American Association for State Federal and Local History, 530 Church Street, Suite 600, Nashville, TN 37219–2325
American Cultural Resources Association, c/o New South Associates, 6150 Ponce de Leon Avenue, Stone Mountain, GA 30083
American Folklife Center, Library of Congress, Washington, D.C. 20540–8100
American Historical Association, 400 A Street, SE., Washington, D.C. 20003
American Institute for the Conservation of Historic & Artistic Works, 1717 K Street, NW., Suite 301, Washington, D.C. 20006
American Institute of Architects, 1735 New York Avenue, NW., Washington, D.C. 20006
American Institute of Certified Planners, 1776 Massachusetts Avenue, NW., Washington, D.C. 20036
American Planning Association, 122 S. Michigan Avenue, Suite 1200, Chicago, IL 60603–6107
American Society of Civil Engineers, 1801 Alexander Bell Drive, Reston, VA 20191–4400
American Society of Landscape Architects, 4401 Connecticut Avenue, NW.,Washington, D.C. 20008–2302
American Society of Mechanical Engineers, P.O. Box 2900, Fairfield, NJ 07007–2900
American Studies Association, 1120 19th Street, NW., Suite 301, Washington, D.C. 20036
Association for Preservation Technology, P.O. Box 3511, Williamsburg, VA 23187
Association of American Geographers, 1710 16th Street, NW., Washington, D.C. 20009
Center for Museum Studies, Smithsonian Institution, Arts and Industries Building, Suite 2235, MRC, 427, Washington, D.C. 20560
The Institute for Electrical and Electronic Engineers, 445 Hoes Lane, Piscataway, NJ 08855–1331
National Council on Preservation Education, c/o Center for Historic Architecture and Engineering, University of Delaware, Newark, DE 19716
National Council on Public History, 327 Cavanaugh Hall-IUPUI, 425 University Blvd., Indianapolis, IN 46202–5140
National Society of Professional Engineers, 1420 King Street, Alexandria, VA 22314–2794
National Trust for Historic Preservation, 1785 Massachusetts Avenue, NW., Washington, D.C. 20036
Organization of American Historians, 112 North Bryan Street, Bloomington, IN 47408–4199
Society for American Archaeology, 900 2nd Street, NE., Suite 12, Washington, D.C. 20002
Society for Applied Anthropology, P.O. Box 24083, Oklahoma City, OK 73124
Society of Architectural Historians, Charnley-Persky House, 1365 North Astor Street, Chicago, IL 60610–2144
Society for Historical Archeology, P.O. Box 30446, Tucson, AZ 85751
Society of Professional Archeologists, Department of Anthropology, Southern Methodist University, Dallas, TX 75275

Dated: June 12, 1997.

Katherine H. Stevenson,

Associate Director, Cultural Resource Stewardship and Partnerships, National Park Service.

[FR Doc. 97–16168 Filed 6–19–97; 8:45 am]

BILLING CODE 4310–70–P

Channel Law Group, LLP

February 17, 2026

Supplement to Appellant's Comments and Objections to ENV-2019-6645-EIR (SCH #2020-110210), 11973 San Vincente Boulevard Project EIR, Council File: 25-1518 ("Project")

EXHIBIT 22

February 17, 2026
Supplemental CEQA Appeal Justification Letter – Footnote 49

federal register

Thursday
September 29, 1983

Part IV

Department of the Interior

National Park Service

Archeology and Historic Preservation; Secretary of the Interior's Standards and Guidelines

DEPARTMENT OF THE INTERIOR

National Park Service

Archeology and Historic Preservation; Secretary of the Interior's Standards and Guidelines

AGENCY: National Park Service, Interior.

ACTION: Notice.

SUMMARY: This notice sets forth the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. These standards and guidelines are not regulatory and do not set or interpret agency policy. They are intended to provide technical advice about archeological and historic preservation activities and methods.

DATE: These Standards and Guidelines are effective on September 29, 1983.

FOR FURTHER INFORMATION CONTACT: Lawrence E. Aten, Chief, Interagency Resources Division, National Park Service, United States Department of the Interior, Washington, D.C. 20240 (202–343–9500). A Directory of Technical Information listing other sources of supporting information is available from the National Park Service.

SUPPLEMENTARY INFORMATION: The Standards and Guidelines are prepared under the authority of Sections 101(f), (g), and (h), and Section 110 of the National Historic Preservation Act of 1966, as amended. State Historic Preservation Officers; Federal Preservation Officers including those of the Department of Agriculture, Department of Defense, Smithsonian Institution and General Services Administration; the Advisory Council on Historic Preservation; the National Trust for Historic Preservation; and other interested parties were consulted during the development of the Standards and Guidelines; additional consultation with these agencies will occur as the Standards and Guidelines are tested during their first year of use.

Purpose

The proposed Standards and the philosophy on which they are based result from nearly twenty years of intensive preservation activities at the Federal, State, and local levels.

The purposes of the Standards are:

To organize the information gathered about preservation activities.

To describe results to be achieved by Federal agencies, States, and others when planning for the identification, evaluation, registration and treatment of historic properties.

To integrate the diverse efforts of many entities performing historic preservation into a systematic effort to preserve our nation's cultural heritage.

Uses of the Standards

The following groups or individuals are encouraged to use these Standards:

Federal agency personnel responsible for cultural resource management pursuant to Section 110 of the National Historic Preservation Act, as amended, in areas under Federal jurisdiction. A separate series of guidelines advising Federal agencies on their specific historic preservation activities under Section 110 is in preparation.

State Historic Preservation Offices responsible under the National Historic Preservation Act, as amended, for making decisions about the preservation of historic properties in their States in accordance with appropriate regulations and the Historic Preservation Fund Grants Management Manual. The State Historic Preservation Offices serve as the focal point for preservation planning and act as a central state-wide repository of collected information.

Local governments wishing to establish a comprehensive approach to the identification, evaluation, registration and treatment of historic properties within their jurisdictions.

Other individuals and organizations needing basic technical standards and guidelines for historic preservation activities.

Organization

This material is organized in three sections: Standards; Guidelines; and recommended technical sources, cited at the end of each set of guidelines. Users of this document are expected to consult the recommended technical sources to obtain guidance in specific cases.

Review of the Standards and Guidelines

The Secretary of the Interior's Standards for Rehabilitation have recently undergone extensive review and their guidelines made current after 5 years of field use. Users and other interested parties are encouraged to submit written comments on the utility of these Standards and Guidelines except for the Rehabilitation Standards mentioned above. This edition will be thoroughly reviewed by the National Park Service (including consultation with Federal and State agencies), after the end of its first full year of use and any necessary modifications will be made. Subsequent reviews are anticipated as needed. Comments should be sent to Chief, Interagency Resources Division, National Park Service, United States Department of the Interior, Washington, D.C. 20240.

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Secretary of the Interior's Standards for Preservation Planning

Preservation planning is a process that organizes preservation activities (identification, evaluation, registration and treatment of historic properties) in a logical sequence. The Standards for Planning discuss the relationship among these activities while the remaining activity standards consider how each activity should be carried out. The Professional Qualifications Standards discuss the education and experience required to carry out various activities.

The Standards for Planning outline a process that determines when an area should be examined for historic properties, whether an identified property is significant, and how a significant property should be treated.

Preservation planning is based on the following principles:

—Important historic properties cannot be replaced if they are destroyed. Preservation planning provides for conservative use of these properties, preserving them in place and avoiding harm when possible and altering or destroying properties only when necessary.

—If planning for the preservation of historic properties is to have positive effects, it must begin before the identification of all significant properties has been completed. To make responsible decisions about historic properties, existing information must be used to the maximum extent and new information must be acquired as needed.

—Preservation planning includes public participation. The planning process should provide a forum for open discussion of preservation issues. Public involvement is most meaningful when it is used to assist in defining values of properties and preservation planning issues, rather than when it is limited to review of decisions already made. Early

and continuing public participation is essential to the broad acceptance of preservation planning decisions.

Preservation planning can occur at several levels or scales: in a project area; in a community; in a State as a whole; or in the scattered or contiguous landholdings of a Federal agency. Depending on the scale, the planning process will involve different segments of the public and professional communities and the resulting plans will vary in detail. For example, a State preservation plan will likely have more general recommendations than a plan for a project area or a community. The planning process described in these Standards is flexible enough to be used at all levels while providing a common structure which promotes coordination and minimizes duplication of effort. The Guidelines for Preservation Planning contain additional information about how to integrate various levels of planning.

Standard I. Preservation Planning Establishes Historic Contexts

Decisions about the identification, evaluation, registration and treatment of historic properties are most reliably made when the relationship of individual properties to other similar properties is understood. Information about historic properties representing aspects of history, architecture, archeology, engineering and culture must be collected and organized to define these relationships. This organizational framework is called a "historic context." The historic context organizes information based on a cultural theme and its geographical and chronological limits. Contexts describe the significant broad patterns of development in an area that may be represented by historic properties. The development of historic contexts is the foundation for decisions about identification, evaluation, registration and treatment of historic properties.

Standard II. Preservation Planning Uses Historic Contexts To Develop Goals and Priorities for the Identification, Evaluation, Registration and Treatment of Historic Properties

A series of preservation goals is systematically developed for each historic context to ensure that the range of properties representing the important aspects of each historic context is identified, evaluated and treated. Then priorities are set for all goals identified for each historic context. The goals with assigned priorities established for each historic context are integrated to produce a comprehensive and consistent set of goals and priorities for all historic contexts in the geographical area of a planning effort.

The goals for each historic context may change as new information becomes available. The overall set of goals and priorities are then altered in response to the changes in the goals and priorities for the individual historic contexts.

Activities undertaken to meet the goals must be designed to deliver a usable product within a reasonable period of time. The scope of the activity must be defined so the work can be completed with available budgeted program resources.

Standard III. The Results of Preservation Planning Are Made Available for Integration Into Broader Planning Processes

Preservation of historic properties is one element of larger planning processes. Planning results, including goals and priorities, information about historic properties, and any planning documents, must be transmitted in a usable form to those responsible for other planning activities. Federally mandated historic preservation planning is most successfully integrated into project management planning at an early stage. Elsewhere, this integration is achieved by making the results of preservation planning available to other governmental planning bodies and to private interests whose activities affect historic properties.

Secretary of the Interior's Guidelines for Preservation Planning

Introduction

These Guidelines link the Standards for Preservation Planning with more specific guidance and technical information. They describe one approach to meeting the Standards for Preservation Planning. Agencies, organizations or individuals proposing to approach planning differently may wish to review their approaches with the National Park Service.

The Guidelines are organized as follows:

Managing the Planning Process
Developing Historic Contexts
Developing Goals for a Historic Context
Integrating Individual Historic Contexts—Creating the Preservation Plan
Coordinating with Management Frameworks
Recommended Sources of Technical Information

Managing the Planning Process

The preservation planning process must include an explicit approach to implementation, a provision for review and revision of all elements, and a mechanism for resolving conflicts within the overall set of preservation goals and between this set of goals and other land use planning goals. It is recommended that the process and its products be described in public documents.

Implementing the Process

The planning process is a continuous cycle. To establish and maintain such a process, however, the process must be divided into manageable segments that can be performed within a defined period, such as a fiscal year or budget cycle. One means of achieving this is to define a period of time during which all the preliminary steps in the planning process will be completed. These preliminary steps would include setting a schedule for subsequent activities.

Review and Revision

Planning is a dynamic process. It is expected that the content of the historic contexts described in Standard I and the goals and priorities described in Standard II will be altered based on new information obtained as planning proceeds. The incorporation of this information is essential to improve the content of the plan and to keep it up-to-date and useful. New information must be reviewed regularly and systematically, and the plan revised accordingly.

Public Participation

The success of the preservation planning process depends on how well it solicits and integrates the views of various groups. The planning process is directed first toward resolving conflicts in goals for historic preservation, and second toward resolving conflicts between historic preservation goals and other land-use planning goals. Public participation is intergral to this approach and includes at least the following actions:

1. Involving historians, architectural historians, archeologists, historical architects, folklorists and persons from related discipline to define, review and revise the historic contexts, goals and priorities;

2. Involving interested individuals, organizations and communities in the planning area in identifying the kinds of historic properties that may exist and suitable protective measures;

3. Involving prospective users of the preservation plan in defining issues, goals and priorities;

4. Providing for coordination with other planning efforts at local, state, regional and national levels, as appropriate; and

5. Creating mechanisms for identifying and resolving conflicts about historic preservation issues.

The development of historic contexts, for example, should be based on the professional input of all disciplines involved in preservation and not be limited to a single discipline. For prehistoric archeology, for example, data from fields such as geology, geomorphology and geography may also be needed. The individuals and organizations to be involved will depend, in part, on those present or interested in the planning area.

Documents Resulting from the Planning Process

In most cases, the planning process produces documents that explain how the process works and that discuss the historic contexts and related goals and priorities. While the process can operate in the absence of these documents, planning documents are important because they are the most effective means of communicating the process and its recommendations to others. Planning documents also record decisions about historic properties.

As various parts of the planning process are reviewed and revised to reflect current information, related documents must also be updated. Planning documents should be created in a form that can be easily revised. It is also recommended that the format, language and organization of any documents or other materials (visual aids, etc.) containing preservation planning information meet the needs of prospective users.

Developing Historic Contexts

General Approach

Available information about historic properties must be divided into manageable units before it can be useful for planning purposes. Major decisions about identifying, evaluating, registering and treating historic properties are most reliably made in the context of other related properties. A historic context is an organizational format that groups information about related historic properties, based on a theme, geographic limits and chronological period. A single historic context describes one or more aspects of the historic development of an area, considering history, architecture, archeology, engineering and culture; and identifies the significant patterns that individual historic properties represent, for example, Coal Mining in Northeastern Pennsylvania between 1860 and 1930. A set of historic contexts is a comprehensive summary of all aspects of the history of the area.

The historic context is the cornerstone of the planning process. The goal of preservation planning is to identify, evaluate, register and treat the full range of properties representing each historic context, rather than only one or two types of properties. Identification activities are organized to ensure that research and survey activities include properties representing all aspects of the historic context. Evaluation uses the historic context as the framework within which to apply the criteria for evalution to specific properties or property types. Decisions about treatment of properties are made with the goal of treating the range of properties in the context. The use of historic contexts in organizing major preservation activities ensures that those activities result in the preservation of the wide variety of properties that represent our history, rather than only a small, biased sample of properties.

Historic contexts, as theoretical constructs, are linked to actual historic properties through the concept of property type. Property types permit the development of plans for identification, evaluation and treatment even in the absence of complete knowledge of individual properties. Like the historic context, property types are artifical constructs which may be revised as necessary.

Historic contexts can be developed at a variety of scales appropriate for local, State and regional planning. Given the probability of historic contexts overlapping in an area, it is important to coordinate the development and use of contexts at all levels. Generally, the State Historic Preservation Office possesses the most complete body of information about historic properties and, in practice, is in the best position to perform this function.

The development of historic contexts generally results in documents that describe the prehistoric processes or patterns that define the context. Each of the contexts selected should be developed to the point of identifying important property types to be useful in later preservation decision-making. The amount of detail included in these summaries will vary depending on the level (local, state, regional, or national) at which the contexts are developed and on their intended uses. For most planning purposes, a synopsis of the written description of the historic context is sufficient.

Creating a Historic Context

Generally, historic contexts should not be constructed so broadly as to include all property types under a single historic context or so narrowly as to contain only one property type per historic context. The following procedures should be followed in creating a historic context.

1. Identify the concept, time period and geographical limits for the historic context

Existing information, concepts, theories, models and descriptions should be used as the basis for defining historic contexts. Biases in primary and secondary sources should be identified and accounted for when existing information is used in defining historic contexts.

The identification and description of historic contexts should incorporate contributions from all disciplines involved in historic preservation. The chronological period and geographical area of each historic context should be defined after the conceptual basis is established. However, there may be exceptions, especially in defining prehistoric contexts where drainage systems or physiographic regions often are outlined first. The geographical boundaries for historic contexts should not be based upon contemporary political, project or other contemporary boundaries if those boundaries do not coincide with historical boundaries. For example, boundaries for prehistoric contexts will have little relationship to contemporary city, county or state boundaries.

2. Assemble the existing information about the historic context

a. *Collecting information:* Several kinds of information are needed to construct a preservation plan. Information about the history of the area encompassed by the historic context must be collected, including any information about historic properties that have already been identified. Existing survey or inventory entries are an important source of information about historic properties. Other sources may include literature on prehistory, history, architecture and the environment; social and environmental impact assessments; county and State land use plans; architectural and folklife studies and oral histories; ethnographic research; State historic inventories and registers; technical reports prepared for Section 106 or other assessments of historic properties; and and direct consultation with individuals and organized groups.

In addition, organizations and groups that may have important roles in defining historic contexts and values

should be identified. In most cases a range of knowlegeable professionals drawn from the preservation, planning and academic communities will be available to assist in defining contexts and in identifying sources of information. In other cases, however, development of historic contexts may occur in areas whose history or prehistory has not been extensively studied. In these situations, broad general historic contexts should be initially identified using available literature and expertise, with the expectation that the contexts will be revised and subdivided in the future as primary source research and field survey are conducted. It is also important to identify such sources of information as existing planning data, which is needed to establish goals for identification, evaluation, and treatment, and to identify factors that will affect attainment of those goals.

The same approach for obtaining information is not necessarily desirable for all historic contexts. Information should not be gathered without first considering its relative importance to the historic context, the cost and time involved, and the expertise required to obtain it. In many cases, for example, published sources may be used in writing initial definitions of historic contexts; archival research or field work may be needed for subsequent activities.

b. *Assessing information:* All information should be reviewed to identify bias in historic perspective, methodological approach, or area of coverage. For example, field surveys for archeological sites may have ignored historic archelolgical sites, or county land use plans may have emphasized only development goals.

3. Synthesize information

The information collection and analysis results in a written narrative of the historic context. This narrative provides a detailed synthesis of the data that have been collected and analyzed. The narrative covers the history of the area from the chosen perspective and identifies important patterns, events, persons or cultural values. In the process of identifying the important patterns, one should consider:

a. Trends in area settlement and development, if relevant;

b. Aesthetic and artistic values embodied in architecture, construction technology or craftsmanship;

c. Research values or problems relevant to the historic context; social and physical sciences and humanities; and cultural interests of local communities; and

d. Intangible cultural values of ethnic groups and native American peoples.

4. Define property types

A property type is a grouping of individual properties based on shared physical or associative characteristics. Property types link the ideas incorporated in the theoretical historic context with actual historic properties that illustrate those ideas. Property types defined for each historic context should be directly related to the conceptual basis of the historic context. Property types defined for the historic context "Coal Mining in Northeastern Pennsylvania, 1860–1930" might include coal extraction and processing complexes; railroad and canal transportation systems; commercial districts; mine workers' housing; churches, social clubs and other community facilities reflecting the ethnic origins of workers; and residences and other properties associated with mine owners and other industrialists.

a. *Identify property types:* The narrative should discuss the kinds of properties expected within the geographical limits of the context and group them into those property types most useful in representing important historic trends.

Generally, property types should be defined after the historic context has been defined. Property types in common usage ("Queen Anne houses," "mill buildings," or "stratified sites") should not be adopted without first verifying their relevance to the historic contexts being used.

b. *Characterize the locational patterns of property types:* Generalizations about where particular types of properties are likely to be found can serve as a guide for identification and treatment. Generalizations about the distribution of archeological properties are frequently used. The distribution of other historic properties often can be estimated based on recognizable historical, environmental or cultural factors that determined their location. Locational patterns of property types should be based upon models that have an explicit theoretical or historical basis and can be tested in the field. The model may be the product of historical research and analysis ("Prior to widespread use of steam power, mills were located on rivers and streams able to produce water power" or "plantation houses in the Mississippi Black Belt were located on sandy clay knolls"), or it may result from sampling techniques. Often the results of statistically valid sample surveys can be used to describe the locational patterns of a representative portion of properties belonging to a particular property type. Other surveys can also provide a basis for suggesting locational patterns if a diversity of historic properties was recorded and a variety of environmental zones was inspected. It is likely that the identification of locational patterns will come from a combination of these sources. Expected or predicted locational patterns of property types should be developed with a provision made for their verification.

c. *Characterize the current condition of property types:* The expected condition of property types should be evaluated to assist in the development of identification, evaluation and treatment strategies, and to help define physical integrity thresholds for various property types. The following should be assessed for each property type:

(1) Inherent characteristics of a property type that either contribute to or detract from its physical preservation. For example, a property type commonly constructed of fragile materials is more likely to be deteriorated than a property type constructed of durable materials; structures whose historic function or design limits the potential for alternative uses (water towers) are less likely to be reused than structures whose design allows a wider variety of other uses (commercial buildings or warehouses).

(2) Aspects of the social and natural environment that may affect the preservation or visibility of the property type. For example, community values placed on certain types of properties (churches, historic cemeteries) may result in their maintenance while the need to reuse valuable materials may stimulate the disappearance of properties like abandoned houses and barns.

It may be most efficient to estimate of the condition of property types based on professional knowledge of existing properties and field test these estimates using a small sample of properties representative of each type.

5. Identify information needs

Filling gaps in information is an important element of the preservation plan designed for each historic context. Statements of the information needed should be as specific as possible, focusing on the information needed, the historic context and property types it applies to, and why the information is needed to perform identification, evaluation, or treatment activities.

Developing Goals for a Historic Context

Developing Goals

A goal is a statement of preferred preservation activities, which is

generally stated in terms of property types.

The purpose of establishing preservation goals is to set forth a "best case" version of how properties in the historic context should be identified, evaluated, registered and treated. Preservation goals should be oriented toward the greatest possible protection of properties in the historic context and should be based on the principle that properties should be preserved in place if possible, through affirmative treatments like rehabilitation, stabilization or restoration. Generally, goals will be specific to the historic context and will often be phrased in terms of property types. Some of these goals will be related to information needs previously identified for the historic context. Collectively, the goals for a historic context should be a coherent statement of program direction covering all aspects of the context.

For each goal, a statement should be prepared identifying:

1. The goal, including the context and property types to which the goal applies and the geographical area in which they are located;
2. The activities required to achieve the goal;
3. The most appropriate methods or strategies for carrying out the activities;
4. A schedule within which the activities should be completed; and
5. The amount of effort required to accomplish the goal, as well as a way to evaluate progress toward its accomplishment.

Setting priorities for goals

Once goals have been developed they need to be ranked in importance. Ranking involves examining each goal in light of a number of factors.

1. General social, economic, political and environmental conditions and trends affecting (positively and negatively) the identification, evaluation, registration and treatment of property types in the historic context.

Some property types in the historic context may be more directly threatened by deterioration, land development patterns, contemporary use patterns, or public perceptions of their value, and such property types should be given priority consideration.

2. Major cost or technical considerations affecting the identification, evaluation and treatment of property types in the historic context.

The identification or treatment of some property types may be technically possible but the cost prohibitive; or techniques may not currently perfected (for example, the identification of submerged sites or objects, or the evaluation of sites containing material for which dating techniques are still being developed).

3. Identification, evaluation, registration and treatment activities previously carried out for property types in the historic context.

If a number of properties representing one aspect of a historic context have been recorded or preserved, treatment of additional members of that property type may receive lower priority than treatment of a property type for which no examples have yet been recorded or preserved. This approach ensures that the focus of recording or preserving all elements of ths historic context is retained, rather than limiting activities to preserving properties representing only some aspects of the context.

The result of considering the goals in light of these concerns will be a list of refined goals ranked in order of priority.

Integrating Individual Contexts—Creating the Preservation Plan

When historic contexts overlap geographically, competing goals and priorities must be integrated for effective preservation planning. The ranking of goals for each historic context must be reconciled to ensure that recommendations for one context do not contradict those for another. This important step results in an overall set of priorities for several historic contexts and a list of the activities to be performed to achieve the ranked goals. When applied to a specific geographical area, this is the preservation plan for that area.

It is expected that in many instances historic contexts will overlap geographically. Overlapping contexts are likely to occur in two combinations—those that were defined at the same scale (i.e., textile development in Smithtown 1850–1910 and Civil War in Smithtown 1855–1870) and those defined at different scales (i.e., Civil War in Smithtown and Civil War in the Shenandoah Valley). The contexts may share the same property types, although the shared property types will probably have different levels of importance, or they may group the same properties into different property types, reflecting either a different scale of analysis or a different historical perspective.

As previously noted, many of the goals that the formulated for a historic context will focus on the property types defined for that context. Thus it is critical that the integration of goals include the explicit consideration of the potential for shared property type membership by individual properties. For example, when the same property types are used by two contexts, reconciling the goals will require weighing the level of importance assigned to each property type. The degree to which integration of historic contexts must involve reconciling property types may be limited by the coordinated development of historic contexts used at various levels.

Integration with Management Frameworks

Preservation goals and priorities are adapted to land units through integration with other planning concerns. This integration must involve the resolution of conflicts that arise when competing resources occupy the same land base. Successful resolution of these conflicts can often be achieved through judicious combination of inventory, evaluation and treatment activities. Since historic properties are irreplaceable, these activities should be heavily weighted to discourage the destruction of significant properties and to be compatible with the primary land use.

Recommended Sources of Technical Information

Resource Protection Planning Process. State and Plans Grants Division, 1980. Washington, D.C. Available from Survey and Planning Branch, Interagency Resources Division, National Park Service, Department of the Interior, Washington, D.C. 20240. Outlines a step-by-step approach to implementing the resource protection planning process.

Resource Protection Planning Process Case Studies. Available from Survey and Planning Branch, Interagency Resources Division, National Park Service, Department of the Interior, Washington, D.C. 20240. Reports prepared by State Historic Preservation Offices and other using the planning process.

Planning Theory. Andreas Faludi, 1980. Oxford: Pergamon Press. Constructs a model of planning using concepts borrowed from general systems theory.

SECRETARY OF THE INTERIOR'S STANDARDS FOR IDENTIFICATION

Identification activities are undertaken to gather information about historic properties in an area. The scope of these activities will depend on: existing knowledge about properties; goals for survey activities developed in the planning process; and current management needs.

Standard I. Identification of Historic Properties Is Undertaken to the Degree Required To Make Decisions

Archival research and survey activities should be designed to gather the information necessary to achieve defined preservation goals. The

objectives, chosen methods and techniques, and expected results of the identification activities are specified in a research design. These activities may include archival research and other techniques to develop historic contexts, sampling an area to gain a broad understanding of the kinds of properties it contains, or examining every property in an area as a basis for property specific decisions. Where possible, use of quantitative methods is important because it can produce an estimate, whose reliability may be assessed, of the kinds of historic properties that may be present in the studied area. Identification activities should use a search procedure consistent with the management needs for information and the character of the area to be investigated. Careful selection of methods, techniques and level of detail is necessary so that the gathered information will provide a sound basis for making decisions.

Standard II. Results of Identification Activities are Integrated Into the Preservation Planning Process

Results of identification activities are reviewed for their effects on previous planning data. Archival research or field survey may refine the understanding of one or more historic contexts and may alter the need for additional survey or study of particular property types. Incorporation of the results of these activities into the planning process is necessary to ensure that the planning process is always based on the best available information.

Standard III. Identification Activities Include Explicit Procedures for Record-Keeping and Information Distribution

Information gathered in identification activities is useful in other preservation planning activities only when it is systematically gathered and recorded, and made available to those responsible for preservation planning. The results of identification activities should be reported in a format that summarizes the design and methods of the survey, provides a basis for others to review the results, and states where information on identified properties is maintained. However, sensitive information, like the location of fragile resources, must be safeguarded from general public distribution.

Secretary of the Interior's Guidelines for Identification

Introduction

These Guidelines link the Standards for Identification with more specific guidance and technical information. The Guidelines outline one approach to meet the Standards for Identification. Agencies, organizations and individuals proposing to approach identification differently may wish to review their approaches with the National Park Service.

The Guidelines are organized as follows:

Role of Identification in the Planning Process
Performing Identification
Integrating Identification Results
Reporting Identification Results
Recommended Sources of Technical Information

Role of Identification in the Planning Process

Identification is undertaken for the purpose of locating historic properties and is composed of a number of activities which include, but are not limited to archival research, informant interviews, field survey and analysis. Combinations of these activities may be selected and appropriate levels of effort assigned to produce a flexible series of options. Generally identification activities will have multiple objectives, reflecting complex management needs. Within a comprehensive planning process, identification is normally undertaken to acquire property-specific information needed to refine a particular historic context or to develop any new historic contexts. (See the Guidelines for Preservation Planning for discussion of information gathering to establish plans and to develop historic contexts.) The results of identification activities are then integrated into the planning process so that subsequent activities are based on the most up-to-date information. Identification activities are also undertaken in the absence of a comprehensive planning process, most frequently as part of a specific land-use or development project. Even lacking a formally developed preservation planning process, the benefits of efficent, goal-directed research may be obtained by the development of localized historic contexts, suitable in scale for the project area, as part of the background research which customarily occurs before field survey efforts.

Performing Identification

Research Design

Identification activities are essentially research activities for which a statement of objectives or research design should be prepared before work is performed. Within the framework of a comprehensive planning process, the research design provides a vehicle for integrating the various activities performed during the identification process and for linking those activities directly to the goals and the historic context(s) for which those goals were defined. The research design stipulates the logical integration of historic context(s) and field and laboratory methodology. Although these tasks may be performed individually, they will not contribute to the greatest extent possible in increasing information on the historic context unless they relate to the defined goals and to each other. Additionally, the research design provides a focus for the integration of interdisciplinary information. It ensures that the linkages between specialized activities are real, logical and address the defined research questions. Identification activities should be guided by the research design and the results discussed in those terms. (See Reporting Identification Results)

The research design should include the following:

1. *Objectives* of the identification activities. For example: to characterize the range of historic properties in a region; to identify the number of properties associated with a context; to gather information to determine which properties in an area are significant.

The statement of objectives should refer to current knowledge about the historic contexts or property types, based on background research or assessments of previous research. It should clearly define the physical extent of the area to be investigated and the amount and kinds of information to be gathered about properties in the area.

2. *Methods* to be used to obtain the information. For example: archival research or field survey. Research methods should be clearly and specifically related to research problems.

Archival research or survey methods should be carefully explained so that others using the gathered information can understand how the information was obtained and what its possible limitations or biases are.

The methods should be compatible with the past and present environmental character of the geographical area under study and the kinds of properties most likely to be present in the area.

3. *The expected results* and the reasons for those expections.

Expectations about the kind, number, location, character and condition of historic properties are generally based on a combination of background research, proposed hypotheses, and analogy to the kinds of properties known to exist in areas of similar environment or history.

Archival Research

Archival or background research is generally undertaken prior to any field survey. Where identification is undertaken as part of a comprehensive planning process, background research may have taken place as part of the development of the historic contexts (see the Guidelines for Preservation Planning). In the absence of previously developed historic contexts, archival research should address specific issues and topics. It should not duplicate previous work. Sources should include, but not be limited to, historical maps, atlases, tax records, photographs, ethnographies, folklife documentation, oral histories and other studies, as well as standard historical reference works, as appropriate for the research problem. (See the Guidelines for Historical Documentation for additional discussion.)

Field Survey

The variety of field survey techniques available, in combination with the varying levels of effort that may be assigned, give great flexibility to implementing field surveys. It is important that the selection of field survey techniques and level of effort be responsive to the management needs and preservation goals that direct the survey effort.

Survey techniques may be loosely grouped into two categories, according to their results. First are the techniques that result in the characterization of a region's historic properties. Such techniques might include "windshield" or walk-over surveys, with perhaps a limited use of sub-surface survey. For purposes of these Guidelines, this kind of survey is termed a "reconnaissance." The second category of survey techniques is those that permit the identification and description of specific historic properties in an area; this kind of survey effort is termed "intensive." the terms "reconnaissance" and "intensive" are sometimes defined to mean particular survey techniques, generally with regard to prehistoric sites. The use of the terms here is general and is not intended to redefine the terms as they are used elsewhere.

Reconnaissance survey might be most profitably employed when gathering data to refine a developed historic context—such as checking on the presence or absence of expected property types, to define specific property types or to estimate the distribution of historic properties in an area. The results of regional characterization activities provide a general understanding of the historic properties in a particular area and permit management decisions that consider the sensitivity of the area in terms of historic preservation concerns and the resulting implications for future land use planning. The data should allow the formulation of estimates of the necessity, type and cost of further identification work and the setting of priorities for the individual tasks involved. In most cases, areas surveyed in this way will require resurvey if more complete information is needed about specific properties.

A reconnaissance survey should document:

1. The kinds of properties looked for;
2. The boundaries of the area surveyed;
3. The method of survey, including the extent of survey coverage;
4. The kinds of historic properties present in the surveyed area;
5. Specific properties that were identified, and the categories of information collected; and
6. Places examined that did not contain historic properties.

Intensive survey is most useful when it is necessary to know precisely what historic properties exist in a given area or when information sufficient for later evaluation and treatment decisions is needed on individual historic properties. Intensive survey describes the distribution of properties in an area; determines the number, location, and condition of properties; determines the types of properties actually present within the area; permits classification of individual properties; and records the physical extent of specific properties.

An intensive survey should document:

1. The kinds of properties looked for;
2. The boundaries of the area surveyed;
3. The method of survey, including an estimate of the extent of survey coverage;
4. A record of the precise location of all properties identified; and
5. Information on the appearance, significance, integrity and boundaries of each property sufficient to permit an evaluation of its significance.

Sampling

Reconnaissance or intensive survey methods may be employed according to a sampling procedure to examine less-than-the-total project or planning area.

Sampling can be effective when several locations are being considered for an undertaking or when it is desirable to estimate the cultural resources of an area. In many cases, especially where large land areas are involved, sampling can be done in stages. In this approach, the results of the initial large area survey are used to structure successively smaller, more detailed surveys. This "nesting" approach is an efficient technique since it enables characterization of both large and small areas with reduced effort. As with all investigative techniques, such procedures should be designed to permit an independent assessment of results.

Various types of sample surveys can be conducted, including, but not limited to: random, stratified and systematic. Selection of sample type should be guided by the problem the survey is expected to solve, the nature of the expected properties and the nature of the area to be surveyed.

Sample surveys may provide data to estimate frequencies of properties and types of properties within a specified area at various confidence levels. Selection of confidence levels should be based upon the nature of the problem the sample survey is designed to address.

Predictive modeling is an application of basic sampling techniques that projects or extrapolates the number, classes and frequencies of properties in unsurveyed areas based on those found in surveyed areas. Predictive modeling can be an effective tool during the early stages of planning an undertaking, for targeting field survey and for other management purposes. However, the accuracy of the model must be verified; predictions should be confirmed through field testing and the model redesigned and retested if necessary.

Special survey techniques

Special survey techniques may be needed in certain situations.

Remote sensing techniques may be the most effective way to gather background environmental data, plan more detailed field investigations, discover certain classes of properties, map sites, locate and confirm the presence of predicted sites, and define features within properties. Remote sensing techniques include aerial, subsurface and underwater techniques. Ordinarily the results of remote sensing should be verified through independent field inspection before making any evaluation or statement regarding frequencies or types of properties.

Integrating Identification Results

The results of identification efforts must be integrated into the planning process so that planning decisions are based on the best available information. The new informantion is first assessed against the objectives of the identification effort to determine whether the gathered information meets

the defined identification goals for the historic context(s); then the goals are adjusted accordingly. In addition, the historic context narrative, the definition of property types and the planning goals for evaluation and treatment are all adjusted as necessary to accommodate the new data.

Reporting Identification Results

Reporting of the results of identification activities should begin with the statement of objectives prepared before undertaking the survey. The report should respond to each of the major points documenting:

1. Objectives;
2. Area researched or surveyed;
3. Research design or statement of objectives;
4. Methods used, including the intensity of coverage. If the methods differ from those outlined in the statement of objectives, the reasons should be explained.
5. Results: how the results met the objectives; result analysis, implications and recommedations; where the compiled information is located.

A summary of the survey results should be available for examination and distribution. Identified properties should then be evaluated for possible inclusion in appropriate inventories.

Protection of information about archeological sites or other properties that may be threatened by dissemination of that information is necessary. These may include fragile archeological properties or properties such as religious sites, structures, or objects, whose cultural value would be compromised by public knowledge of the property's location.

Recommended Sources of Technical Information

The Archeological Survey: Methods and Uses. Thomas F. King. Interagency Archeological Services, U.S. Department of the Interior, 1978. Washington, D.C. Available through the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402. GPO stock number 024-016-00091. Written primarily for the non-archeologist, this publication presents methods and objectives for archeological surveys.

Cultural Resources Evaluation of the Northern Gulf of Mexico Continental Shelf. National Park Service, U.S. Department of the Interior, 1977.

Guidelines for Local Surveys: A Basis for Preservation Planning. Anne Derry, H. Ward Jandl, Carol Shull and Jan Thorman. National Register Division, U.S. Department of the Interior, 1978. Washington, D.C. Available through the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402. GPO stock number 024-016-0089-7. General guidance about designing and carrying out community surveys.

The Process of Field Research: Final Report on the Blue Ridge Parkway Folklife Project. American Folklife Center, 1981.

Regional Sampling in Archeology. David Hurst Thomas. University of California, Archeological Survey Annual Report, 1968-9, 11:87-100.

Remote Sensing: A Handbook for Archeologists and Cultural Resource Managers. Thomas R. Lyons and Thomas Eugene Avery. Cultural Resource Management Division, National Park Service, U.S. Department of the Interior, 1977.

Remote Sensing and Non-Destructive Archeology. Thomas R. Lyons and James L. Ebert, editors. Remote Sensing Division, Southwest Cultural Resources Center, National Park Service, U.S. Department of the Interior and University of New Mexico, 1978.

Remote Sensing Experiments in Cultural Resource Studies: Non-Destructive Methods of Archeological Exploration, Survey and Analysis. Thomas R. Lyons, assembler. reports of the Chaco Center, Number One. National Park Service, U.S. Department of the Interior and University of New Mexico, 1976.

Sampling in Archeology. James W. Mueller, editor. University of Arizona Press, 1975. Tucson, Arizona.

Scholars as Contractors. William J. Mayer-Oakes and Alice W. Portnoy, editors. Cultural Resource Management Studies. U.S. Department of the Interior, 1979.

Sedimentary Studies of Prehistoric Archeological Sites. Sherwood Gagliano, Charles Pearson, Richard Weinstein, Diana Wiseman, and Christopher McClendon. Division of State Plans and Grants, National Park Service, U.S. Department of the Interior, 1982. Washington, D.C. Available from Coastal Environments Inc., 1260 Main Street, Baton Rouge, Louisiana 70802. Establishes and evaluates a method for employing sedimentological analysis in distinguishing site areas from non-site areas when identifying submerged archeological sites on the continental shelf.

State Survey Forms. Available from Interagency Resource Management Division, National Park Service, Department of the Interior, Washington, D.C. 20240. Characterizes cultural resource survey documentation methods in State Historic Preservation Offices.

Truss Bridge Types: A Guide to Dating and Identifying. Donald C. Jackson and T. Allan Comp. American Association for State and Local History, 1977. Nashville, Tennessee. Technical leaflet #95. Available from AASLH, 708 Berry Road, Nashville, Tennessee 37204. Information about performing surveys of historic bridges and identifying the types of properties encountered.

Secretary of the Interior's Standards for Evaluation

Evaluation is the process of determining whether identified properties meet defined criteria of significance and therefore should be included in an inventory of historic properties determined to meet the criteria. The criteria employed vary depending on the inventory's use in resource management.

Standard I. Evaluation of the Significance of Historic Properties Uses Established Criteria

The evaluation of historic properties employs criteria to determine which properties are significant. Criteria should therefore focus on historical, architectural, archeological, engineering and cultural values, rather than on treatments. A statement of the minimum information necessary to evaluate properties against the criteria should be provided to direct information gathering activities.

Because the National Register of Historic Places is a major focus of preservation activities on the Federal, State and local levels, the National Register criteria have been widely adopted not only as required for Federal purposes, but for State and local inventories as well. The National Historic Landmark criteria and other criteria used for inclusion of properties in State historic site files are other examples of criteria with different management purposes.

Standard II. Evaluation of Significance Applies the Criteria Within Historic Contexts

Properties are evaluated using a historic context that identifies the significant patterns that properties represent and defines expected property types against which individual properties may be compared. Within this comparative framework, the criteria for evaluation take on particular meaning with regard to individual properties.

Standard III. Evaluation Results in A List or Inventory of Significant Properties That Is Consulted In Assigning Registration and Treatment Priorities

The evaluation process and the subsequent development of an inventory of significant properties is an on-going activity. Evaluation of the significance of a property should be completed before registration is considered and before preservation treatments are selected. The inventory entries should contain sufficient information for subsequent activities such as registration or treatment of properties, including an evaluation statement that makes clear the significance of the property within one or more historic contexts.

Standard IV. Evaluation Results Are Made Available to the Public

Evaluation is the basis of registration and treatment decisions. Information about evaluation decisions should be organized and available for use by the general public and by those who take part in decisions about registration and treatment. Use of appropriate computer-assisted data bases should be a part of the information dissemination effort. Sensitive information, however, must be safeguarded from general public distribution.

Secretary of the Interior's Guidelines for Evaluation

Introduction

These Guidelines link the Standards for Evaluation with more specific guidance and technical information. These Guidelines describe one approach to meeting the Standards for Evaluation. Agencies, organizations, or individuals proposing to approach evaluation differently may wish to review their approach with the National Park Service.

The Guidelines are organized as follows:

The Evalauation Process
Criteria
Application of Criteria within a Historic Context
Inventory
Recommended Sources of Technical Information

The Evaluation Process

These Guidelines describe principles for evaluating the significance of one or more historic properties with regard to a given set of criteria.

Groups of related properties should be evaluated at the same time whenever possible; for example, following completion of a theme study or community survey.

Evaluation should not be undertaken using documentation that may be out of date. Prior to proceeding with evaluation the current condition of the property should be determined and previous analyses evaluated in light of any new information.

Evaluation must be performed by persons qualified by education, training and experience in the application of the criteria. Where feasible, evaluation should be performed in consultation with other individuals experienced in applying the relevant criteria in the geographical area under consideration; for example, the State Historic Preservation Officer or local landmarks commission.

Evaluation is completed with a written determination that a property is or is not significant based on provided information. This statement should be part of the record.

Criteria: The purposes of evaluation criteria should be made clear. For example, the criteria may be used "to evaluate properties for inclusion in the county landmarks list," or "to implement the National Register of Historic Places program."

For Federal cultural resource management purposes, criteria used to develop an inventory should be coordinated with the National Register criteria for evaluation as implemented in the approved State comprehensive historic preservation plan.

Content of Criteria: Criteria should be appropriate in scale to the purpose of the evaluation. For example, criteria designed to describe national significance should not be used as the basis for creating a county or State inventory. Criteria should be categorical and not attempt to describe in detail every property likely to qualify. Criteria should outline the disciplines or broad areas of concern (history, archeology, architectural history, engineering and culture, for example) included within the scope of the inventory; explain what kinds of properties, if any, are excluded and the reasons for exclusion; and define how levels of significance are measured, if such levels are incorporated into the criteria. If the criteria are to be used in situations where the National Register criteria are also widely used, it is valuable to include a statement explaining the relationship of the criteria used to the National Register criteria, including how the scope of the inventory differs from that defined by the National Register criteria and how the inventory could be use to identify properties that meet the National Register criteria.

Information Needed to Evaluate Properties: The criteria should be accompanied by a statement defining the minimum information necessary to evaluate properties to insure that this information is collected during identification activities intended to locate specific historic properties. Generally, at least the following will be needed:

1. Adequately developed historic contexts, including identified property types. (See the Guidelines for Preservation Planning for discussion of development of historic contexts.)

2. Sufficient information about the appearance, condition and associative values of the property to be evaluated to:

a. Classify it as to property type;

b. Compare its features or characteristics with those expected for its property type; and

c. Define the physical extent of the property and accurately locate the property.

To facilitate distinguishing between facts and analysis, the information should be divided into categories, including identification and description of pertinent historical contexts; description of the property and its significance in the historical context; and analysis of the integrity of the property relative to that needed to represent the context.

Usually documentation need not include such items as a complete title history or biography of every owner of a property, except where that information is important in evaluating its significance. Information on proposed or potential treatments or threats, such as destruction of a property through uncontrollable natural processes, is also not needed for evaluation, unless those effects are likely to occur prior to or during the evaluation, thereby altering the significant characteristic of the property. If archeological testing or structural analysis is needed for evaluation, it should not proceeded beyond the point of providing the information necessary for evaluation and should not unnecessarily affect significant features or values of the property.

When more information is needed: Evaluation cannot be conducted unless all necessary information is available. (See Information Needed to Evaluate Properties.) Any missing information or analysis should be identified (e.g. development of context or information on the property) as well as the specific activities required to obtain the information (archival research, field survey and testing, or laboratory testing). When adequate information is not available, it is important to record that fact so that evaluation will not be undertaken until the information can be obtained. In some cases needed information is not obtainable, for example, where historical records have been destroyed or analytical techniques have not been developed to date materials in archeological sites. If an evaluation must be completed in these cases, it is important to acknowledge what information was not obtainable and how that missing information may affect the reliability of the evaluation.

Application of the Criteria within a Historic Context

The first step in evaluation is considering how the criteria apply to the

particular historic context. This is done by reviewing the previously developed narrative for the historic context and determining how the criteria would apply to properties in that context, based on the important patterns, events, persons and cultural values identified. (See the discussion of the historic context narrative in the Guidelines for Preservation Planning.) This step includes identification of which criteria each property type might meet and how integrity is to be evaluated for each property type under each criterion. Specific guidelines for evaluating the eligibility of individual properties should be established. These guidelines should outline and justify the specific physical characteristics or data requirements that an individual property must possess to retain integrity for the particular property type; and define the process by which revisions or additions can be made to the evaluation framework.

Consideration of property type and intergrity: After considering how the criteria apply to the particular historic context, the evaluation process for a property generally includes the following steps:

1. A property is classified as to the appropriate historic context(s) and property type(s). If no existing property type is appropriate, a new property type is defined, its values identified, and the specific characteristics or data requirements are outlined and justified as an addition to the historic context. If necessary, a new historic context is defined for which values and property types and their integrity requirements are identified and justified.

2. A comparison is made between the existing information about the property and the integrity characteristics or data required for the property type.

a. If the comparison shows that the property possesses these characteristics, then it is evaluated as significant for that historic context. The evaluation includes a determination that the property retains integrity for its type.

b. If the comparison shows that the property does not meet the minimum requirements, one of several conclusions is reached:

(1) The property is determined not significant because it does not retain the integrity defined for the property type.

(2) The property has characteristics that may make it significant but these differ from those expected for that property type in that context. In this case, the historic context or property types should be reexamined and revised if necessary, based on subsequent research and survey.

The evaluation should state how the particular property meets the integrity requirements for its type. When a property is disqualified for loss of integrity, the evaluation statement should focus on the kinds of integrity expected for the property type, those that are absent for the disqualified property, and the impact of that absence on the property's ability to exemplify architectural, historical or research values within a particular historic context.

The integrity of the property in its current condition, rather than its likely condition after a proposed treatment, should be evaluated. Factors such as structural problems, deterioration, or abandonment should be considered in the evaluation only if they have affected the integrity of the significant features or characteristics of the property.

Inventory

An inventory is a repository of information on specific properties evaluated as significant.

Content: The inventory should include:

1. Summaries of the important historic contexts. These may be in the form of an approved plan or analyses of historic contexts important in the history of the geographical area covered by the inventory.

2. Descriptions of significant property types of these contexts, whether or not any specific properties have been identified.

3. Results of reconnaissance surveys or other identification activities, even if the level of information on specific properties identified as part of those activities is not sufficient to evaluate individual properties.

4. Information on individual properties that was used in evaluation.

Historic contexts are identified by name, with reference to documents describing those contexts, or with a narrative statement about the context(s) where such documents do not exist.

A description of the property. Part of this description may be a photographic record.

A statement that justifies the significance of the property in relation to its context(s). This statement should include an analysis of the integrity of the property.

Boundaries of the property.

A record of when a property was evaluated and included in the inventory, and by whom.

Records on demolished or altered properties and properties evaluated as not significant should be retained, along with full description of areas surveyed, for the planning information these records provide about impacts to properties and about the location and character of non-significant properties to prevent redundant identification work at a later time.

Maintenance: Inventory entries should be maintained so that they accurately represent what is known about historic properties in the area covered by the inventory. This will include new information gained from research and survey about the historic contexts, property types, and previously evaluated properties, as well as information about newly evaluated properties. For individual properties, addition of kinds of significance, change in the boundaries, or loss of significance through demolition or alteration should be recorded.

Uses and Availability: An inventory should be managed so that the information is accessible. Its usefulness depends on the organization of information and on its abilty to incorporate new information. An inventory should be structured so that entries can be retrieved by locality or by historic context.

The availability of the inventory information should be announced or a summary should be distributed. This may be in the form of a list of properties evaluated as significant or a summary of the historic contexts and the kinds of properties in the inventory. Inventories should be avilable to managers, planners, and the general public at local, State, regional, and Federal agency levels.

It is necessary to protect information about archeological sites or other properties whose integrity may be damaged by widespread knowledge of their location. It may also be necessary to protect information on the location of properties such as religious sites, structures, or objects whose cultural value would be compromised by public knowledge of the property's location.

Recommended Sources of Technical Information

How to Apply the National Register Critera. Available through the National Register Branch, Interagency Resources Division, National Park Service, U.S. Department of the Interior, Washington, D.C. 20240. Provides detalied technical information about interpretation of the significance and integrity criteria used by the National Register of Historic Places program.

How To Series. Available through the National Register Branch, Interagency Resources Division, National Park Service, U.S. Department of the Interior, Washington, D.C. 20240. Discusses application of the National Register criteria for evaluation. Titles include:

How To Establish Boundaries for National Register Properties.
How To Evaluate and Nominate Potential National Register Properties That Have Achieved Significance Within the Last 50 Years.
How To Improve Quality of Photos for National Register Nominations.
How To Apply for Certification of Significance Under Section 2124 of the Tax Reform Act of 1976.
How To Apply for Certification of State and Local Statutes and Historic Districts.
How To Quality Historic Properties Under the New Federal Law Affective Easements.

Importance of Small, Surface, and Disturged Sites as Sources of Significant Archeological Data. Valerie Talmage and Olga Chesler. Interagency Archeological Service 1977. Washington, D.C. Available from the National Technical Information Service. NTIS Publication Number PB 270939/AS. Discusses the role of small, surface, and disturbed sites as sources of significant information about a variety of prehistoric activities. These types of sites are frequently ignored in the development of regional archeological research designs.

Secretary of the Interior's Standards For Registration

Registration is the formal recognition of properties evaluated as significant. Preservation benefits provided by various registration programs range from honorific recognition to prohibition of demolition or alteration of included properties. Some registration programs provide recognition and other broad benefits while other programs authorize more specific forms of protection.

Standard I. Registration Is Conducted According To Stated Procedures

Registration of historic properties in the National Register of Historic Places must be done in accordance with the National Register regulations published in the Code of Federal Regulations, 36 CFR 60. Registration for other lists or purposes follow an established process that is understood by the public, particularly by those interests that may be affected by registration.

Standard II. Registration Information Locates, Describes and Justifies the Significance and Physical Integrity of a Historic Property

Registers are used for planning, research and treatment. They must contain adequate information for users to locate a property and understand its significance. Additional information may be appropriate depending on the intended use of the register.

Standard III. Registration Information is Accessible to the Public

Information should be readily available to the public and to government agencies responsible for the preservation of historic properties and for other planning needs.

Secretary of the Interior's Guidelines for Registration

Introduction

These Guidelines link the Standards for Registration with more specific guidance and technical information. They describe one approach to meeting the Standards for Registration. Agencies, organizations, or individuals proposing to approach registration differently may wish to review their approach with the National Park Service.

The Guidelines are organized as follows:

Purpose of Registration Programs
Registration Procedures
Documentation on Registered Properties
Public Availability
Recommended Sources of Technical Information

Purpose of Registration Programs

Registration of historic properties is the formal recognition of properties that have been evaluated as significant according to written criteria. Registration results in an official inventory or list that serves an administrative function. A variety of benefits or forms of protection accure to a registered property, ranging from honorific recognition to prohibition of demolition or alteration.

Some registration programs provide recognition and other broad benefits or entitlements, while other registrations of properties may, in addition, authorize more specific forms of protection. The application of the registration process should be a logical outgrowth of the same planning goals and priorities that guided the identification and evaluation activities. All registration programs should establish priorities for recognition of their authorized range of properties; provide for confidentiality of sensitive information; and establish a means of appealing the registration or non-registration of a property.

Registration Procedures

Explicit procedures are essential because they are the means by which the public can understand and participate in the registration process. Procedures for registration programs should be developed by professionals in the field of historic preservation, in consultation with those who will use or be affected by the program. Prior to taking effect, procedures should be published or circulated for comment at the governmental level at which they will be used. (Procedures for registration of properties in the National Register of Historic Places and the National Historic Landmarks list, for example, are published in the **Federal Register**.)

Any registration program should include:

1. A professional staff to prepare or assess the documentation;
2. A professional review, independent of the nominating source, to provide an impartial evaluation of the documented significance;
3. Adequate notice to property owners, elected officials and the public about proposed registrations and the effects of listing, if any; and
4. A means of public participation.

Professional Review: The registration process should include an independent evaluation of the significance of the property and of the quality and thoroughness of the documentation supporting that significance. Such evaluation ensures that significance is adequately justified and that registration documentation meets the technical requirements of the registration process.

State and local preservation programs, concerned with both public and private properties, generally use a review board, panel or commission. This level of professional review has proven to be effective in assessing the significance of properties considered for registration.

Review boards and other forms of independent review should include professionals in the fields or diciplines included in the criteria; representatives of other fields or disciplines may be desirable to reflect other values or aspects of the register. Key personnel must be qualified by education, training or experience to accomplish their designated duties. (See the Professional Qualifications Standards.)

The scope of the independent review should be clearly stated in the registration procedures and should not include issues outside the scope of the applicable criteria for evaluation and other areas specified in the procedures. Generally, independent reviewers should not be involved in any primary research or analysis related to properties under consideration; this information should be gathered and organized prior to review meetings. Documentation presented to the reviewers should be made available to

the public prior to review meetings or public hearings. Registration of properties should not take place until review of documentation has been completed.

Public Notice: Adequate notice allows property owners, officials and other interested parties to comment on proposed registrations prior to action by the independent reviewers. The degree of protection and control provided by a registration program may be a factor in determining what constitutes adequate notice. For example, adequate notice of proposed inclusion in honorific registers may be less complex than that for registration that results in local controls on alteration or demolition of registered properties.

Notice to elected officials and the public is necessary to distribute information about potential registrations of concern to planning and development interests.

Adequate notice to property owners may be accomplished through means ranging from individual notification by mail to publication of a public notice, depending on the nature of the registration program and the number and character of the properties involved.

Public notices and owner notification about proposed registrations should include the dates and times of public meetings and review meetings, the kinds of comments that are appropriate, and how comments will be considered in the evaluation process. The notice should also state where information can be obtained about the registration program, the criteria used to evaluate properties for inclusion, and the significance of specific properties under consideration.

The procedures should include a means of public participation in the form of submission of written comments or a review meeting open to the public or a public hearing.

The procedures should state time periods within which reviews, notices, comments, public hearings, review meetings and appeals will occur. The time periods should be short enough to allow for efficient recognition of historic properties but also allow adequate time for public comment and participation by those affected. Time periods may vary depending on whether activities are carried out at the local, State, or national level. These time schedules should be widely circulated so that the process is widely understood.

Appeal Process: A means of appeal should be included in the registration process to allow for reconsideration of a property's inclusion. Reasons for appeal may range from existence of additional information about the property supporting or refuting its significance to administrative or procedural error. An appeal process should specify to whom an appeal may be made and how the information that is provided will be evaluated. The appeal procedures should also state the time limit, if any, on appealing a decision and on consideration of information and issuance of a decision by the appeal authority.

Documentation on Registered Properties

Documentation requirements should be carefully weighed to provide the information *actually* needed to reach a registration decision and should be made public. It should be made certain that identification and evaluation activities obtain and record the information necessary for registration. Documentation should be prepared in a standardized format and on materials that are archivally stable and easy to store and retrieve.

Location: The precise location of a historic property must be clearly identified.

Street address, town or vicinity, and county should be provided. Properties should also be located on maps; these may be USGS maps, county planning maps, or city base maps or real estate maps. A uniform system of noting location, such as UTM grid points or longitude and latitude, should supplement mapping. It is recommended that each registration process standardize the preferred choice of maps appropriate to the scope of the process.

Description: An accurate description of a property includes a description of both the current and historical physical appearance and condition of the property and notes the relevant property type(s) for the applicable historic context(s). Discussion should include alterations, deterioration, relocation and other changes to the property since its period of significance.

Significance: A statement of significance should explain why a property meets the criteria for inclusion in the register to which it has been nominated.

This statement should contain at least 3 elements:

1. Reference to the relevant historic context(s);

2. Identification of relevant property types within the context and their characteristics; and

3. Justification that the property under consideration has the characteristics required to qualify it.

Relevant historic contexts can be identified through reference to the preservation plan or other documents where the contexts have been previously described or can be provided by a narrative discussion of the context. (The development of contexts and their use in evaluating properties are discussed in the Guidelines for Preservation Planning and the Guidelines for Evaluation.) A significant property type and its characteristics are identified either through reference to the historic context(s) or by a narrative in the documentation that describes historic contexts. Justification of a specific property is made by systematic comparison of its characteristics to those required for the property type.

Boundaries: The delineation and justification of boundaries for a registered property are important for future treatment activities. It is expecially critical when legal restraints or restrictions may result from the registration of properties. Thus, boundaries should correspond as closely as possible to the actual extent and configuration of the property and should be carefully selected to encompass, but not exceed, the extent of the significant resource(s). The selection of boundaries should reflect the significant aspects of the property.

Arbitrary boundaries should not be chosen for ease of description since this can result in the inclusion of unrelated land or in exclusion of a portion of the historic property. Present property lines should not be chosen as property boundaries without careful analysis of whether they are appropriate to the historic property. A single uniform boundary description and acreage should not be applied to a group or class of properties (antebellum plantations, for example) without examination of the actual extent of each property. The selected boundaries should be justified as appropriate to the historic property.

Boundaries should be clearly and precisely described, using a verbal boundary description, legal description, accurate sketch map, or lines drawn on base maps, or a combination of these where needed to specify the limits of the property being registered. When used, maps should show the location of buildings, structures, sites or objects within the boundary.

Updating Information on Registered Properties: A change in the condition of the significant features of a property may require a change in the official registration record. Alteration of a significant architectural feature, for example, could mean that a property is no longer significant for its architectural design.

Additional significance of registered properties may be identified through development of new historic contexts.

Research may reveal that a property is significant in other historic contexts or is significant at a higher level. For example, a property previously recognized as of local significance could be found to be of national significance.

A change in location or condition of a registered property may mean that the property is no longer significant for the reasons for which it was registered and the property should be deleted from the registered list.

Public Availability

Lists of registered properties should be readily available for public use, and information on registered properties should be distributed on a regular basis. Lists of properties registered nationally are distributed through publication in the **Federal Register** and to Congressional Offices and State Historic Preservation Offices. Comprehensive information should be stored and maintained for public use at designated national, State and local authorities open to the public on a regular basis.

Information should be retrievable by the property name, and location, historic context or property type. The specific location of properties that may be threatened by dissemination of that information must be withheld. These may include fragile archeological properties or properties such as religious sites, structures, or objects whose cultural value would be compromised by public knowledge of the property location.

Recommended Sources of Technical Information

How to Complete National Register Forms. National Register Division, National Park Service, U.S. Deparment of the Interior, 1977. Washington, D.C. Available through the Superintendent of Documents, US Government Printing Office, Washington, D.C. 20402. GPO Stock Number 024–005–00666–4. This publication is the standard reference on the documentation requirements of the National Register of Historic Places program.

How To Series. Available through the National Register Branch, Interagency Resources Division, National Park Service, Department of the Interior 20240. These information sheets contain supplementary information about interpreting the National Register criteria for evaluation and documentation requirements of the National Register registration program. Title include:

How To Establish Boundaries for National Register Properties.

How To Evaluate and Nominate Potential National Register Properties That Have Achieved Significance Within the Last 50 Years.

How To Improve the Quality of Photographs for National Register Nominations.

How To Apply for Certification of Significance Under Section 2124 of the Tax Reform Act of 1976.

How To Apply for Certification of State and Local Statutes and Historic Districts.

How To Qualify Historic Properties Under the New Federal Law Affecting Easements.

Note on Documentation and Treatment of Historic Properties

Documentation and treatment of historic properties includes a variety of techniques to preserve or protect properties, or to document their historic values and information. While documentation activities may be applied to any potentially historic property, generally only those properties that first have been evaluated as significant against specified criteria (such as those of the National Register) are treated. Some commonly applied treatments are preservation in place, rehabilitation, restoration and stabilization; there are other types of treatments also. Documentation and treatment may be applied to the same property; for example, archeological, historical, and architectural documentation may be prepared before a structure is stabilized or before foundations or chimneys or other lost features are reconstructed.

Alternatives for treatment will usually be available, and care should be applied in choosing among them. Preservation in place is generally preferable to moving a property. Over time, the preferred treatment for a property may change; for example, an archeological site intended for preservation in place may begin to erode so that a combination of archeological documentation and stabilization may be required. If a decision is made that a particular property will not be preserved in place, the need for documentation must then be considered.

The three sets of documentation standards (i.e., the Standards for Historical Documentation, Standards for Architectural and Engineering Documentation, and Standards for Archeological Documentation) as well as the Standards for Historic Preservation Projects (Acquisition, Preservation, Stabilization, Protection, Rehabilitation, Restoration, and Reconstruction) describe the techniques of several disciplines to treat historic properties, and to document or preserve information about their historical values. The integration of planning for documentation and treatment with their execution is accomplished in a statement of objectives, or research design. Because both the goals and appropriate methodologies are likely to be interdisciplinary in nature, the relationship among these various activities should be specified in the research design to ensure that the resulting documentation produces a comprehensive record of historic properties in an efficient manner.

Secretary of the Interior's Standards for Historical Documentation

Historical documentation provides important information related to the significance of a property for use by historians, researchers, preservationists, architects, and historical archeologists. Research is used early in planning to gather information needed to identify and evaluate properties. (These activities are discussed in the Standards and Guidelines for Preservation Planning and the Standards and Guidelines for Identification.) Historical documentation is also a treatment that can be applied in several ways to properties previously evaluated as significant; it may be used in conjunction with other treatment activities (as the basis for rehabilitation plans or interpretive programs, for example) or as a final treatment to preserve information in cases of threatened property destruction. These Standards concern the use of research and documentation as a treatment.

Standard I. Historical Documentation Follows a Research Design That Responds to Needs Identified in the Planning Process

Historical documentation is undertaken to make a detailed record of the significance of a property for research and interpretive purposes and for conservation of information in cases of threatened property destruction. Documentation must have defined objectives so that proposed work may be assessed to determine whether the resulting documentation will meet needs identified in the planning process. The research design or statement of objectives is a formal statement of how the needs identified in the plan are to be addressed in a specific documentation project. This is the framework that guides the selection of methods and evaluation of results, and specifies the relationship of the historical documentation efforts to other proposed treatment activities.

Standards II. Historical Documentation Employs an Appropriate Methodology to Obtain the Information Required by The Research Design

Methods and techniques of historical research should be chosen to obtain needed information in the most efficient way. Techniques should be carefully selected and the sources should be

recorded so that other researchers can verify or locate information discovered during the research.

Standard III. The Results of Historical Documentation Are Assessed Against the Research Design and Integrated Into the Planning Process

Documentation is one product of research; information gatherd about the usefulness of the research design itself is another. The research results are assessed against the research design to determine how well they meet the objectives of the research. The results are integrated into the body of current knowledge and reviewed for their implications for the planning process. The research design is reviewed to determine how future research designs might be modified based on the activity conducted.

Standard IV. The Results of Historical Documentation Are Reported and Made Available to the Public

Research results must be accessible to prospective users. Results should be communicated to the professional community and the public in reports summarizing the documentation activity and identifying the repository of additional detailed information. The goal of disseminating information must be balanced, however, with the need to protect sensitive information whose disclosure might result in damage to properties.

Secretary of the Interior's Guidelines for Historical Documentation

Introduction

These Guidelines link the Standards for Historical Documentation with more specific guidance and technical information. They describe one approach to meeting the Standards for Historical Documentation. Agencies, organizations or individuals proposing to approach historical documentation differently may wish to review their approaches with the National Park Service.

The Guidelines are organized as follows:

Historical Documentation Objectives
Research Design
Methods
Integrating Results
Reporting Results
Recommended Sources of Technical Information

Documentation Objectives

Documentation is a detailed record, in the form of a report or other written document, of the historical context(s) and significance of a property. Historical research to create documentation uses archival materials, oral history techniques, ethnohistories, prior research contained in secondary sources and other sources to make a detailed record of previously identified values or to investigate particular questions about the established significance of a property or properties. It is an investigative technique that may be employed to document associative, architectural, cultural or informational values of properties. It may be used as a component of structural recording or archeological investigation, to enable interpretation or to mitigate the anticipated loss of a property through conservation of information about its historical, architectural or archeological significance. Documentation generally results in both greater factual knowledge about the specific property and its values, and in better understanding of the property in its historical context. In addition to increasing factual knowledge about a property and its significance in one historical context, documentation may also serve to link the property to or define its importance in other known or yet-to-be defined historic contexts.

Documentation should incorporate, rather than duplicate, the findings of previous research. Research may be undertaken to identify how a particular property fits into the work of an architect or builder; to analyze the historical relationship among several properties; or to document in greater detail the historical contexts of properties. The kinds of questions investigated will generally depend on what is already known or understood and what information is needed. For example, documentation of a bridge whose technological significance is well understood, but whose role in local transportation history is not, would summarize the information on the former topic and focus research on the associative values of the property. The questions that research seeks to answer through deed, map or archival search, oral history and other techniques may also relate to issues addressed in structural documentation or archeological investigation; for example, the reasons for and history of modification of a building to be the subject of architectural or engineering documentation.

Research Design

Historical documentation is guided by a statement of objectives, research design or task directive prepared before research is performed. The research design is a useful statement of how proposed work will enhance existing archival data and permits comparison of the proposed work with the results. The purpose of the research design is to define the proposed scope of the documentation work and to define a set of expectations based on the information available prior to the research. Generally, the research design also ensures that research methods are commensurate with the type, quality and source of expected information.

The research design for a property should identify:

1. Evaluated significance of the property(ies) to be investigated;
2. Historical, architectural, archeological or cultural issues relevant to the evaluated significance of the property;
3. Previous research on those issues and how the proposed work is related to existing knowledge;
4. The amount and kinds of information required to produce reliable historical analyses;
5. Methods to be used to obtain the information;
6. Types of sources to be investigated; types of personnel required;
7. Expected results or findings based on available knowledge about the property and its context; and
8. Relationship of the proposed historical documentation to other proposed treatment activities; for example, recommendations on the use of documentation in interpretive programs or other aspects of treatment such as anticipated architectural, engineering or archeological documentation).

Research Methods

Research methods should be chosen based on the information needs, be capable of replication and be recorded so that another researcher could follow the same research procedure. Sources should be recorded so that other researchers can locate or verify the information discovered during the search.

Use of Sources: The variety of available written and graphic materials and the number of individuals that can serve as sources, including but not limited to personal records, deed and title books, newspapers, plats, maps, atlases, photographs, vital records, censuses, historical narratives, interviews of individuals and secondary source materials, should be considered in developing the research design. Part of the development of the research design is deciding what kinds of source materials are most likely to contain needed information and at what point in the research process that information will be most valuable. For example,

often secondary sources are most valuable for gathering background information, while primary sources are more useful to gather or confirm specific facts. The documentation goals may not *require* exhaustive investigation of sources, such as deed records or building permits. Research may be kept cost-effective by making careful decisions about when to use particular sources, thereby limiting the use of time-consuming techniques to when absolutely necessary. Decisions about when to gather information may also affect the quality of information that can be gathered. When dealing with large project areas where loss of many properties is anticipated, it is important to gather information from local archival sources and oral histories before project activities destroy or disperse family or community records and residents.

Analysis of the accuracy and biases of source materials is critical in analyzing the information gathered from these sources. Maps, historical atlases and insurance maps should be assessed like written records for errors, biases and omissions; for example, some map sources may omit structures of a temporary nature or may not fully depict ethnic or minority areas. Likewise, building plans and architectural renderings may not reflect a structure as it was actually built.

Analysis: Analysis should not only focus on the issues defined in the research design, but should also explore major new issues identified during the course of research or analysis. The documentation gathered may raise important issues not previously considered, and further investigation may be important, particularly when contradictory information has been gathered. It is important to examine the implications of these new issues to ensure that they are investigated in a balanced way.

Questions that should be considered in analyzing the information include:

1. Has enough information been gathered to anwser the questions that were posed?

2. Do the answers contradict one another? If so, it may be necessary to search for more evidence. If no additional evidence is available, judgements must be based on the available sources, weighing their biases. Conflicts of source materials should be noted.

In general, the more the researcher knows about the general historical period and setting, and limitations of the source materials under investigation, the better the individual is prepared to evaluate the information found in the documentary sources investigated. Peer review or consultation with other knowledgeable individuals about the information and the tentative conclusions can be an important part of the analysis.

Integrating Results

The results of documentation must be integrated into the planning process so that planning decisions are based on the best available informaiton. The new information is first assessed against the research design to determine whether the gathered information meets the defined objectives of the research. Then the relevant historic contexts, property types, and treatment goals for those contexts are all adjusted, as necessary, based on the historical documentation results.

Reporting Results

Reports should contain:

1. Summaries of the purpose of the documentation, the research design and methods and techniques of investigation.

2. Sources of facts or analyses so that other researchers can locate the information in its original context. Notation of any conflicts in source materials and how the individual performing the documentation interpreted these conflicts.

3. Sources consulted, including those expected to contain useful information and those that contained no information about the property(s).

4. Assessment of the accuracy, biases and historical perspective of all sources. This information and that identified in No. 3 may be provided in an annotated bibliography.

5. Discussion of major analyses and results, including conclusions regarding all major research issues identified in the research design, as well as important issues raised in the course of research. The analysis should be summarized in terms of its impact on interpretating the property's significance and expanding or altering the knowledge about the property and its context.

6. Researchers' interpretation of historical events or trends. These interpretations should be clearly identified.

Primary results should be preserved and made accessible in some manner, although they need not necessarily be contained in the report. At a minimum, the report should reference the location of notes and analyses.

Results of historical documentation should be made available for use in preservation planning and by the general public. Report formats may vary, depending on the audience and the anticipated uses of the documentation, but professionally accepted rules of report writing should be followed. If reports are of a technical nature, the format of the major scientific journal of the pertinent discipline may be the most appropriate format. Peer review of draft reports is one means of ensuring that state-of-the-art technical reports are produced.

Recommended Sources of Technical Information

Folklife and Fieldwork: A Layman's Introduction to Field Techniques. Peter Bartis. American Folklife Center, Washington, D.C., 1979.

Ordinary People and Everyday Life: Perspectives on the New Social History. James B. Gardnee and George Rollie Adams, editors, American Association for State and Local History, Nashville, Tennessee, 1983.

The Process of Field Research. Carl Fleischhauer and Charles K. Wolfe. American Folklife Center, Washington, D.C., 1981.

Researching Heritage Buildings. Margaret Carter. Ministry of the Environment, Ottawa, Canada, 1983.

Secretary of the Interior's Standards for Architectural and Engineering Documentation

These standards concern the development of documentation for historic buildings, sites, structures and objects. This documentation, which usually consists of measured drawings, photographs and written data, provides important information on a property's significance for use by scholars, researchers, preservationists, architects, engineers and others interested in preserving and understanding historic properties. Documentation permits accurate repair or reconstruction of parts of a property, records existing conditions for easements, or may preserve information about a property that is to be demolished.

These Standards are intended for use in developing documentation to be included in the Historic American Building Survey (HABS) and the Historic American Engineering Record (HAER) Collections in the Library of Congress. HABS/HAER, in the National Park Service, have defined specific requirements for meeting these Standards for their collections. The HABS/HAER requirements include information important to development of documentation for other purposes such as State or local archives

Standard I. Documentation Shall Adequately Explicate and Illustrate What is Significant or Valuable About the Historic Building, Site, Structure or Object Being Documented.

The historic significance of the building, site, structure or object identified in the evaluation process should be conveyed by the drawings, photographs and other materials that comprise documentation. The historical, architectural, engineering or cultural values of the property together with the purpose of the documentation activity determine the level and methods of documentation. Documentation prepared for submission to the Library of Congress must meet the HABS/HAER Guidelines.

Standard II. Documentation Shall be Prepared Accurately From Reliable Sources With Limitations Clearly Stated to Permit Independent Verification of the Information.

The purpose of documentation is to preserve an accurate record of historic properties that can be used in research and other preservation activities. To serve these purposes, the documentation must include information that permits assessment of its reliability.

Standard III. Documentation Shall be Prepared on Materials That are Readily Reproductible, Durable and in Standard Sizes.

The size and quality of documentation materials are important factors in the preservation of information for future use. Selection of materials should be based on the length of time expected for storage, the anticipated frequency of use and a size convenient for storage.

Standard IV. Documentation Shall be Clearly and Concisely Produced.

In order for documentation to be useful for future research, written materials must be legible and understandable, and graphic materials must contain scale information and location references.

Secretary of the Interior's Guidelines for Architectural and Engineering Documentation

Introduction

These Guidelines link the Standards for Architectural and Engineering Documentation with more specific guidance and technical information. They describe one approach to meeting the Standards for Architectural Engineering Documentation. Agencies, organizations or individuals proposing to approach documentation differently may wish to review their approaches with the National Park Service.

The Guidelines are organized as follows:

Definitions
Goal of Documentation
The HABS/HAER Collections
Standard I: Content
STandard II: Quality
Standard III: Materials
Standard IV: Presentation
Architectural and Engineering Documentation Prepared for Other Purposes
Recommended Sources of Technical Information

Definitions

These definitions are used in conjunction with these Guidelines:

Architectural Data Form—a one page HABS form intended to provide identifying information for accompanying HABS documentation.

Documentation—measured drawings, photographs, histories, inventory cards or other media that depict historic buildings, sites, structures or objects.

Field Photography—photography, other than large-format photography, intended for the purpose of producing documentation, usually 35mm.

Field Records—notes of measurements taken, field photographs and other recorded information intended for the purpose of producing documentation.

Inventory Card—a one page form which includes written data, a sketched site plan and a 35mm contact print dry-mounted on the form. The negative, with a separate contact sheet and index should be included with the inventory card.

Large Format Photographs—photographs taken of historic buildings, sites, structures or objects where the negative is a 4 X 5", 5 X 7" or 8 X 10" size and where the photograph is taken with appropriate means to correct perspective distortion.

Measured Drawings—drawings produced on HABS or HAER formats depicting existing conditions or other relevant features of historic buildings, sites, structures or objects. Measured drawings are usually produced in ink on archivally stable material, such as mylar.

Photocopy—A photograph, with large-format negative, of a photograph or drawing.

Select Existing Drawings—drawings of historic buildings, sites, structures or objects, whether original construction or later alteration drawings that portray or depict the historic value or significance.

Sketch Plan—a floor plan, generally not to exact scale although often drawn from measurements, where the features are shown in proper relation and proportion to one another.

Goal of Documentation

The Historic American Buildings Survey (HABS) and Historic American Engineering Record (HAER) are the national historical architectural and engineering documentation programs of the National Park Service that promote documentation incorporated into the HABS/HAER collections in the Library of Congress. The goal of the collections is to provide architects, engineers, scholars, and interested members of the public with comprehensive documentation of buildings, sites, structures and objects significant in American history and the growth and development of the built environment.

The HABS/HAER Collections: HABS/HAER documentation usually consists of measured drawings, photographs and written data that provide a detailed record which reflects a property's significance. Measured drawings and properly executed photographs act as a form of insurance against fires and natural disasters by permitting the repair and, if necessary, reconstruction of historic structures damaged by such disasters. Documentation is used to provide the basis for enforcing preservation easement. In addition, documentation is often the last means of preservation of a property; when a property is to be demolished, its documentation provides future researchers access to valuable information that otherwise would be lost.

HABE/HAER documentation is developed in a number of ways. First and most usually, the National Park Service employs summer teams of student architects, engineers, historians and architectural historians to develop HABS/HAER documentation under the supervision of National Park Service professionals. Second, the National Park Service produces HABS/HAER documentation, in conjunction with restoration or other preservation treatment, of historic buildings managed by the National Park Service. Third, Federal agencies, pursuant to Section 110(b) of the National Historic Preservation Act, as amended, record those historic properties to be demolished or substantially altered as a result of agency action or assisted action (referred to as mitigation projects). Fourth, individuals and organizations prepare documentation to HABS/HAER standards and donate that documentation to the HABS/HAER collections. For each of these programs,

different Documentation Levels will be set.

The Standards describe the fundamental principles of HABS/HAER documentation. They are supplemented by other material describing more specific guidelines, such as line weights for drawings, preferred techniques for architectural photography, and formats for written data. This technical information is found in the HABS/HAER Procedures Manual.

These Guidelines include important information about developing documentation for State or local archives. The State Historic Preservation Officer or the State library should be consulted regarding archival requirements if the documentation will become part of their collections. In establishing archives, the important questions of durability and reproducibility should be considered in relation to the purposes of the collection.

Documentation prepared for the purpose of inclusion in the HABS/HAER collections must meet the requirements below. The HABS/HAER office of the National Park Service retains the right to refuse to accept documentation for inclusion in the HABS/HAER collections when that documentation does not meet HABS/HAER requirements, as specified below.

Standard I: Content

1. *Requirement:* Documentation shall adequately explicate and illustrate what is significant or valuable about the historic building, site, structure or object being documented.

2. *Criteria:* Documentation shall meet one of the following documentation levels to be considered adequate for inclusion in the HABS/HAER collections.

a. Documentation Level I;

(1) Drawings: a full set of measured drawings depicting existing or historic conditions.

(2) Photographs: photographs with large-format negatives of exterior and interior views; photocopies with large format negatives of select existing drawings or historic views where available.

(3) Written data: history and description.

b. Documentation Level II;

(1) Drawings: select existing drawings, where available, should be photographed with large-format negatives or photographically reproduced on mylar.

(2) Photographs: photographs with large-format negatives of exterior and interior views, or historic views, where available.

(3) Written data: history and description.

c. Documentation Level III;

(1) Drawings: sketch plan.

(2) Photographs: photographs with large-format negatives of exterior and interior views.

(3) Written data: architectural data form.

d. Documentation Level IV: HABS/HAER inventory card.

3. *Test:* Inspection of the documentation by HABS/HAER staff.

4. *Commentary:* The HABS/HAER office retains the right to refuse to accept any documentation on buildings, site, structures or objects lacking historical significance. Generally, buildings, sites, structures or objects must be listed in, or eligible for listing in the National Register of Historic Places to be considered for inclusion in the HABS/HAER collections.

The kind and amount of documentation should be appropriate to the nature and significance of the buildings, site, structure or object being documented. For example, Documentation Level I would be inappropriate for a building that is a minor element of a historic district, notable only for streetscape context and scale. A full set of measured drawings for such a minor building would be expensive and would add little, if any, information to the HABS/HAER collections. Large format photography (Documentation Level III) would usually be adequate to record the significance of this type of building.

Similarly, the aspect of the property that is being documented should reflect the nature and significance of the building, site, structure or object being documented. For example, measured drawings of Dankmar Adler and Louis Sullivan's Auditorium Building in Chicago should indicate not only facades, floor plans and sections, but also the innovative structural and mechanical systems that were incorporated in that building. Large format photography of Gunston Hall in Fairfax County, Virginia, to take another example, should clearly show William Buckland's hand-carved moldings in the Palladian Room, as well as other views.

HABS/HAER documentation is usually in the form of measured drawings, photographs, and written data. While the criteria in this section have addressed only these media, documentation need not be limited to them. Other media, such as films of industrial processes, can and have been used to document historic buildings, sites, structures or objects. If other media are to be used, the HABS/HAER office should be contacted before recording.

The actual selection of the appropriate documentation level will vary, as discussed above. For mitigation documentation projects, this level will be selected by the National Park Service Regional Office and communicated to the agency responsible for completing the documentation. Generally, Level I documentation is required for nationally significant buildings and structures, defined as National Historic Landmarks and the primary historic units of the National Park Service.

On occasion, factors other than significance will dictate the selection of another level of documentation. For example, if a rehabilitation of a property is planned, the owner may wish to have a full set of as-built drawings, even though the significance may indicate Level II documentation.

HABS Level I measured drawings usually depict existing conditions through the use of a site plan, floor plans, elevations, sections and construction details. HAER Level I measured drawings will frequently depict original conditions where adequate historical material exists, so as to illustrate manufacturing or engineering processes.

Level II documentation differs from Level I by substituting copies of existing drawings, either original or alteration drawings, for recently executed measured drawings. If this is done, the drawings must meet HABS/HAER requirements outlined below. While existing drawings are rarely as suitable as as-built drawings, they are adquate in many cases for documentation purposes. Only when the desirability of having as-built drawings is clear are Level I measured drawings required in addition to existing drawings. If existing drawings are housed in an accessible collection and cared for archivally, their reproduction for HABS/HAER may not be necessary. In other cases, Level I measured drawings are required in the absence of existing drawings.

Level III documentation requires a sketch plan if it helps to explain the structure. The architectural data form should supplement the photographs by explaining what is not readily visible.

Level IV documentation consists of completed HABS/HAER inventory cards. This level of documentation, unlike the other three levels, is rarely considered adequate documentation for the HABS/HAER collections but is undertaken to identify historic resources in a given area prior to additional, more comprehensive documentation.

Standard II: Quality

1. *Requirement:* HABS and HAER documentation shall be prepared accurately from reliable sources with limitations clearly stated to permit independent verification of information.

2. *Criteria:* For all levels of documentation, the following quality standards shall be met:

a. Measured drawings: Measured drawings shall be produced from recorded, accurate measurements. Portions of the building that were not accessible for measurement should not be drawn on the measured drawings, but clearly labeled as not accessible or drawn from available construction drawings and other sources and so identified. No part of the measured drawings shall be produced from hypothesis or non-measurement related activities. Documentation Level I measured drawings shall be accompanied by a set of field notebooks in which the measurements were first recorded. Other drawings, prepared for Documentation Levels II and III, shall include a statement describing where the original drawings are located.

b. Large format photographs: Large format photographs shall clearly depict the appearance of the property and areas of significance of the recorded building, site, structure or object. Each view shall be perspective-corrected and fully captioned.

c. Written history: Written history and description for Documentation Levels I and II shall be based on primary sources to the greatest extent possible. For Levels III and IV, secondary sources may provide adequate information; if not, primary research will be necessary. A frank assessment of the reliability and limitations of sources shall be included. Within the written history, statements shall be footnoted as to their sources, where appropriate. The written data shall include a methodology section specifying name of researcher, date of research, sources searched, and limitations of the project.

3. *Test:* Inspection of the documentation by HABS/HAER staff.

4. *Commentary:* The reliability of the HABS/HAER collections depends on documentation of high quality. Quality is not something that can be easily prescribed or quantified, but it derives from a process in which thoroughness and accuracy play a large part. The principle of independent verification HABS/HAER documentation is critical to the HABS/HAER collections.

Standard III: Materials

1. *Requirement:* HABS and HAER documentation shall be prepared on materials that are readily reproducible for ease of access; durable for long storage; and in standard sizes for ease of handling.

2. *Criteria:* For all levels of documentation, the following material standards shall be met:

a. Measured Drawings:

Readily Reproducible: Ink on translucent material.

Durable: Ink on archivally stable materials.

Standard Sizes: Two sizes: 19 × 24" or 24 × 36".

b. Large Format Photographs:

Readily Reproducible: Prints shall accompany all negatives.

Durable: Photography must be archivally processed and stored. Negatives are required on safety film only. Resin-coated paper is not accepted. Color photography is not acceptable.

Standard Sizes: Three sizes: 4 × 5", 5 × 7", 8 × 10".

c. Written History and Description:

Readily Reproducible: Clean copy for xeroxing.

Durable: Archival bond required.

Standard Sizes: 8½ × 11".

d. Field Records:

Readily Reproducible: Field notebooks may be xeroxed. Photo identification sheet will accompany 35 mm negatives and contact sheets.

Durable: No requirement.

Standard Sizes: Only requirement is that they can be made to fit into a 9½ × 12" archival folding file.

3. *Test:* Inspection of the documentation by HABS/HAER staff.

4. *Commentary:* All HABS/HAER records are intended for reproduction; some 20,000 HABS/HAER records are reproduced each year by the Library of Congress. Although field records are not intended for quality reproduction, it is intended that they be used to supplement the formal documentation. The basic durability performance standard for HABS/HAER records is 500 years. Ink on mylar is believed to meet this standard, while color photography, for example, does not. Field records do not meet this archival standard, but are maintained in the HABS/HAER collections as a courtesty to the collection user.

Standard IV: Presentation

1. *Requirement:* HABS and HAER documentation shall be clearly and concisely produced.

2. *Criteria:* For levels of documentation as indicated below, the following standards for presentation will be used:

a. Measured Drawings: Level I measured drawings will be lettered mechanically (i.e., Leroy or similar) or in a handprinted equivalent style. Adequate dimensions shall be included on all sheets. Level III sketch plans should be neat and orderly.

b. Large format photographs: Level I photographs shall include duplicate photographs that include a scale. Level II and III photographs shall include, at a minimum, at least one photograph with a scale, usually of the principal facade.

c. Written history and description: Data shall be typewritten on bond, following accepted rules of grammar.

3. *Test:* Inspection of the documentation by HABS/HAER staff.

Architectural and Engineering Documentation Prepared for Other Purposes

Where a preservation planning process is in use, architectural and engineering documentation, like other treatment activities, are undertaken to achieve the goals identified by the preservation planning process. Documentation is deliberately selected as a treatment for properties evaluated as significant, and the development of the documentation program for a property follows from the planning objectives. Documentation efforts focus on the significant characteristics of the property, as defined in the previously completed evaluation. The selection of a level of documentation and the documentation techniques (measured drawings, photography, etc.) is based on the significance of the property and the management needs for which the documentation is being performed. For example, the kind and level of documentation required to record a historic property for easement purposes may be less detailed than that required as mitigation prior to destruction of the property. In the former case, essential documentation might be limited to the portions of the property controlled by the easement, for example, exterior facades; while in the latter case, significant interior architectural features and non-visible structural details would also be documented.

The principles and content of the HABS/HAER criteria may be used for guidance in creating documentation requirements for other archives. Levels of documentation and the durability and sizes of documentation may vary depending on the intended use and the repository. Accuracy of documentation should be controlled by assessing the reliability of all sources and making that assessment available in the archival record; by describing the limitations of the information available from research and physical examination of the

property; and by retaining the primary data (field measurements and notebooks) from which the archival record was produced. Usefulness of the documentation products depends on preparing the documentation on durable materials that are able to withstand handling and reproduction, and in sizes that can be stored and reproduced without damage.

Recommended Sources of Technical Information

Recording Historic Buildings. Harley J. McKee. Government Printing Office, 1970. Washington, D.C. Available through the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402. GPO number 024-005-0235-9.

HABS/HAER Procedures Manual. Historic American Buildings Survey/Historic American Engineering Record, National Park Service, 1980. Washington, D.C.

Photogrammetric Recording of Cultural Resources. Perry E. Borchers. Technical Preservation Services, U.S. Department of the Interior, 1977. Washinton, D.C.

Rectified Photography and Photo Drawings for Historic Preservation. J. Henry Chambers. Technical Preservation Services, U.S. Department of the Interior, 1975. Washington, D.C.

Secretary of the Interior's Standards for Archeological Documentation

Archeological documentation is a series of actions applied to properties of archeological interest. Documentation of such properties may occur at any or all levels of planning, identification, evaluation or treatment. The nature and level of documentation is dictated by each specific set of circumstances. Archeological documentation consists of activities such as archival research, observation and recording of above-ground remains, and observation (directly, through excavation, or indirectly, through remote sensing) of below-ground remains. Archeological documentation is employed for the purpose of gathering information on individual historic properties or groups of properties. It is guided by a framework of objectives and methods derived from the planning process, and makes use of previous planning decisions, such as those on evaluation of significance. Archeological documentation may be undertaken as an aid to various treatment activities, including research, interpretation, reconstruction, stabilization and data recovery when mitigating archeological losses resulting from construction. Care should be taken to assure that documentation efforts do not duplicate previous efforts.

Standard I. Archeological Documentation Activities Follow an Explicit Statement of Objectives and Methods That Responds to Needs Identified in the Planning Process

Archeological research and documentation may be undertaken to fulfill a number of needs, such as overviews and background studies for planning, interpretation or data recovery to mitigate adverse effects. The planning needs are articulated in a statement of objectives to be accomplished by the archeological documentation activities. The statement of objectives guides the selection of methods and techniques of study and provides a comparative framework for evaluating and deciding the relative efficiency of alternatives. Satisfactory documentation involves the use of archeological and historical sources, as well as those of other disciplines. The statement of objectives usually takes the form of a formal and explicit research design which has evolved from the interrelation of planning needs, current knowledge, resource value and logistics.

Standard II. The Methods and Techniques of Archeological Documentation are Selected To Obtain the Information Required by the Statement of Objectives

The methods and techniques chosen for archeological documentation should be the most effective, least destructive, most efficient and economical means of obtaining the needed information. Methods and techniques should be selected so that the results may be verified if necessary. Non-destructive techniques should be used whenever appropriate. The focus on stated objectives should be maintained throughout the process of study and documentation.

Standard III. The Results of Archeological Documentation are Assessed Against the Statement of Objectives and Integrated Into the Planning Process

One product of archeological documentation is the recovered data; another is the information gathered about the usefulness of the statement of objectives itself. The recovered data are assessed against the objectives to determine how they meet the specified planning needs. Information related to archeological site types, distribution and density should be integrated in planning at the level of identification and evaluation. Information and data concerning intra-site structure may be needed for developing mitigation strategies and are appropriately integrated at this level of planning. The results of the data analyses are integrated into the body of current knowledge. The utility of the method of approach and the particular techniques which were used in the investigation (i.e. the research design) should be assessed so that the objectives of future documentation efforts may be modified accordingly.

Standard IV. The Results of Archeological Documentation are Reported and Made Available to the Public

Results must be accessible to a broad range of users including appropriate agencies, the professional community and the general public. Results should be communicated in reports that summarize the objectives, methods, techniques and results of the documentation activity, and identify the repository of the materials and information so that additional detailed information can be obtained, if necessary. The public may also benefit from the knowledge obtained from archeological documentation through pamphlets, brochures, leaflets, displays and exhibits, or by slide, film or multi-media productions. The goal of disseminating information must be balanced, however, with the need to protect sensitive information whose disclosure might result in damage to properties. Curation arrangements sufficient to preserve artifacts, specimens and records generated by the investigation must be provided for to assure the availability of these materials for future use.

Secretary of the Interior's Guidelines for Archeological Documentation

Introduction

These Guidelines link the Standards for Archeological Documentation with more specific guidance and technical information. They describe one approach to meeting the Standards for Documentation. Agencies, organizations or individuals proposing to approach archeological documentation differently may wish to review their approach with the National Park Service.

The Guidelines are organized as follows:

Archeological Documentation Objectives
Documentation Plan
Methods
Reporting Results
Curation
Recommended Sources of Technical Information

1. Collection of base-line data;

2. Problem-oriented research directed toward particular data gaps recognized in the historic context(s);

3. Preservation or illustration of significance which has been identified for treatment by the planning process; or

4. Testing of new investigative or conservation techniques, such as the effect of different actions such as forms of site burial (aqueous or non-aqueous).

Many properties having archeological components have associative values as well as research values. Examples include Native American sacred areas and historic sites such as battlefields. Archeological documentation may preserve information or data that are linked to the identified values that a particular property possesses. Depending on the property type and the range of values represented by the property, it may be necessary to recover information that relates to an aspect of the property's significance other than the specified research questions. It is possible that conflicts may arise between the optimal realizations of research goals and other issues such as the recognition/protection of other types of associative values. The research design for the archeological documentation should provide for methods and procedures to resolve such conflicts, and for the close coordination of the archeological research with the appropriate ethnographic, social or technological research.

Archeological Documentation Objectives

The term "archeological documentation" is used here to refer specifically to any operation that is performed using archeological techniques as a means to obtain and record evidence about past human activity that is of importance to documenting history and prehistory in the United States. Historic and prehistoric properties may be important for the data they contain, or because of their association with important persons, events, or processes, or because they represent architectural or artistic values, or for other reasons. Archeological documentation may be an appropriate option for application not only to archeological properties, but to above-ground structures as well, and may be used in collaboration with a wide range of other treatment activities.

If a property contains artifacts, features, and other materials that can be studied using archeological techniques, then archeological documentation may be selected to achieve particular goals of the planning process—such as to address a specified information need, or to illustrate significant associative values. Within the overall goals and priorities established by the planning process, particular methods of investigation are chosen that best suit the types of study to be performed.

Relationship of archeological documentation to other types of documentation or other treatments: Archeological documentation is appropriate for achieving any of various goals, including:

Documentation Plan

Research Design: Archeological documentation can be carried out only after defining explicit goals and a methodology for reaching them. The goals of the documentation effort directly reflect the goals of the preservation plan and the specific needs identified for the relevant historic contexts. In the case of problem oriented archeological research, the plan usually takes the form of a formal research design, and includes, in addition to the items below, explicit statements of the problem to be addressed and the methods or tests to be applied. The purpose of the statement of objectives is to explain the rationale behind the documentation effort; to define the scope of the investigation; to identify the methods, techniques, and procedures to be used; to provide a schedule for the activities; and to permit comparison of the proposed research with the results. The research design for an archeological documentation effort follows the same guidelines as those for identification (see the Guidelines for Identification) but has a more property-specific orientation.

The research design should draw upon the preservation plan to identify:

1. Evaluated significance of the property(ies) to be studied;

2. Research problems or other issues relevant to the significance of the property;

3. Prior research on the topic and property type; and how the proposed documentation objectives are related to previous research and existing knowledge;

4. The amount and kinds of information (data) required to address the documentation objectives and to make reliable statements, including at what point information is redundant and documentation efforts have reached a point of diminishing returns;

5. Methods to be used to find the information; and

6. Relationship of the proposed archeological investigation to anticipated historical or structural documentation, or other treatments.

The primary focus of archeological documentation is on the data classes that are required to address the specified documentation objectives. This may mean that other data classes are deliberately neglected. If so, the reasons for such a decision should be carefully justified in terms of the preservation plan.

Archeological investigations seldom are able to collect and record all possible data. It is essental to determine the point at which further data recovery and documentation fail to improve the usefulness of the archeological information being recovered. One purpose of the research design is to estimate those limits in advance and to suggest at what point information becomes duplicative. Investigation strategies should be selected based on these general principles, considering the following factors:

1. Specific data needs;

2. Time and funds available to secure the data; and

3. Relative cost efficiency of various strategies.

Responsiveness to the concerns of local groups (e.g., Native American groups with ties to specific properties) that was built into survey and evaluation phases of the preservation plan, should be maintained in archeological investigation, since such activity usually involves site disturbance. The research design, in addition to providing for appropriate ethnographic research and consultation, should consider concerns voiced in previous phases. In the absence of previous efforts to coordinate with local or other interested groups, the research design should anticipate the need to initiate appropriate contracts and provide a mechanism for responding to sensitive issues, such as the possible uncovering of human remains or discovery of sacred areas.

The research design facilitates an orderly, goal directed and economical project. However, the research design must be flexible enough to allow for examination of unanticipated but important research opportunities that arise during the investigation.

Documentation Methods

Background Review: Archeological documentation usually is preceded by, or integrated with historical research (i.e. that intensive background information gathering including identification of previous archeological work and inspection of museum collections; gathering relevant data on geology, botany, urban geography and other related disciplines; archival research; informant interviews, or recording of oral tradition, etc.).

Depending on the goals of the archeological documentation, the background historical and archeological research may exceed the level of research accomplished for development of the relevant historic contexts or for identification and evaluation, and focuses on the unique aspects of the property to be treated. This assists in directing the investigation and locates a broader base of information than that contained in the property itself for response to the documentation goals. This activity is particularly important for historic archeological properties where information sources other than the property itself may be critical to preserving the significant aspects of the property. (See the Secretary of the Interior's Standards and Guidelines for Historical Documentation for discussion of associated research activities.)

Field Studies: The implementation of the research design in the field must be flexible enough to accommodate the discovery of new or unexpected data classes or properties, or changing field conditions. A phased approach may be appropriated when dealing with large complex properties or groups of properties, allowing for changes in emphasis or field strategy, or termination of the program, based on analysis of recovered data at the end of each phase. Such an approach permits the confirmation of assumptions concerning property extent, content or organization which had been made based on data gathered from identification and evaluation efforts, or the adjustment of those expectations and resulting changes in procedure. In some cases a phased approach may be necessary to gather sufficient data to calculate the necessary sample size for a statistically valid sample. A phased documentation program may often be most cost-effective, in allowing for early termination of work if the desired objectives cannot be achieved.

Explicit descriptive statements of and justification for field study techniques are important to provide a means of evaluating results. In some cases, especially those employing a sampling strategy in earlier phases (such as identification or evaluation), it is possible to estimate parameters of certain classes of data in a fairly rigorous statistical manner. It is thus desirable to maintain some consistency in choice of sampling designs throughout multiple phases of work at the same property. Consistency with previously employed areal sampling frameworks also improves potential replication in terms of later locating sampled and unsampled areas. It often is desirable to estimate the nature and frequency of data parameters based on existing information or analogy to other similar cases. These estimates may then be tested in field studies.

An important consideration in choosing methods to be used in the field studies should be assuring full, clear, and accurate descriptions of all field operations and observations, including excavation and recording techniques and stratigraphic or inter-site relationships.

To the extent feasible, chosen methodologies and techniques should take into account the possibility that future researchers will need to use the recovered data to address problems not recognized at the time the data were recovered. The field operation may recover data that may not be fully analyzed; this data, as well as the data analyzed, should be recorded and preserved in a way to facilitate future research.

A variety of methodologies may be used. Choices must be explained, including a measure of cost-effectiveness relative to other potential choices. Actual results can then be measured against expectations, and the information applied later in similar cases.

Destructive methods should not be applied to portions or elements of the property if nondestructive methods are practical. If portions or elements of the property being documented are to be preserved in place, the archeological investigation should employ methods that will leave the property as undisturbed as possible. However, in cases where the property will be destroyed by, for example, construction following the investigation, it may be most practical to gather the needed data in the most direct manner, even though that may involve use of destructive techniques.

Logistics in the field, including the deployment of personnel and materials and the execution of sampling strategies, should consider site significant, anticipated location of most important data, cost effectiveness, potential time limitations and possible adverse environmental conditions.

The choice of methods for recording data gathered in the field should be based on the research design. Based on that statement, it is known in advance of field work what kinds of information are needed for analysis; record-keeping techniques should focus on these data. Field records should be maintained in a manner that permits independent interpretation in so far as possible. Record-keeping should be standardized in format and level of detail.

Archeological documentation should be conducted under the supervision of qualified professionals in the disciplines appropriate to the data that are to be recovered. When the general public is directly involved in archeological documentation activities, provision should be made for training and supervision by qualified professionals. (See the Professional Qualifications Standards.)

Analysis: Archeological documentation is not completed with field work; analysis of the collected information is an integral part of the documentation activity, and should be planned for in the research design. Analytical techniques should be selected that are relevant to the objectives of the investigation. Forms of analysis that may be appropriate, depending on the type of data recovered and the objectives of the investigation, include but are not limited to: studying artifact types and distribution; radiometric and other means of age determination; studies of soil stratigraphy; studies of organic matter such as human remains, pollen, animal bones, shells and seeds; study of the composition of soils and study of the natural environment in which the property appears.

Reporting Results

Report Contents: Archeological documentation concludes with written report(s) including minimally the following topics:

1. Description of the study area;
2. Relevant historical documentation/background research;
3. The research design;
4. The field studies as actually implemented, including any deviation from the research design and the reason for the changes;
5. All field observations;
6. Analyses and results, illustrated as appropriate with tables, charts, and graphs;
7. Evaluation of the investigation in terms of the goals and objectives of the investigation, including discussion of how well the needs dictated by the planning process were served;
8. Recommendations for updating the relevant historic contexts and planning goals and priorities, and generation of new or revised information needs;
9. Reference to related on-going or proposed treatment activities, such as structural documentation, stabilization, etc.; and

10. Information on the location of original data in the form of field notes, photographs, and other materials.

Some individual property information, such as specific locational data, may be highly sensitive to disclosure, because of the threat of vandalism. If the objectives of the documentation effort are such that a report containing confidential information such as specific site locations or information on religious practices is necessary, it may be appropriate to prepare a separate report for public distribution. The additional report should summarize that information that is not under restricted access in a format most useful to the expected groups of potential users. Peer review of draft reports is recommended to ensure that state-of-the-art technical reports are produced.

Availability: Results must be made available to the full range of potential users. This can be accomplished through a variety of means including publication of results in monographs and professionals journals and distribution of the report to libraries or technical clearinghouses such as the National Technical Information Service in Springfield, Virginia.

Curation

Archeological specimens and records are part of the documentary record of an archeological site. They must be curated for future use in research, interpretation, preservation, and resource management activities. Curation of important archeological specimens and records should be provided for in the development of any archeological program or project.

Archeological specimens and records that should be curated are those that embody the information important to history and prehistory. They include artifacts and their associated documents, photographs, maps, and field notes; materials of an environmental nature such as bones, shells, soil and sediment samples, wood, seeds, pollen, and their associated records; and the products and associated records of laboratory procedures such as thin sections, and sediment fractions that result from the analysis of archeological data.

Satisfactory curation occurs when:

1. Curation facilities have adequate space, facilities, and professional personnel;

2. Archeological specimens are maintained so that their information values are not lost through deterioration, and records are maintained to a professional archival standard;

3. Curated collections are accessible to qualified researchers within a reasonable time of having been requested; and

4. Collections are available for interpretive purposes, subject to reasonable security precautions.

Recommended Sources of Technical Information

Archeomagnetism: A Handbook for the Archeologist. Jeffrey L. Eighmy, U.S. Department of the Interior, Washington, D.C., 1980.

The Curation and Management of Archeological Collections: A Pilot Study. Cultural Resource Management Series, U.S. Department of the Interior, September 1980.

Human Bones and Archeology. Douglas H. Ubelaker. Interagency Archeological Services, Heritage Conservation and Recreation Service, U.S. Department of the Interior, Washington, D.C., 1980. Available from the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402

Manual for Museums. Ralph H. Lewis, National Park Service, U.S. Department of the Interior, 1976.

Treatment of Archeological Properties: A Handbook. Advisory Council on Historic Preservation. Washington D.C., 1980.

Secretary of the Interior's Standards for Historic Preservation Projects

General Standards for Historic Preservation Projects

The following general standards apply to all treatments undertaken on historic properties listed in the National Register.

1. Every reasonable effort shall be made to provide a compatible use for a property that requires minimal alteration of the building, structure, or site and its environment, or to use a property for its originally intended purpose.

2. The distinguishing original qualities or character of a building, structure, or site and its environment shall not be destroyed. The removal or alteration of any historic material or distinctive architectural features should be avoided when possible.

3. All buildings, structures, and sites shall be recognized as products of their own time. Alterations which have no historical basis and which seek to create an earlier appearance shall be discouraged.

4. Changes which have taken place in the course of time are evidence of the history and development of a building, structure, or site and its environment. These changes may have acquired significance in their own right, and this significance shall be recognized and respected.

5. Distinctive architectural features or examples of skilled craftsmanship which characterize a building, structure, or site shall be treated with sensitivity.

6. Deteriorated architectural features shall be repaired rather than replaced, wherever possible. In the event replacement is necessary, the new material should match the material being replaced in composition, design, color, texture, and other visual qualities. Repair or replacement of missing architectural features should be based on accurate duplications of features, substantiated by historic, physical, or pictorial evidence rather than on conjectural designs or the availability of different architectural elements from other buildings or structures.

7. The surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning methods that will damage the historic building materials shall not be undertaken.

8. Every reasonable effort shall be made to protect and preserve archeological resources affected by, or adjacent to, any acquisition, stabilization, preservation, rehabilitation, restoration, or reconstruction project.

Specific Standards for Historic Preservation Projects

The following specific standards for each treatment are to be used in conjunction with the eight general standards and, in each case, begin with number 9. For example, in evaluating acquisition projects, include the eight general standards plus the four specific standards listed under standards for Acquisition. The specific standards differ from those published for use in Historic Preservation Fund grant-in-aid projects (36 CFR Part 68) in that they discuss more fully the treatment of archeological properties.

Standards for Acquisition

9. Careful consideration shall be given to the type and extent of property rights which are required to assure the preservation of the historic resource. The preservation objectives shall determine the exact property rights to be acquired.

10. Properties shall be acquired in fee simple when absolute ownership is required to insure their preservation.

11. The purchase of less-than-fee-simple interests, such as open space or facade easements, shall undertaken when a limited interest achieves the preservation objective.

12. Every reasonable effort shall be made to acquire sufficient property with the historic resource to protect its historical, archeological, architectural or cultural significance.

Standard for Protection

9. Before applying protective measures which are generally of a temporary nature and imply future historic preservation work, an analysis of the actual or anticipated threats to the property shall be made.

10. Protection shall safeguard the physical condition or environment of a property or archeological site from further deterioration or damage caused by weather or other natural, animal, or human intrusions.

11. If any historic material or architectural features are removed, they shall be properly recorded and, if possible, stored for future study or reuse.

Standards for Stabilization

9. Stabilization shall reestablish the structural stability of a property through the reinforcement of loadbearing members or by arresting deterioration leading to structural failure. Stabilization shall also reestablish weather resistant conditions for a property.

10. Stabilization shall be accomplished in such a manner that it detracts as little as possible from the property's appearance and significance. When reinforcement is required to reestablish structural stability, such work shall be concealed wherever possible so as not to intrude upon or detract from the aesthetic and historical or archeological quality of the property, except where concealment would result in the alteration or destruction of historically or archeologically significant material or spaces. Accurate documentation of stabilization procedures shall be kept and made available for future needs.

11. Stabilization work that will result in ground disturbance shall be preceded by sufficient archeological investigation to determine whether significant subsurface features or artifacts will be affected. Recovery, curation and documentation of archeological features and specimens shall be undertaken in accordance with appropriate professional methods and techniques.

Standards for Preservation

9. Preservation shall maintain the existing form, integrity, and materials of a building, structure, or site. Archeological sites shall be preserved undisturbed whenever feasible and practical. Substantial reconstruction or restoration of lost features generally are not included in a preservation undertaking.

10. Preservation shall include techniques of arresting or retarding the deterioration of a property through a program of ongoing maintenance.

11. Use of destructive techniques, such as archeological excavation, shall be limited to providing sufficient information for research, interpretation and management needs.

Standards for Rehabilitation

9. Contemporary design for alterations and additions to existing properties shall not be discouraged when such alterations and additions do not destroy significant historic, architectural, or cultural material and such design is compatible with the size, scale, color, material, and character of the property, neighborhood, or environment.

10. Wherever possible, new additions or alterations to structures shall be done in such a manner that if such additions or alterations were to be removed in the future, the essential form and integrity of the structure would be unimpaired.

Standards for Restoration

9. Every reasonable effort shall be made to use a property for is originally intended purpose or to provide a compatible use that will require minimum alteration to the property and its environment.

10. Reinforcement required for structural stability or the installation of protective or code required mechanical systems shall be concealed wherever possible so as not to intrude or detract from the property's aesthetic and historical qualities, except where concealment would result in the alteration or destruction of historically significant materials or spaces.

11. Restoration work such as the demolition of non-contributing additions that will result in ground or structural disturbance shall be preceded by sufficient archeological investigation to determine whether significant subsurface or structural features or artifacts will be affected. Recovery, curation and documentation of archeological features and specimens shall be undertaken in accordance with appropriate professional methods and techniques.

Standards for Reconstruction

9. Reconstruction of a part or all of a property shall be undertaken only when such work is essential to reproduce a significant missing feature in a historic district or scene, and when a contemporary design solution is not acceptable. Reconstruction of archeological sites generally is not appropriate.

10. Reconstruction of all or a part of a historic property shall be appropriate when the reconstruction is essential for understanding and interpreting the value of a historic district, or when no other building, structure, object, or landscape feature with the same associative value has survived and sufficient historical or archeological documentation exists to insure an accurate reproduction of the original.

11. The reproduction of missing elements accomplished with new materials shall duplicate the composition, design, color, texture, and other visual qualities of the missing element. Reconstruction of missing architectural or archeological features shall be based upon accurate duplication of original features substantiated by physical or documentary evidence rather than upon conjectural designs or the availability of different architectural features from other buildings.

12. Reconstruction of a building or structure on an original site shall be preceded by a thorough archeological investigation to locate and identify all subsurface features and artifacts. Recovery, curation and documentation of archeological features and specimens shall be undertaken in accordance with professional methods and techniques.

13. Reconstruction shall include measures to preserve any remaining original fabric, including foundations, subsurface, and ancillary elements. The reconstruction of missing elements. The reconstruction of missing elements and features shall be done in such a manner that the essential form and integrity of the original surviving features are unimpaired.

Secretary of the Interior Guidelines for Historic Preservation Projects

The guidelines for the Secretary of the Interior's Standards for Historic Preservation Projects, not included here because of their length, may be obtained separately from the National Park Serivce.

Professional Qualifications Standards

The following requirements are those used by the National Park Service, and have been previously published in the Code of Federal Regulations, 36 CFR Part 61. The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed, depending on the complexity of the task and the nature of the historic properties involved. In the following definitions, a year of full-time professional experience need not consist of a continuous year of fulltime work but

may be made up of discontinuous periods of full-time or part-time work adding up to the equivalent of a year of full-time experience.

History

The minimum professional qualifications in history are a graduate degree in history or closely related field; or a bachelor's degree in history or closely related field plus one of the following:

1. At least two years of full-time experience in research, writing, teaching, interpretation, or other demonstrable professional activity with an academic institution, historic organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of history.

Archeology

The minimum professional qualifications in archeology are a graduate degree in archeology, anthropology, or closely related field plus:

1. At least one year of full-time professional experience or equivalent specialized training in archeological research, administration or management;
2. At least four months of supervised field and analytic experience in general North American archeology; and
3. Demonstrated ability to carry research to completion.

In addition to these minimum qualifications, a professional in prehistoric archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the prehistoric period. A professional in historic archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the historic period.

Architectural History

The minimum professional qualifications in architectural history are a graduate degree in architectural history, art history, historic preservation, or closely related field, with coursework in American architectural history; or a bachelor's degree in architectural history, art history, historic preservation or closely related field plus one of the following:

1. At least two years of full-time experience in research, writing, or teaching in American architectural history or restoration architecture with an academic institution, historical organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of American architectural history.

Architecture.

The minimum professional qualifications in architecture are a professional degree in architecture plus at least two years of full-time experience in architecture; or a State license to practice architecture.

Historic Architecture

The minimum professional qualifications historic in architecture are a professional degree in architecture or a State license to practice architecture, plus one of the following:

1. At least one year of graduate study in architectural preservation, American architectural history, preservation planning, or closely related field; or
2. At least one year of full-time professional experience on historic preservation projects.

Such graduate study or experience shall include detailed investigations of historic structures, preparation of historic structures research reports, and preparation of plans and specifications for preservation projects.

Preservation Terminology

Acquisition—the act or process of acquiring fee title or interest other than fee title of real property (including acquisition of development rights or remainder interest).

Comprehensive Historic Preservation Planning—the organization into a logical sequence of preservation information pertaining to identification, evaluation, registration and treatment of historic properties, and setting priorities for accomplishing preservation activities.

Historic Context—a unit created for planning purposes that groups information about historic properties based on a shared theme, specific time period and geographical area.

Historic Property—a district, site, building, structure or object significant in American history, architecture, engineering, archeology or culture at the national, State, or local level.

Integrity—the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic or prehistoric period.

Intensive Survey—a systematic, detailed examination of an area designed to gather information about historic properties sufficient to evaluate them against predetermined criteria of significance within specific historic contexts.

Inventory—a list of historic properties determined to meet specified criteria of significance.

National Register Criteria—the established criteria for evaluating the eligibility of properties for inclusion in the National Register of Historic Places.

Preservation (treatment)—the act or process of applying measures to sustain the existing form, integrity and material of a building or structure, and the existing form and vegetative cover of a site. It may include initial stabilization work, where necessary, as well as ongoing maintenance of the historic building materials.

Property Type—a grouping of individual properties based on a set of shared physical or associative characteristics.

Protection (treatment)—the act or process of applying measures designed to affect the physical condition of a property by defending or guarding it from deterioration, loss or attack, or to cover or shield the property from danger or injury. In the case of buildings and structures, such treatment is generally of a temporary nature and anticipates future historic preservation treatment; in the case of archeological sites, the protective measure may be temporary or permanent.

Reconnaissance Survey—an examination of all or part of an area accomplished in sufficient detail to make generalizations about the types and distributions of historic properties that may be present.

Reconstruction (treatment)—the act or process of reproducing by new construction the exact form and detail of a vanished building, structure, or object, or any part thereof, as it appeared at a specific period of time.

Rehabilitation (treatment)—the act or process of returning a property to a state of utility through repair or alteration which makes possible an efficient contemporary use while preserving those portions or features of the property which are significant to its historical, architectural and cultural values.

Research design—a statement of proposed identification, documentation, investigation, or other treatment of a historic property that identifies the project's goals, methods and techniques, expected results, and the relationship of the expected results to other proposed activities or treatments.

Restoration—the act or process of accurately recovering the form and details of a property and its setting as it appeared at a particular period of time

by means of the removal of later work or by the replacement of missing earlier work.

Sample Survey—survey of a representative sample of lands within a given area in order to generate or test predictions about the types and distributions of historic properties in the entire area.

Stabilization (treatment)—the act or process of applying measures designed to reestablish a weather resistant enclosure and the structural stability of an unsafe or deteriorated property while maintaining the essential form as it exists at present.

Statement of objectives—see Research design.

Dated: September 26, 1983.

Russell E. Dickenson,

Director, National Park Service.

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