

**Drew Stewart Public Comments**  
QAP Draft 2014

My name is Drew Stewart and I am here representing the Foundation for Historical LA. We support historic preservation efforts statewide and I appreciate the opportunity to offer feedback on the Draft Qualified Allocation Plan.

Our **first** note of feedback regards the definitions used for “historic rehabilitation” and “historic projects.” We are part of a coalition of preservation organizations statewide that has come up with model definitions regarding historic rehabilitation that we respectfully request be included in the 2014 QAP and indeed all of your housing programs. We are submitting these definitions in writing, but in summary, they are intended to ensure that if a Developer selects “Historic Rehabilitation” as the housing type for his or her project then the rehabilitation should meet certain standards for appropriate historic rehabilitation. It closes loopholes and creates a level playing field.

Second, as I am sure you are aware, there are thousands and thousands of blighted but historic single-family homes throughout the state. We would like for developers to rehabilitate these existing houses as affordable housing. Doing so would provide an economic boost to our neighborhoods, halt the demolition by neglect of hundreds of homes, and create affordable housing in close proximity to the jobs and social services required by the residents of these homes. To that end we request a set aside pool, or alternately, a significant point preference for projects that consist entirely of blighted, historic, single-family and two family homes whether in rural or urban areas.

Third, we would ask that the Agency reinstate the 2013 Limits for Total allowable Development Costs for Historic Preservation Projects until a statewide survey of actual costs can be conducted. The current limits proposed in the Draft QAP are significantly lower than the actual hard costs of other historic preservation projects in the state and our fear is that ALL adaptive reuse and historic rehabilitation projects will stop if the proposed limits are enacted. If you choose to keep the per square foot limits then we respectfully request an increase of 35-40% over the proposed limits.

Finally, in order to promote both energy efficiency AND Historic preservation we request that the State Historic Preservation Officer should be able to make specific suggestions and requests regarding energy efficiency waivers. This is in recognition of the fact that the Secretary of the Interiors Standards for Historic Rehabilitation and the threshold Energy Star energy efficiency requirements were not drafted to be compatible with each other. This is not a blanket waiver, but rather a request that the project Owner can seek the support of the State Historic Preservation Office and then ask for particular waivers just as they would with elevation requirements or other specific requests that relate to historic preservation. Doing so will encourage developers to pursue historic projects.

Thank you.