

From: [Christopher Sutton](#)
To: [Affordable Sales Program@DOT](mailto:Affordable_Sales_Program@DOT)
Subject: Comments on SR 710 Draft Regulations
Date: Tuesday, September 02, 2014 4:59:00 PM
Attachments: [DOC090214.pdf](#)
[DOC090214.pdf](#)

Mr. Green and Ms. Lowden:

Attached are my further comments with ten additional exhibits.

- - - Christopher Sutton

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LAW OFFICE OF
CHRISTOPHER SUTTON
586 LA LOMA ROAD
PASADENA, CALIFORNIA 91105-2443
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Tuesday, September 2, 2014
(Transmitted by facsimile, email, and U.S. Mail)

Mr. Brent L. Green
Chief, Division of Right of Way and Land Survey
State of California, Department of Transportation ("Caltrans")
ATTN: Affordable Sales Program
1120 'N' Street, MS 37
Sacramento, California 95814

Re: Fourth Comment Letter on Proposed Sales Regulations, SR 710 Corridor

Dear Mr. Green and Caltrans:

This office represents the Caltrans Tenants of the 710 Corridor and other individuals, commercial entities, and non-profit entities, all renting properties from Caltrans within the SR 710 corridor in the cities of Los Angeles, South Pasadena, and Pasadena. The below comments are submitted pursuant to Government Code §§ 11346 - 11348 within the California Administrative Procedures Act ("APA"), and several Notices published by Caltrans.

1. Prior Letters Are Incorporated By Reference

This is my **fourth** comment letter. Please incorporate all my prior written comment letters and attachments into this letter as though they are set forth herein. My prior letters commenting on the proposed SR 710 sales regulations were dated and directed as follows:

- a. July 31, 2014, to Brent L. Green (comment Item Nos. 1 thru 23) and Item 24, California Public Records Act requests
- b. August 26, 2014, to Jennifer Lowden (w/ 2 attachments)
- c. August 27, 2014, to Jennifer Lowden (w/ 1 attachment)

2. Prior Oral Comments Are Incorporated by Reference

I made oral comments at the following Caltrans-sponsored forums. There was a court reporter at each of these forums, and it was announced by Caltrans personnel running the meeting that a written transcription would be prepared of all oral comments.

- a. October 23, 2013, held at El Sereno Senior Center
- b. October 24, 2013, held at Pasadena Convention Center
- c. July 15, 2014 held at Cal State Los Angeles
- d. July 17, 2014, held at Pasadena Convention Center
- e. August 21, 2014, held at Los Angeles Christian Presbyterian Church

3. All Other Oral and Written Comments Sre Incorporated by Reference

Every other written and oral comment received by Caltrans regarding these proposed property sales regulations from every person and entity is hereby incorporated by this reference as though they were set forth herein. Later in this letter I request copies of these other comments under the California Public Records Act and Article One, Section 3(b), of the California Constitution (constitutional right to receive public records).

4. Attached Nine Exhibits Are Incorporated by Reference

Attached to this letter are following nine exhibits, and these are each incorporated into this letter as though set forth in full in the text:

<u>Exhibit Number</u>	<u>Date</u>	<u>Description</u>	<u>Page Length</u>
1	4-5-2007	Judgment, <u>South Pasadena v. Caltrans</u> , BC331628	8
2	5-2009	Caltrans Right of Way Manual, section 2.05.01.00	1
3	10-2013	SB 416 (Liu), Stats. 2014, chap. 468, Roberti Law amended	6
4	7-3-2014	Caltrans Phase 1A and 1B Property Sales List (APA violated)	1
5	11-5-2013	Caltrans SR 710 Vacant Properties List (incomplete)	2
6	6-25-2007	Caltrans SR 710 Rental Properties List (incomplete)	11
7	9-2-2014	Reconfigured SR 710 Vacant Property List (incomplete)	2
8	9-2-2014	Reconfigured SR 710 Single Family Res List (incomplete)	10
9	9-2-2014	Reconfigured SR 710 Commercial and Non-Profit Properties (incomplete)	2
10	9-2-2014	Proposed Amended SR 710 Sales Regulations	20

5. Continuing Violation of Streets and Highways Code § 118.6 In Not Having Regulations in Place on Excess Property Determinations

Streets and Highways Code § 118.6 reads as follows, emphasis supplied:

§ 118.6. The department shall, to the greatest extent possible, offer to sell or exchange excess real property within one year from the date that it is determined by the department to be excess.

"Excess real property," for the purposes of this section, means all land and improvements situated outside of calculated highway right-of-way lines not needed or used for highway or other public purposes, including, but not limited to, those leased to public agencies pursuant to Section 104.15, and available for sale or exchange.

The department shall adopt rules and regulations to determine which real property outside of calculated right-of-way lines is no longer needed or used for highway or other public purposes, and which is available for sale or exchange. The department is authorized to lease all real property not presently

needed or used for highway purposes pending the sale or exchange of such property.

Excess real property which consists of lands of notable environmental value, such as, but not limited to, lands of extraordinary scenic beauty, lands fronting on waterway, lakes, and marshes, lands within the boundaries of parks, recreational areas, wildlife preserves or refuges, and lands providing wildlife habitat shall first be offered for sale or exchange to public agencies operating parks and recreational areas as follows:

(a) To any park or recreation department of any city within which the land may be situated.

(b) To any park or recreation department of the county within which the land is situated.

(c) To any regional park authority having jurisdiction within the area in which the land is situated.

(d) To the State Resources Agency or any agency which may succeed to its powers.

The public agency desiring to purchase such land for park or recreation use shall notify the department within 60 days of its intent to purchase the land after receipt of the department's notification of intent to sell the land. If the public agency desiring to purchase the land and the department are unable to arrive at a mutually satisfactory sales price for the land during the 60-day period, the land may be disposed of in the normal manner.

The failure of the department to first offer excess real property which consists of lands of notable environmental value to public agencies operating parks and recreational areas shall not affect the validity of any conveyance of such excess real property to any person or entity unaware of the failure of the department to do so; however, this shall in no way be construed as releasing the department from its responsibility in offering such property to such public agencies first.

[Added stats 1972, ch. 1331 § 1; Amended Stats 1974 ch. 545 § 37; Amended Stats 1982 ch. 681 § 46.5.]

In 1973 Caltrans adopted the regulations required by Streets & Highways Code § 118.6. However, it then repealed all these regulations in 1981 without replacing them. This repeal appears to have been part of wide spread Caltrans practice beginning in 1981 to repeal all its formal regulations and thereafter cease compliance with the APA.

Instead, Caltrans adopted "internal rules" within a document entitled the "Right of Way Manual," over 1,000 pages in length. But this process did not comply with either due process or the mandatory statutory procedures in the APA. No public notice given to affected parties. No comment period was provided. No public hearing or forum was conducted. No review by the Office of Administrative Law was conducted. No sections were published in the California Register of proposed and adopted regulations. Caltrans has repeatedly amended and repealed sections of the Right of Way Manual without complying

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with the APA or providing any due process notices, hearings, or explanations to the persons and entities adversely impacted by the changes. This illegal practice continues.

6. The Caltrans Right of Way Manual and its Caltrans' Informal "Delegations" of Decision-Making Authority Violate the APA and Due Process

The right and ability to purchase "surplus" or "excess" Caltrans property at or below full market value are vested rights in the qualified tenants, including individual tenants, non-profit tenants, business tenants, and governmental tenants. Caltrans seeks to make decisions on when to sell, and to whom it will sell, in a closed and secretive fashion. The APA and due process protected by the California and United States Constitutions require that all these decisions be open, transparent, comply with the APA, and provide meaningful opportunity to participate in the process, including notice of all procedures, notice of all decisions, public hearings, written rules and written findings, and a minimal appeal process.

There are many conflicts between the substantive provisions and procedures in Caltrans' Right of Way Manual and various state laws (including the APA and others). These instant proposed regulations for property sales in the SR 710 corridor also conflict with the Right of Way Manual. These conflicts remain unresolved. It appears that Caltrans intends to use the procedures and substantive provisions of the Right of Way Manual to administer the SR 710 sales program described in the proposed regulations. It appears that Caltrans has already used the Right of Way Manual or some other "underground" procedure to formulate the list of fifty-three (53) properties it released on July 3, 2014, via its web site, but without any explanation.

These past and ongoing Caltrans practices violate the APA because no portion of the Right of Way Manual was adopted in compliance with the APA or with due process. The entire Right of Way Manual is an illegal "underground regulation" in continuing violation of the APA and the due process rights of those persons and entities adversely impacted by it.

In 2007, the City of South Pasadena obtained a judgment in the L.A. County Superior Court and the court enjoined the sale of fifteen (15) properties to Beacon Housing, Inc., and Esperanza Charities, Inc. See City of South Pasadena v. California Department of Transportation, LASC Case No. BC 331628 (attached hereto as Exhibit 1). The Court's finding of illegal "underground regulations" being used by Caltrans applies equally to all parts of the Right of Way Manual. Yet, seven years later, Caltrans has failed to honor the judgment and correct its widespread violation of the APA. Caltrans also has failed to adopt the regulations required by Streets and Highways Code § 118.6 for determinations of "excess" property status.

The Caltrans website under "publications" describes the Right of Way Manual as follows:

RIGHT OF WAY MANUAL (Direct Internet Link)

"The Right of Way (R/W) Program administers the statewide program for right of way acquisition and real property management in support of Caltrans' purpose, mission, vision, and goals. The purpose of the R/W Manual is to give users a tool that will lead them through the R/W processes. The manual is organized along the normal work flow as much as possible. Various type faces have been used to produce the manual. All section headings are in bold print. The text of any law, statute, or regulation is in bold italicized print. Abbreviations and acronyms are used wherever possible. A glossary of definitions is included along with the various forms and exhibits. The manual will be updated to keep current through the issuance of periodic changes."

Chapter 16 of the Right of Way Manual is entitled "EXCESS LAND" and is 194 pages in length. This chapter fails to mention the mandate in Streets and Highways Code § 118.6 that formal regulations be adopted for "excess land" determinations by Caltrans. Chapter 16 of the Right of Way Manual is an illegal "underground regulation" in violation of the APA and the 2007 Judgment (Exhibit 1). Specifically, sub-chapter 16-05, entitled "Disposal Methods and Procedures," appears a direct circumvention and violation of Streets and Highways Code section 118.6. Section 16.05.06.02 directly conflicts with the Roberti Law by requiring all sale to existing tenant be at full market value, rather than the affordable price mandated by the Roberti Law for certain tenants, local governments, and non-profit entities. In addition, Chapter 16 repeatedly relies upon a California Transportation Commission resolution, No. G-98-22, adopted in 1998. This Resolution is an attempt to evade the Roberti Law and to ignore the formal opinion of the California Attorney General issued on December 30, 2009 (AG Op. 07-801), finding that the Roberti Law and the Caltrans process of providing affordable rents to residential tenants were fully constitutional and

Chapter 11 of the Right of Way Manual is entitled "Property Management" and is 324 pages in length. Under this Chapter Caltrans continues to raise rents on residential and non-residential tenants. All these rent calculations and additional rental terms are imposed without complying with due process or the APA. Caltrans has recently attacked tenants for having pets, and has begun charging additional deposits and imposing additional insurance requirements on tenants, all without complying with APA. The entirety of Chapter 11, Property Management, is an illegal "underground regulation" that Caltrans is using to determine whether tenants are in "**good standing**" and thus eligible to acquire the properties under the Roberti Law. This use of Chapter 11 to determine Roberti Law eligibility, including new standards and fees for pets, is a violation of APA and the 2007 Judgment (Exhibit 1).

Chapter 2 of the Right of Way Manual is entitled "Organization and Policy," and is 35 pages in length. In sub-chapter 2.05.00.00, entitled "Delegation Matrices," section 2.05.01.00 describes an informal process of authorizing local Caltrans offices to take unspecified actions based on periodic "delegation" memos via email and "on the R/W Intranet." This is a further violation of APA and due process rights of adversely impacted persons and entities. The policy-making and decision-making functions of Caltrans are subject of constant and

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unnoticed changes via these "delegations" of authority. It remain totally concealed by Caltrans how the decision was made to list fifty-three (53) properties for sale on July 3, 2014. There is no APA-compliant process to appeal an determination to list or not list a specific property for sale. There must be a full and open appeal process.

The proposed SR 710 sales regulations need to expressly disavow and overrule the Caltrans **Right of Way Manual** and the informal "delegation" memos and emails. Otherwise the process will be handled via illegal "underground regulations" and violate the APA and the due process rights of all persons impacted by these "underground regulations."

7. Failure to Follow Streets & Highways Code § 118.1
As to Non-Residential Excess Properties

Streets and Highways Code § 118.1 reads as follows (emphasis supplied):

§118.1. Except as provided in Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5 of the Government Code and Section 118.6 of this code, with respect to **commercial real property** acquired for the construction of a state highway, but no longer required for that purpose because the construction will not be undertaken, **the department shall first offer the real property for sale at its current fair market value to the occupant thereof if the occupant is renting or leasing the real property from the department**, has used and occupied the real property, and has made improvements of a value in excess of five thousand dollars (\$5,000) on the real property during that time at his or her own expense consistent with the terms of the rental or lease agreement with the department. For the purpose of establishing fair market value, the department shall obtain at least two independent appraisals from qualified appraisers.

The failure of the department to first offer excess real property as required by this section shall not affect the validity of any conveyance of this excess real property to any person or entity unaware of the failure of the department to do so. However, this shall in no way be construed as releasing the department from its responsibility in offering that property to the occupants thereof first.

[Added Stat 1981 ch. 831 § 1;

The provisions of the Roberti Law (Government Code §§ 54235 to 54238.7) only apply to surplus **residential** property. Vacant land (leased or unoccupied) and parcels used for other than residential purposes --- commercial businesses, non-profit entities, government entities --- do not fall within the definition of "surplus residential property" contained in Government Code § 54236(b). These properties are not to be sold under the Roberti Law, but under Streets and Highways Code sections 118, 118.1 or 118.6. The proposed regulations fail to distinguish between residential and non-residential properties are to be sold and fail to describe the method to determine which are to be sold under which law.

8. Caltrans Staff and Attorneys Delayed and Undermined the Goal of the Governor, the Agency Secretary, and the Caltrans Director To Sell SR 710 Properties During 1996 to 2007

In 1994, then Caltrans Director James Van Lobensels instructed Caltrans staff to prepare a list of one hundred (100) properties in the SR 710 corridor to be sold as "surplus residential properties" under the Roberti Law. In response to this instruction, Caltrans staff produced a list of fifty-four (54) properties. These 54 were then formally declared "surplus," and the sales process initiated in 1996. Of these 54 properties, only 32 were in fact sold between 1996 and 2007. However, without seeking a further determination of "surplus" status, a different set of fifteen (15) *other* properties were sold outside the original 54 list. During the sales of SR 710 properties in the 1996-2007 time period Caltrans assigned no more than two people at any one time to conduct the sales. Caltrans failed to set a time line or schedule to complete selling the list of 54 properties.

Thus, it took Caltrans twelve years to sell a total of forty-six (47) properties. This is roughly 3.92 sales per year. There are over 600 properties in the SR 710 corridor. At the rate of 3.92 sales per year Caltrans would take 153 years to sell the 600 properties. For the many tenants in their 60's, 70's, 80's and 90's such a schedule effectively denies the purchase rights set forth in the Roberti Law. Caltrans will simply wait until they are dead. Caltrans and its regulations need to specify a larger staff associated with the sales process. Otherwise, the lack of adequate staff will thwart the purchase rights of hundreds of people. The lack of adequate staff to handle the sales process would be a violation of the Americans With Disabilities Act, the U.S. Fair Housing Act, a form of housing discrimination based on age and disability, and similar state laws and regulations. Caltrans needs to set forth in the regulations a fix time line and schedule for the sale of each property.

9. Attached Exhibits Must be Used in the Regulations and Sales Process

Exhibits 2, 4, 5 and 6 attached were obtained from Caltrans between 2007 and 2014. Exhibit 2 is a page from the Caltrans Right of Way Manual from its web site. Exhibits 4, 5, and 6 are property lists prepared by Caltrans in 2014, 2013, and 2007, respectively. Parcel and tenant economic data is deleted from Exhibit 6.

Exhibit 1 is the 2007 judgment finding Caltrans in violation of the APA. Exhibit 3 is the 2013 law which amended the Roberti Law authored by State Senator Carol Liu (SB 416). Exhibits 7, 8, and 9 are reconfigured versions of Exhibit 6, which show the vacant land, single family residences, and commercial and non-profit uses. Since Exhibit 6 was incomplete when it was prepared by Caltrans in 2007, Exhibits 7, 8, and 9 are incomplete lists of these categories. It is clear that Caltrans has a current 2014 version of Exhibit 6 in its possession. A full and complete list of ALL properties in the SR 710 Corridor must be included in the final regulations. Each and every parcel of land must be categorized as either "surplus residential property" or non-residential property or governmental property.

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Many parcels on Exhibit 6 are within the boundaries of freeways, off-ramps, on-ramps, and other highway improvements. Many properties are missing. One hundred percent disclosure of all Caltrans parcels and their assigned surplus or excess or retained by Caltrans status must be published in the final SR 710 sale regulations. Each one must be included in a sales schedule so the affects persons and entities can plan accordingly.

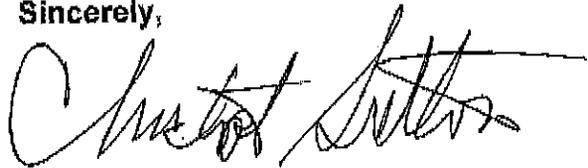
10. Inoperable Fax Number and Email for Submitting Comments

On July 31, 2014, this office attempted to submit comments on these proposed regulations by the 5:00 p.m. deadline. Neither the fax number nor the email address for comments was working between 3:00 pm and 5:00 pm that day. If there is a similar breakdown during today's deadline, Caltrans needs to further extend the deadline, at least to accept mailed comments post marked by September 2, 2014.

Conclusion

This office will be willing work with Caltrans staff and attorneys to provide effective regulations to implement the Roberti Act and all other state laws for the sale of Caltrans properties.

Sincerely,



Christopher Sutton

Enclosed Exhibits:

1	4-5-2007	Judgment, <u>South Pasadena v. Caltrans</u> , BC331628	8
2	5-2009	Caltrans Right of Way Manual, section 2.05.01.00	1
3	10-2013	SB 416 (Liu), Stats. 2014, chap. 468, Roberti Law amended	6
4	7-3-2014	Caltrans Phase 1A and 1B Property Sales List (APA violated)	1
5	11-5-2013	Caltrans SR 710 Vacant Properties List (incomplete)	2
6	6-25-2007	Caltrans SR 710 Rental Properties List (incomplete)	11
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10	9-2-2014	Proposed Amended SR 710 Sales Regulations	20

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John A. Davis, Executive Officer/Clerk

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DEPUTY

JOHN A. CLARKE, CLERK

BY F. MOREAU, DEPUTY

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F.D.

SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

RECEIVED
APR 20 2007

CITY OF SOUTH PASADENA,

Plaintiff,

v.

THE CALIFORNIA DEPARTMENT OF
TRANSPORTATION; WILL KEMPTON,
as DIRECTOR OF THE CALIFORNIA
DEPARTMENT OF
TRANSPORTATION; CALIFORNIA
TRANSPORTATION COMMISSION;
BEACON HOUSING, INC., a non-profit
corporation, and ESPERANZA
CHARITIES, INC., a non-profit
corporation, and DOES 1 to 10,

Defendants.

CASE NO.: BC331628 A. Caballero

[Handwritten signature]
**PROPOSED
DECLARATORY JUDGMENT
FOR PLAINTIFF**

[Handwritten number]
-26

The motion of plaintiff City of South Pasadena ("City") for summary adjudication on the first and third causes of action of the verified Complaint on file herein for declaratory relief against defendants California Department of Transportation and its Director Will Kempton in his official capacity ("Caltrans"), Beacon Housing, Inc. ("Beacon") and Esperanza Charities, Inc. ("Esperanza"), duly came on for hearing in Department 3 of the above-entitled court on February 5, 2007 before Honorable James R. Dunn, Judge presiding.

DECLARATORY JUDGMENT FOR PLAINTIFF

EXHIBIT 1

1 Richard R. Terzian, Esq. appeared for City; Erick Solares, Esq. appeared for Caltrans; Scott
2 Carlson, Esq. and Lane Thomas, Esq. appeared for defendant Beacon; and Charles Granville-
3 Mathews, Esq. appeared for defendant Esperanza.
4

5 Having reviewed the moving and opposing papers of the respective parties and oral
6 arguments of their counsel, and having sustained the objections of City to the declaration of
7 Linda Wilford filed by Caltrans in opposition to the motion, and having determined from the
8 verified complaint and the admissions of Caltrans that there are no triable issues of material
9 fact and that the issues before the Court can be determined as a matter of law and that City has
10 met its burden to establish that there is no defense to said first and third causes of action and
11 that City is entitled to judgment as a matter of law, the Court hereby finds:
12

13 1. Subchapter 16.10 of Chapter 16 of the Caltrans Right-of-Way Manual,
14 consisting of Sections 16.10.01.00 through 16.10.14.00, inclusive ("Roberti Bill Regulation"),
15 is a regulation implementing, interpreting and making specific a statute within the meaning of
16 Government Code Section 11342.600;
17

18 2. The statute that the Roberti Bill Regulation purports to interpret, implement and
19 specify is found at Government Code Sections 54235 through 54238.7 inclusive, commonly
20 known as the Roberti Bill, and more particularly Section 54237 which governs disposal of the
21 parcels of real property at issue here;
22

23 3. The Roberti Bill Regulation was not noticed for adoption nor were public
24 hearings held nor was it published as required by the Administrative Procedure Act ("APA"),
25 specifically Government Code Sections 11346 through 11348 inclusive;
26

27 4. The Roberti Bill Regulation does not appear in the Code of California
28 Regulations;

Et. 1

1 5. The Roberti Bill Regulation is not an internal management rule within the
2 meaning of Government Code Section 11340.9(d) since it applies to a significant segment of
3 the general public nor is it the only legally tenable interpretation of the Roberti Bill within the
4 meaning of Government Code Section 11340.9(f);

6 6. The Roberti Bill Regulation has provisions for sales of parcels of real property
7 owned by Caltrans within the proposed right-of-way of the 710 Freeway within the City. Said
8 provisions are substantially inconsistent with the Roberti Bill;

10 7. Said parcels of real property at issue here, described below by their street
11 addresses, were offered for sale by public bidding and selection of the winning bidders was
12 made by a committee created by Caltrans pursuant to criteria set forth in the Roberti Bill
13 Regulation;

15 8. The sales of said real properties took place in accordance with the procedures
16 set forth in the Roberti Bill Regulation;

17 9. The City is a housing-related public entity within the meaning of the Roberti
18 Bill;

20 10. The City was a bona fide qualified bidder for said real properties and was
21 treated as such by Caltrans;

22 11. The City has significant statutory duties and powers related to provision of
23 affordable housing for low and moderate income persons which it has implemented in the
24 Housing Element of its General Plan and the City is, or may be, impacted by the Roberti Bill
25 Regulation;

27 12. The City is an interested person within the meaning of Government Code
28 Section 11350(a) and is entitled to pursue an action to challenge the Roberti Bill Regulation;

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13. After this action was filed and the Complaint served on Esperanza, Caltrans and Esperanza consummated sale of the specific parcel of real property described below;

14. Esperanza was not a bona fide purchaser of said parcel within the meaning of Government Code Section 54238.5 in that Esperanza was aware of the claims of City with respect to all said parcels of real property prior to approval of sale of said parcel by the California Transportation Commission.

Based on the foregoing, it is

ORDERED, ADJUDGED AND DECLARED that:

A. The Roberti Bill Regulation is an invalid regulation and cannot be utilized, issued, enforced or otherwise used in connection with any action of Caltrans in carrying out the mandate of the Roberti Bill for disposal of surplus properties;

B. The Roberti Bill Regulation is without legal force or effect for any purpose;

C. Awards on the bids, and contracts for sale, of the following parcels of real property located within City from Caltrans to Beacon and Esperanza are invalid, null and void:

- 1. 217 Fremont Street;
- 2. 225 Fremont Avenue;
- 3. 302 Fairview Avenue;
- 4. 1037-1039 Grevelia Street;
- 5. 705-711 Fairview Avenue;

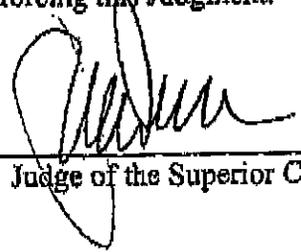
DECLARATORY JUDGMENT FOR PLAINTIFF

Ex. 1

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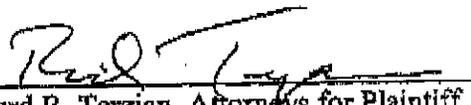
FURTHER ORDERED, ADJUDGED AND DECLARED, that the Court shall retain jurisdiction of this action for the purpose of enforcing this Judgment.

DATED: 4/5, 2007



Judge of the Superior Court

Presented by:
BANNAN, GREEN, FRANK & TERZIAN LLP

By: 
Richard R. Terzian, Attorneys for Plaintiff

EX. 1

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, JoAnn G. Johnson, declare as follows:

1. I am employed in the County of Los Angeles, State of California and am over the age of 18 and not a party to the within action. My business address is: 555 South Flower Street, 27th Floor, Los Angeles, California 90071.

2. On February 16, 2007, I served the foregoing document(s) described as: **[PROPOSED] DECLARATORY JUDGMENT FOR PLAINTIFF** on interested parties by placing a true copy thereof enclosed in a sealed envelope with postage fully prepared and addressed as follows:

SEE ATTACHED SERVICE LIST

BY MAIL I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepared at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

BY FEDERAL EXPRESS I caused such documents to be served via Federal Express to the office of the addressee.

BY PERSONAL SERVICE I caused such envelopes to be delivered by hand to the office of the addressee.

BY TELEFACSIMILE I caused such documents to be served via facsimile transmittal to the office of the addressee.

STATE FEDERAL

I declare under penalty of perjury and the laws of the State of California that the foregoing is true and correct and if called upon, I could and would competently testify thereto.

Executed February 16, 2007, at Los Angeles, California.

JoAnn G. Johnson

JOANN G. JOHNSON

Ex-1

SERVICE LIST
CITY OF SOUTH PASADENA v. CALTRANS, etc. (BC331628)

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<p>Lane J. Thomas, Esq. Counsel for Beacon Housing 225 South Lake Ave., Fl. 9 Pasadena, California 91101 Tel: (626) 304-7065 Fax: (626) 796-4738</p>	<p>Robert B. Schoenburg, Deputy Attorney William H. Rittenburg, Deputy Attorney Erick Solares, Esq. Counsel for The People of the State of California, by and through the Department of Transportation 100 South Main Street, Suite 1300 Los Angeles, California 90012-3702 Tel: (213) 687-6000 Fax: (213) 687-8300</p>
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2.05.00.00 - DELEGATION MATRICES

2.05.01.00 Delegations

Pursuant to Director's Policy #16 dated December 1, 1994, and Executive Order #98-21 dated July 2, 1998, the HQ R/W Division Chief issues, updates, and disseminates delegations directly to the Regions/Districts through electronic mail (e-mail) and posting on the R/W Intranet. Delegations transfer to Region/District Directors, and by separate subdelegation order from Region/District Directors to Region/District Division Chiefs - R/W, and thereafter to the designated position.

The delegation matrices identify specific delegations to Regions/Districts, and also identify the Region/District subdelegation level of approval required for actions within each R/W function. Each Region/District will determine whether to delegate down to the lowest level allowed. The Region/District R/W Division Chief must report any amendment to the level of approval authority to the appropriate HQ Office Chief. The HQ Office Chief then initiates the update through the HQ Resource Manager for R/W.

The HQ Resource Manager for R/W has overall responsibility for maintaining, updating, and publishing updates to the delegation matrices on the Intranet at <http://pd.dwt.ca.gov/row/> for access by Department staff, and immediately providing the updated delegation matrices to HQ P&M to send by e-mail to Region/District Division Chiefs - R/W for distribution.

2.05 - 1 (REV 5/2009)

EXHIBIT 2

Senate Bill No. 416

CHAPTER 468

An act to amend Sections 54236 and 54237 of, and to add Sections 54237.3, 54237.7, and 54237.8 to, the Government Code, relating to surplus residential property, and making an appropriation therefor.

[Approved by Governor October 1, 2013. Filed with
Secretary of State October 1, 2013.]

LEGISLATIVE COUNSEL'S DIGEST

SB 416, Liu. Surplus residential property.

Existing law declares the intent of the Legislature to preserve, upgrade, and expand the supply of housing to persons and families of low or moderate income, through the sale of specified surplus residential property owned by public agencies. Existing law establishes priorities and procedures that any state agency disposing of that surplus residential property is required to follow, and defines relevant terms for these purposes, including "fair market value."

This bill would revise the definition of "fair market value" for purposes of the sale of this surplus residential property, to reflect the existing "as is" condition of the property, taking into account any needed repairs.

Existing law requires specified single-family residences to be first offered to their present occupants, at an affordable price, as defined. Under existing law, the selling agency has the option of making repairs to the property required by lenders or government assistance programs, or providing the occupants with a replacement dwelling, pursuant to a specified provision of law.

This bill would revise the procedures applicable to the sale of these surplus residential properties not otherwise sold pursuant to existing procedures, to be offered to current and former tenants in good standing, respectively, and to purchasers who will be owner occupants. The bill additionally would require the selling agency to offer tenants in good standing of nonresidential properties to be given priority to purchase the property they occupy. The bill would authorize the Department of Transportation to offer a residence or property in an "as is" condition, at the request of a person with priority to purchase the residence or property in accordance with existing law.

This bill would require proceeds from sales of surplus residential property to be placed in the SR-710 Rehabilitation Account, created by the bill, and would continuously appropriate these funds for the purpose of providing specified repairs to the properties until the last of the properties is repaired, at which time the funds, less any reimbursements due to the federal government, would be transferred to the State Highway Account, for allocation by the California Transportation Commission, as specified.

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EXHIBIT 3

This bill would provide that the preliminary project alternative referred to as Alternative F-6 in the December 2012 Alternative Analysis Report of the Los Angeles Metropolitan Transportation Authority shall no longer be deemed a feasible alternative for consideration in any state environmental review process for the Interstate 710 North Gap Closure project, as specified.

Appropriation: yes.

The people of the State of California do enact as follows:

SECTION 1. Section 54236 of the Government Code is amended to read:

54236. (a) As used in this article, the term "offer" means to solicit proposals prior to sale in a manner calculated to achieve a sale under the conditions specified, and to hold the offer open for a reasonable period of time, which shall be no more than one year, unless the time is extended by the selling agency at its discretion, for a period to be specified by the selling agency.

(b) As used in this article, the term "affordable price" means, in the case of a purchaser, other than a lower income household, the price for residential property for which the purchaser's monthly payments will not exceed that portion of the purchasing household's adjusted income as determined in accordance with the regulations of the United States Department of Housing and Urban Development, issued pursuant to Section 235 of the National Housing Act; and, in the case of a purchaser that is a lower income household, the price for residential property for which the purchaser's monthly payments will not exceed that portion of the purchasing household's adjusted income as determined in accordance with the regulations of the United States Department of Housing and Urban Development issued pursuant to Section 8 of the United States Housing Act of 1937.

(c) As used in this article, the term "single-family residence" means a real property improvement used, or intended to be used, as a dwelling unit for one family.

(d) As used in this article, the term "surplus residential property" means land and structures owned by any agency of the state that is determined to be no longer necessary for the agency's use, and that is developed as single-family or multifamily housing, except property being held by the agency for the purpose of exchange.

Surplus residential properties shall only include land and structures that, at the time of purchase by the state, the state had intended to remove the residences thereon and to use the land for state purposes.

(e) As used in this article, the term "displacement" includes, but is not limited to, persons who will have to move from surplus residential property that they occupy when it is sold by a state agency because they are unable to afford to pay the price that the state agency is asking for the residential property.

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(f) As used in this article, the term "fair market value" shall mean fair market value as of the date the offer of sale is made by the selling agency pursuant to the provisions of this article and shall reflect the existing "as is" condition of the property, taking into account any repairs required to make the property safe and habitable. This definition shall not apply to terms of sale that are described as mitigation measures in an environmental study prepared pursuant to the Public Resources Code if the study was initiated before this measure was enacted.

(g) As used in this article, the term "affordable rent" means, in the case of an occupant person or family, other than a person or family of low or moderate income, rent for residential property that is not more than 25 percent of the occupant household's gross monthly income, and in the case of an occupant person or family of low or moderate income, rent for residential property that is not more than the percentage of the adjusted income of the occupant person or family as permitted under regulations of the United States Department of Housing and Urban Development issued pursuant to Section 8 of the United States Housing Act of 1937, but not in excess of the market rental value for comparable property.

(h) As used in this article, the term "area median income" means median household income, adjusted for family size as determined in accordance with the regulations of the United States Department of Housing and Urban Development issued pursuant to Section 235 of the National Housing Act, as amended (Public Law 90-448), for the standard metropolitan statistical area (SMSA), in which surplus residential property to be disposed of pursuant to this article is located, or the county in which the property is located, if it is outside an SMSA.

(i) As used in this article, the term "persons and families of low or moderate income" means persons and families who meet both of the following conditions:

(1) Meet the definition of persons and families of low or moderate income set forth in Section 50093 of the Health and Safety Code.

(2) Have not had an ownership interest in real property in the last three years.

(j) As used in this article, the term "lower income households" means lower income households as defined in Section 50079.5 of the Health and Safety Code.

SEC. 2. Section 54237 of the Government Code is amended to read:

54237. (a) Notwithstanding Section 11011.1, any agency of the state disposing of surplus residential property shall do so in accordance with the following priorities and procedures:

(1) First, all single-family residences presently occupied by their former owners shall be offered to those former owners at the appraised fair market value.

(2) Second, all single-family residences shall be offered, pursuant to this article, to their present occupants who have occupied the property two years or more and who are persons and families of low or moderate income.

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(3) Third, all single-family residences shall be offered, pursuant to this article, to their present occupants who have occupied the property five years or more and whose household income does not exceed 150 percent of the area median income.

(4) Fourth, a single-family residence shall not be offered, pursuant to this article, to present occupants who are not the former owners of the property if the present occupants have had an ownership interest in real property in the last three years.

(b) Single-family residences offered to their present occupants pursuant to paragraphs (2) and (3) of subdivision (a) shall be offered to those present occupants at an affordable price, which price shall not be less than the price paid by the agency for original acquisition, unless the acquisition price was greater than the current fair market value, and shall not be greater than fair market value. When single-family residences are offered to present occupants at a price that is less than fair market value, the selling agency shall impose terms, conditions, and restrictions to ensure that the housing will remain available to persons and families of low or moderate income and households with incomes no greater than the incomes of the present occupants in proportion to the area median income. The Department of Housing and Community Development shall provide to the selling agency recommendations of standards and criteria for these prices, terms, conditions, and restrictions. The selling agency shall provide repairs required by lenders and government housing assistance programs, or, at the option of the agency, provide the present occupants with a replacement dwelling pursuant to Section 54237.5.

(c) If single-family residences are offered to their present occupants pursuant to paragraphs (2) and (3) of subdivision (a), the occupants shall certify their income and assets to the selling agency. When single-family residences are offered to present occupants at a price that is less than fair market value, the selling agency may verify the certifications, in accordance with procedures utilized for verification of incomes of purchasers and occupants of housing financed by the California Housing Finance Agency and with regulations adopted for the verification of assets by the United States Department of Housing and Urban Development. The income and asset limitations and term of residency requirements of paragraphs (2) and (3) of subdivision (a) shall not apply to sales that are described as mitigation measures in an environmental study prepared pursuant to the Public Resources Code, if the study was initiated before this measure was enacted.

(d) All other surplus residential properties and all properties described in paragraphs (1), (2), and (3) of subdivision (a) that are not purchased by the former owners or the present occupants shall be then offered to housing-related private and public entities at a reasonable price, which is best suited to economically feasible use of the property as decent, safe, and sanitary housing at affordable rents and affordable prices for persons and families of low or moderate income, on the condition that the purchasing entity shall cause the property to be rehabilitated and developed as limited equity cooperative housing with first right of occupancy to present occupants,

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except that where the development of cooperative or cooperatives is not feasible, the purchasing agency shall cause the property to be used for low and moderate income rental or owner-occupied housing, with first right of occupancy to the present tenants. The price of the property in no case shall be less than the price paid by the agency for original acquisition unless the acquisition price was greater than current fair market value and shall not be greater than fair market value. Subject to the foregoing, it shall be set at the level necessary to provide housing at affordable rents and affordable prices for present tenants and persons and families of low or moderate income. When residential property is offered at a price that is less than fair market value, the selling agency shall impose terms, conditions, and restrictions as will ensure that the housing will remain available to persons and families of low or moderate income. The Department of Housing and Community Development shall provide to the selling agency recommendations of standards and criteria for prices, terms, conditions, and restrictions.

(e) Any surplus residential properties not sold pursuant to subdivisions (a) to (d), inclusive, shall then be sold at fair market value, with priority given first to purchasers who are present tenants in good standing with all rent obligations current and paid in full, second to former tenants who were in good standing at the time they vacated the premises, with priority given to the most recent tenants first, and then to purchasers who will be owner occupants. The selling agency may commence the sales of properties that former tenants may possess a right to purchase as provided by this subdivision 30 days after the selling agency has done both of the following:

(1) Posted information regarding the sales under this subdivision on the selling agency's Internet Web site.

(2) Made a good faith effort to provide written notice, by first-class mail, to the last known address of each former tenant.

(f) Tenants in good standing of nonresidential properties shall be given priority to purchase, at fair market value, the property they rent, lease, or otherwise legally occupy.

SEC. 3. Section 54237.3 is added to the Government Code, to read:

54237.3. Notwithstanding the requirement to provide repairs in subdivision (b) of Section 54237, the Department of Transportation may offer a residence or property in an "as is" condition at the request of a person given priority to purchase pursuant to paragraphs (2) and (3) of subdivision (a) of Section 54237.

SEC. 4. Section 54237.7 is added to the Government Code, to read:

54237.7. Notwithstanding Section 183.1 of the Streets and Highways Code, the Department of Transportation shall deposit proceeds from sales pursuant to this article into the SR-710 Rehabilitation Account, which is hereby created. Notwithstanding Section 13340, funds in the account are hereby continuously appropriated to the department without regard to fiscal years for the purpose of providing repairs required pursuant to subdivision (b) of Section 54237. The total funds maintained in the account shall not exceed five hundred thousand dollars (\$500,000). Funds exceeding that amount, less any reimbursements due to the federal government, shall be

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transferred to the State Highway Account in the State Transportation Fund to be used for allocation by the California Transportation Commission (commission) exclusively to fund projects located in Pasadena, South Pasadena, Alhambra, La Cañada Flintridge, and the 90032 postal ZIP Code. Projects shall be selected and prioritized by the affected communities in consultation with the Los Angeles County Metropolitan Transportation Authority, pursuant to guidelines developed by the commission. The Los Angeles Metropolitan Transportation Authority shall submit a proposed program of projects and the commission shall have final authority to approve the projects. Eligible projects may include, but are not limited to: sound walls; transit and rail capital improvements; bikeways; pedestrian improvements; signal synchronization; left turn signals; and major street resurfacing, rehabilitation, and reconstruction. The funds shall not be used to advance or construct any proposed North State Route 710 tunnel. Any funds remaining in the SR-710 Rehabilitation Account on the date that final payment due for the last of the properties repaired has been made, less any reimbursements due to the federal government, shall be transferred to the State Highway Account in the State Transportation Fund, to be used exclusively for the purposes described in this section.

SEC. 5. Section 54237.8 is added to the Government Code, to read:

54237.8. Notwithstanding any other law, for purposes of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code), the preliminary project alternative referred to as Alternative F-6 in the December 2012 Alternative Analysis Report of the Los Angeles Metropolitan Transportation Authority shall no longer be deemed a feasible alternative for consideration in any state environmental review process for the Interstate 710 North Gap Closure project, State Clearinghouse number 1982092310.

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Phase 1A and Phase 1B Properties

	Phase 1A Properties	Phase 1B Properties	Parcel Number	Street Number	Street	City	TYPE OF PROPERTY
1	X		044428	540	PROSPECT AVENUE	SOUTH PASADENA	Single Family Residence
2	X		044538	885	ONEONTA DRIVE	SOUTH PASADENA	Single Family Residence
3	X		060763	2007	CAMBRIDGE PLACE	SOUTH PASADENA	Single Family Residence
4	X		061284	532	MERIDIAN AVENUE	SOUTH PASADENA	Single Family Residence
5	X		067558	534	ORANGE GROVE AVENUE	SOUTH PASADENA	Single Family Residence
6	X		068109	808	VALLEY VIEW ROAD	SOUTH PASADENA	Single Family Residence
7	X		069292	1101	PINE STREET	SOUTH PASADENA	Single Family Residence
8	X		068353	863	MONTEREY ROAD	SOUTH PASADENA	Single Family Residence
9	X		068500	1109	GREVELIA STREET	SOUTH PASADENA	Single Family Residence
10	X		068509	535	MERIDIAN AVENUE	SOUTH PASADENA	Single Family Residence
11	X		068626	529	PROSPECT AVENUE	SOUTH PASADENA	Single Family Residence
12	X		068635	530	ORANGE GROVE AVENUE	SOUTH PASADENA	Single Family Residence
13	X		068670	822	VALLEY VIEW ROAD	SOUTH PASADENA	Single Family Residence
14	X		068672	815	BONITA DRIVE	SOUTH PASADENA	Single Family Residence
15	X		045699	2011	CAMBRIDGE PLACE	SOUTH PASADENA	Single Family Residence
16	X		047407	2035	BERKSHIRE AVENUE	SOUTH PASADENA	Single Family Residence
17	X		047924	2028	BERKSHIRE AVENUE	SOUTH PASADENA	Single Family Residence
18	X		061158	533	PROSPECT AVENUE	SOUTH PASADENA	Single Family Residence
19	X		067567	1707	MERIDIAN AVENUE	SOUTH PASADENA	Single Family Residence
20	X		074836	852	MONTEREY ROAD	SOUTH PASADENA	Single Family Residence
21		X	043710	5524	KENDALL AVENUE	LOS ANGELES	Single Family Residence
22		X	048144	5501	BERKSHIRE DRIVE	LOS ANGELES	Single Family Residence
23		X	048145	5500	ATLAS STREET	LOS ANGELES	Single Family Residence
24		X	048146	5506	ATLAS STREET	LOS ANGELES	Single Family Residence
25		X	048147	5512	ATLAS STREET	LOS ANGELES	Single Family Residence
26		X	048150	5513	ATLAS STREET	LOS ANGELES	Single Family Residence
27		X	046831	288	WAVERLY DRIVE	PASADENA	Single Family Residence
28		X	048833 and 49325	385	HAVENDALE DRIVE	PASADENA	Single Family Residence
29		X	049322	265	WAVERLY DRIVE	PASADENA	Single Family Residence
30		X	061158	910	BONITA DRIVE	SOUTH PASADENA	Single Family Residence
31		X	061345	1821	MERIDIAN AVE	SOUTH PASADENA	Single Family Residence
32		X	067320	495	PROSPECT AVENUE	SOUTH PASADENA	Single Family Residence
33		X	067332	801	BONITA DRIVE	SOUTH PASADENA	Single Family Residence

	Phase 1A Properties	Phase 1B Properties	Parcel Number	Street Number	Street	City	TYPE OF PROPERTY
34		X	067556	901	BONITA DRIVE	SOUTH PASADENA	Single Family Residence
35		X	068385	1131	GLENDON WAY	SOUTH PASADENA	Single Family Residence
36		X	068553	400	PROSPECT CIRCLE	SOUTH PASADENA	Single Family Residence
37		X	068629	811	PROSPECT AVENUE	SOUTH PASADENA	Single Family Residence
38		X	068671	823	BONITA DRIVE	SOUTH PASADENA	Single Family Residence
39		X	88878	773	BONITA DRIVE	SOUTH PASADENA	Single Family Residence
40		X	045423	705	BONITA DRIVE	SOUTH PASADENA	Multi-Family Residence
41		X	069213	816	BONITA DRIVE	SOUTH PASADENA	Multi-Family Residence
42		X	068469	828	PROSPECT AVENUE	SOUTH PASADENA	Multi-Family Residence

	Parcel Number	Street Number	Street	City	TYPE OF PROPERTY
1	46819	245	WAVERLY DRIVE	PASADENA	Unimproved Property
2	46820	255	WAVERLY DRIVE	PASADENA	Unimproved Property
3	46832	375	HAVENDALE DRIVE	PASADENA	Unimproved Property
4	46834	405	HAVENDALE DRIVE	PASADENA	Unimproved Property
5	49327 and 46835	275	BELLEVUE DRIVE	PASADENA	Unimproved Property
6	48328 and 46838	272	BELLEVUE DRIVE	PASADENA	Unimproved Property
7	41597	821	BONITA DRIVE	SOUTH PASADENA	Unimproved Property
8	62582	804	VALLEY VIEW ROAD	SOUTH PASADENA	Unimproved Property
9	64544	2006	BERKSHIRE AVENUE	SOUTH PASADENA	Unimproved Property
10	68222	728	BONITA DRIVE	SOUTH PASADENA	Unimproved Property
11	68499	1107	GREVELIA STREET	SOUTH PASADENA	Unimproved Property

EXHIBIT 4

710 Properties - Vacant 110513

SR-710			VACANT		PROPERTIES	
S: SFR	#: MFR	HISTORICAL	Street Number	Street	City	COMMENTS
			W/5649	ALHAMBRA AVE	LOS ANGELES	Vacant Lot
2			5501	ALLAN STREET	LOS ANGELES	Vacant Lot
3 S			5482	ALMONT ST	LOS ANGELES	Boarded
4	1		5488	ALMONT ST	LOS ANGELES	
5	1 H		4411	ALPHA STREET	LOS ANGELES	Boarded
6	1 H		4411.5	ALPHA STREET	LOS ANGELES	Boarded
7			4524	ALPHA STREET	LOS ANGELES	Vacant Lot
8			5500	CONCORD AVE	LOS ANGELES	Vacant Lot
9			5523	CONCORD AVE	LOS ANGELES	Vacant Lot
10			5529	CONCORD AVE	LOS ANGELES	Vacant Lot
11			5637	CONCORD AVE	LOS ANGELES	Vacant Lot
12			5541	CONCORD AVE	LOS ANGELES	Vacant Lot
13			5586	CONCORD AVE	LOS ANGELES	Vacant Lot
14			3220	Front Street	LOS ANGELES	Vacant Industrial
15	1		544.6	HUNTINGTON DRIVE	LOS ANGELES	Boarded
16			5433	HUNTINGTON DRIVE	LOS ANGELES	Vacant Lot
17	1		5440	HUNTINGTON DRIVE	LOS ANGELES	Boarded
18	1		5440.5	HUNTINGTON DRIVE	LOS ANGELES	Boarded
19	1		5442.5	HUNTINGTON DRIVE	LOS ANGELES	Boarded
20	1		5444	HUNTINGTON DRIVE	LOS ANGELES	Boarded
21			5450	HUNTINGTON DRIVE	LOS ANGELES	Vacant Lot
22			5450	HUNTINGTON DRIVE	LOS ANGELES	Vacant Lot
23	1		5442 A	HUNTINGTON DRIVE	LOS ANGELES	Boarded
24	1		5442 B	HUNTINGTON DRIVE	LOS ANGELES	Boarded
25 S			5465	KEATS ST	LOS ANGELES	
26			5471	KEATS ST	LOS ANGELES	Vacant Lot
27			2974	LOWELL AVE	LOS ANGELES	Vacant Lot
28 S			2950	LOWELL AVE	LOS ANGELES	Boarded
29	1		3955	LOWELL AVE	LOS ANGELES	
30			4010	Lowell Avenue	LOS ANGELES	Vacant Lot
31	1		4334	LOWELL AVE	LOS ANGELES	Boarded
32 S			4336	LOWELL AVE	LOS ANGELES	Boarded
33	1		4215	MAYCREST AVE	LOS ANGELES	Boarded
34	1		4215.5	MAYCREST AVE	LOS ANGELES	Boarded
35	1		4217	MAYCREST AVE	LOS ANGELES	Boarded
36	1		4217.5	MAYCREST AVE	LOS ANGELES	Boarded
37	1		4219	MAYCREST AVE	LOS ANGELES	Boarded
38	1		4219.5	MAYCREST AVE	LOS ANGELES	Boarded
39	1		4221	MAYCREST AVE	LOS ANGELES	Boarded
40	1		4221.5	MAYCREST AVE	LOS ANGELES	Boarded
41 S			4303	MAYCREST AVE	LOS ANGELES	
42 S			4433	MAYCREST AVE	LOS ANGELES	
43 S			5511	NORWICH AVENUE	LOS ANGELES	
44 S			5536	POPLAR BLVD	LOS ANGELES	
45 S			3116	SHEFFIELD AVENUE	LOS ANGELES	Boarded
46			3118	SHEFFIELD AVE	LOS ANGELES	Vacant Lot
47			3119	SHEFFIELD AVE	LOS ANGELES	Vacant Lot
48 S			3227	SHEFFIELD AVENUE	LOS ANGELES	Boarded
49 S			3701	SHEFFIELD AVE	LOS ANGELES	
50 S			3826	SHEFFIELD AVENUE	LOS ANGELES	Boarded
51	1		5443	SHELLEY STREET	LOS ANGELES	Uninhabitable-Storage
52			5451	SHELLEY STREET	LOS ANGELES	Vacant Lot
53			5453	SHELLEY STREET	LOS ANGELES	Vacant Lot
54	1		5465	SHELLEY STREET	LOS ANGELES	
55 S			5469	SHELLEY STREET	LOS ANGELES	
56			3911	Stockbridge Avenue	LOS ANGELES	Vacant Lot
57			5519	Templeton Street	LOS ANGELES	Vacant Lot
58			5575	Valley Boulevard	LOS ANGELES	Vacant Industrial
59			5601	VALLEY BLVD	LOS ANGELES	Vacant Industrial-Recycling

EXHIBIT 5

710 Properties - Vacant 110513

60			6801	VALLEY BLVD	LOS ANGELES	Vacant Industrial-Recycle E
61			N/O 6675	Valley Boulevard	LOS ANGELES	Vacant Industrial
62 S			244	ARLINGTON DR.	PASADENA	Storage - Boarded
63			1138	Avoca Avenue	PASADENA	Vacant Lot
64			172	BELLEFONTAINE ST.	PASADENA	Vacant Lot
65			182	BELLEFONTAINE ST.	PASADENA	Vacant Lot(100/yr)
66			234	BELLEFONTAINE ST.	PASADENA	Vacant Lot-Garage
67			220	Bellevue Drive	PASADENA	Vacant Lot(Valley Hunt Clu
68			250	Bellevue Drive	PASADENA	Vacant Lot(Valley Hunt Clu
69			272	Bellevue Drive	PASADENA	Vacant Lot(Valley Hunt Clu
70			275	Bellevue Drive	PASADENA	Vacant Lot
71		1 H	210	CALIFORNIA BLVD. W.	PASADENA	
72		1	227B	CALIFORNIA BLVD. W.	PASADENA	
73 S			180	GLENARM ST.	PASADENA	
74 S		H	185	GLENARM ST.	PASADENA	
75			N/W CORN	HAVENDALE / BELLEVUE	PASADENA	Vacant Lot-Rose Garden(3
76			375	HAVENDALE DR.	PASADENA	Vacant Lot
77			405	HAVENDALE DR.	PASADENA	Vacant Lot
78			R/385	Havendale Drive	PASADENA	Vacant Lot
79			W/165	HURLBUT ST.	PASADENA	Vacant Lot
80			244	PALMETTO DRIVE	PASADENA	Vacant Lot
81 S			268	PALMETTO DRIVE	PASADENA	
82			777	PALMETTO DRIVE	PASADENA	Vacant Lot(Valley Hunt Clu
83			777	PALMETTO DRIVE	PASADENA	Vacant Lot(Valley Hunt Clu
84			W/244	PALMETTO DRIVE	PASADENA	Vacant Lot
85		1 H	595	PASADENA AVE	PASADENA	
86			673	PASADENA AVENUE	PASADENA	Vacant Lot
87		1 H	703	PASADENA AVENUE	PASADENA	Boarded
88			721	PASADENA AVE.	PASADENA	Vacant Lot(100/yr)
89		1 H	1142	PASADENA AVE.	PASADENA	
90 S		H	1199	PASADENA AVE	PASADENA	Boarded - renting garage
91 S		H	1200	PASADENA AVE.	PASADENA	Boarded
92		2 H	894/894B	PASADENA AVENUE	PASADENA	Boarded
93 S		H	828	ST. JOHN AVE.	PASADENA	
94 S		H	180	STATE STREET	PASADENA	
95			245	WAVERLY DRIVE	PASADENA	Vacant Lot
96			256	WAVERLY DRIVE	PASADENA	Vacant Lot
97 S			268	WAVERLY DRIVE	PASADENA	
98 S		H	212	WIGMORE DRIVE	PASADENA	
99 S		H	230	WIGMORE DRIVE	PASADENA	Boarded
100			2006	Berkshire Ave	SOUTH PASADENA	Vacant Lot
101			728	BONITA DRIVE	SOUTH PASADENA	Vacant Lot
102 S			778	BONITA DRIVE	SOUTH PASADENA	Boarded
103			821	BONITA DRIVE	SOUTH PASADENA	Vacant Lot
104			215	FAIRVIEW AVENUE	SOUTH PASADENA	Vacant Lot
105 S			216	FAIRVIEW AVENUE	SOUTH PASADENA	
106 S			302	FAIRVIEW AVENUE	SOUTH PASADENA	Boarded
107 S			217	FREMONT AVE	SOUTH PASADENA	Boarded
108 S			225	FREMONT AVE	SOUTH PASADENA	Boarded
109		1	1832	GILLETTE CRESCENT	SOUTH PASADENA	Boarded
110 S		H	1170	GLENDON WAY	SOUTH PASADENA	
111		1	1134	GLENDON WAY	SOUTH PASADENA	
112		1	1037	GREVELIA STREET	SOUTH PASADENA	Boarded
113		1	1039	GREVELIA STREET	SOUTH PASADENA	Boarded
114			1107	GREVELIA STREET	SOUTH PASADENA	Vacant Lot
115		1 H	1008	HOPE STREET	SOUTH PASADENA	
116		1	1010 1/2	HOPE STREET	SOUTH PASADENA	Boarded
117			1028	Magnolia Street	SOUTH PASADENA	Vacant Lot
118			508	Meridian Avenue	SOUTH PASADENA	Vacant Lot
119 S			535	MERIDIAN AVE	SOUTH PASADENA	
120			807	ROLLIN STREET	SOUTH PASADENA	Vacant Lot
121 S		H	237	STATE STREET	SOUTH PASADENA	
122		1	907	SUMMIT DRIVE	SOUTH PASADENA	
123			804	VALLEY VIEW	SOUTH PASADENA	Vacant Lot
124 S			808	VALLEY VIEW	SOUTH PASADENA	

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710 Rental Accounts 6/25/07

Number	Parcel Number	Street	City
1	03001-0001	W/5601 Valley Blvd	Los Angeles
2	03003-0001	Corn. Alhm/Concord	Los Angeles
3	03003-0002	Bet. Alhm & Concord	Los Angeles
4	03003-0003	5649 Alhambra Ave	Los Angeles
5	03003-0004	Bet. Alhambra and Conc	Los Angeles
6	03006-0001	W/5649 Alhambra Ave	Los Angeles
7	03006-0002	3220 W. Front St.	Los Angeles
9	03660-0001	5460 Huntington Drive	Los Angeles
10	03661-0001	5486 Huntington Drive	Los Angeles
11	14136-0001	W/5575 Valley Blvd.	Los Angeles
12	14136-0001	5675 Valley Blvd.	Los Angeles
13	14891-0001	W/5537 Concord Ave.	Los Angeles
14	18266-0001	3125 Winchester	Los Angeles
15	18497-0001	5600 Alhambra Ave	Los Angeles
16	18500-0003	2958 Lowell Ave	Los Angeles
17	18501-0001	5520 Concord Ave	Los Angeles
18	18503-0001	5548 Concord Ave	Los Angeles
19	18503-0002	5550 Concord Ave	Los Angeles
20	18504-0001	5556 Concord Ave	Los Angeles
21	18505-0001	5562 Concord Ave	Los Angeles
22	18506-0002	5564 Concord Ave	Los Angeles
23	18506-0001	2962 Lowell Ave	Los Angeles
24	18507-0001	2968 Lowell Ave	Los Angeles
25	18508-0001	2970 Lowell Ave	Los Angeles
26	18508-0001	2974 Lowell Ave	Los Angeles
27	18510-0001	2978 Lowell Ave	Los Angeles
28	18511-0001	W/5537 Concord Ave.	Los Angeles
29	18512-0001	5537 Concord Ave	Los Angeles
30	18513-0001	E/5537 Concord Ave	Los Angeles
31	18514-0001	2990 Lowell Ave	Los Angeles
32	18515-0001	5506 Allan Street	Los Angeles
33	18516-0001	5510 Allan Street	Los Angeles
34	18517-0001	5514 Allan Street	Los Angeles
35	18518-0001	5518 Allan Street	Los Angeles
36	18519-0001	5524 Allan Street	Los Angeles
37	18520-0001	5528 Allan Street	Los Angeles
38	18521-0001	5532 Allan Street	Los Angeles
39	18522-0001	5536 Allan Street	Los Angeles
40	18522-0002	5538 Allan Street	Los Angeles
41	18523-0001	5544 Allan Street	Los Angeles
42	18524-0001	5501 Allan Street	Los Angeles
43	18525-0001	5507 Allan Street	Los Angeles
44	18526-0001	5511 Allan Street	Los Angeles
45	18527-0001	5515 Allan Street	Los Angeles
46	18528-0001	5519 Allan Street	Los Angeles
47	18529-0001	5523 Allan Street	Los Angeles
48	18530-0001	3115 Sheffield Ave	Los Angeles
49	18531-0001	3119 Sheffield Ave	Los Angeles

EXHIBIT 6

710 Rental Accounts 6/25/07

50	18532-0001	3123 Sheffield Ave	Los Angeles
51	18533-0001	3127 Sheffield Ave	Los Angeles
52	18534-0001	3131 Sheffield Ave	Los Angeles
53	18535-0001	3135 Sheffield Ave	Los Angeles
54	18536-0001	3137 Sheffield Ave	Los Angeles
55	18537-0001	3145 Sheffield Ave	Los Angeles
56	18538-0001	3201 Sheffield Ave	Los Angeles
57	18539-0001	3205 Sheffield Ave	Los Angeles
58	18540-0001	3209 Sheffield Ave	Los Angeles
59	18543-0001	3223 Sheffield Ave	Los Angeles
60	18544-0001	3227 Sheffield Ave	Los Angeles
61	18546-0001	5518 Norwich Ave	Los Angeles
62	18547-0001	5522 Norwich Ave	Los Angeles
63	18548-0001	5531 Allan Street	Los Angeles
64	18549-0001	5537 Allan Street	Los Angeles
65	18550-0001	5541 Allan Street	Los Angeles
66	18554-0001	3114 Sheffield Ave	Los Angeles
67	18555-0001	3118 Sheffield Ave	Los Angeles
68	18558-0001	3122 Sheffield Ave	Los Angeles
69	18557-0001	3126 Sheffield Ave	Los Angeles
70	18558-0001	3130 Sheffield Ave	Los Angeles
71	18559-0001	3134 Sheffield Ave	Los Angeles
72	18560-0001	3138 Sheffield Ave	Los Angeles
73	18561-0001	3144 Sheffield Ave	Los Angeles
74	18562-0001	3200 Sheffield Ave	Los Angeles
75	18563-0001	3206 Sheffield Ave	Los Angeles
76	18564-0001	3210 Sheffield Ave	Los Angeles
77	18565-0001	3216 Sheffield Ave	Los Angeles
78	18566-0001	3218 Sheffield Ave	Los Angeles
79	18567-0001	3222 Sheffield Ave	Los Angeles
80	18568-0001	3226 Sheffield Ave	Los Angeles
81	18583-0001	5532 Norwich Ave	Los Angeles
82	18584-0001	5536 Norwich Ave	Los Angeles
83	18585-0001	5540 Norwich Ave	Los Angeles
84	18590-0001	5519 Norwich Ave	Los Angeles
85	18591-0001	5523 Norwich Ave	Los Angeles
88	18592-0001	3315 Sheffield Ave	Los Angeles
87	18593-0001	3319 Sheffield Ave	Los Angeles
88	18594-0001	3323 Sheffield Ave	Los Angeles
89	18595-0001	3327 Sheffield Ave	Los Angeles
90	18596-0001	3331 Sheffield Ave	Los Angeles
91	18597-0001	3335 Sheffield Ave	Los Angeles
92	18598-0001	3339 Sheffield Ave	Los Angeles
93	18599-0001	3343 Sheffield Ave	Los Angeles
94	18600-0001	3401 Sheffield Ave	Los Angeles
95	18601-0001	3405 Sheffield Ave	Los Angeles
96	18602-0001	3409 Sheffield Ave	Los Angeles
97	18603-0001	3415 Sheffield Ave	Los Angeles
98	18604-0001	3419 Sheffield Ave	Los Angeles
99	18605-0001	3423 Sheffield Ave	Los Angeles
100	18606-0001	3427 Sheffield Ave	Los Angeles
101	18607-0001	3431 Sheffield Ave	Los Angeles
102	18609-0001	5520 Templeton Street	Los Angeles
103	18610-0001	5522 Templeton Street	Los Angeles
104	18611-0001	5533 Norwich Ave	Los Angeles
105	18612-0001	5537 Norwich Ave	Los Angeles
106	18613-0001	5541 Norwich Ave	Los Angeles
107	18614-0001	3314 Sheffield Ave	Los Angeles

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710 Rental Accounts 8/25/07

108	18615-0001	3316 Sheffield Ave	Los Angeles
109	18616-0001	3322 Sheffield Ave	Los Angeles
110	18617-0001	3326 Sheffield Ave	Los Angeles
111	18618-0001	3330 Sheffield Ave	Los Angeles
112	18619-0001	3334 Sheffield Ave	Los Angeles
113	18620-0001	3338 Sheffield Ave	Los Angeles
114	18621-0001	3342 Sheffield Ave	Los Angeles
115	18622-0001	3400 Sheffield Ave	Los Angeles
116	18623-0001	3404 Sheffield Ave	Los Angeles
117	18624-0001	3406 Sheffield Ave	Los Angeles
118	18625-0001	3412 Sheffield Ave	Los Angeles
119	18626-0001	3418 Sheffield Ave	Los Angeles
120	18627-0001	3422 Sheffield Ave	Los Angeles
121	18628-0001	3426 Sheffield Ave	Los Angeles
122	18629-0001	3430 Sheffield Ave	Los Angeles
123	18630-0001	5532 Templeton Street	Los Angeles
124	18631-0001	5536 Templeton Street	Los Angeles
125	24135-0001	5565 Valley Blvd	Los Angeles
126	28388-0001	XX	
127	28541-0001	3215 Sheffield Ave	Los Angeles
128	28542-0001	3219 Sheffield Ave	Los Angeles
129	30505-0001	5466-68 Huntington Dr.	Los Angeles
130	30543-0001	5523 Templeton Street	Los Angeles
131	30544-0001	3515 Sheffield Ave	Los Angeles
132	30545-0001	3519 Sheffield Ave	Los Angeles
133	30546-0001	3523 Sheffield Ave	Los Angeles
134	30547-0001	3529 Sheffield Ave	Los Angeles
135	30548-0001	3533 Sheffield Ave	Los Angeles
136	30549-0001	3573 Sheffield Ave	Los Angeles
137	30550-0001	3541 Sheffield Ave	Los Angeles
138	30551-0001	3701 Sheffield Ave	Los Angeles
139	30562-0001	3705 Sheffield Ave	Los Angeles
140	30553-0001	3711 Sheffield Ave	Los Angeles
141	30554-0001	3715 Sheffield Ave	Los Angeles
142	30555-0001	3719 Sheffield Ave	Los Angeles
143	30556-0001	3723 Sheffield Ave	Los Angeles
144	30559-0001	5514 Poplar Blvd	Los Angeles
145	30560-0001	5518 Poplar Blvd	Los Angeles
146	30561-0001	5531 Templeton Street	Los Angeles
147	30562-0001	5537 Templeton Street	Los Angeles
148	30565-0001	3514 Sheffield Ave	Los Angeles
149	30566-0001	3518 Sheffield Ave	Los Angeles
150	30567-0001	3522 Sheffield Ave	Los Angeles
151	30568-0001	3526 Sheffield Ave	Los Angeles
152	30569-0001	3530 Sheffield Ave	Los Angeles
153	30570-0001	3534 Sheffield Ave	Los Angeles
154	30571-0001	3540 Sheffield Ave	Los Angeles
155	30572-0001	3700 Sheffield Ave	Los Angeles
156	30573-0001	3706 Sheffield Ave	Los Angeles
157	30574-0001	3710 Sheffield Ave	Los Angeles
158	30575-0001	3716 Sheffield Ave	Los Angeles
159	30576-0001	3720 Sheffield Ave	Los Angeles
160	30577-0001	3724 Sheffield Ave	Los Angeles
161	30578-0001	5532 Poplar Blvd	Los Angeles
162	30579-0001	5536 Poplar Blvd	Los Angeles
163	30580-0001	5540 Poplar Blvd	Los Angeles
164	30593-0001	5515 Poplar Blvd	Los Angeles

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710 Rental Accounts 6/25/07

165	30594-0001	5519 Poplar Blvd	Los Angeles
166	30595-0002	3815 Sheffield Ave	Los Angeles
167	30596-0001	3817 Sheffield Ave	Los Angeles
168	30597-0002	3823 Sheffield Ave	Los Angeles
169	30598-0001	3827 Sheffield Ave	Los Angeles
170	30600-0001	3837 Sheffield Ave	Los Angeles
171	30601-0001	3841 Sheffield Ave	Los Angeles
172	30602-0001	5533 Sheffield Ave	Los Angeles
173	30603-0001	5537 Sheffield Ave	Los Angeles
174	30603-0002	5539 Poplar Blvd	Los Angeles
175	30604-0001	5541 Poplar Blvd	Los Angeles
176	30608-0001	3818 Sheffield Ave	Los Angeles
177	30609-0001	3822 Sheffield Ave	Los Angeles
178	30610-0001	3826 Sheffield Ave	Los Angeles
179	30611-0001	3832 Sheffield Ave	Los Angeles
180	30612-0001	3836 Sheffield Ave	Los Angeles
181	30613-0001	3928 Stockbridge Ave	Los Angeles
182	30617-0001	3911 Stockbridge Ave	Los Angeles
183	30617-0002	3913 Stockbridge Ave	Los Angeles
184	30618-0001	3917 Stockbridge Ave	Los Angeles
185	30619-0001	3923 Stockbridge Ave	Los Angeles
186	30620-0001	3927-29 Stockbridge Ave	Los Angeles
187	30621-0001	3931 Stockbridge Ave	Los Angeles
188	30621-0002	3933 Stockbridge Ave	Los Angeles
189	30621-0003	3935 Stockbridge Ave	Los Angeles
190	30621-0004	3931-LDY Stockbridge A	Los Angeles
191	30622-0001	3939 Stockbridge Ave	Los Angeles
192	30623-0001	5454-B Keats St	Los Angeles
193	30624-0001	5454 Keats St	Los Angeles
194	30625-0001	5460 Keats St	Los Angeles
195	30626-0001	5464 Keats St	Los Angeles
196	30627-0001	5470 Keats St	Los Angeles
197	30628-0001	5476 Keats St	Los Angeles
198	30633-0001	3949 Lowell Ave	Los Angeles
199	30633-0002	3953 Lowell Ave	Los Angeles
200	30633-0003	3955 Lowell Ave	Los Angeles
201	30633-0004	3951 Lowell Ave	Los Angeles
202	30634-0001	5485 Keats St	Los Angeles
203	30635-0001	5471 Keats St	Los Angeles
204	30636-0001	5477 Keats St	Los Angeles
205	30638-0001	5477 Shelley St	Los Angeles
208	30639-0001	5458 Shelley St	Los Angeles
207	30639-0002	5460 Shelley St	Los Angeles
208	30650-0001	5440 Huntington Dr	Los Angeles
209	30650-0002	5440 1/2 Huntington Dr	Los Angeles
210	30650-0003	5442 B Huntington Dr	Los Angeles
211	30650-0004	5442 1/2 Huntington Dr	Los Angeles
212	30650-0005	5442 A Huntington Dr	Los Angeles
213	30650-0006	5444 Huntington Dr	Los Angeles
214	30650-0007	5444 1/2 Huntington Dr	Los Angeles
215	30650-0013	5443 Shelley St	Los Angeles
216	30651-0001	4007-1 Lowell Ave	Los Angeles
217	30651-0002	4007-2 Lowell Ave	Los Angeles
218	30651-0003	4007-3 Lowell Ave	Los Angeles
219	30651-0004	4007-4 Lowell Ave	Los Angeles
220	30651-0005	4005 Lowell Ave	Los Angeles
221	30651-0006	4007-LDY Lowell Ave	Los Angeles
222	30653-0001	5451 Shelley St	Los Angeles

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710 Rental Accounts 6/25/07

223	30854-0001	5453 Shelley St	Los Angeles
224	30655-0001	5459 Shelley St	Los Angeles
225	30655-0002	5461 Shelley St	Los Angeles
226	30856-0001	5465 Shelley St	Los Angeles
227	30856-0002	5467 Shelley St	Los Angeles
228	30659-0001	4010 Lowell Ave	Los Angeles
228	30660-0002	5460 Huntington Drive	Los Angeles
230	30661-0001	5480 Huntington Drive	Los Angeles
231	30662-0001	4012 Lowell Ave	Los Angeles
232	41452-0001	215 Fairview Ave	South Pasadena
233	41585-0001	782 St. John Ave	Pasadena
234	41596-0001	234 Bellefontaine St.	Pasadena
235	41597-0001	821 Bonita Dr.	South Pasadena
236	41598-0001	224 State Street	Pasadena
237	41598-0002	232 State Street	Pasadena
238	41787-0001	1028 Magnolia Street	South Pasadena
239	43370-0001	410F Fremont Ave	South Pasadena
240	43402-0001	NW Pasadena and Palm	Pasadena
241	43578-0001	1011 Foothill Street	South Pasadena
242	43671-0001	275 Arlington Dr.	Pasadena
243	43710-0001	5524 Kendall Ave	Los Angeles
244	43711-0001	4363 Maycrest Ave	Los Angeles
245	44428-0001	540 Prospect Ave	South Pasadena
246	44538-0001	885 Oneonta Drive	South Pasadena
247	44879-0001	242 Bellefontaine St.	Pasadena
248	45023-0001	1033 Highland Street	South Pasadena
249	45314-0001	N401 Fremont Ave	South Pasadena
250	45340-0001	4326 Lowell Ave	Los Angeles
251	45423-0001	1832 Gillette Crescent	South Pasadena
252	45423-0002	705 Bonita Drive	South Pasadena
253	45699-0001	2011 Cambridge Place	South Pasadena
254	45724-0001	1041 Foothill Street	South Pasadena
255	45789-0001	218 Madeline Drive	Pasadena
256	46857-0001	302 Fairview Ave	South Pasadena
257	45903-0001	S/W Bellevue & Pasadena	Pasadena
258	46781-0001	5462 Almont St.	Los Angeles
259	46815-0001	210 Del Mar St.	Pasadena
260	46816-0001	244 Del Mar St.	Pasadena
261	46816-0002	238 Del Mar St.	Pasadena
262	46819-0001	245/255 Waverly Drive	Pasadena
263	46824-0001	876 Havendale Dr.	Pasadena
264	46825-0001	386 Havendale Dr.	Pasadena
265	46826-0001	400 Havendale Dr.	Pasadena
266	46827-0001	410 Havendale Dr.	Pasadena
267	46829-0001	215 Bellevue Dr.	Pasadena
268	46829-0001	420 Havendale Dr.	Pasadena
269	46830-0001	E/268 Waverly Drive	Pasadena
270	46831-0001	268 Waverly Dr.	Pasadena
271	46832-0001	375 Havendale Dr.	Pasadena
272	46833-0001	385 Havendale Dr.	Pasadena
273	46834-0001	405 Havendale Dr.	Pasadena
274	46835-0001	N/W COR Havendale Dr	Pasadena
275	46836-0001	220 Bellevue Dr.	Pasadena
276	46838-0001	250 Bellevue Dr.	Pasadena

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710 Rental Accounts 6/25/07

277	46843-0001	535 Pasadena Ave	Pasadena
278	46844-0002	225A W. California Blvd.	Pasadena
279	46844-0003	225B W. California Blvd.	Pasadena
280	46844-0004	225C W. California Blvd.	Pasadena
281	46844-0005	225D W. California Blvd.	Pasadena
282	46844-0006	227A W. California Blvd.	Pasadena
283	46844-0007	227-B West California Bl	Pasadena
284	46844-0008	229A W. California Blvd.	Pasadena
285	46844-0009	229B W. California Blvd.	Pasadena
286	46844-0010	229C W. California Blvd.	Pasadena
287	46844-0001	229D W. California Blvd.	Pasadena
288	46844-0012	231 W. California Blvd.	Pasadena
289	46844-0013	233 W. California Blvd.	Pasadena
290	46846-0001	246 California St.	Pasadena
291	46847-0001	244 Palmetto Dr.	Pasadena
292	47380-0001	S/W Bellevue & Pasaden	Pasadena
293	47407-0001	2035 Berkshire Ave	South Pasadena
294	47409-0001	316 Fairview Ave	South Pasadena
295	47416-0001	508 Meridian Ave	South Pasadena
296	47417-0001	4411 Alpha St.	Los Angeles
297	47417-0002	4411 1/2 Alpha St.	Los Angeles
298	47425-0001	1019 Foothill Street	South Pasadena
299	47443-0001	1151 Pasadena Ave.	Pasadena
300	47444-0001	4339 Maycrest Ave	Los Angeles
301	47445-0001	206 Madeline Dr.	Pasadena
302	47616-0001	721 Pasadena Ave	Pasadena
303	47776-0001	1180 Pasadena Ave	Pasadena
304	47924-0001	2028 Berkshire Ave	South Pasadena
305	47977-0001	169 Arlington W. Dr.	Pasadena
306	48087-0001	5433 Huntington Drive N	Los Angeles
307	48097-0001	4215 Maycrest Ave	Los Angeles
308	48097-0002	4215 1/2 Maycrest Ave	Los Angeles
309	48097-0003	4217 Maycrest Ave	Los Angeles
310	48097-0004	4217 1/2 Maycrest Ave	Los Angeles
311	48097-0005	4219 Maycrest Ave	Los Angeles
312	48097-0006	44219 1/2 Maycrest Ave	Los Angeles
313	48097-0007	4221 Maycrest ave	Los Angeles
314	48097-0008	4221 1/2 Maycrest Ave	Los Angeles
315	48098-0001	5486 Almont St.	Los Angeles
316	48098-0002	5486 Almont St.	Los Angeles
317	48102-0001	4226 Maycrest Ave	Los Angeles
318	48102-0002	4228 Maycrest Ave	Los Angeles
319	48102-0003	4302 Maycrest Ave	Los Angeles
320	48104-0001	4312 Maycrest Ave	Los Angeles
321	48105-0001	4316 Maycrest Ave	Los Angeles
322	48106-0001	4320 Maycrest Ave	Los Angeles
323	48107-0001	4326 Maycrest Ave	Los Angeles
324	48108-0001	4332 Maycrest Ave	Los Angeles
325	48112-0001	4358 Maycrest Ave	Los Angeles
326	48112-0002	4360 Maycrest Ave	Los Angeles
327	48112-0003	4362 Maycrest Ave	Los Angeles
328	48112-0004	4364 Maycrest Ave	Los Angeles
329	48112-0005	5460 Newtonia Dr.	Los Angeles

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710 Rental Accounts 6/25/07

330	48116-0001	4303 Maycrest Ave	Los Angeles
331	48119-0001	4317 Maycrest Ave	Los Angeles
332	48121-0001	4329 Maycrest Ave	Los Angeles
333	48126-0001	4359 Maycrest Ave	Los Angeles
334	48130-0001	4422 Maycrest Ave	Los Angeles
335	48132-0001	4432 Maycrest Ave	Los Angeles
336	48134-0001	4417 Alpha St.	Los Angeles
337	48141-0001	4451 Alpha St.	Los Angeles
338	48143-0001	4507 Alpha St.	Los Angeles
339	48144-0001	5501 Berkshire Dr.	Los Angeles
340	48145-0001	5500 Atlas St.	Los Angeles
341	48146-0001	5506 Atlas St.	Los Angeles
342	48147-0001	5512 Atlas St.	Los Angeles
343	48150-0001	5513 Atlas St.	Los Angeles
344	48151-0001	4524 Alpha St.	Los Angeles
345	48156-0001	231 Columbia St.	Pasadena
346	48158-0001	1207 Pasadena Ave	Pasadena
347	48159-0001	1199 Pasadena Ave	Pasadena
348	48160-0001	1191 Pasadena Ave	Pasadena
349	48161-0001	214 State St.	Pasadena
350	48162-0001	1175 Pasadena Ave	Pasadena
351	48163-0001	181 Columbia St.	Pasadena
352	48165-0001	1220 Pasadena Ave	Pasadena
353	48168-0001	1220 Pasadena Ave	Pasadena
354	48170-0001	180 State St.	Pasadena
355	48171-0001	1150 Pasadena Ave	Pasadena
358	48172-0001	1140 Pasadena Ave	Pasadena
357	48172-0002	1142 Pasadena Ave	Pasadena
358	48173-0001	1128 Pasadena Ave	Pasadena
359	48174-0001	1120 Pasadena ave	Pasadena
360	48175-0001	1112 Pasadena Ave	Pasadena
361	48176-0001	1100 Pasadena Ave	Pasadena
362	48177-0001	1090 Pasadena Ave	Pasadena
363	48178-0001	1080 Pasadena Ave	Pasadena
364	48179-0001	1062 Pasadena Ave	Pasadena
365	48180-0001	180 Glenarm St.	Pasadena
366	48181-0001	225 State St.	Pasadena
367	48182-0001	1141 Pasadena Ave	Pasadena
368	48183-0001	1131 Pasadena Ave	Pasadena
369	48184-0001	230 Madeline Drive	Pasadena
370	48185-0001	202 Madeline Drive	Pasadena
371	48187-0001	215 Madeline Ave	Pasadena
372	48188-0001	225 Madeline Ave	Pasadena
373	48189-0001	1059 Pasadena Ave	Pasadena
374	48190-0001	1051 Pasadena Ave	Pasadena
375	48191-0001	1041 Pasadena Ave	Pasadena
376	48192-0001	1031 Pasadena Ave	Pasadena
377	48193-0001	216 Arlington Dr	Pasadena
378	48194-0001	1030 Pasadena Ave	Pasadena
379	48195-0001	185 Glenarm St.	Pasadena
380	48196-0001	180 Arlington Dr.	Pasadena
381	48197-0001	177 Glenarm St.	Pasadena
382	48198-0001	1000 Pasadena Ave	Pasadena
383	48199-0001	181 Arlington Dr.	Pasadena
384	48200-0001	966 Pasadena Ave	Pasadena
385	48201-0001	956 Pasadena Ave	Pasadena
386	48202-0001	946 Pasadena Ave	Pasadena
387	48203-0001	936 Pasadena Ave	Pasadena

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710 Rental Accounts 6/26/07

388	48204-0001	926 Pasadena Ave	Pasadena
389	48206-0001	953 Pasadena Ave	Pasadena
390	48207-0001	949 Pasadena Ave	Pasadena
391	48207-0002	955 Pasadena Ave	Pasadena
392	48208-0001	929 Pasadena Ave	Pasadena
393	48209-0001	250 Wigmore Drive	Pasadena
394	48210-0001	230 Wigmore Drive	Pasadena
395	48211-0001	212 Wigmore Drive	Pasadena
396	48212-0001	231 Wigmore Drive	Pasadena
397	48213-0001	215 Wigmore Drive	Pasadena
398	48214-0001	900 Pasadena Ave	Pasadena
399	48215-0001	177 Hurbut St.	Pasadena
400	48216-0001	894 Pasadena Ave	Pasadena
401	48217-0001	888 Pasadena Ave	Pasadena
402	48218-0001	876 Pasadena Ave	Pasadena
403	48219-0001	866 Pasadena Ave	Pasadena
404	48220-0001	182 Bellefontaine St.	Pasadena
405	48222-0001	172 Bellefontaine St.	Pasadena
406	48223-0001	235 Bellefontaine St.	Pasadena
407	48224-0001	203 Bellefontaine St.	Pasadena
408	48225-0001	779 Pasadena Ave	Pasadena
409	48225-0002	801 Pasadena Ave	Pasadena
410	48226-0001	765 Pasadena Ave	Pasadena
411	48227-0001	763 Pasadena Ave	Pasadena
412	48228-0001	737 Pasadena Ave	Pasadena
413	48229-0001	734 St. John Ave	Pasadena
414	48230-0001	726 St. John Ave	Pasadena
415	48231-0001	714 St. John Ave	Pasadena
416	48232-0001	696 St. John Ave	Pasadena
417	48233-0001	678 St. John Ave	Pasadena
418	48233-0002	678-B St. John Ave	Pasadena
419	48234-0001	660 St. John Ave	Pasadena
420	48235-0001	648 St. John Ave	Pasadena
421	48236-0001	640 St. John Ave	Pasadena
422	48237-0001	628 St. John Ave	Pasadena
423	48238-0001	620 St. John Ave	Pasadena
424	48239-0001	602 St. John Ave	Pasadena
425	48240-0001	600 St. John Ave	Pasadena
426	48241-0001	230 W. California Blvd.	Pasadena
427	48241-0002	230A W. California Blvd.	Pasadena
428	48241-0003	584 St. John Ave	Pasadena
429	48243-0001	679 Pasadena Ave	Pasadena
430	48243-0003	703 S. Pasadena Ave	Pasadena
431	48244-0004	711 Pasadena Ave	Pasadena
432	48244-0001	615/633 Pasadena Ave	Pasadena
433	48244-0002	N of 679 Pasadena Ave	Pasadena
434	48246-0001	206 W. California Blvd	Pasadena
435	48246-0003	208 W. California Blvd	Pasadena
436	48246-0004	210 W. California Blvd	Pasadena
437	48246-0005	212 W. California Blvd	Pasadena
438	48246-0006	214 W. California Blvd	Pasadena
439	48246-0007	216 W. California Blvd	Pasadena
440	48247-0001	202 W. California Blvd	Pasadena
441	48247-0002	204 W. California Blvd	Pasadena
442	48248-0001	190 W. California Blvd	Pasadena
443	48248-0002	595 Pasadena Ave	Pasadena
444	48341-0001	240 State Street	Pasadena

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Et. 6

710 Rental Accounts 8/25/07

445	49322-0001	265 Waverly Drive	Pasadena
446	49325-0001	386 Gordon Terrace	Pasadena
447	49327-0001	275 Bellevue Dr.	Pasadena
448	49328-0001	272 Bellevue Dr.	Pasadena
449	49329-0001	269 Palmetto Dr.	Pasadena
450	49399-0001	670 St. John Ave	Pasadena
451	49584-0001	245 Wigmore Dr.	Pasadena
452	49685-0001	1101 Columbia Street	South Pasadena
453	49741-0001	1035 Foothill Street	South Pasadena
454	60763-0001	2007 Cambridge Place	South Pasadena
455	61157-0001	1021 Foothill Street	South Pasadena
456	61158-0001	910 Bonita Drive	South Pasadena
457	61159-0001	533 Prospect Ave	South Pasadena
458	61161-0001	1134 Glendon Way	South Pasadena
459	61161-0002	1136 Glendon Way	South Pasadena
460	61162-0001	1110 Glendon Way	South Pasadena
461	61163-0001	1321 Meridian Ave	South Pasadena
462	61218-0001	237 State Street	Pasadena
463	61294-0001	532 Meridian Ave	South Pasadena
464	61314-0001	5601 Valley Blvd	Los Angeles
465	61314-0002	5601 Valley Blvd	Los Angeles
466	61337-0001	216 Fairview Ave	South Pasadena
467	61338-0001	1109 Columbia Street	South Pasadena
468	61345-0001	1821 Meridian Ave	South Pasadena
469	61389-0001	170 Arlington Dr	Pasadena
470	62423-0002	1010 Hope Street	South Pasadena
471	62423-0002	1010 1/2 Hope Street	South Pasadena
472	62582-0001	804 Valley View	South Pasadena
473	62588-0001	925 Jane Place	Pasadena
474	62882-0001	905 Summit Drive	South Pasadena
475	62882-0002	907 Summit Drive	South Pasadena
476	62915-0001	W/145 Hurbut St.	Pasadena
477	64544-0001	2006 Berkshire Dr	South Pasadena
478	64556-0001	5469 Shelley St	Los Angeles
479	64557-0001	5474 Newtonia Dr	Los Angeles
480	64558-0001	4401 Maycrest Ave	Los Angeles
481	67022-0001	1722 Gillette Crescent	South Pasadena
482	67029-0001	5506 Norwhich Ave	Los Angeles
483	67102-0001	903 Monterey Road	South Pasadena
484	67109-0001	911 Monterey Road	South Pasadena
485	67151-0001	3138 Lowell Ave	Los Angeles
486	67174-0001	4332 Lowell Ave	Los Angeles
487	67174-0002	4334 Lowell Ave	Los Angeles
488	67174-0003	4334 1/2 Lowell Ave	Los Angeles
489	67178-0001	5501 Templeton Street	Los Angeles
490	67204-0001	5541 Templeton Street	Los Angeles
491	67320-0001	495 Prospect Circle	South Pasadena
492	67332-0001	801 Bonita Drive	South Pasadena
493	67555-0001	4336 Lowell Ave	Los Angeles
494	67556-0001	901 Bonita Drive	South Pasadena
495	67558-0001	534 Orange Grove Ave	South Pasadena
496	67567-0001	1707 Meridian Ave	South Pasadena
497	67879-0001	5464 Shelley St	Los Angeles
498	67897-0001	1325 Meridian Ave	South Pasadena
499	68109-0001	808 Valley View	South Pasadena
500	68147-0001	4442 Maycrest Ave	Los Angeles
501	68168-0001	2042 Alpha Ave	South Pasadena
502	68213-0001	816 Bonita Drive	South Pasadena

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ET-8

Number	Parcel Number	Street Address	City	Vacant Land
1	.03001-0001	W/5601 Valley Blvd	Los Angeles	Vacant Land
2	.03003-0001	Com. Alhambra/Concord	Los Angeles	Vacant Land
271	.46832-0001	375 Havendale Drive	Pasadena	Vacant Land
4	.03003-0003	5649 Alhambra Ave	Los Angeles	Vacant Land
5	.03003-0004	Bet Alhambra & Concord	Los Angeles	Vacant Land
6	.03006-0001	W/5649 Alhambra Ave	Los Angeles	Vacant Land
7	.03006-0002	3220 W. Front St	Los Angeles	Vacant Land
274	.46835-0001	N/W/ COR Havendale Drive	Pasadena	Vacant Land
9	.03660-0001	5460 Huntington Drive	Los Angeles	Vacant Land
507	.68311-0001	815 Rollin Street	South Pasadena	Vacant Land
11	.14135-0001	W/5575 Valley Blvd	Los Angeles	Vacant Land
12	.14136-0001	5575 Valley Blvd.	Los Angeles	Vacant Land
13	.14891-0001	W/5537 Concord Ave	Los Angeles	Vacant Land
477	.64544-0001	2006 Berkshire Drive	South Pasadena	Vacant Land
448	.49328-0001	272 Bellevue Drive	Pasadena	Vacant Land
447	.49327-0001	275 Bellevue Drive	Pasadena	Vacant Land
223	.30654-0001	5453 Shelley Street	Los Angeles	Vacant Land
432	.48244-0001	615/633 Pasadena Ave	Pasadena	Vacant Land
276	.46838-0001	250 Bellevue Drive	Pasadena	Vacant Land
472	.62582-0001	804 Valley View	South Pasadena	Vacant Land
240	.43402-0001	N/W/ Pasadena and Palm	Pasadena	Vacant Land
239	.43370-0001	410F Fremont Ave	South Pasadena	Vacant Land
129	.30505-0001	5466-68 Huntington Dr.	Los Angeles	Vacant Land
446	.49325-0001	386 Gordon Terrace	Pasadena	Vacant Land
126	.28389-0001	XX	Los Angeles	Vacant Land
26	.18509-0001	2974 Lowell Ave	Los Angeles	Vacant Land
230	.30661-0001	5480 Huntington Drive	Los Angeles	Vacant Land
28	.18511-0001	W/5537 Concord Ave	Los Angeles	Vacant Land
29	.18512-0001	5537 Concord Ave	Los Angeles	Vacant Land
30	.18513-0001	E/5537 Concord Ave	Los Angeles	Vacant Land
235	.41597-0001	821 Bonita Drive	South Pasadena	Vacant Land
238	.41787-0001	1028 Magnolia Street	South Pasadena	Vacant Land
232	.41452-0001	215 Fairview Ave	South Pasadena	Vacant Land
541	.68499-0001	1107 Grevelia Street	South Pasadena	Vacant Land
506	.68310-0001	807 Rollin Street	South Pasadena	Vacant Land
503	.68222-0001	728 Bonita Drive	South Pasadena	Vacant Land
476	.62915-0001	W/145 Hurlbut Street	Pasadena	Vacant Land

EXHIBIT 7

242 . 43671-0001	275 Arlington Drive	Pasadena	Vacant Land
228 . 30659-0001	4010 Lowell Ave	Los Angeles	Vacant Land
430 . 48243-0003	703 S. Pasadena Ave	Pasadena	Vacant Land
306 . 48087-0001	5433 Huntington Drive	Los Angeles	Vacant Land
42 . 18524-0001	5501 Allan Street	Los Angeles	Vacant Land
564 . 68784-0001	1133 Avoca Ave	Pasadena	Vacant Land
248 . 45023-0001	1033 Highland Street	South Pasadena	Vacant Land
405 . 48222-0001	172 Bellefontaine Street	Pasadena	Vacant Land
67 . 18555-0001	3118 Sheffield Ave	Los Angeles	Vacant Land
273 . 46834-0001	405 Havendale Drive	Pasadena	Vacant Land
257 . 45903-0001	SW Bellevue & Pasadena	Pasadena	Vacant Land
49 . 18531-0001	3119 Sheffield Ave	Los Angeles	Vacant Land
295 . 47416-0001	508 Meridian Ave	South Pasadena	Vacant Land
222 . 30653-0001	5451 Shelley Street	Los Angeles	Vacant Land
404 . 48220-0001	182 Bellefontaine Street	Pasadena	Vacant Land
203 . 30635-0001	5471 Keats Street	Los Angeles	Vacant Land
192 . 30623-0001	5454-B Keats Street	Los Angeles	Vacant Land
302 . 47616-0001	721 Pasadena Ave	Pasadena	Vacant Land
344 . 48151-0001	4524 Alpha Street	Los Angeles	Vacant Land

Ex. 7

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Number	Parcel Number	Street Address	City	SFR
244	. 43711-0001	4363 Maycrest Ave	Los Angeles	SFR
181	. 30613-0001	3928 Stockbridge Ave	Los Angeles	SFR
584	. 74836-0001	852 Monterey Road	South Pasadena	SFR
293	. 47407-0001	2035 Berkshire Ave	South Pasadena	SFR
294	. 47409-0001	316 Fairview Ave	South Pasadena	SFR
583	. 74835-0001	887 Flores de Oro	Los Angeles	SFR
582	. 69802-0001	4423 Maycrest Ave	Los Angeles	SFR
581	. 69800-0001	4433 Maycrest Ave	Los Angeles	SFR
580	. 69536-0001	5511 Poplar Blvd	Los Angeles	SFR
579	. 69533-0001	3730 Lowell Ave	Los Angeles	SFR
578	. 69518-0001	5515 Templeton Street	Los Angeles	SFR
577	. 69515-0001	5514 Templeton Street	Los Angeles	SFR
576	. 69513-0001	5506 Templeton Street	Los Angeles	SFR
14	. 18266-0001	3125 Winchester	Los Angeles	SFR
574	. 69511-0001	3430 Lowell Ave	Los Angeles	SFR
16	. 18500-0003	2958 Lowell Ave	Los Angeles	SFR
575	. 69512-0001	5502 Templeton Street	Los Angeles	SFR
573	. 69494-0001	5511 Norwich Ave	Los Angeles	SFR
572	. 69446-0001	5514 Norwich Ave	Los Angeles	SFR
571	. 69443-0001	3226 Lowell Ave	Los Angeles	SFR
570	. 68943-0001	5429 Poplar Blvd	Los Angeles	SFR
569	. 68829-0001	225 Fairview Ave	South Pasadena	SFR
23	. 18506-0001	2962 Lowell Ave	Los Angeles	SFR
24	. 18507-0001	2968 Lowell Ave	Los Angeles	SFR
25	. 18508-0001	2970 Lowell Ave	Los Angeles	SFR
563	. 68676-0001	773 Bonita Ave	South Pasadena	SFR
27	. 18510-0001	2978 Lowell Ave	Los Angeles	SFR
565	. 68777-0001	163 State Street	Pasadena	SFR
558	. 68635-0001	530 Orange Grove Ave	South Pasadena	SFR
557	. 68269-0001	511 Prospect Ave	South Pasadena	SFR
31	. 18514-0001	2990 Lowell Ave	Los Angeles	SFR
32	. 18515-0001	5506 Allan Street	Los Angeles	SFR
33	. 18516-0001	5510 Allan Street	Los Angeles	SFR
34	. 18517-0001	5514 Allan Street	Los Angeles	SFR
35	. 18518-0001	5518 Allan Street	Los Angeles	SFR
36	. 18519-0001	5524 Allan Street	Los Angeles	SFR
37	. 18520-0001	5528 Allan Street	Los Angeles	SFR

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38	18521-0001	5532 Allan Street	Los Angeles	SFR
568	68799-0001	165 Hurbut Street	Pasadena	SFR
298	47425-0001	1019 Foothill Street	South Pasadena	SFR
41	18523-0001	5544 Allan Street	Los Angeles	SFR
299	47443-0001	1151 Pasadena Ave	Pasadena	SFR
43	18525-0001	5507 Allan Street	Los Angeles	SFR
44	18526-0001	5511 Allan Street	Los Angeles	SFR
45	18527-0001	5515 Allan Street	Los Angeles	SFR
46	18528-0001	5519 Allan Street	Los Angeles	SFR
47	18529-0001	5523 Allan Street	Los Angeles	SFR
48	18530-0001	3115 Sheffield Ave	Los Angeles	SFR
566	68626-0001	529 Prospect Ave	South Pasadena	SFR
50	18532-0001	3123 Sheffield Ave	Los Angeles	SFR
51	18533-0001	3127 Sheffield Ave	Los Angeles	SFR
52	18534-0001	3131 Sheffield Ave	Los Angeles	SFR
53	18535-0001	3135 Sheffield Ave	Los Angeles	SFR
54	18536-0001	3137 Sheffield Ave	Los Angeles	SFR
55	18537-0001	3145 Sheffield Ave	Los Angeles	SFR
56	18538-0001	3201 Sheffield Ave	Los Angeles	SFR
57	18539-0001	3205 Sheffield Ave	Los Angeles	SFR
58	18540-0001	3209 Sheffield Ave	Los Angeles	SFR
59	18543-0001	3223 Sheffield Ave	Los Angeles	SFR
555	68600-0001	225 Fremont Ave	South Pasadena	SFR
61	18546-0001	5518 Norwich Ave	Los Angeles	SFR
62	18547-0001	5522 Norwich Ave	Los Angeles	SFR
63	18548-0001	5531 Allan Street	Los Angeles	SFR
64	18549-0001	5537 Allan Street	Los Angeles	SFR
65	18550-0001	5541 Allan Street	Los Angeles	SFR
66	18554-0001	3114 Sheffield Ave	Los Angeles	SFR
554	68599-0001	217 Fremont Ave	South Pasadena	SFR
68	18556-0001	3122 Sheffield Ave	Los Angeles	SFR
69	18557-0001	3126 Sheffield Ave	Los Angeles	SFR
70	18558-0001	3130 Sheffield Ave	Los Angeles	SFR
71	18559-0001	3134 Sheffield Ave	Los Angeles	SFR
72	18560-0001	3138 Sheffield Ave	Los Angeles	SFR
73	18561-0001	3144 Sheffield Ave	Los Angeles	SFR
74	18562-0001	3200 Sheffield Ave	Los Angeles	SFR
75	18563-0001	3206 Sheffield Ave	Los Angeles	SFR

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76	. 18564-0001	3210 Sheffield Ave	Los Angeles	SFR
77	. 18565-0001	3216 Sheffield Ave	Los Angeles	SFR
78	. 18566-0001	3218 Sheffield Ave	Los Angeles	SFR
79	. 18567-0001	3222 Sheffield Ave	Los Angeles	SFR
80	. 18568-0001	3226 Sheffield Ave	Los Angeles	SFR
81	. 18583-0001	5532 Norwich Ave	Los Angeles	SFR
82	. 18584-0001	5536 Norwich Ave	Los Angeles	SFR
83	. 18585-0001	5540 Norwich Ave	Los Angeles	SFR
84	. 18590-0001	5519 Norwich Ave	Los Angeles	SFR
85	. 18591-0001	5523 Norwich Ave	Los Angeles	SFR
86	. 18592-0001	3315 Sheffield Ave	Los Angeles	SFR
87	. 18593-0001	3319 Sheffield Ave	Los Angeles	SFR
88	. 18594-0001	3323 Sheffield Ave	Los Angeles	SFR
89	. 18595-0001	3327 Sheffield Ave	Los Angeles	SFR
90	. 18596-0001	3331 Sheffield Ave	Los Angeles	SFR
91	. 18597-0001	3335 Sheffield Ave	Los Angeles	SFR
92	. 18598-0001	3339 Sheffield Ave	Los Angeles	SFR
93	. 18599-0001	3343 Sheffield Ave	Los Angeles	SFR
94	. 18600-0001	3401 Sheffield Ave	Los Angeles	SFR
95	. 18601-0001	3405 Sheffield Ave	Los Angeles	SFR
96	. 18602-0001	3409 Sheffield Ave	Los Angeles	SFR
97	. 18603-0001	3415 Sheffield Ave	Los Angeles	SFR
98	. 18604-0001	3419 Sheffield Ave	Los Angeles	SFR
99	. 18605-0001	3423 Sheffield Ave	Los Angeles	SFR
100	. 18606-0001	3427 Sheffield Ave	Los Angeles	SFR
101	. 18607-0001	3431 Sheffield Ave	Los Angeles	SFR
102	. 18609-0001	5520 Templeton Street	Los Angeles	SFR
103	. 18610-0001	5522 Templeton Street	Los Angeles	SFR
104	. 18611-0001	5533 Norwich Ave	Los Angeles	SFR
105	. 18612-0001	5537 Norwich Ave	Los Angeles	SFR
106	. 18613-0001	5541 Norwich Ave	Los Angeles	SFR
107	. 18614-0001	3314 Sheffield Ave	Los Angeles	SFR
108	. 18615-0001	3318 Sheffield Ave	Los Angeles	SFR
109	. 18616-0001	3322 Sheffield Ave	Los Angeles	SFR
110	. 18617-0001	3326 Sheffield Ave	Los Angeles	SFR
111	. 18618-0001	3330 Sheffield Ave	Los Angeles	SFR
112	. 18619-0001	3334 Sheffield Ave	Los Angeles	SFR
113	. 18620-0001	3338 Sheffield Ave	Los Angeles	SFR

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114 . 18621-0001	3342 Sheffield Ave	Los Angeles	SFR
115 . 18622-0001	3400 Sheffield Ave	Los Angeles	SFR
116 . 18623-0001	3404 Sheffield Ave	Los Angeles	SFR
117 . 18624-0001	3408 Sheffield Ave	Los Angeles	SFR
118 . 18625-0001	3412 Sheffield Ave	Los Angeles	SFR
119 . 18626-0001	3418 Sheffield Ave	Los Angeles	SFR
120 . 18627-0001	3422 Sheffield Ave	Los Angeles	SFR
121 . 18628-0001	3426 Sheffield Ave	Los Angeles	SFR
122 . 18629-0001	3430 Sheffield Ave	Los Angeles	SFR
123 . 18630-0001	5532 Templeton Street	Los Angeles	SFR
124 . 18631-0001	5536 Templeton Street	Los Angeles	SFR
339 . 48144-0001	5501 Berkshire Drive	Los Angeles	SFR
553 . 68598-0001	1131 Columbia Street	South Pasadena	SFR
127 . 28541-0001	3215 Sheffield Ave	Los Angeles	SFR
128 . 28542-0001	3219 Sheffield Ave	Los Angeles	SFR
340 . 48145-0001	5500 Atlas Street	Los Angeles	SFR
130 . 30543-0001	5523 Templeton Street	Los Angeles	SFR
131 . 30544-0001	3515 Sheffield Ave	Los Angeles	SFR
132 . 30545-0001	3519 Sheffield Ave	Los Angeles	SFR
133 . 30546-0001	3523 Sheffield Ave	Los Angeles	SFR
134 . 30547-0001	3529 Sheffield Ave	Los Angeles	SFR
135 . 30548-0001	3533 Sheffield Ave	Los Angeles	SFR
136 . 30549-0001	3573 Sheffield Ave	Los Angeles	SFR
552 . 68584-0001	1015 Columbia Street	South Pasadena	SFR
138 . 30551-0001	3701 Sheffield Ave	Los Angeles	SFR
139 . 30552-0001	3705 Sheffield Ave	Los Angeles	SFR
140 . 30553-0001	3711 Sheffield Ave	Los Angeles	SFR
141 . 30554-0001	3715 Sheffield Ave	Los Angeles	SFR
142 . 30555-0001	3719 Sheffield Ave	Los Angeles	SFR
143 . 30556-0001	3723 Sheffield Ave	Los Angeles	SFR
144 . 30559-0001	5514 Poplar Blvd	Los Angeles	SFR
145 . 30560-0001	5518 Poplar Blvd	Los Angeles	SFR
146 . 30561-0001	5531 Templeton Street	Los Angeles	SFR
147 . 30562-0001	5537 Templeton Street	Los Angeles	SFR
148 . 30565-0001	3514 Sheffield Ave	Los Angeles	SFR
149 . 30566-0001	3518 Sheffield Ave	Los Angeles	SFR
150 . 30567-0001	3522 Sheffield Ave	Los Angeles	SFR
151 . 30568-0001	3526 Sheffield Ave	Los Angeles	SFR

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152 . 30569-0001	3530 Sheffield Ave	Los Angeles	SFR
153 . 30570-0001	3534 Sheffield Ave	Los Angeles	SFR
154 . 30571-0001	3540 Sheffield Ave	Los Angeles	SFR
155 . 30572-0001	3700 Sheffield Ave	Los Angeles	SFR
156 . 30573-0001	3706 Sheffield Ave	Los Angeles	SFR
157 . 30574-0001	3710 Sheffield Ave	Los Angeles	SFR
158 . 30575-0001	3716 Sheffield Ave	Los Angeles	SFR
159 . 30576-0001	3720 Sheffield Ave	Los Angeles	SFR
160 . 30577-0001	3724 Sheffield Ave	Los Angeles	SFR
161 . 30578-0001	5532 Poplar Blvd	Los Angeles	SFR
162 . 30579-0001	5536 Poplar Blvd	Los Angeles	SFR
163 . 30580-0001	5540 Poplar Blvd	Los Angeles	SFR
164 . 30593-0001	5515 Poplar Blvd	Los Angeles	SFR
165 . 30594-0001	5519 Poplar Blvd	Los Angeles	SFR
166 . 30595-0002	3815 Sheffield Ave	Los Angeles	SFR
167 . 30596-0001	3817 Sheffield Ave	Los Angeles	SFR
168 . 30597-0002	3823 Sheffield Ave	Los Angeles	SFR
169 . 30598-0001	3827 Sheffield Ave	Los Angeles	SFR
170 . 30600-0001	3837 Sheffield Ave	Los Angeles	SFR
171 . 30601-0001	3841 Sheffield Ave	Los Angeles	SFR
172 . 30602-0001	5533 Sheffield Ave	Los Angeles	SFR
362 . 48177-0001	1090 Pasadena Ave	Pasadena	SFR
361 . 48176-0001	1100 Pasadena Ave	Pasadena	SFR
175 . 30604-0001	5541 Poplar Blvd	Los Angeles	SFR
176 . 30608-0001	3818 Sheffield Ave	Los Angeles	SFR
177 . 30609-0001	3822 Sheffield Ave	Los Angeles	SFR
363 . 48178-0001	1080 Pasadena Ave	Pasadena	SFR
179 . 30611-0001	3832 Sheffield Ave	Los Angeles	SFR
180 . 30612-0001	3836 Sheffield Ave	Los Angeles	SFR
270 . 46831-0001	268 Waverly Drive	Pasadena	SFR
365 . 48160-0001	180 Glenarm Street	Pasadena	SFR
548 . 68553-0001	400 Prospect Circle	South Pasadena	SFR
184 . 30618-0001	3917 Stockbridge Ave	Los Angeles	SFR
185 . 30619-0001	3923 Stockbridge Ave	Los Angeles	SFR
186 . 30620-0001	3927-29 Stockbridge Ave	Los Angeles	SFR
367 . 48162-0001	1141 Pasadena Ave	Pasadena	SFR
547 . 68530-0001	1030 Foothill Street	South Pasadena	SFR
546 . 68528-0001	1005 Buena Vista	South Pasadena	SFR

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545 . 68525-0001	1010 Foothill Street	South Pasadena	SFR
191 . 30622-0001	3939 Stockbridge Ave	Los Angeles	SFR
368 . 48183-0001	1131 Pasadena Ave	Pasadena	SFR
193 . 30624-0001	5454 Keats Street	Los Angeles	SFR
194 . 30625-0001	5460 Keats Street	Los Angeles	SFR
195 . 30626-0001	5464 Keats Street	Los Angeles	SFR
196 . 30627-0001	5470 Keats Street	Los Angeles	SFR
197 . 30628-0001	5476 Keats Street	Los Angeles	SFR
371 . 48187-0001	215 Madeline Ave	Pasadena	SFR
544 . 68517-0001	1107 Foothill Street	South Pasadena	SFR
543 . 68509-0001	535 Meridian Ave	South Pasadena	SFR
359 . 48174-0001	1120 Pasadena Ave	Pasadena	SFR
202 . 30634-0001	5465 Keats Street	Los Angeles	SFR
360 . 48175-0001	1112 Pasadena Ave	Pasadena	SFR
204 . 30636-0001	5477 Keats Street	Los Angeles	SFR
205 . 30638-0001	5477 Shelley Street	Los Angeles	SFR
551 . 68576-0001	311 Fairview Ave	South Pasadena	SFR
512 . 68355-0001	1131 Glendon Way	South Pasadena	SFR
511 . 68353-0001	863 Monterey Road	South Pasadena	SFR
510 . 68347-0001	916 Lyndon Street	South Pasadena	SFR
509 . 68328-0001	845 Bank Street	South Pasadena	SFR
358 . 48173-0001	1128 Pasadena Ave	Pasadena	SFR
505 . 68262-0001	1724 Gillette Crescent	South Pasadena	SFR
502 . 68213-0001	816 Bonita Drive	South Pasadena	SFR
501 . 68168-0001	2042 Alpha Ave	South Pasadena	SFR
500 . 68147-0001	4442 Maycrest Ave	Los Angeles	SFR
499 . 68109-0001	808 Valley View	South Pasadena	SFR
498 . 67897-0001	1325 Meridian Ave	South Pasadena	SFR
497 . 67879-0001	5464 Shelley Street	Los Angeles	SFR
496 . 67567-0001	1707 Meridian Ave	South Pasadena	SFR
495 . 67558-0001	534 Orange Grove Ave	South Pasadena	SFR
494 . 67556-0001	901 Bonita Drive	South Pasadena	SFR
493 . 67555-0001	4336 Lowell Ave	Los Angeles	SFR
492 . 67332-0001	801 Bonita Drive	South Pasadena	SFR
491 . 67320-0001	495 Prospect Circle	South Pasadena	SFR
490 . 67204-0001	5541 Templeton Street	Los Angeles	SFR
489 . 67178-0001	5501 Templeton Street	Los Angeles	SFR
355 . 48171-0001	1150 Pasadena Ave	Pasadena	SFR

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485 . 67151-0001	3138 Lowell Ave	Los Angeles	SFR
484 . 67109-0001	911 Monterey Road	South Pasadena	SFR
483 . 67102-0001	903 Monterey Road	South Pasadena	SFR
482 . 67029-0001	5506 Norwich Ave	Los Angeles	SFR
481 . 67022-0001	1722 Gillette Crescent	South Pasadena	SFR
480 . 64558-0001	4401 Maycrest Ave	Los Angeles	SFR
479 . 64557-0001	5474 Newtonta Drive	Los Angeles	SFR
354 . 48170-0001	180 State Street	Pasadena	SFR
351 . 48163-0001	181 Columbia Street	Pasadena	SFR
468 . 61345-0001	1821 Meridian Ave	South Pasadena	SFR
467 . 61338-0001	1109 Columbia Street	South Pasadena	SFR
350 . 48162-0001	1175 Pasadena Ave	Pasadena	SFR
463 . 61294-0001	532 Meridian Ave	South Pasadena	SFR
241 . 43578-0001	1011 Foothill Street	South Pasadena	SFR
466 . 61337-0001	216 Fairview Ave	South Pasadena	SFR
243 . 43710-0001	5524 Kendall Ave	Los Angeles	SFR
393 . 48209-0001	250 Wignore Drive	Pasadena	SFR
245 . 44428-0001	540 Prospect Ave	South Pasadena	SFR
246 . 44538-0001	885 Oneonta Drive	South Pasadena	SFR
247 . 44879-0001	242 Bellefontaine Street	Pasadena	SFR
473 . 62588-0001	925 Jane Place	Pasadena	SFR
462 . 61218-0001	237 State Street	Pasadena	SFR
250 . 45340-0001	4326 Lowell Ave	Los Angeles	SFR
478 . 64556-0001	5469 Shelley Street	Los Angeles	SFR
461 . 61163-0001	1321 Meridian Ave	South Pasadena	SFR
253 . 45699-0001	2011 Cambridge Place	South Pasadena	SFR
254 . 45724-0001	1041 Foothill Street	South Pasadena	SFR
255 . 45739-0001	218 Madeline Drive	Pasadena	SFR
256 . 45857-0001	302 Fairview Ave	South Pasadena	SFR
504 . 68232-0001	1101 Pine Street	South Pasadena	SFR
258 . 46781-0001	5462 Almont Street	Los Angeles	SFR
508 . 68327-0001	845 Bank Street	South Pasadena	SFR
457 . 61159-0001	533 Prospect Ave	South Pasadena	SFR
456 . 61158-0001	910 Bonita Drive	South Pasadena	SFR
455 . 61157-0001	1021 Foothill Street	South Pasadena	SFR
454 . 60763-0001	2007 Cambridge Place	South Pasadena	SFR
453 . 49741-0001	1035 Foothill Street	South Pasadena	SFR
452 . 48685-0001	1101 Columbia Street	South Pasadena	SFR

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451	.49584-0001	245 Wigmore Drive	Pasadena	SFR
450	.49399-0001	670 St. John Ave	Pasadena	SFR
445	.49322-0001	265 Waverly Drive	Pasadena	SFR
425	.48240-0001	600 St. John Ave	Pasadena	SFR
381	.48197-0001	177 Glenham Street	Pasadena	SFR
424	.48239-0001	602 St. John Ave	Pasadena	SFR
272	.48833-0001	385 Havendale Drive	Pasadena	SFR
423	.48238-0001	620 St. John Ave	Pasadena	SFR
422	.48237-0001	628 St. John Ave	Pasadena	SFR
421	.48236-0001	640 St. John Ave	Pasadena	SFR
420	.48235-0001	646 St. John Ave	Pasadena	SFR
419	.48234-0001	650 St. John Ave	Pasadena	SFR
416	.48232-0001	696 St. John Ave	Pasadena	SFR
415	.48231-0001	714 St. John Ave	Pasadena	SFR
414	.48230-0001	726 St. John Ave	Pasadena	SFR
413	.48229-0001	734 St. John Ave	Pasadena	SFR
412	.48228-0001	737 Pasadena Ave	Pasadena	SFR
411	.48227-0001	763 Pasadena Ave	Pasadena	SFR
410	.48226-0001	765 Pasadena Ave	Pasadena	SFR
407	.48224-0001	203 Bellefontaine Street	Pasadena	SFR
406	.48223-0001	235 Bellefontaine Street	Pasadena	SFR
403	.48219-0001	866 Pasadena Ave	Pasadena	SFR
402	.48218-0001	876 Pasadena Ave	Pasadena	SFR
401	.48217-0001	888 Pasadena Ave	Pasadena	SFR
400	.48216-0001	894 Pasadena Ave	Pasadena	SFR
399	.48215-0001	177 Hurlbut Street	Pasadena	SFR
398	.48214-0001	900 Pasadena Ave	Pasadena	SFR
397	.48213-0001	215 Wigmore Drive	Pasadena	SFR
559	.68670-0001	822 Valley View	South Pasadena	SFR
562	.68672-0001	815 Bonita Ave	South Pasadena	SFR
567	.68789-0001	935 Jane Place	Pasadena	SFR
396	.48212-0001	231 Wigmore Drive	Pasadena	SFR
395	.48211-0001	212 Wigmore Drive	Pasadena	SFR
394	.48210-0001	230 Wigmore Drive	Pasadena	SFR
300	.47444-0001	4339 Maycrest Ave	Los Angeles	SFR
301	.47445-0001	205 Madeline Drive	Pasadena	SFR
331	.48119-0001	4317 Maycrest Ave	Los Angeles	SFR
303	.47778-0001	1190 Pasadena Ave	Pasadena	SFR

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304 . 47924-0001	2028 Berkshire Ave	South Pasadena	SFR
392 . 48208-0001	929 Pasadena Ave	Pasadena	SFR
389 . 48206-0001	953 Pasadena Ave	Pasadena	SFR
383 . 48199-0001	181 Arlington Drive	Pasadena	SFR
388 . 48204-0001	926 Pasadena Ave	Pasadena	SFR
387 . 48203-0001	936 Pasadena Ave	Pasadena	SFR
386 . 48202-0001	946 Pasadena Ave	Pasadena	SFR
385 . 48201-0001	956 Pasadena Ave	Pasadena	SFR
384 . 48200-0001	966 Pasadena Ave	Pasadena	SFR
335 . 48132-0001	4432 Maycrest Ave	Los Angeles	SFR
382 . 48198-0001	1000 Pasadena Ave	Pasadena	SFR
337 . 48141-0001	4451 Alpha Street	Los Angeles	SFR
380 . 48196-0001	180 Arlington Drive	Pasadena	SFR
379 . 48195-0001	185 Glenarm Street	Pasadena	SFR
378 . 48194-0001	1030 Pasadena Ave	Pasadena	SFR
377 . 48193-0001	216 Arlington Drive	Pasadena	SFR
320 . 48104-0001	4312 Maycrest Ave	Los Angeles	SFR
321 . 48105-0001	4316 Maycrest Ave	Los Angeles	SFR
322 . 48106-0001	4320 Maycrest Ave	Los Angeles	SFR
323 . 48107-0001	4326 Maycrest Ave	Los Angeles	SFR
324 . 48108-0001	4332 Maycrest Ave	Los Angeles	SFR
376 . 48192-0001	1031 Pasadena Ave	Pasadena	SFR
375 . 48191-0001	1041 Pasadena Ave	Pasadena	SFR
374 . 48190-0001	1051 Pasadena Ave	Pasadena	SFR
373 . 48189-0001	1059 Pasadena Ave	Pasadena	SFR
372 . 48188-0001	225 Madeline Ave	Pasadena	SFR
330 . 48116-0001	4303 Maycrest Ave	Los Angeles	SFR
345 . 48156-0001	231 Columbia Street	Pasadena	SFR
332 . 48121-0001	4329 Maycrest Ave	Los Angeles	SFR
333 . 48126-0001	4359 Maycrest Ave	Los Angeles	SFR
334 . 48130-0001	4422 Maycrest Ave	Los Angeles	SFR
346 . 48158-0001	1207 Pasadena Ave	Pasadena	SFR
336 . 48134-0001	4417 Alpha Street	Los Angeles	SFR
348 . 48160-0001	1191 Pasadena Ave	Pasadena	SFR
338 . 48143-0001	4507 Alpha Street	Los Angeles	SFR
542 . 68500-0001	1109 Grevelia Street	South Pasadena	SFR
370 . 48185-0001	202 Madeline Drive	Pasadena	SFR
341 . 48146-0001	5506 Alias Street	Los Angeles	SFR

F. 8

342 . 48147-0001	5512 Atlas Street	Los Angeles	SFR
343 . 48150-0001	5513 Atlas Street	Los Angeles	SFR
366 . 48181-0001	225 State Street	Pasadena	SFR
460 . 61162-0001	1110 Glendon Way	South Pasadena	SFR
364 . 48179-0001	1062 Pasadena Ave	Pasadena	SFR
369 . 48184-0001	230 Madeline Drive	Pasadena	SFR
444 . 48341-0001	240 State Street	Pasadena	SFR
349 . 48161-0001	214 State Street	Pasadena	SFR
431 . 48244-0004	711 Pasadena Ave	Pasadena	SFR
518 . 68448-0001	1021 Magnolia Street	South Pasadena	SFR
449 . 48329-0001	269 Palmetto Drive	Pasadena	SFR
585 . 75393-0001	2018 Alpha Ave	South Pasadena	SFR
137 . 30550-0001	3541 Sheffield Ave	Los Angeles	SFR, vacant
60 . 18544-0001	3227 Sheffield Ave	Los Angeles	SFR, vacant
251 . 45423-0001	1832 Gillette Crescent	South Pasadena	SFR, fire damage
353 . 48188-0001	1200 Pasadena Ave	Pasadena	SFR, foundati
347 . 48169-0001	1199 Pasadena Ave	Pasadena	SFR, vacant
178 . 30610-0001	3826 Sheffield Ave	Los Angeles	SFR, vacant
273 . 46834-0001	405 Havendale Drive	Pasadena	SFR

Ex. 8

Number	Parcel Number	Street Address	City	Commercial
465	61314-0002	5601 Valley Blvd	Los Angeles	Commercial
9	03660-0001	5460 Huntington Drive	Los Angeles	Billboard
464	61314-0001	5601 Valley Blvd	Los Angeles	Commercial
538	68463-0013	626 Prospect Ave	South Pasadena	Commercial
15	18467-0004	5600 Alhambra	Los Angeles	Commercial
519	68463-0001	705 Fairview Ave	South Pasadena	Commercial
220	30651-0005	4005 Lowell Ave	Los Angeles	Commercial, laundry
190	30621-0004	3931-LDY Stockbridge Ave	Los Angeles	Commercial, laundry
125	24135-0001	5565 Valley Blvd	Los Angeles	Industrial
3	03003-0002	Bet. Alhm & Concord	Los Angeles	Industrial
566	68793-0001	244 Arlington Drive	Pasadena	Offices
234	41596-0001	234 Bellefontaine Street	Pasadena	Spec Purpose
229	30660-0002	5460 Huntington Drive	Los Angeles	Storage
				vacant comm

EXHIBIT 9

Proposed revisions to draft Caltrans Affordable Sales Regulations:

**TITLE 21 PUBLIC WORKS
DIVISION 2. DEPARTMENT OF TRANSPORTATION
CHAPTER 9.5. AFFORDABLE SALES PROGRAM**

§ 1475 Purpose and Scope

(a) *Article XIX of California Constitution provides that the Department of Transportation ("Department") may utilize its funds and assets to mitigate adverse environmental effects which impact upon persons and communities caused by the planning, acquisition of property, or construction of public transportation projects. In 2009, the Office of the California Attorney General issued a formal opinion determining that it was proper to use the Department's funds and assets to preserve affordable housing that might otherwise be lost if the property were rented or sold at higher market rates. In 1979, the Legislature passed Senate Bill 86, known as the "Roberti Act," and these regulations implement that Act. The Legislature has found and declared that the sale of certain surplus residential properties by the Department of Transportation (Department) at higher market rates will result in the loss of decent and affordable housing for persons and families of low- and moderate-income, and in the displacement of large numbers of such persons and families, and the disruption of local communities. These impacts would be adverse environmental effects that the Department is authorized and directed to prevent. In addition, the sale of certain properties will result in the saving of Department funds otherwise required for the maintenance, upkeep, repair, management, and rehabilitation of aging properties, and the avoidance of future liability associated with the Department's continued ownership of the properties. Pursuant to Government Code sections 54235 through 54238.7, the Department is required to dispose of such properties in a manner that will preserve, upgrade and expand the supply of housing available to affected persons and families of low or moderate income, and to avoid unnecessary disruptions of local communities. This article sets forth the regulations used by the Department for the sale of surplus residential properties under Government Code sections 54235 et seq. The regulations specified herein and the governing statutes are collectively known as the "Affordable Sales Program."*

(b) Pursuant to Government Code section 54238 .3, the regulations in this article are limited in effect to surplus residential properties acquired *and retained by the Department* for State Route 710 (SR 710), in Los Angeles County.

ADD:

(c) Pursuant to Government Code section 54236(b) and (c), at this time, properties in the following categories are hereby deemed not to be "surplus residential properties" subject to the provisions of the Roberti Act, but may be sold under the provisions of generally applicable law:

- (1) Parcels of land currently lacking habitable structures, including leased or rented parcels;
- (2) Parcels of land with habitable structures currently utilized for non-residential purposes; and
- (3) Parcels of land with structures that are not currently occupied due to health and safety reasons and for which the Department presently lacks funds to address. The Department shall publish a list of the properties within the SR 710 corridor which have been determined, at this time, not to be sold as "surplus residential properties."

EXHIBIT 10

The following properties within the SR 710 corridors are hereby determined not to be "surplus residential properties" within the meaning of Government Code section 54236(b) at this time, but this determination may be revised as future date (partial list):

<u>Item</u>	<u>Street No.</u>	<u>Street Name</u>	<u>City</u>	<u>Status</u>	<u>Caltrans Parcel</u>
	w/ corner	Alhambra/Concord	Los Angeles	Vacant Land	03003-0001
	interior lot	Alhambra/Concord	Los Angeles	Vacant Land	03003-0002
1	w/5649	Alhambra Ave	Los Angeles	Vacant Lot	03003-0003
	interior lot	Alhambra/Concord	Los Angeles	Vacant Land -Storage	03003-0004
2	5301	Allan St	Los Angeles	Vacant Lot	18524-0001
3	5462	Almont St	Los Angeles	Boarded	46781-0001
4	5468	Almont St	Los Angeles		48098-0002
5	4411	Alpha St	Los Angeles	Boarded	47417-0001
6	4411 ½	Alpha St	Los Angeles	Boarded	47417-0002
7	4524	Alpha St	Los Angeles	Vacant Lot	48151-0001
8	5500	Concord Ave	Los Angeles	Vacant Lot	??
9	5523	Concord Ave	Los Angeles	Vacant Lot	??
10	5529	Concord Ave	Los Angeles	Vacant Lot	??
11	5537	Concord Ave	Los Angeles	Vacant Lot	18512-0001
12	5541	Concord Ave	Los Angeles	Vacant Lot	??
13	5556	Concord Ave	Los Angeles	Vacant Lot	18504-0001
14	3220	Front St	Los Angeles	Vacant Indust	03006-0002
15	5444 ½	Huntington Dr	Los Angeles	Boarded	30650-0007
16	5433	Huntington Dr	Los Angeles	Vacant Lot	48087-0001
17	5440	Huntington Dr	Los Angeles	Boarded	30650-0001
18	5440 ½	Huntington Dr	Los Angeles	Boarded	30650-0002
19	5442 ½	Huntington Dr	Los Angeles	Boarded	30650-0004
20	5444	Huntington Dr	Los Angeles	Boarded	30650-0006
21	5450	Huntington Dr	Los Angeles	Vacant Lot	48094-0001
22	5460	Huntington Dr	Los Angeles	Vacant Lot - Billboard	30660-0002
23	5442 A	Huntington Dr	Los Angeles	Boarded	30650-0005
24	5442 B	Huntington Dr	Los Angeles	Boarded	30650-0003
	5486	Huntington Dr	Los Angeles	Child Care Facility	03661-0001
25	5465	Keats St	Los Angeles		30634-0001
26	5471	Keats St	Los Angeles	Vacant Lot	30635-0001
27	2974	Lowell Ave	Los Angeles	Vacant Lot	18509-0001
28	2990	Lowell Ave	Los Angeles	Boarded	18514-0001
29	3955	Lowell Ave	Los Angeles		30633-0001
30	4010	Lowell Ave	Los Angeles	Vacant Lot	30659-0001
31	4334	Lowell Ave	Los Angeles	Boarded	67174-0002
32	4336	Lowell Ave	Los Angeles	Boarded	67555-0001
33	4215	Maycrest Ave	Los Angeles	Boarded	48097-0001
34	4215 ½	Maycrest Ave	Los Angeles	Boarded	48097-0002
35	4217	Maycrest Ave	Los Angeles	Boarded	48097-0003
36	4217 ½	Maycrest Ave	Los Angeles	Boarded	48097-0004
37	4219	Maycrest Ave	Los Angeles	Boarded	48097-0005
38	4219 ½	Maycrest Ave	Los Angeles	Boarded	48097-0006
39	4221	Maycrest Ave	Los Angeles	Boarded	48097-0007
40	4221 ½	Maycrest Ave	Los Angeles	Boarded	48097-0008
41	4303	Maycrest Ave	Los Angeles		48116-0001
42	4433	Maycrest Ave	Los Angeles		69800-0001
43	5511	Norwich Ave	Los Angeles		69494-0001
44	5536	Poplar Blvd	Los Angeles		30579-0001
45	3115	Sheffield Ave	Los Angeles	Boarded	18530-0001
46	3118	Sheffield Ave	Los Angeles	Vacant Lot	18555-0001
47	3119	Sheffield Ave	Los Angeles	Vacant Lot	18531-0001

48	3227	Sheffield Ave	Los Angeles	Boarded	18544-0001
49	3701	Sheffield Ave	Los Angeles		30551-0001
50	3826	Sheffield Ave	Los Angeles	Boarded	30610-0001
51	5443	Shelley St	Los Angeles	Uninhabitable-storage	30650-0013
52	5451	Shelley St	Los Angeles	Vacant Lot	30653-0001
53	5453	Shelley St	Los Angeles	Vacant Lot	30654-0001
54	5465	Shelley St	Los Angeles		30656-0001
55	5469	Shelley St	Los Angeles		64556-0001
56	3911	Stockbridge Ave	Los Angeles	Vacant Lot	30617-0001
57	5519	Templeton St	Los Angeles	Vacant Lot	18691-0001
58	5575	Valley Blvd	Los Angeles	Vacant Indust	14136-0001
59	5601	Valley Blvd	Los Angeles	Vac Indust-recycling	61314-0001
60	5601	Valley Blvd	Los Angeles	Vac Indust-recycling	?61314-0002
	w/ 5601	Valley Blvd	Los Angeles	Vacant Land	
	5575	Valley Blvd	Los Angeles		
61	w/ 5575	Valley Blvd	Los Angeles	Vacant Industrial	03001-0001
62	244	Arlington Dr	Pasadena	Storage-boarded	68793-0001
63	1133	Avoca Ave	Pasadena	Vacant Lot	68784-0001
64	172	Bellefontaine St	Pasadena	Vacant Lot	48222-0001
65	182	Bellefontaine St	Pasadena	Vacant Lot (100/yr)	48220-0001
66	234	Bellefontaine St	Pasadena	Vacant Lot-garage	41596-0001
67	220	Bellevue Dr	Pasadena	Vac Lot Valley Hunt Club	46836-0001
68	250	Bellevue Dr	Pasadena	Vac Lot Valley Hunt Club	46838-0001
69	272	Bellevue Dr	Pasadena	Vac Lot Valley Hunt Club	49328-0001
70	275	Bellevue Dr	Pasadena	Vacant Lot	49327-0001
71	310	California Blvd W	Pasadena		48246-0004
72	227B	California Blvd W	Pasadena		46844-0007
73	180	Glenarm St	Pasadena		48180-0001
74	185	Glenarm St	Pasadena		48195-0001
75	n/w corner	Havendale /Bellevue	Pasadena	Vac Lot-rose Garden	46835-0001
76	375	Havendale Dr	Pasadena	Vacant Lot	46832-0001
77	405	Havendale Dr	Pasadena	Vacant Lot	46834-0001
78	R/385	Havendale Dr	Pasadena	Vacant Lot	?46833-0001
79	w/165	Huribut St	Pasadena	Vacant Lot	62915-0001
80	244	Palmetto Dr	Pasadena	Vacant Lot	46847-0001
81	269	Palmetto Dr	Pasadena		49329-0001
82	???	Palmetto Dr	Pasadena	Vac Lot Valley Hunt Club	?46839-0001
83	???	Palmetto Dr	Pasadena	Vac Lot Valley Hunt Club	?46847-0001
84	w/244	Palmetto Dr	Pasadena	Vacant Lot	?46848-0001
85	595	Pasadena Ave	Pasadena		48248-0002
86	673 ?	Pasadena Ave	Pasadena	Vacant Lot	?48244-0002
87	703	Pasadena Ave	Pasadena	Boarded	48243-0003
88	721	Pasadena Ave	Pasadena	Vacant Lot (100 Yr)	48244-0002
89	1142	Pasadena Ave	Pasadena		48172-0002
90	1199	Pasadena Ave	Pasadena	Boarded-renting Garage	48159-0001
91	1200	Pasadena Ave	Pasadena	Boarded	48168-0001
92	894/894B	Pasadena Ave	Pasadena	Boarded	48216-0001
93	628	St. John Ave	Pasadena		48237-0001
94	180	State St	Pasadena		48170-0001
95	245	Waverly Dr	Pasadena	Vacant Lot	?46819-0001
96	255	Waverly Dr	Pasadena	Vacant Lot	?46819-0001
97	268	Waverly Dr	Pasadena		?46830-0001
98	212	Wigmore Dr	Pasadena		48211-0001
99	230	Wigmore Dr	Pasadena	Boarded	48210-0001
100	2006	Berkshire Ave	South Pasadena	Vacant Lot	64544-0001
101	728	Bonita Dr	South Pasadena	Vacant Lot	68222-0001

102	773	Bonita Dr	South Pasadena	Boarded	68676-0001
103	821	Bonita Dr	South Pasadena	Vacant Lot	41597-0001
104	215	Fairview Ave	South Pasadena	Vacant Lot	41452-0001
105	216	Fairview Ave	South Pasadena		61337-0001
106	302	Fairview Ave	South Pasadena	Boarded	45857-0001
107	217	Fremont Ave	South Pasadena	Boarded	68599-0001
108	225	Fremont Ave	South Pasadena	Boarded	68600-0001
109	1832	Gillette Crescent	South Pasadena	Boarded	45423-0001
110	1110	Glendon Way	South Pasadena		61162-0001
111	1134	Glendon Way	South Pasadena		61161-0001
112	1037	Grevelia St	South Pasadena	Boarded	68494-0001
113	1039	Grevelia St	South Pasadena	Boarded	68494-0002
114	1107	Grevelia St	South Pasadena	Vacant Lot	68499-0001
115	1008	Hope St	South Pasadena		68439-0003
116	1010 ½	Hope St	South Pasadena	Boarded	62423-0002
117	1028	Magnolia St	South Pasadena	Vacant Lot	41787-0001
118	508	Meridian Ave	South Pasadena	Vacant Lot	47416-0001
119	535	Meridian Ave	South Pasadena		68509-0001
120	807	Rollin St	South Pasadena	Vacant Lot	68310-0001
121	237	State St	Pasadena		?61218-0001
122	907	Summit Dr	South Pasadena		62882-0002
123	804	Valley View	South Pasadena	Vacant Lot	62582-0001
124	808	Valley View	South Pasadena		68109-0001

(partial list)

(d) Surplus residential properties currently utilized for residential purposes will be offered for sale chronologically in the order of priority listed in Government Code section 54237(a). The sales of all properties in a specific sub-category shall be completed before any sales commence in the next category, as follows:

- (1) First, all sales of single-family residences to persons and families who are the former owners of the single-family residences they presently occupy will be completed.*
- (2) Second, all sales of single-family residences to persons and families of low or moderate income who have occupied their single-family residences for two years or more will be completed.*
- (3) Third, all sales of single-family residences to persons and families whose income does not exceed 150 percent of the area median income who have occupied their single-family residence for five years or more will be completed.*
- (4) Fourth, all sales of single-family residences to occupant and non-occupant persons and families, public entities, and housing-related private entities will be completed, with first priority given to present tenants and second priority to former tenants.*
- (5) Fifth, all sales of residential properties containing two or more residential units to occupant and non-occupant persons and families, public entities, and housing-related private entities will be completed, with first priority given to present tenants and second priority to former tenants.*
- (6) Sixth, all sales of surplus residential properties not sold under categories (1) through (5)*

above shall be sold individually.

(e) The following properties are hereby determined to be "surplus residential properties" within the terms of the Roberti Law at Government Code § 54236(b):

Properties in the City of Los Angeles

(1) In the City of Los Angeles, the following properties are occupied single-family residences presently occupied and utilized for residential purposes (partial list):

<u>Item</u>	<u>Caltrans Parcel</u>	<u>Street No.</u>	<u>Street Name</u>	<u>City</u>	<u>Type of Use</u>
1	18515-0001	5506	Allan Street	Los Angeles	SFR
2	18516-0001	5510	Allan Street	Los Angeles	SFR
3	18517-0001	5514	Allan Street	Los Angeles	SFR
4	18518-0001	5518	Allan Street	Los Angeles	SFR
5	18519-0001	5524	Allan Street	Los Angeles	SFR
6	18520-0001	5528	Allan Street	Los Angeles	SFR
7	18521-0001	5532	Allan Street	Los Angeles	SFR
10	18523-0001	5544	Allan Street	Los Angeles	SFR
11	18525-0001	5507	Allan Street	Los Angeles	SFR
12	18526-0001	5511	Allan Street	Los Angeles	SFR
13	18527-0001	5515	Allan Street	Los Angeles	SFR
14	18528-0001	5519	Allan Street	Los Angeles	SFR
15	18529-0001	5523	Allan Street	Los Angeles	SFR
16	18548-0001	5531	Allan Street	Los Angeles	SFR
17	18549-0001	5537	Allan Street	Los Angeles	SFR
18	18550-0001	5541	Allan Street	Los Angeles	SFR
19	46781-0001	5462	Almont Street	Los Angeles	SFR
20	48134-0001	4417	Alpha Street	Los Angeles	SFR
21	48141-0001	4451	Alpha Street	Los Angeles	SFR
22	48143-0001	4507	Alpha Street	Los Angeles	SFR
23	48151-0001	4524	Alpha Street	Los Angeles	SFR
24	48145-0001	5500	Atlas Street	Los Angeles	SFR
25	48146-0001	5506	Atlas Street	Los Angeles	SFR
26	48147-0001	5512	Atlas Street	Los Angeles	SFR
27	48159-0001	5513	Atlas Street	Los Angeles	SFR

28	48144-0001	5501	Berkshire Drive	Los Angeles	SFR
...				Los Angeles	SFR

(2) In the City of Los Angeles, the following properties contain two or more residential units, and some or all of the units are presently occupied and utilized for residential purposes (partial list):

Item	Caltrans Parcel	Street No.	Street Name	City	Type of Use
100	18522-0001	5536	Allan Street	Los Angeles	Duplex
101	18522-0002	5538	Allan Street	Los Angeles	Duplex
102	48098-0001	5466	Almont Street	Los Angeles	Duplex
103	18503-0001	5548	Concord Avenue	Los Angeles	Duplex
104	18503-0002	5550	Concord Avenue	Los Angeles	Duplex
105	18505-0001	5562	Concord Avenue	Los Angeles	Duplex
106	18605-0002	5564	Concord Avenue	Los Angeles	Duplex
...					

(3) In the City of Los Angeles, the following surplus residential properties are vacant single-family residences and vacant properties with two or more residential units, but which fully comply with all state and local laws for habitable residential units (partial list):

Item	Caltrans Parcel	Street No.	Street Name	City
131				
132				
133				
...				

Properties in the City of South Pasadena

(4) In the City of South Pasadena, the following properties are occupied single-family residences presently occupied and utilized for residential purposes (partial list):

Item	Caltrans Parcel	Street No.	Street Name	City
151				
152				
153				
...				

(5) In the City of South Pasadena, the following properties contain two or more residential units, and some or all of the units are presently occupied and utilized for residential purposes (partial list):

<u>Item</u>	<u>Caltrans Parcel</u>	<u>Street No.</u>	<u>Street Name</u>	<u>City</u>
351				
352				
...				

(6) In the City of South Pasadena, the following surplus residential properties are vacant single-family residences and vacant properties with two or more residential units, but which fully comply with all state and local laws for habitable residential units (partial list):

<u>Item</u>	<u>Caltrans Parcel</u>	<u>Street No.</u>	<u>Street Name</u>	<u>City</u>
401				
402				
403				
...				

Properties in the City of Pasadena

(7) In the City of Pasadena, the following properties are occupied single-family residences presently occupied and utilized for residential purposes (partial list):

<u>Item</u>	<u>Caltrans Parcel</u>	<u>Street No.</u>	<u>Street Name</u>	<u>City</u>
451				
452				
453				
...				

(8) In the City of Pasadena, the following properties contain two or more residential units, and some or all of the units are presently occupied and utilized for residential purposes (partial list):

<u>Item</u>	<u>Caltrans Parcel</u>	<u>Street No.</u>	<u>Street Name</u>	<u>City</u>
501				
502				
...				

(9) *In the City of Pasadena, the following surplus residential properties are vacant single-family residences and vacant properties with two or more residential units, but which fully comply with all state and local laws for habitable residential units (partial list):*

<u>Item</u>	<u>Caltrans Parcel</u>	<u>Street No.</u>	<u>Street Name</u>	<u>City</u>
521				
522				
...				

(f) *During the time the Department is determining which occupied residential properties are to be sold as surplus residential property and is calculating the terms of such sales under the Affordable Sales Program, and until a determination is made and the property is sold, the monthly rental rate on each dwelling unit shall not be increased, but the monthly rental rate may be decreased to accurately reflect the income of a tenant in the Affordable Rental Program.*

NOTE:

Authority cited:

Calif. Const. Article XIX; Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7; Streets & Highways Code §§ 118.1, 118.6; Attorney General's Opinion 07-801 (December 30, 2009)

Reference cited:

Govt. Code §§ 54235, 54236, 54237, 54238.3 & 54238.4

§1476 Definitions

(a) **Housing-related private entity** means an "Eligible Sponsor" as defined in California Code of Regulations, Title 25, section 7303 *and determined eligible by the Department pursuant its regulations.*

(b) **Housing-related public entity** means a Public Housing Agency (PHA) as defined in Code of Federal Regulations, Title 24, section 5.100.

(c) **Principal place of residence** means the place where one actually lives for the greater part of time, or the place where one remains when not called elsewhere for some special or temporary purpose and to which one returns frequently and periodically, as from work or vacation. There may be only one personal place of residence for any individual. Evidence that a location is the individual's "principal place of residence" includes, but is not limited to, the following elements, a compilation of which lends greater credibility to the determination that a particular place is the principal place of residence, whereas the presence of only one element may not support such a determination:

- (1) The subject premises are listed as the individual's place of residence on any motor vehicle registration, driver's license, voter registration, or with any other public agency, including federal, state and local taxing authorities.
- (2) Utilities are billed to and paid by the individual at the subject premises.
- (3) All of the individual's personal possessions have been moved into the subject premises.

- (4) A homeowner's tax exemption for the individual has not been filed for a different property.
- (5) The subject premises are the place the individual normally returns to as his/her home, exclusive of military service, hospitalization, vacation, family emergency, travel necessitated by employment or education, or other reasonable temporary periods of absence.

(d) Occupant, notwithstanding any other provision of law, means a person or persons who is in occupancy, is of majority age, and is listed on *or may be added to* the lease or rental agreement *prior to the date a prospective buyer responds to a Conditional Offer Prior to Sale*.

(e) Reasonable price means a decision reached jointly between a buyer and seller of property, reflecting a judgment influenced by the economic realities of the marketplace and the relative bargaining powers of the parties and is a price that provides the best *total agreed* value for *both buyer and seller* in consideration of availability, delivery time, fitness for purpose, payment terms, quality, quantity, and service. In no instance shall "reasonable price" be less than the price originally paid by the Department.

(f) Surplus residential property means land and structures owned by the Department that have been determined to be excess pursuant to Streets and Highways Code section 118.6, *and the regulations the Department has adopted pursuant to that section*, and are developed *and utilized* as single-family or multifamily housing, but does not include property held by the Department for the purpose of exchange.

[COMMENT: Does Caltrans have the "excess property regulations" it is required to adopt by Streets and Highways Code section 118.6? It appears from the C.C.R. that Caltrans did so in 1973, but then repealed all these regs in 1981, when it began generally avoiding the A.P.A.]

(g) Limited equity housing cooperative means a corporation as defined in Health and Safety Code section 50076.5.

(h) Affordable housing cost means that amount as defined in California Code of Regulations, Title 25, section 6924.

[COMMENT: This H.C.D. Regulation (25 CCR 6924) only applies to "lower-income" and "very low-income" households. Caltrans has not drafted or cross-referenced to any definition of "affordable housing cost" for moderate-income or 150-percent-of-median-income households. The latter category only exists in the Roberti Law, and hence no H.C.D. Regulations are written for it. Caltrans may independently define "affordable housing cost" for this unique category. We have suggested a method for doing so in new subdivision (n) and in Section 1477(a)(3).]

(i) Affordable price means the price that would be yielded from applying the market interest rate over a fully amortized 30-year term to the purchasing household's **affordable housing cost**, less the cost of property taxes and assessments, fire and casualty insurance covering replacement value of property improvements, property maintenance and repairs, utilities, and homeowner association fees but under no circumstances shall it be more than fair market value nor less than the price paid by the Department.

(j) Fair market value means fair market value as of the date the offer of sale is made by the selling agency pursuant to the provisions of this article and shall reflect the existing "as-is" condition of the property, taking into account any repairs required to make the property safe and habitable.

(k) Gross income means income as defined in California Code of Regulations, Title 25, section 6914.

[COMMENT: This HCD Regulation (25 CCR § 6914) requires income to be determined looking forward in time 12 months from the date of determination, but Caltrans has generally looked backwards in time to a prior year. Caltrans' past practices and Right of Way Manual sections would appear to violate 25 CCR § 6914.]

(l) Good standing means tenants or occupants who are current in rent obligations, and in full compliance with the terms and conditions of the lease or rental agreement *as of the date the tenant or occupant is required to respond to a Conditional Offer Prior to Sale sent by the Department.*

(m) Former tenants in good standing means tenants who were current in rent obligations, in full compliance with the terms and conditions of the lease or rental agreement at the time of vacancy, and whose tenancy was not terminated for cause. *Former tenants who voluntarily moved from a residential unit as a result of health or safety conditions or the lack of disability accommodations at their unit or pursuant to a settlement agreement or a compromise of pending litigation shall be deemed former tenants in good standing.*

(n) Net Adjusted Gross Income means the number shown on the final line of the first page of a federal income tax return minus the following required or periodic payments for family members which reduce a person or family's available yearly income:

- (1) Medical expenses, such as doctors, hospitals, medicine, medical care, and similar expenses;
- (2) Disability expenses, such as rehabilitative therapy and devices, prosthetics, mobility assistance devices, wheelchairs, and similar expenses;
- (3) Health insurance premiums or co-payments;
- (4) Professional union or organization dues required as a condition of employment;
- (5) Rental insurance for the unit occupied;
- (6) Job training, continuing education, and college or university expenses;
- (7) Student loan payments; and
- (8) Utility bills exceeding one hundred dollars (\$100) per month.

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 54236 & 54237; Sts. & Hy. Code § 118.6; 25 C.F.R. § 7303; 24 C.F.R. § 5.100; Health & Saf. Code § 50076.5; Cal. Code Regs., tit. 25, § 6924; Cal. Code Regs., tit. 25, § 6914.

§1477 Conditional Offer Prior to Sale

(a) Prior to sale, the Department shall make a Conditional Offer Prior to Sale to sell surplus residential property, subject to the following order of priority pursuant to Government Code sections 54237(a) and (d):

(1) *First, all* single-family residences presently occupied by their former owners who are tenants in good standing shall be offered to those former owners at the appraised fair market value.

(2) *Second, all* single-family residences shall be offered at an affordable price or fair market value at each buyer's option to the present occupants who are in good standing who have occupied the property two years or more, and who are persons and families of low or moderate income, if the present occupants have not had an ownership interest in real property in the last three years.

(3) *Third, all* single-family residences shall be offered at an affordable price or fair market value at each buyer's option to the present occupants who are in good standing who have occupied the property five years or more, and whose household *Net Adjusted Gross Income* does not exceed 150 percent of the area median income if the present occupants have not had an ownership interest in real property in the last three years.

(4) *Fourth, all* other surplus residential properties and all properties described in paragraphs 1, 2, or 3 of this Subdivision that are not purchased by the former owners or the present occupants shall then be offered to housing-related public and private entities, *present tenants, and former tenants* at a reasonable price, *with first priority given to present residential tenants and second priority given to former residential tenants.*

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 54237 & 54237.3

§1478 Conditions of Conditional Offer Prior to Sale

(a) For *single-family* residences offered to occupants, the Conditional Offer Prior to Sale shall be made to all occupants shown on the existing Rental Agreement for purchase in the entirety. No offers shall be made that excludes any otherwise qualified occupants.

(b) Sales Price Determination:

(1) For income-qualified buyers, the Department shall use the criteria listed in California Code of Regulations, Title 25, section 6910 et seq., as the sales price determination.

(2) For all other households not proposing to purchase as income-qualified purchasers according to California Code of Regulations, Title 25, section 6910 et seq., the Department shall use fair market value as the sales price determination.

(1) Pursuant to Government Code section 54237.3, effective January 1, 2014 (SB 416), existing occupants who are income-qualified purchasers shall be offered

(3) For housing-related public ~~and private~~ entities, the Department shall use reasonable price as the sales price determination. *Such public entities may purchase more than one property.*

(4) *For housing-related private entities, the Department shall limit the purchase to a single property for each such entity and shall use reasonable price as the sales price determination.*

(c) The Department shall verify income and employment for buyers whose purchase price is based on affordability. *To protect privacy, the Department shall not take possession of any physical or electronic copies of any person's or family's tax return or similar income or employment information, but shall merely review tax and employment documents in a place and manner convenient to the buyer and which will protect the privacy of such documents and information.*

(d) Purchase funds must come from sources other than the Department; the Department will not lend or otherwise finance purchases of the surplus property. *Restrictions associated with a Director's Deed imposed on a property will be written in such a manner as to not interfere in any way with a purchaser who is a natural person in obtaining a loan to purchase and/or repair the property. Such a lender's right to have its loan secured by the property will be superior to the Department's rights under the Director's Deed restriction. The restrictions associated with the Director's Deed shall be in the form of a "Silent Trust Deed" lower in priority than the lender's trust deed, but including the specific dollar amount by which the price was reduced below fair market value. The amount owed on the "Silent Trust Deed" shall not require any payment as long as the purchaser remains in compliance with the Director's Deed restrictions. The amount owed on the "Silent Trust Deed" shall decrease six (6) percent per year until the term of the Director's Deed restrictions expires. When the term of the "Silent Trust Deed" expires the Department shall execute and record a Full Reconveyance of its rights to the property in the manner required by Civil Code section 2941. Upon the death of an income-qualified purchaser the affordability restrictions shall terminate, and upon the tender of a certified copy of a death certificate to the Department of all purchasers of a property, the Department shall record a Full Reconveyance as described above.*

(e) For single-family residences sold below fair market value to income-qualified purchasers, the Department's obligation to make repairs required by lenders and government housing assistance programs is limited to the Federal Housing Administration's (FHA) Minimum Property Standards pursuant to Code of Federal Regulations , Title 24, section 200.926.

(f) All other surplus residential properties sold under the Affordable Sales Program will be sold for fair market value. *Pursuant to the provisions of Government Code section 54237.3, at the option of an income-qualified purchaser, the property shall be sold in an "as-is" condition, with the fair market value price reduced by the amount the Department will save in not making required repairs, and in such case there shall be no affordability restrictions placed on the property as a condition of the Director's Deed.*

(g) All properties sold are without warranty.

(h) For all property sold at below fair market value:

(1) There shall be a Director's Deed restriction limiting the subsequent sale of the property as defined in Government Code section 54237(b) and the rent of the property to an affordable rent as defined in this section. The duration of the restriction shall be for *thirty (30) years starting commencing from the date of recordation of the Director's Deed when the purchaser is a public or private entity. When the purchaser is a natural person, the duration of the restriction shall be fifteen (15) years commencing from the date of recordation of the Director's Deed except as follows: For purchasers who are existing tenants and at least one buyer is a natural person of sixty (60) years of age or older the term of the restriction shall be no more than 10 years. For purchasers who are existing tenants and at least one buyer is a natural person of (65) sixty-five years of age or older the term of the restriction shall be no more than five (5) years.*

(2) Property sold to a local public agency is subject to Streets and Highways Code section 118(a) (2).

(3) *When purchasers obtain loans to finance the purchase or repair of the property, the rights of the lender to the property as security will be superior to all rights of the Department to enforce the affordability restrictions.*

(i) For *multi-family residential properties* sold to housing-related public and private entities:

(1) The purchasing entity shall cause the property to be rehabilitated and developed as a limited equity cooperative housing with first right of occupancy to present occupants, except where the development of a cooperative or cooperatives is not feasible, *in which case* the purchasing agency shall cause the property to be used for low- and moderate-income rental or owner-occupied housing, with first right of occupancy *and purchase* to the present tenants.

(2) *The purchasing entity shall enter into binding agreements with all occupants to ensure their continued occupancy during the transition from the Department ownership to the purchaser, during any period of repair or rehabilitation, and thereafter.*

(3) *The purchasing entity shall not use the property as security for borrowed funds which are not used directly for the physical repair and rehabilitation of the property. Borrowed funds shall not be used to pay the salary or other compensation of persons associated with the purchasing entity.*

(4) *The purchasing entity shall enter into binding contract terms with the Department to prohibit and prevent the saddling of the property with excessive loans or liens in the future, or the use of future loan proceeds for payments to any person associated with the management of the purchasing entity.*

(2) (5) The Department shall solicit proposals or bids for such sales.

(6) *No more than one property shall be sold to any one private entity.*

(j) For property sold at fair market value to *natural* persons who will be owner occupants, the purchaser(s) must declare intention to reside in or on the property, and maintain it as their principal place of residence.

NOTE:

Authority cited: Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited: Govt. Code § 54237; Cal. Code Regs., Title 25, §§ 6910 et seq.; 24 C.F.R. § 200.926; Sts. & Hy. Code §§ 104.5 & 118.

§1479 Notice of Conditional Offer Prior to Sale

(a) Present occupants:

(1) The Department shall give written notice of the Conditional Offer Prior to Sale by certified mail, return receipt requested, to the present occupants and to housing-related public and private entities.

(2) *Because Certified Mail is a less reliable form of delivery than First Class Mail — many people refuse to sign for anything, or some mailing addresses do not conform to the addresses in the Department's records, or residents are absent from home during the day, or residents cannot travel to a post office during their working hours to sign for the notice — a second written notice of the Conditional Offer Prior to Sale will be sent simultaneously by First Class Mail.*

(3) *In the event both the Certified and First Class envelopes are both returned undelivered, the Department shall hand-deliver the Conditional Offer Prior to Sale to the residential unit, and all response dates shall be calculated from the date of the actual physical delivery.*

(b) Housing-related public and private entities and ~~person or~~ persons who are not occupants but who intend to be owner occupants: The Department shall give written notice of the Conditional Offer Prior to Sale by publishing the notice in at least one newspaper of general circulation within the *specific city or county* in which the property is located, pursuant to Government Code section ~~6061~~ 6064 (once a week for four successive weeks).

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 6064, 54237 & 54237.3.

§1480 Term of Conditional Offer Prior to Sale

(a) The Conditional Offer Prior to Sale to present occupants shall remain open for ~~60~~ 120 days from the *final* date of mailing or *hand-delivery, as applicable*. The Conditional Offer Prior to Sale to housing-related public and private entities and/or persons who are not occupants but who intend to be owner occupants, shall remain open for ~~60~~ 120 days from the *final* date of publication.

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 54237 & 54237.3.

§1481 Acceptance of Conditional Offer Prior to Sale

(a) Acceptance of the Conditional Offer Prior to Sale must be made in writing to the Department, *either by First Class Mail or by Certified Mail (return receipt requested)*, to the address identified in the Conditional Offer Prior to Sale, *or by other means*, and *received mailed or deposited with a delivery service no later than 60 120 days from the final date of mailing or hand delivery of the notice* Conditional Offer Prior to Sale or the *final* date of publication, as applicable.

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 54237 & 54237.3.

§1482 Acceptance Must Include Evidence of Income and Occupancy; Burden on Buyer

(a) The burden is on the buyer to show eligibility for purchase based on *affordability and length of occupancy*. *A buyer's statement under penalty of perjury as to the length of occupancy shall be accepted as prima facie evidence of such occupancy*. The buyer(s) shall provide documentation of income and family composition. Income from all occupants 18 years of age or older *as of the date the documentation is provided* shall be included as part of household income. Documentation may include but is not limited to Internal Revenue Service Form W-2, state or federal income tax returns and forms, pay stubs, and any other financial documentation relevant to income. *To protect privacy, the Department shall not take possession of any physical or electronic copies of any person's or family's tax return or similar employment or income information, but shall merely review tax and employment documents in a place and manner convenient to the buyer and which will protect the privacy of such documents and information.*

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 54237 & 54237.3.

§1483 Incomplete or Insufficient Documentation is Grounds for Denial

(a) Buyers that submit initial responses to the Conditional Offer Prior to Sale that are deemed to be incomplete or insufficient shall be notified of the *specific* incompleteness or insufficiency of the response within 10 working days of the Department receiving the response, *and be notified by First Class Mail and email of precisely which document(s) or information are missing*. Such buyers will be granted an additional 30 days to provide *the specifically requested* additional required documentation. *The requested additional documentation must be received transmitted no later than 90 thirty (30) days from the date of mailing of each request for specific missing information. Conditional Offer Prior to Sale.* Failure of the buyer to respond satisfactorily and timely shall be deemed a rejection of the offer. *One further extension of time of thirty (30) days may be granted for good cause. No buyer's response shall be deemed incomplete, insufficient,*

or untimely unless the specific missing information is requested by the Department in the manner set forth in this section.

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 54237 & 54237.3.

§1484 Failure to Respond Within 60 120 Days of Notice Deemed Rejection of Offer.

(a) Failure to respond to the Conditional Offer Prior to Sale or a response received after 60 120 days from the *final* date of notice or publication, as applicable, shall be deemed a rejection of the offer.

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 54237 & 54237.3.

§1485 Determination of Eligibility and Qualifications; Qualified Buyers Ranked by Priority

(a) The Department shall review the documentation supplied by, and determine the eligibility of each respondent within 60 days of receipt of full documentation. When two or more respondents have equal eligibility for a particular property, each respondent's relative priority for purchasing the property will be ranked according to the respondent who best qualified *in terms of the respondent with longer duration at the property, lower income, and larger family size, and who was the earliest to respond with full documentation to the Conditional Offer Prior to Sale.*

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 54237 & 54237.3.

§1486 Offer to Enter into Contract for Sale to be Made According to Priority Ranking; 30 Days to Accept

(a) Upon determining the respondent with the highest priority to purchase, the Department shall send the respondent a Contract for Sale via First Class Mail. To accept the Contract for Sale, the respondent shall sign and *mail return* the Contract for Sale within 30 days from the date of the Department's mailing of the Contract for Sale.

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 54237 & 54237.3.

§1487 Upon Acceptance, Buyer has 90 120 Days to Close Escrow

(a) Upon acceptance of an Offer to Enter into a Contract of Sale, the buyer has 90 120 days to close escrow. The Department may, however, at its sole discretion, and upon the buyer showing good cause, grant a 30-day extension giving the buyer additional time to close escrow.

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §§ 54237 & 54237.3.

§1488 Surplus Residential Properties Not Subject to Sale Under Government Code section 54237(a) through 54237(d)

(a) For surplus residential properties not sold pursuant to Government Code section 54237(a) through 54237(d), the Department shall sell the property according to the following priority:

- (1) To present tenants at fair market value;
- (2) To eligible former tenants at fair market value; and
- (3) Pursuant to Streets and Highways Code sections 118, 118.1, or 118.6 and Department regulations adopted pursuant to those sections, with preference given to the highest responsive bidder who will be an owner occupant.

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7; Streets & Highway Code §§ 118, 118.1, 118.6 [Department required to adopt "excess property" regulations].

Reference cited:

Govt. Code §§ 54237 & 54237.3; Streets & Highway Code §§ 118, 118.1, 118.6.

§ 1489 Duty of Purchaser Upon Noncompliance

(a) Pursuant to Government Code section 54238, in the event a purchaser of surplus residential property does not comply with terms, conditions, and restrictions imposed pursuant to Section 54237 of this article, a state agency which sold the property may require that the purchasers pay the state the difference between the actual price paid by the purchaser for the property and the fair market value of such property; at the time of the agency's determination of noncompliance, original sale to the purchaser plus 6 percent interest on such amount for the period of time the land has been held by the purchaser. Such interest shall be compounded annually. The terms described in this Subdivision exist to ensure that such properties will remain available to persons and families of low or moderate income, but that the purchaser receives and owns the amount of

equity in the property above the amount of the Department's share as a result of repairs, improvements, and natural increases in value. The Department's interest in and monitoring of the property shall terminate upon the expiration of the affordability restrictions. The rights of the Department to enforce the affordability restrictions shall not be superior to the rights of any lender who provided financing for purchase of the property.

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code §54238.

§ 1490 Monitoring

(a) All properties sold at below fair market value shall be monitored at least annually for the duration of the Director's Deed restriction to ensure affordable housing availability.

(b) *Buyers under this Affordable Sales Program will be entitled to take any or all of the following actions and not be deemed in violation of any Director's Deed or affordability restriction:*

- (1) Re-finance all or some of the loans secured by the property;*
- (2) Make any repairs or aesthetic or landscaping changes to the property or structures;*
- (3) Make the property or structures more accessible or usable by disabled persons;*
- (4) Make any improvements to the property or structures, including ones involving mechanics liens or similar liens;*
- (5) Add air conditioning, heating, windows, roofs, insulation or other energy-saving measures;*
- (6) Transfer title of the property into their living trust as part of an estate plan;*
- (7) Transfer title of the property upon their death to heirs or devisees pursuant to a trust, will, estate plan, or decision of a probate court; or*
- (8) Freely use or direct the use of insurance proceeds or governmental grants or loans to address any impacts of fire, flood, wind, earthquake, earth movement, utility line mis-function, vehicle accident, damage from air born material, or any other calamity or natural disaster.*

NOTE:

Authority cited:

Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54237.7, 54237.8, 54238, 54238.3, 54238.4, 54238.5, 54238.6, 54238.7.

Reference cited:

Govt. Code § 54237.

§ 1491 Appeals of Department Determinations

(a) *Any aggrieved person or entity may appeal any determination made by the Department or its employees under the Affordable Sales Program as to one or more of the following decisions:*

- (1) That a present occupant is not, or former occupant was not, in "good standing;"*
- (2) That a present occupant has not occupied the property for the duration required;*
- (3) That a present occupant is not income-qualified to purchase a property;*
- (4) That the income of a person or family is determined correctly;*

- (5) That the sales price to be offered to a present or former occupant is calculated correctly;
- (6) The proper number of years by which a property will be deed restricted;
- (7) Which features of the property which be subject to historic covenant restrictions;
- (8) Whether or not a purchaser has timely responded to Conditional Offer Prior to Sale;
- (9) Whether or not a purchaser has provided sufficient information to the Department; or
- (10) Whether a public or private entity is qualified to purchase property.

(b) Such appeals shall be made in a letter sent to Andrew Nierenberg, District 7, Deputy Director for Right of Way Management, at 100 S. Main Street, Los Angeles, California 90012. The appeal letter shall be post marked or submitted to a delivery service within fifteen (15) days of the date of the adverse decision appealed. The appeal letter shall set forth all pertinent facts and legal authority in support of the appellant's claims. Items may be attached to the letter. The letter shall include the appellant's address, email, and telephone information.

(c) A decision on the appeal will be made within thirty (30) days of the date of the appeal. The decision will be made by either the District 7 Assistant Director for Real Property Management or by another Department employee designated for that purpose. An informal meeting and discussion of the issues may be ordered by the Assistant Director to occur during that thirty (30) day period, and the appellant shall be notified by telephone and email of the time and place of the meeting not less than seven (7) days before the meeting. The decision on the appeal shall be in writing, shall address all points in the appeal, and shall be mailed to appellant by First Class Mail. The decision shall be final as to the Department. A further aggrieved person or entity may thereafter file and serve a civil lawsuit in the Superior Court within ninety (90) days of the decision on the appeal.

NOTE:

Authority Cited:

Code of Civil Procedure §§ 1085, 1094.5; Streets and Highway Code §§ 118.6.

§ 1492 Right-of-Way Manual and Department Internal Rules Inapplicable

No provisions of the Department's publication known as the Right-of-Way Manual nor any other rule or guideline of the Department not adopted pursuant to the Administrative Procedures Act shall be applied to any aspect of the Affordable Sales Program described in these regulations.

NOTE:

Authority Cited:

Administrative Procedures Act, Government Code §§ 11340 to 11361;

City of South Pasadena v. Department of Transportation, Los Angeles County Superior Court case number, BC331628, judgment entered on April 5, 2007.

§ 1493 Accommodations for Disabled Persons

(a) The Department is committed to respecting the needs of disabled persons as protected by state and federal law.

(b) Any natural person who is disabled as defined in state or federal law or in regulations adopted under such laws may request an accommodation and partial adjustment or partial waiver of the requirements and deadlines set forth in the Affordable Sales Program.

(c) The Department shall use its best efforts to accommodate the needs of disabled persons by providing additional time to meet deadlines, by providing information in different formats, by accepting information in different formats, and by taking any other action deemed necessary to accommodate the needs of a disabled person seeking to purchase property.

NOTE:

Authority Cited:

Americans With Disabilities Act of 1990, Title 42 United States Code §§ 12101, et seq.,

Rehabilitation Act of 1973, Title 29 United States Code §§ 701, et seq.

Fair Housing Act, Title 42 United States Code §§ 3601, et seq.

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- 6. 1041-1043 Magnolia;
- 7. 626 Prospect Avenue;
- 8. 726 Meridian Avenue;
- 9. 1002 Hope Street;
- 10. 1008 Hope Street;
- 11. 1010-1010½ Hope Street.

D. The subsequent purported sale of the parcel of real property at 1010-1010½ Hope Street to Esperanza by Caltrans is hereby declared null and void and the parties are ordered and directed to rescind said transaction and take all steps necessary to restore legal title to said parcel in Caltrans;

E. Legal title to all parcels of real property described above shall remain in Caltrans until adoption of an appropriate regulation under the APA for their disposal pursuant to the Roberti Bill or further order of this Court.

The Court further finds and it is,

FURTHER ORDERED, ADJUDGED AND DECLARED, that the summary adjudication herein of the first and third causes of action of the Complaint renders the second and fourth causes of action of the Complaint against Caltrans moot and they are accordingly hereby dismissed and, since this Court has heretofore issued its writ of mandate on the fifth cause of action in the Complaint against Caltrans under the Public Records Act, there is nothing further to adjudicate and the within judgment is the final judgment in the action and fully resolves all issues between and among the parties; and it is

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