

- 1. SOHO could support moving up the application deadline from October 1 to an earlier date maybe July 31, but not March 31.
- 2. SOHO would support fair fee increases to recover staff time to administer the program.
- 3. SOHO strongly supports inspections of Mills Act properties and we support annual inspections instead of every five years as suggested by the Mayor. SOHO would entertain contracting with the city to perform the inspections. Fees should represent actual costs.
- 4. SOHO strongly supports tailored contracts for each property to insure the continued maintenance and preservation of the historic structure and to allow structures that are not already restored to be regulated and restored.
- 5. We are adamantly opposed to the mayors suggested eligibility requirements, as they would exclude virtually all historic buildings from the program. Eligibility requirements could reasonably be changed to read that Mills Act contracts must further the goals of the General Plan.
- 6. We are adamantly opposed to any sort of cap, as this would reduce the current protections in place and leave many historic resources vulnerable to demolition that are not currently in danger.

Items #5 and #6 would require preparation of an EIR with adequate mitigation to implement. Some of the other items would also have this requirement if not modified. To avoid a lengthy and expensive EIR process will require cooperation of all parties arriving at a sensible solution.

SOHO will challenge the legality of the Mayor's suggested changes if they are not modified, as currently proposed they violate State law.

SOHO strongly supports the Grand Jury's recommendation to increase the HRB staff to effectively handle the demands of the program and ensure protection of our historic resources.

We are also supporting a number of other reforms to these programs. These reforms and many of the above are ones we have been advocating for many years. These include demolition review and penalties, qualified staff review of changes to designated resources, the super majority vote problem on the HRB, additional incentives to supplement the Mills Act, early and more comprehensive historic surveys to inform the community, plan updates, and many more. A number of these reforms are now being implemented by the city.