TRANSMITTAL

TO	DATE
The City Council	10/30/2026

FROM
The Mayor

REQUEST FOR APPROVAL TO ENTER INTO LOAN AND REGULATORY AGREEMENTS TO FINANCE ACCESSIBILITY RETROFIT OF EXISTING AFFORDABLE HOUSING DEVELOPMENT BARTLETT HILL MANOR IN ACCORDANCE WITH THE AMENDED CORRECTED SETTLEMENT AGREEMENT WITH THE INDEPENDENT LIVING CENTER OF SOUTHERN CALIFORNIA, ET. AL. AND VOLUNTARY COMPLIANCE AGREEMENT WITH THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Approved and transmitted for your consideration.
Please see attached.



MAYOR
(Mitch Kamin for)

Tiena Johnson Hall, General Manager
Luz C. Santiago, Executive Officer

Anna E. Ortega, Assistant General Manager
Emilyzen Cervantes, Assistant General Manager
Craig Arceneaux, Assistant General Manager

City of Los Angeles

Karen Bass, Mayor

LOS ANGELES HOUSING DEPARTMENT
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October 22, 2026

Council File:
Council District: 1
Contact Person: Eric Claros (323) 273-5356

The Honorable Karen Bass
Mayor, City of Los Angeles
Room 303, City Hall
200 N. Spring Street
Los Angeles, CA 90012

Attention: Legislative Coordinator

COUNCIL TRANSMITTAL: REQUEST AUTHORITY TO ENTER INTO LOAN AND REGULATORY AGREEMENTS TO FINANCE ACCESSIBILITY RETROFIT OF EXISTING AFFORDABLE HOUSING DEVELOPMENT BARTLETT HILL MANOR IN ACCORDANCE WITH THE AMENDED CORRECTED SETTLEMENT AGREEMENT WITH THE INDEPENDENT LIVING CENTER OF SOUTHERN CALIFORNIA, ET. AL. AND VOLUNTARY COMPLIANCE AGREEMENT WITH THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

SUMMARY

The General Manager of the Los Angeles Housing Department (LAHD) respectfully requests that your office review and approve this transmittal and forward it to the City Council for further consideration.
This transmittal requests authority for LAHD to execute loan and regulatory agreements (totaling up to $1,894,819) to finance physical accessibility retrofits at Bartlett Hill Manor, an existing affordable housing development in Council District 1.

The City of Los Angeles is bound by two major legal agreements governing housing accessibility:

1. Amended Corrected Settlement Agreement (ACSA) with the Independent Living Center of Southern California (ILCSC), and
2. Voluntary Compliance Agreement (VCA) with the U.S. Department of Housing and Urban Development (HUD).

These agreements require the City to make thousands of affordable housing units fully accessible to individuals with disabilities:

- ACSA Mandate: 4,000 total certified accessible units.
- VCA Mandate: 4,031 total accessible units, with 3,100 of those required to come specifically from retrofitting existing affordable housing developments in LAHD's portfolio.

Approving this request will allow LAHD to provide the required loan funding for construction and structural modifications at Bartlett Hill Manor, directly contributing to the City's legally mandated accessible unit production targets under both federal (VCA) and court-ordered settlement agreements (ACSA).
The work funded under this request will certify 12 accessible units and remediate all common areas of the housing development.

RECOMMENDATIONS

I. That the Mayor review this transmittal and forward to the City Council for further action;

II. That the City Council, subject to the approval of the Mayor:

A. AUTHORIZE the General Manager of the LAHD, or designee, subject to the review and approval of the City Attorney as to form, to negotiate and execute accessibility retrofit Loan and Regulatory Agreements with the legal owner of the project and in the amounts identified in Table 1;

B. AUTHORIZE the General Manager of LAHD, or designee, subject to the review and approval of the City Attorney as to form, to execute subordination agreements of the financial commitment for the project identified in Table 1, wherein the City's Loan and Regulatory Agreements are subordinated to their respective conventional or municipally funded loans; as required;

C. AUTHORIZE the General Manager of LAHD, or designee, to:

i. Obligate and disburse Funds for the project in amounts not to exceed those listed below:

TABLE 1, PROJECT RETROFIT FUNDING OBLIGATIONS			
Owner	**Fund Name / No**	**Appr Acct / Name**	**Amount**
Bartlett Hill Associates	**Accessible Housing Fund / 10D**	**43E698 / Retrofit**	**$1,894,818.78**

D. AUTHORIZE the General Manager of LAHD, or designee, to prepare Controller's Instructions and any necessary technical adjustments consistent with Mayor and City Council actions, subject to the approval of the City Administrative Officer (CAO), and instruct the Controller to implement the instructions.

BACKGROUND

The Accessible Housing Program (AcHP) ensures that multifamily affordable housing developed with assistance from the City and/or the former Community Redevelopment Agency of the City of Los Angeles (CRA/LA) is accessible to people with disabilities. This program was established to ensure the City's compliance with and implementation of the Amended Corrected Settlement Agreement (ACSA), entered into on September 5, 2016, with Independent Living Center of Southern California (ILCSC), et. al. Under the ACSA, the City must provide 4,000 accessible units. As such, AcHP staff are responsible for surveying previously constructed multifamily affordable housing developments to identify deficiencies and retrofitting them where feasible; accelerating the construction of new and substantially rehabilitated affordable accessible units by requiring 11% mobility and 4% hearing/vision accessible units; and by requiring all developments to adopt, implement, and maintain compliance with consistent rental management policies that address fair housing for people with disabilities. The AcHP staff

actively monitor each development's compliance with these policies and applicable accessibility requirements on a quarterly basis. The AcHP staff also monitor compliance with the design and construction of covered housing projects to ensure that they are designed and built to applicable accessibility standards.

Also in response to concerns about the accessibility of the City's affordable housing program, the U.S. Department of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity (FHEO) initiated a compliance review investigation in 2011 under its fair housing and civil rights laws. During the course of the investigation, the FHEO conducted multiple on-site reviews of existing housing developments supported with federal funding and identified conditions that were not fully compliant with all applicable accessibility standards. On August 2, 2019, HUD and the City reached an agreement to resolve these findings resulting in a Voluntary Compliance Agreement (VCA) with a term of 10 years. The HUD/FHEO settlement with the City, concurrently with the ACSA, intends to provide accessibility improvements for persons with disabilities across the affordable multifamily housing program by adding guidelines that the City must uphold. However, the VCA has additional actions and requirements beyond those required under the ACSA. Under the VCA, the City must create 4,031 accessible units, and unlike under the ACSA, the VCA specifically requires that 3,100 of the accessible units must be provided through retrofitting existing developments. Failure to satisfy the VCA's obligations by the expiration of the agreement's term in 2029 could result in a penalty assessment requiring additional accessible units.

To date, 2,221 units of affordable housing have been certified as accessible. In addition, approximately 1,692 accessible units are currently in construction or pre-development financing stages of LAHD's affordable housing development pipeline.

ACCESSIBILITY RETROFIT OF EXISTING AFFORDABLE HOUSING DEVELOPMENTS

Both the ACSA and VCA allow for the retrofitting of existing affordable housing developments for accessibility as a means by which the City will achieve the 4,031 accessible housing units required by the settlement agreements. In accordance with the settlement agreements, LAHD worked with the private plaintiffs representing the disability community and Evan Terry Associates (ETA), which serves as the City's required Neutral Accessibility Consultant (NAC), to develop the Accessible Housing Unit Plan (AHUP). The AHUP is intended to guide the process of identifying existing developments for accessibility retrofit to ensure geographic distribution of accessible units throughout the City, in a range of unit sizes, and to maximize affordability and access to public transportation and other amenities, in a cost effective and efficient manner. While the AHUP prioritizes the surveying of newer developments for accessibility retrofit ahead of older developments, it also recognizes the opportunity to leverage other capital investments planned for older developments to facilitate retrofitting units in older buildings.

The process for retrofitting an existing development for accessibility begins with the City's NAC reviewing existing building plans and performing a detailed on-site accessibility survey (inspection) of the property to determine what barriers to accessibility exist that must be remediated to meet applicable accessibility standards. The inspection includes all exterior and interior public spaces, including paths of travel, parking, stairs, and community spaces. In addition, all accessible units are inspected for accessibility, and non-accessible units are inspected for adaptability in compliance with the Fair Housing Act (FHA) and the California Building Code as applicable. Based upon the inspection, the NAC prepares a detailed Architectural Accessibility Conditions Report (NAC Report) identifying barriers to accessibility that must be addressed at the development in order to achieve

accessibility certification under the ACSA and VCA. Based upon the content of the NAC Report, the property owner works with its contractor to develop a scope of work and cost estimate to complete the accessibility retrofit. The AcHP construction staff review the scope of work and cost estimate for cost reasonableness and to ensure that all of the accessibility requirements are addressed.

The accessibility retrofits will require construction work to be performed at occupied housing developments. Property ownership and management will need to coordinate with their contractor and construction crews to minimize disruptions to building operations and tenants. To incentivize property owners to complete the accessibility retrofits, LAHD will offer favorable financing terms. To finance the accessibility retrofits, LAHD will offer no-interest, deferred repayment loans. Loans will be due and payable in full at the same time as existing LAHD or other public financing on the property. Loans will also be subordinate to other existing project financing and be secured by a Deed of Trust recorded on the property title.

Bartlett Hill Manor is the next development to complete the process to be ready to perform accessibility retrofits. LAHD is requesting authority to provide loans totaling up to $1,894,819 to support the required retrofit work on these sites. The work funded pursuant to this request will result in the remediation of 12 accessible units, 8 mobility units and 4 communication units, and all common areas of the housing development. This will result in the certification of 12 accessible units. This will also result in common areas, community rooms, paths of travel, parking, and similar development-wide facilities being brought into compliance with accessibility standards. The accessibility improvements cost approximately $157,901 per unit. While it is generally more efficient and cost effective to ensure accessibility compliance is met during initial construction, because of changes in the HUD and Court-approved certification process, these projects were not able to be certified prior to their initial completion. Therefore, the requested amount will allow for certification of these projects and will enable the City to count the accessible units towards the City's settlement obligations.

Bartlett Hill Manor

Bartlett Hill Manor is a 64-unit housing development with two sites and one building on each site located at 625 Bartlett Ave and 816 Bartlett Ave in Los Angeles that is affordable to lower-income households earning at or below 60% of Area Median Income (AMI). In 2018, LAHD provided financing totaling $1,500,000 to Bartlett Hill Manor to rehabilitate the project. Although the development was completed and occupied, the project was not certified as meeting accessibility requirements due to changes in the HUD and Court-approved certification process.

In 2023, ETA performed an accessibility survey of Bartlett Hill Manor and prepared a NAC Report identifying barriers to accessibility needing to be addressed to achieve certification as required by the ACSA and VCA. The NAC Report identified accessibility barriers in public and community areas, such as narrow access isles, missing accessible parking spaces, walkways and/or hallways with missing railings or handrails, public area exterior door closing speeds that are too fast, noncompliant and inconsistent height, depth, and slope of stairways and railings, out of reach storage space, and missing and improperly installed signage. In addition, within dwelling units, including within both adaptable units and designated accessible units, kitchens sinks do not provide sufficient knee and toe clearance, lavatories have improperly installed grab bars, tub controls are out of reach, balconies do not provide required turning space, and front doors require too much force to open.

The estimated budget for the scope of work to address the accessibility barriers at Bartlett Hill Manor is $1,894,818.78. This estimate includes all hard construction costs, architectural and other fees for review, reports,

and monitoring by required Certified Accessibility Specialists (CASps), a 15% contingency, as well as insurance, and other related and soft costs and contingencies and temporary short-term relocation as necessary. The contingency fee is increased from 10% to 15% for this project because the general contractor is not one of our regular vendors. Upon completion of the accessibility retrofit, the Bartlett Hill Manor apartments will be a fully accessible, 64-unit affordable housing development, including eight mobility units, and four communication units, with accessible paths, community, and common areas. These 12 accessible units, including the mobility and communication units, will count towards the City's obligations under both the ACSA and the VCA.

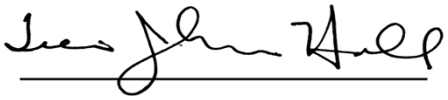
FISCAL IMPACT

Funding for the accessibility retrofit program has already been allocated to AcHP as part of LAHD's approved budget for Fiscal Year 2025-2026. AcHP is funded by the General Fund, and is ineligible for federal funds as required in both the ACSA and VCA.

Approved By:

TIENA JOHNSON HALL
General Manager
Los Angeles Housing Department

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Los Angeles Housing Department