

CITY OF LOS ANGELES
CALIFORNIA

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June 26, 2003

Subcommittee on Housing and Community Opportunity
C/o Congresswoman Maxine Waters
10124 Broadway, Suite One
Los Angeles, CA 90003

**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
THE IMPACT OF CDBG ON OUR COMMUNITIES**

Enclosed is the submission of written statement of Clifford Graves, General Manager for the City of Los Angeles Community Development Department, for the hearing on Monday, June 30, 2003.

Please contact me at (213) 485-1617 if you would like additional information.

Thank you,

Clifford W. Graves
General Manager



SUBCOMMITTEE ON HOUSING AND COMMUNITY OPPORTUNITY

FIELD HEARING
JUNE 30, 2003

*Community Development Block Grant (CDBG)
The Impact of CDBG on our Communities*

TESTIMONY INTRODUCTION

The City of Los Angeles is a dynamic, diverse and complex metropolis, with unique needs and challenges. Its 467 square mile territory is equal to the combined areas of Boston, Minneapolis, St. Louis, Manhattan, Milwaukee, Pittsburgh, San Francisco, and Cleveland. Based on the 2000 Census figures, Los Angeles has:

- 3,694,820 inhabitants (a 6% increase from 1990)
- 816,000 persons in poverty (22.1% of the population)
- 147,516 families below poverty
- 1,512,720 residents were born outside the United States
- Over 140 different languages and dialects are spoken
- 288,496 children (under 18 years old) are below poverty
- 226,813 disabled persons

In addition to these census figures:

- In 2002-2003, the City's population increased by 6 percent (58,948 people, or approximately 20,120 households), there was only a 3 percent increase in dwelling units (5,400) added to the housing stock.
- In the City of Los Angeles, the homeownership rate is 38.6% (renters is 61.4%), compared to the national homeownership rate of 66.2% (renters is 33.8%).
- Between 2002 and 2006, the City is at risk of losing 2,400 affordable rental units per year, further exacerbating the inadequate housing development.

The Census Bureau also estimates that the City of Los Angeles' undercount was 76,800 people, mostly minorities. It is estimated that the City loses \$242.76 in CDBG and state funds for every missed person. When multiplied over the 10-year period that the census data is used, the City of Los Angeles will lose over \$180 million in funding, of which over \$60 million is lost CDBG.

This is the setting for the City Community Development Block Grant (CDBG) Program.

Questions concerning Community Development Block Grant in general

No. 1 What community development activities do you provide to revitalize neighborhoods and enhance economic development? What actions do you take to provide improved community facilities and services?

The City provides CDBG funds yearly for community development activities that revitalize neighborhoods and enhance economic development. A list of the eighty (80) funded projects can be found on Attachment I. The 2003-2004 program year funding levels and activities for the following programs includes:

- Public Services and Community Based Development Organizations, Public Services - \$41,070,382

Highlights of the improved services, the City provides through use of CDBG funding, include the following programs: Human Services Self-Sufficiency Delivery System, Homeless Shelter and Services, LA's BEST, Youth and Family Centers, Aging Services Delivery System, Domestic Violence Shelter Operations, Supplemental Youth Recreation, and Youth Nutrition and Enrichment.

It is important to note that the City is currently operating under a waiver of the 15 percent cap on Public Services. The 25 percent cap expires at the end of the current program year. Reversion to the 15 percent cap would represent a 40 percent reduction in funds available for Public Services funded activity. Without an extension of the 25 percent cap, \$11,229,844 of the City's Public Services are in jeopardy. Extension of the waiver is the City's top CDBG priority.

- Neighborhood Improvements - \$9,251,504

Neighborhood improvement activities include: Alley Closure Program, Code Enforcement, Cornfields, Nuisance Property Abatement, Neighborhood Empowerment Action Team, Sidewalk and Tree Planting, and Neighborhood Block Grant program.

- Economic Development - \$7,812,149

Programs which enhance economic development include: Business Assistance Center (Growth Business, Retail Business, and Microenterprise/Entrepreneur), Northeast Business Assistance Centers, Community Financial Resource Center, Pacoima Community Development Credit Union, Brownfields Development Opportunities, Westlake Commercial Façade and Signage, Commerce Avenue, Marlton Square, Fresh Foods Access, and Sidewalk Vending.

- Public Facilities - \$5,873,178

The City of Los Angeles works to improve community facilities and services through property acquisition, renovation and new construction through CDBG funds. Facility

improvement projects for the 2003-2004 program year include: Neighborhood Facilities Rehabilitation, development of parks (Daniels Field Skate Park, Koreatown Pocket Park, Hope and Peace Park), and construction of public facilities (East Valley Multipurpose Center for Seniors, Homeless Drop-In Center, Temple Beverly Recreation Center)

No. 2 How do you develop your consolidated plan? For example, who writes it and what public input is received? How is it evaluated to see if it's objectives are met, and what are the steps to modify it in light of these findings?

Development of the Consolidated Plan for the City of Los Angeles is conducted by the Community Development Department (CDD). CDD prepares the Consolidated Plan under the direction of the Mayor's Office, in conformance with HUD Consolidated Plan regulations, and compiles contributions of project descriptions, demographics, tables, charts, and project data from over nineteen (19) city departments and related city agencies into a cohesive document. To further depict the City's strategies and goals for HUD funds, illustrative graphs, tables, charts and statistical data are included in the Consolidated Plan.

Public Participation

Public input is encouraged and provided by a citizen advisory board, formally known as the Citizens Unit for Participation (CUP). It is the primary body for scheduling public meetings, workshops, hearings, and solicits public comment on both the draft and final Consolidated Plan. CUP plays an important role in providing citizen review on the draft and final Consolidated Plan, substantial amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER). The CUP also provides citizen input on projects funded through reprogramming of CDBG funds, and is responsible for arranging and chairing public meetings on the Consolidated Plan.

The membership of the CUP is designed to encourage participation by low-and-moderate-income persons, particularly those living in slum and blighted areas; and in areas of Los Angeles where use of CDBG funds are needed. There are now eighteen members of the CUP, including one member-at-large. Council Members appoint CUP members to represent their Council District. The CUP meets monthly and its meetings are publicized on CDD's Home Page, at www.cdd.lacity.org/cup.

Additional public participation processes also include:

- Web posting of the Consolidated Plan,
- Notification to Neighborhood Councils (72 currently certified) of CDBG and Consolidated Plan actions,
- The CUP sponsored regional meetings both before and after the development of the projects recommended for the Consolidated Plan,

- Public Hearings at the City Council Committee's consideration of the Consolidated Plan and any substantial amendments (audio broadcast of Council Meetings is available by phone or the Internet), and,
- City Council meetings (broadcast on television and audio broadcast of Council Meetings is available by phone or the Internet).

Evaluation of the Consolidated Plan is accomplished by:

- The Consolidated Annual Performance and Evaluation Report (CAPER) - The CAPER measures program and project performance against quantitative and qualitative goals established in the Plan. The CAPER is provided to the Mayor, and City Council, and also made available to the public for review.
- Quarterly Reports - City departments and agencies undertaking Consolidated Plan funded activities report accomplishments quarterly to CDD for HUD's Integrated Disbursement and Information System (IDIS) data base. All newly approved projects identify goals and milestones in a Project Expenditure Plan which is monitored quarterly.

Modifications to the Consolidated Plan are considered when a project is not progressing as planned. The City Council and the Mayor's Office will determine if funds will be reprogrammed from one project to support another project. The City has initiated several major reprogramming actions in the past two years to better utilize available funds.

All project activities proposed for reprogramming must also undergo a formal "project readiness review" evaluation to determine if proposed activities are fundable and capable of completion in a timely manner.

City projects funded through the Consolidated Plan are under continuous review.

No. 3 What would be the advantages or disadvantages of state, local or regional administration of the CDBG program?

There are several advantages of local administration. Local control provides flexibility, within federal guidelines, to meet the unique needs and challenges of diverse communities.

No unit of government better understands the dynamics and complexities of the City than its local government. California has a long tradition of "home rule" when it comes to community development. The role of the state is one of enabling local government rather than collaborating. No regional agency in southern California focuses on community development issues.

Los Angeles, the second highest populated city in the nation, will continue to have a significant voice in national issues. Under City control, an equitable distribution of funds is ensured by the Mayor's Office and the fifteen elected City Councilmembers.

The City of Los Angeles enjoys a constructive relationship with HUD's area office. We see no benefit to interjecting another unit of government into the process.

No. 4 How is the decision made to dispense funds from CDBG grant? How are the subgrantees monitored to ensure the funds are used as intended?

Dispensing CDBG Funding

The Mayor and City Council make the final funding decisions related to the CDBG grant. The funding decision is made after an application phase, where City departments and outside agencies apply for grants. Annual programs from prior years must reapply every year. The Mayor's Office reviews the applications and releases its funding recommendation, based upon the Mayor's goals, for public review.

The Mayor makes funding recommendations based on the Consolidated Plan goals. The Mayor's Consolidated Plan goals for 2003-2004 are:

- Increase public safety;
- Increase access to affordable and decent housing;
- Promote the development of our youth;
- Secure our economic future, and
- Protect and assist the City's special needs populations.

After public review and comment (described earlier), the Mayor's CDBG funding proposal goes to the Housing and Community Development and Economic Development and Employment Committees of the City Council. The joint committee holds hearings and works with the Mayor's Office to make changes to the Mayor's proposal, after which, the proposal is sent to the full City Council. The full City Council holds hearings and makes changes to the proposal. A final proposal is developed and approved by the City Council and the Mayor.

It is important to note that the City is currently evaluating alternative allocation methodologies for disbursing CDBG funds across the City. It is expected that a more process for allocation will be used for the 30th year CDBG allocation process.

Once the allocation process is complete, specific projects are funded through a competitive bid process, more commonly known as a Request for Proposal (RFP). Published announcements inform the public of the available funds, funding objectives, criteria for applicants, and the pre-proposal conferences to be held throughout the City. An RFP process is often used to fund projects for public services, neighborhood facilities, housing and economic development.

Monitoring

The Los Angeles Community Development Department applies a comprehensive and complex monitoring system to evaluate projects in three main areas: performance goals, program objectives (clients served, client demographics, services provided), and fiscal performance. The City analyzes deficiencies, feedback and updates on a continuous basis.

The City Controller's Office and the City Administrative Officer periodically conduct in-depth audits and performance reviews of grant programs.

Additionally, the federal General Accounting Office, HUD, DOL and other grantor conduct periodic audits, monitoring visits and performance reviews.

Questions concerning the Los Angeles Community Development Bank

1. How does, or did, the LACDB obtain and disburse its funds?

Funding of the Los Angeles Community Development Bank (LACDB) has primarily been provided by the U.S. Department of Housing and Urban Development (HUD) with Section 108 Loan Guarantees, Economic Development Initiative (EDI) Grants, and Community Development Block Grant (CDBG) entitlement funds. While some private funds have been secured by LACDB, the full partnership with private sector lending institutions originally envisioned for the bank has never materialized.

Pursuant to the December 1994 Notice of Fund Availability (NOFA), HUD approved \$250 million in EDI and Section 108 funds for the Los Angeles "Supplemental Empowerment Zone" target area, with \$200 million for City portions and \$50 million for County portions of the Empowerment Zone. The City received an additional \$200 million in Section 108 Loan Guarantees to be used in eligible areas described in the application, and appropriated \$5 million of its CDBG entitlement for administrative costs and reserves.

The procedures for LACDB obtaining and disbursing funding are specified in the Comprehensive CDB Agreement between the County of Los Angeles, the City of Los Angeles and the LACDB; as well as applicable HUD instructions and guidelines, and City and County accounting policies and procedures.

In accordance with the Comprehensive Agreement, the LACDB is required to submit an Annual Business Plan to the City and County for review and approval with a copy to HUD. Among other things, the Plan must contain a CDB Budget, performance criteria data, reconciliation of actual financial results, and any other amendments, supplements, or modifications to the previous CDB Business Plan. The Annual Business Plan is approved by LACDB's Board of Directors on behalf of LACDB, the Los Angeles County Board of Supervisors on behalf of the County, and the Los Angeles City Council, with the concurrence of the Mayor, on behalf of the City.

The Comprehensive Agreement also specifies fund distribution procedures. With respect to CDBG and EDI Grant funds, LACDB submits a Notice of Grant Distribution Request to the Authorized Representative of the City or County, as applicable. Upon determination that the Notice of Grant Distribution Request is within budget and applicable requirements, the Authorized Representative requests withdrawal of federal funds from the City or County federal line of credit established by HUD for the EDI Grant, and utilizes appropriated funds for the CDBG funding. HUD distributes the funds to a City or County custodial account in accordance with respective Grant Agreements, and from these accounts, funds are disbursed to the LACDB.

The Comprehensive Agreement, as well as HUD's Contract for Loan Guarantee Assistance and Promissory Notes, describe requirements associated with Section 108 loan funds. These funds are drawn directly by the LACDB from HUD, with funds

disbursed to the Collateral Agent in accordance with HUD's Section 108 loan requirements.

2. As an independent Organization, to whom is/was it accountable?

The LACDB, although not a commercial bank, was originally proposed as an innovative project to bring private banking experience and funding to areas traditionally underserved by conventional banking institutions. Therefore, rather than the usual process of the City and/or County making federal funding available and directing nonprofit service providers, the LACDB was intended by both HUD and others to be a nontraditional approach to serving low income communities through the creation of an independent lending institution with access to both federal and local, public and private resources.

Moreover, as documents concerning LACDB operations were being developed, the City was cautioned by HUD, the federal funding entity, to make every effort to assure that the independence of LACDB is not compromised." Accordingly, the LACDB was granted unprecedented autonomy to make loans and investments in underserved communities.

In accordance with the Comprehensive Agreement and as a result of subsequent experiences and audits, steps were taken by the City and County to apply reasonable oversight to LACDB activities in the following ways:

- Reviewed, recommended changes, and approved or disapproved of the LACDB Annual Business Plans;
- Reviewed, recommended changes, and approved or disapproved of LACDB requests for funding in accordance with Comprehensive Agreement, federal guidelines and instructions, and the City policies and procedures;
- Contracted with an independent auditor for quarterly financial and program compliance reviews of LACDB;
- Worked with LACDB and HUD to address operational questions and audit findings;
- Organized quarterly City/County LACDB Oversight Committee meetings, including discussion of LACDB management and outside auditor reports;
- Reviewed and discussed annual financial and compliance reports, and attended annual public meetings; and,

- Organized discussions between LACDB, the Empowerment Zone Oversight Committee, City Workforce Development staff and Work Source Center community-based agencies to facilitate program success.
3. ***It is our understanding that the LACDB is no longer operational. What happened to the projects that it was funding? What will happen to any unobligated funds that remain?***

Current Operating Conditions

The LACDB is still operational, and it is operating in accordance with its last Annual Business Plan, entitled the Transition Plan of the Los Angeles Community Development Bank.

More specifically, the City Council and the Mayor disapproved of LACDB's 2002 Business Plan due to issues including:

- LACDB compliance with the required use of funds for loans and investments to business located in the Empowerment Zone;
- LACDB compliance with required hiring of Empowerment Zone residents; and,
- Insufficient funds from the City's EDI Grant or other sources for: 1) administrative needs; 2) adequate security for high-risk loans in the existing portfolio; and 3) adequate security for the remaining supplemental Section 108 authority.

Consequently, the City Council and Mayor directed City staff to work with the LACDB on an approach to LACDB plans and operations through calendar year 2003 that would allow the LACDB to:

- Pursue improvement of LACDB's financial condition;
- Help meet job creation and other regulatory, legal, and contractual responsibilities; and,
- Transition to sustainable self-sufficiency or the winding up of LACDB operations of functions by another entity.

The LACDB has developed a transition plan that contains several actions, including:

- Solicit and evaluate proposals for outside parties to acquire LACDB's venture capital portfolio;
- Request and evaluate proposals for outside parties to perform any or all of the following: 1) service loan portfolio; 2) monitor job compliance; and 3) purchase loan portfolio;
- Assess debt obligations to HUD with respect to borrower repayments, and propose means to best meet financial obligations;
- Develop processes and procedures for addressing accounting, asset, and records management issues;
- Adjust staffing levels according to operational needs; and,
- Work with the City, County and HUD on legal and operational documents and processes for the transition.

Funded Loans/Investments

There are approximately 60 LACDB loans with balances of over \$16 million for which payments are still being collected. There are also approximately 30 loans that have been written-off, but for which LACDB is still seeking recovery from the remaining loan balance that totals over \$5 million. Additionally, there are 7 open venture capital companies, with LACDB investments valued at over \$7 million. Servicing and monitoring these funded loans and investments to ensure that they meet financial and other legal obligations remains a priority of the LACDB and the City.

Unobligated Funds

There remains over \$196 million in Supplemental Section 108 loan guarantee authority that is currently allocated to LACDB. Since prior history, current reserves, and future projections, indicate that the LACDB will be unable to prudently loan these funds in the time remaining for City-supported LACDB operations, the City has requested HUD to reallocate that loan authority as follows:

- Up to \$50 million to be used in accordance with the original HUD Section 108 Loan Guarantee Program Application. This City is moving forward on approval of this portion so that the funds may be immediately available; and,
- The full amount of remaining Section 108 loan authority (approximately \$146 million plus the aforementioned \$50 million for a total of \$196 million) is also being recommended for use in the geographic areas described in the original Supplemental Section 108 application. However, the City is recommending that this lending authority be used for broader CDBG national objectives and eligible purposes than those originally intended for this funding (e.g., elimination of slum and blight; provision of goods and services; creation of mixed-use or housing projects that help address community needs and development).

Because the second action requires an amendment to the original Supplemental Section 108 application, the City proposes to proceed immediately with the \$50 million reallocation described above, and then include this amount with the remaining \$146 million for a total of \$196 million in the amendment.

HUD has been favorably disposed toward the City's request, but has required that the uses of funding be consistent with original Section 108 application or amended appropriately. Additionally, the Los Angeles Empowerment Zone Strategic Plan application and the City Consolidated Plan may require modification to directly use the funds already allocated to the City of Los Angeles, but currently earmarked for LACDB, for these activities.

It is important to note that although the LACDB was created as a unique experiment in economic development, the City remains committed to the mission of providing capital and improving conditions in the affected communities in need. The map, Attachment II, indicates areas that qualify for the aforementioned remaining Supplemental Section 108

loan authority. These areas include the City Empowerment Zone and the areas of the City meeting poverty qualifications delineated in 24 CFR 570.208 (a) (4) (iv-v).

Clearly, this geographic area is large and the need for community development great. However, we believe that affordable and effective loan programs can help the City meet this challenge. There have been lessons learned from the LACDB experience, including the need for:

- Practical program requirements

For example, LACDB required that borrowers must have been turned down for a loan at least once by a commercial bank before applying for a loan with LACDB, which made LACDB lending more risky and repayments more challenging than in typical financing situations. Further, there were federal requirements with respect to job creation numbers and income level that did not consider the situations of struggling borrowers and employment demographics in way that would ensure business and program success.

- Adequate financial/compliance controls

As indicated above, structuring a publicly-funded entity with the independence allowed LACDB in areas of lending, investing, contracting, and conducting operations did not fully produce desired or required outcomes. Moreover, this independent arrangement has left the City with needing to address resulting financial and contractual obligations, regulatory and legal issues, and public image and service matters for which it was not involved or responsible.

- Reliable private sector involvement

The LACDB was formed with commitments by financial institutions to co-lend with LACDB. However, the commitments were non-binding, and the public-private partnerships did not materialize as envisioned. Consequently, LACDB was left with riskier loans and poorer results than would otherwise have been expected with private capital participation.

- Strategic utilization of resources

LACDB made loans and investments on a case-by-case basis. However, in order to have effective outcomes for individual borrowers and larger communities, there ought to be consideration of strategies to make use of federal funding in ways that are integrated into City goals, priorities, and development plans.

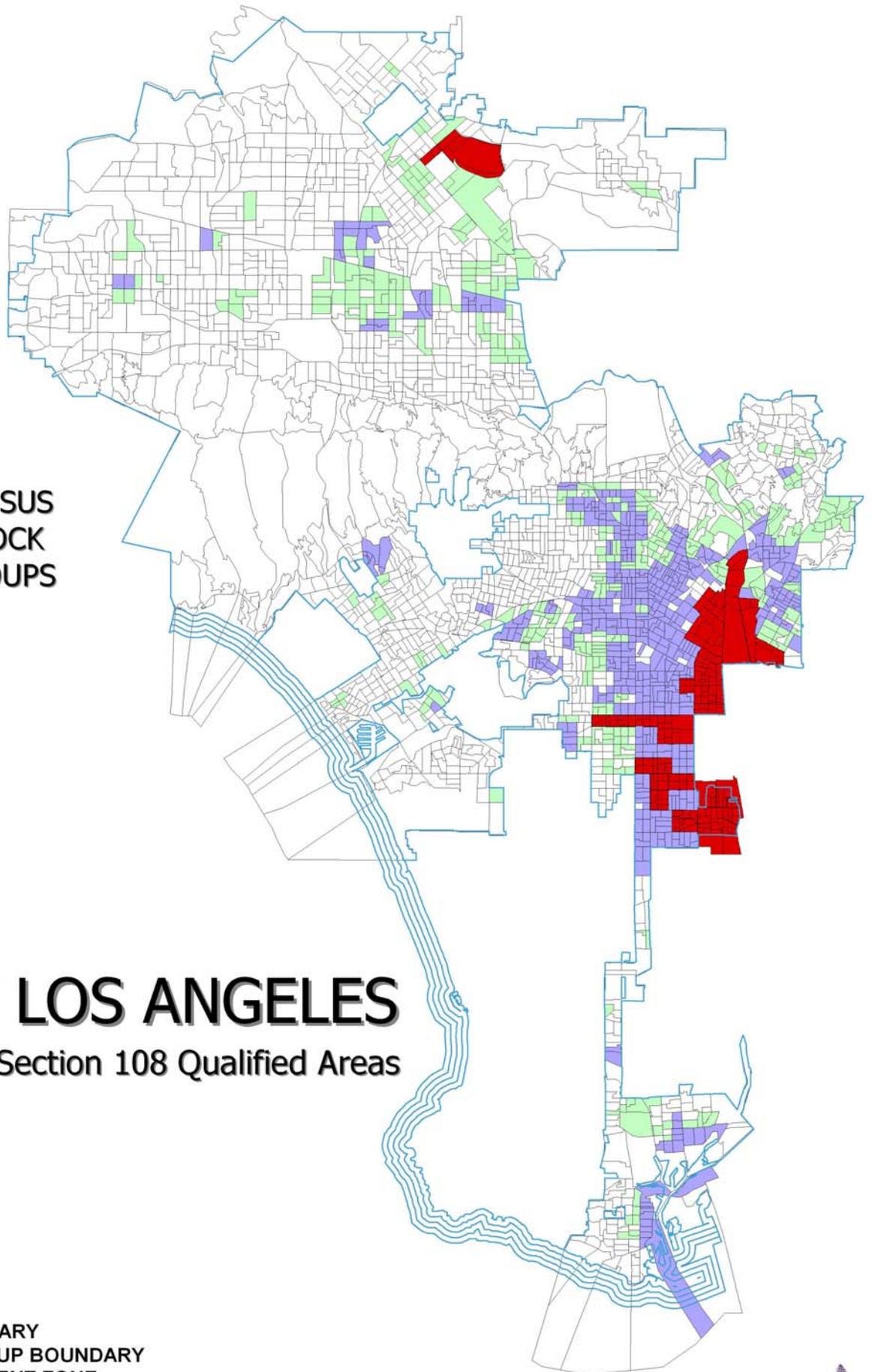
This lending authority can be used effectively in concert with other City programs such as federal, state, and local tax incentives; business assistance and Work Source job placement centers; and Industrial Development/Empowerment Zone bond financing. The City is undertaking a number of economic develop initiatives

that will further guide these investments. The area and population to be served are essentially the same that LACDB was chartered to serve.

City of Los Angeles		
Approved 2003-2004 CDBG Budget		
#	PROGRAMS/PROJECTS	CDBG
1	Citywide Home Secure Program	599,908
2	Handyworker	4,085,000
3	Citywide Housing Rehabilitation	6,390,819
4	Nuisance Abatement - City Attorney PPRT - Falcon	1,035,158
5	Section 108 Debt Service	1,955,976
6	LAHSA Respite Center for Homeless Families and Women	800,000
7	Neighborhood Facilities Rehabilitation	1,411,100
8	Daniels Fields Skate Park	150,000
9	East Valley Multipurpose Center for Seniors	350,000
10	Garvanza Skate Park	510,000
11	Koreatown Pocket Park	170,000
12	Hope and Peace Park	50,000
13	Toberman Capital Development Program	150,000
14	Alley Closure Program	300,000
15	Code Enforcement-Citywide PACE	889,235
16	Nuisance Property Abatement-Demolition	200,000
17	Neighborhood Empowerment Action Team	2,027,592
18	Sidewalk and Tree Planting	1,950,000
19	Neighborhood Block Grant Program	3,698,496
20	Brownfields Development Opportunities	1,000,000
21	Business Assistance Centers - Growth Business	300,000
22	Business Assistance Centers - Microenterprise/Entrepreneur	1,500,000
23	Business Assistance Centers - Retail Business	532,000
24	Community Financial Resource Center	180,000
25	Fresh Foods Access Program (Farmer's Market)	155,149
26	Marlton Square Project	1,750,000
27	Housing Development - New Construction	6,162,213
28	Housing Development - Acquisition/Rehabilitation	4,108,142
29	Aging Services Delivery System	1,776,354
30	AIDS Prevention	1,077,500
31	Central City Neighborhood Partners (Youth Fair Chance)	602,664
32	Domestic Violence Shelter Operations	1,393,330
33	Housing Authority - Community Service Centers	1,025,904
34	Human Services Delivery System	9,276,109
35	LAHSA Beyond Shelter Assistance for Skid Row Families	137,166
36	LAHSA Central City East Public Sanitation	312,000
37	LAHSA Homeless Emergency Shelter & Services	2,288,212
38	LAHSA Rent to Prevent Eviction	250,000
39	LAHSA Winter Shelter Program	95,333
40	LAHSA Year Round Emergency Shelter - Hollywood	400,000
41	LA's Best (Better Educated Students for Tomorrow)	2,000,000
42	Library Community Jobs Program	200,000
43	Operation Clean Sweep - Public Works Board	1,080,700
44	South Central Youth Opportunities	1,140,992
45	Summer Zoo Camp Scholarship Program	111,300
46	Supplemental Youth Recreation Program	1,550,735

City of Los Angeles		
Approved 2003-2004 CDBG Budget		
#	PROGRAMS/PROJECTS	CDBG
47	Youth and Family Centers	2,676,868
48	Youth Nutrition and Enrichment Program - Off Track	1,200,693
49	CBDOS - Aging Services Delivery Systems	562,702
50	CBDOS - Clean and Green Job Program	1,034,300
51	CBDOS - Day Laborer	1,099,939
52	CBDOS - Domestic Violence Shelter Operations	1,863,238
53	CBDOS - Human Services Delivery System	2,976,343
54	CBDOS - LA Bridges Program	275,000
55	CBDOS - LA Youth At Work	100,000
56	CBDOS - Operation Clean Sweep	180,000
57	LAHSA Special Activities by CBDOS	4,333,000
58	AIDS Policy Planning	896,063
59	Citizens Unit for Participation	50,000
60	Computerized Information Centers - Dept. on Disability	214,854
61	Fair Housing	500,000
62	General Program Administration - CDBG - CDD	15,014,979
63	General Program Administration - CDBG - Other Departments	1,331,229
64	General Program Administration - LAHD - CDBG & HOME	1,925,000
65	General Program Administration - LAHSA	1,150,000
66	Planning Department	244,367
67	Shelter Partnership - Technical Assistance	156,874
68	Repayment of Reprogrammed Projects	3,250,657
69	UDAG Swap for LA's Best	1,665,000
70	Proyecto Pastoral at Dolores Mission	50,000
71	Cornfields	186,181
72	Delano Recreation Center	250,000
73	Temple Beverly	2,032,078
74	Commerce Avenue	80,000
75	Northeast Los Angeles Business Assistance Center	75,000
76	Pacoima Community Development Credit Union	200,000
77	Sidewalk Vending	75,000
78	Westlake Commercial Façade & Signage Program	300,000
79	Elysian Park Master Plan	50,000
80	Affordable Housing Trust Fund	500,000
Total Funds Programmed		113,628,452

CENSUS
BLOCK
GROUPS



CITY OF LOS ANGELES

Supplemental Section 108 Qualified Areas

-  CITY BOUNDARY
-  BLOCK GROUP BOUNDARY
-  EMPOWERMENT ZONE
-  30% QUALIFICATION LEVEL; QUALIFIED BLOCK GROUP
-  20% QUALIFICATION LEVEL; QUALIFIED BLOCK GROUP

