CALIFORNIA COASTAL COMMISSION

South Coast District Office 301 E. Ocean Blvd., Suite 300 Long Beach, CA 90802 (562) 590-5071



F18a

5-18-0872 (Sunshine Enterprises, LP)

June 12, 2020

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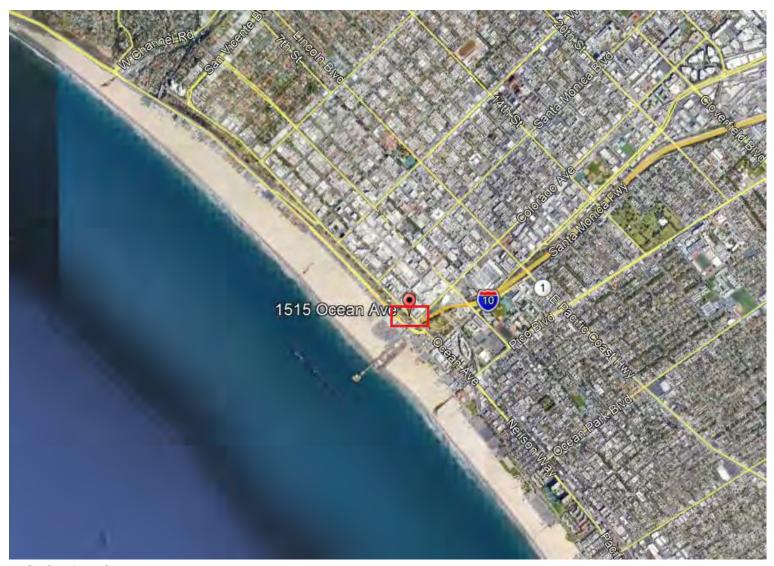
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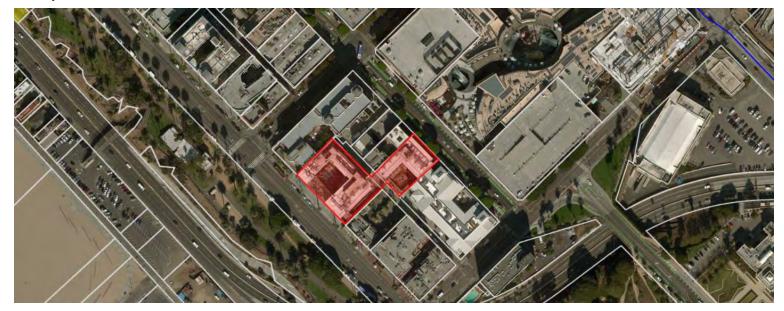
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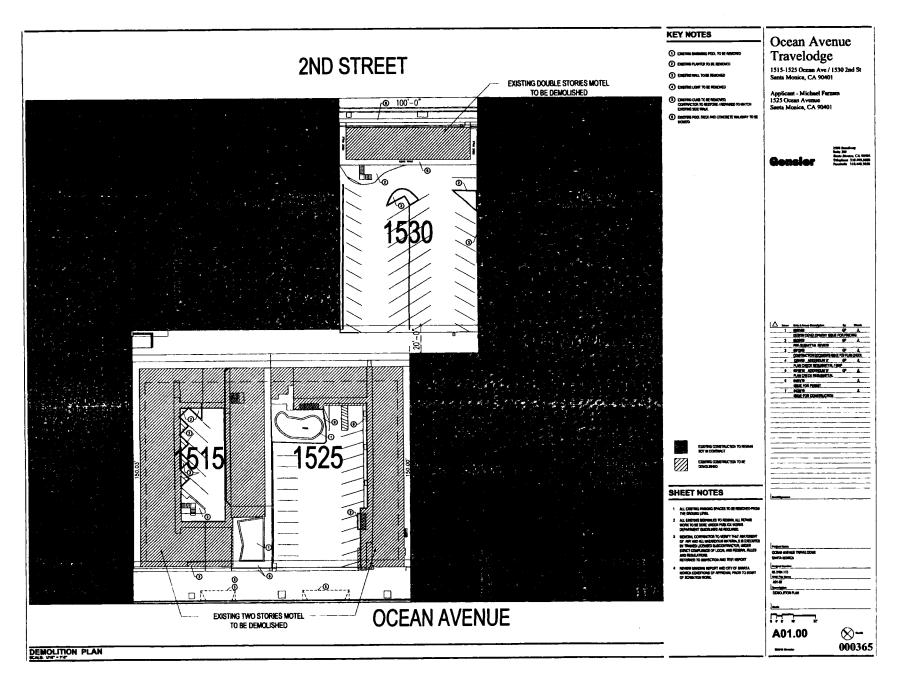
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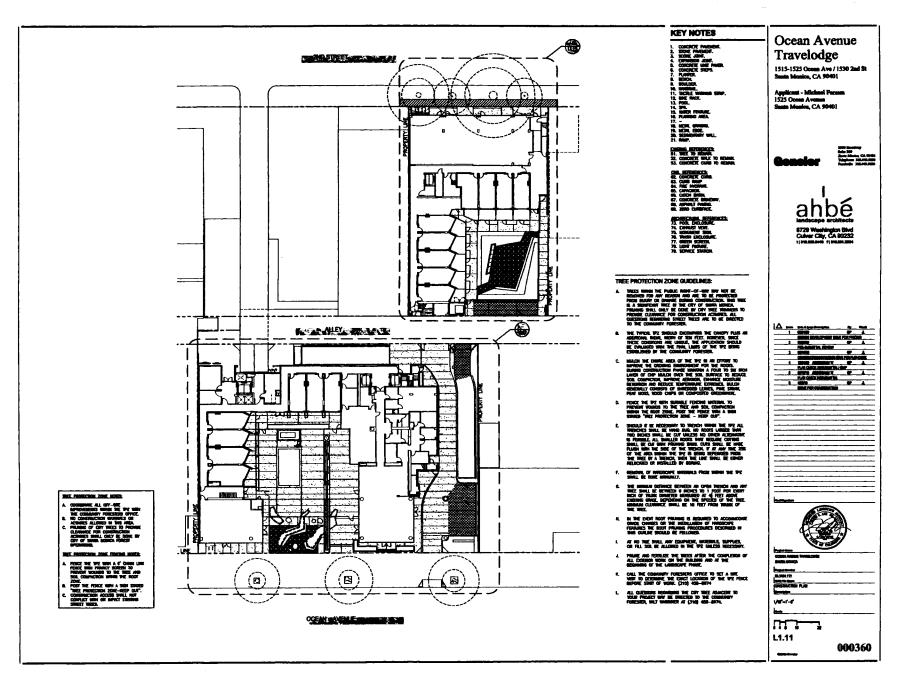


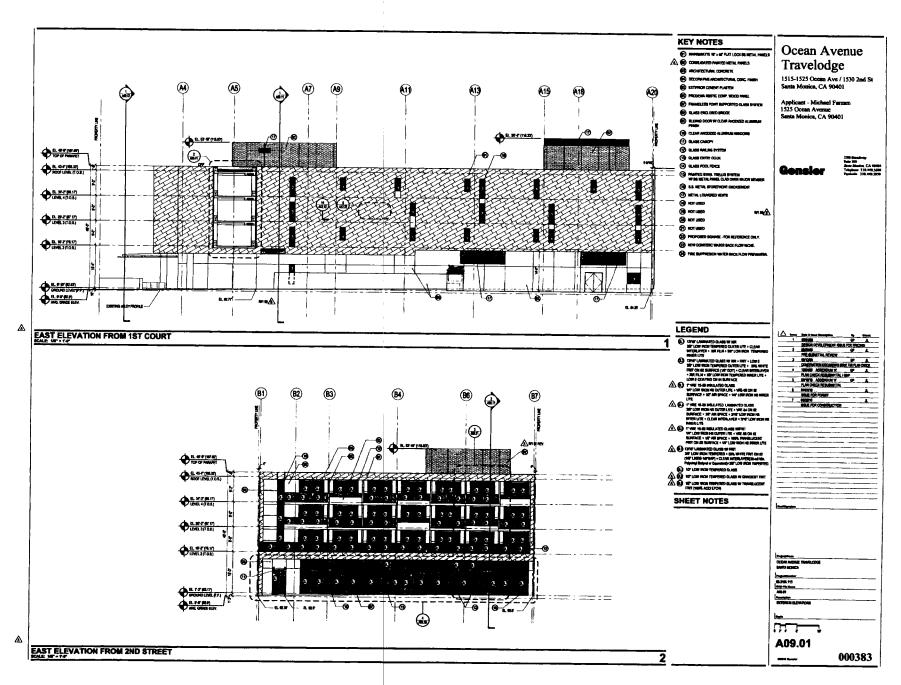
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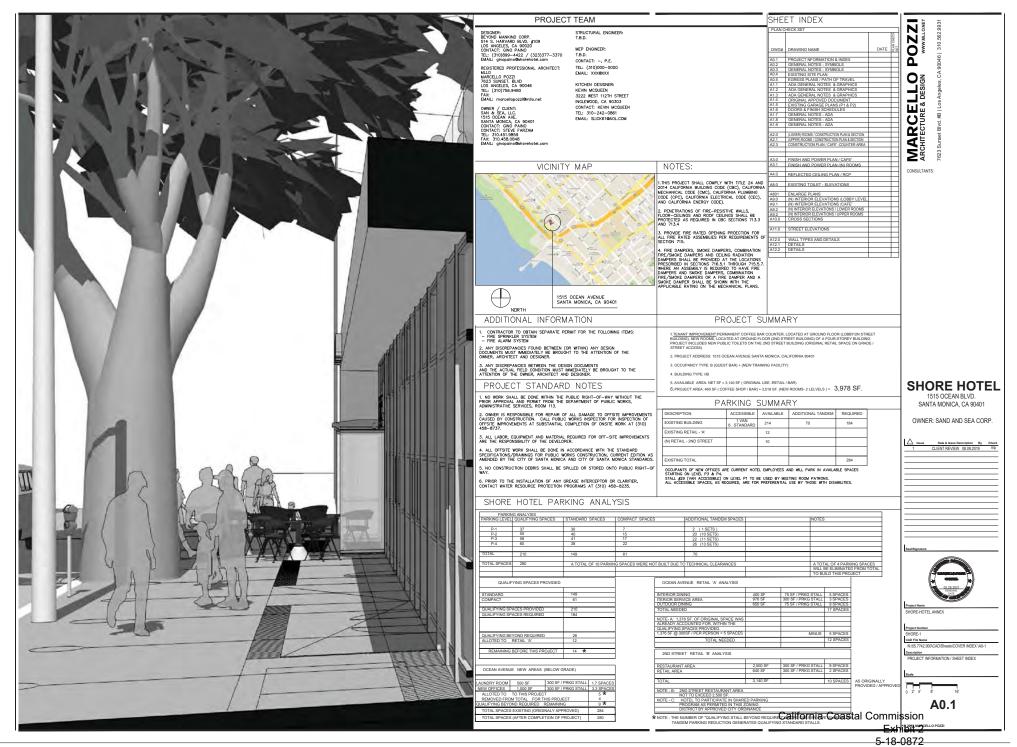


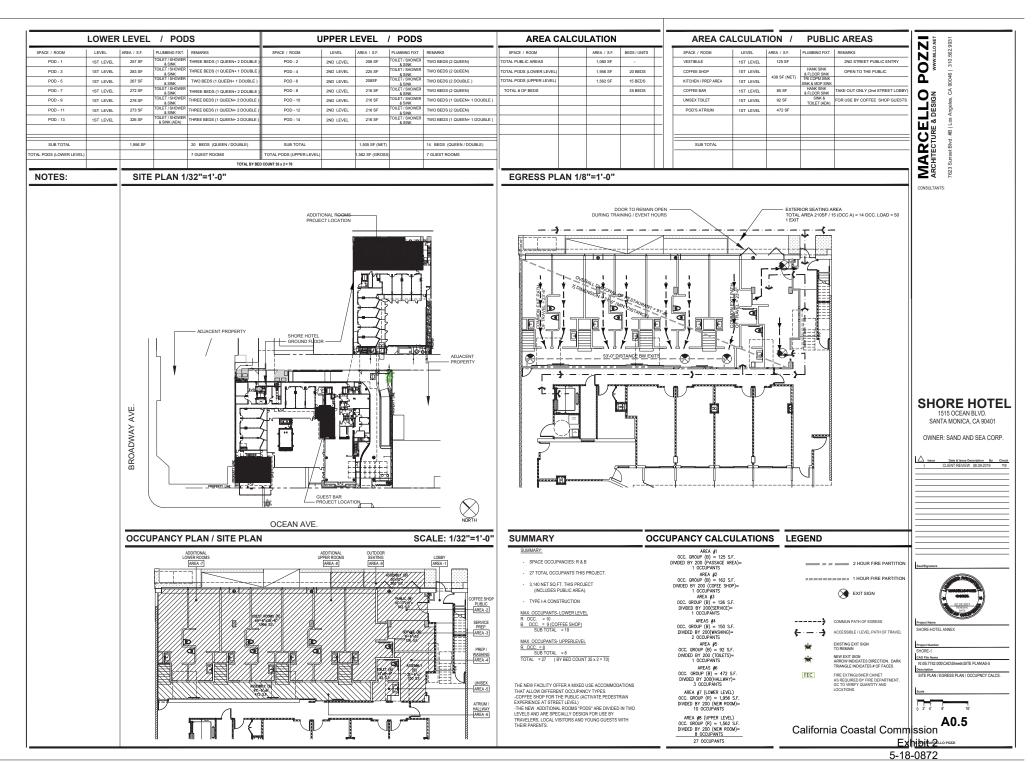
Project Site

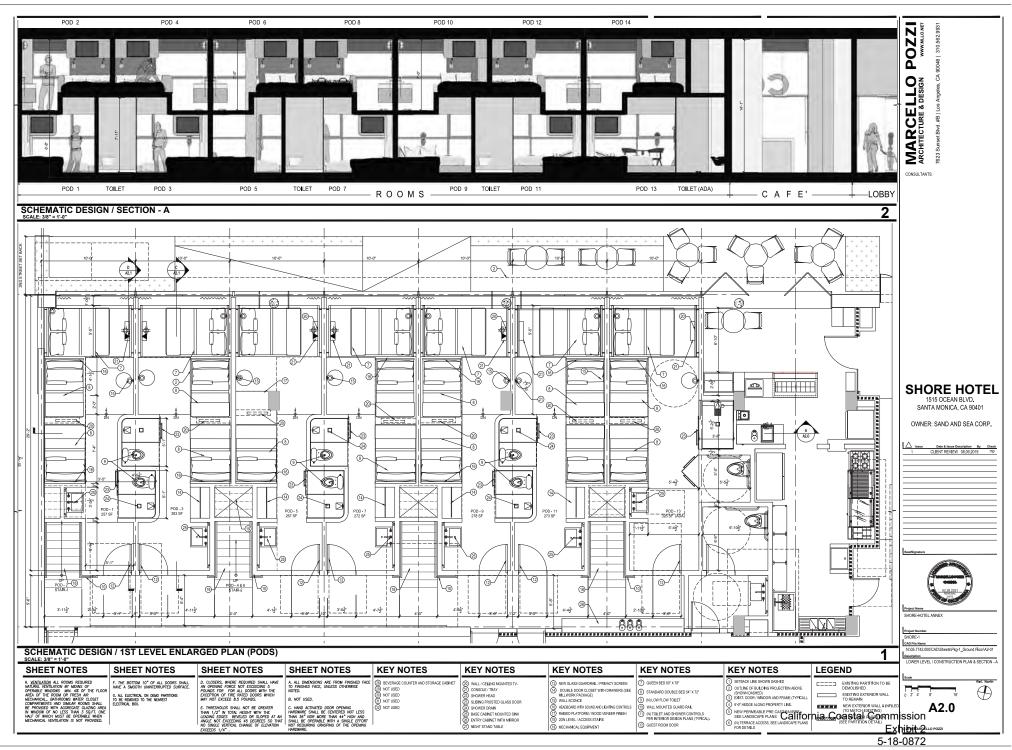


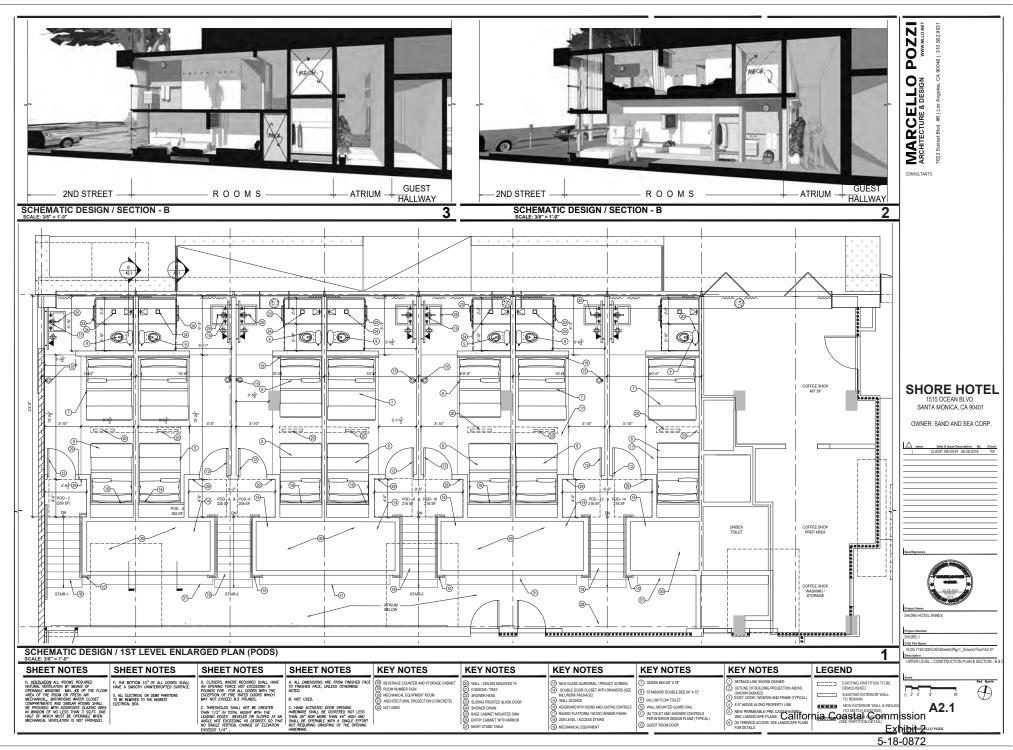














SCHEMATIC DESIGN / SECTION - D

MARCELLO POZZI
ARCHITECTURE & DESIGN WWW.MLO.NET
7023 Survei Blvd. #8| Los Angeles, CA 80046 | 310.562.8931

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Exhibite 2 LLO POZZ

5-18-0872 Page 8 of 8

ORDINANCE NUMBER 1516 (CCS)
(City Council Series)

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SANTA MONICA IMPLEMENTING POLICY 45 OF THE CITY OF SANTA MONICA DRAFT LOCAL COASTAL PROGRAM ESTABLISHING MITIGATION FEES FOR THE REMOVAL OF LOW COST LODGING ACCOMMODATIONS IN THE SANTA MONICA COASTAL ZONE

THE CITY COUNCIL OF THE CITY OF SANTA MONICA DOES ORDAIN AS FOLLOWS:

SECTION 1. Findings and Purpose. The City Council finds and declares:

- (a) In recent years, there has been a significant shift in the development of visitor accommodations within the Santa Monica Coastal Zone from low cost lodging accommodations to luxury lodging accommodations. Since 1984, six luxury hotels containing 1,109 rooms have received City approvals within the Coastal Zone while no new low cost rooms have been proposed in this area.
- (b) The City of Santa Monica has experienced a significant reduction in the number of low cost lodging accommodations due to demolition and conversion of existing units and construction of office development and luxury lodging accommodations. Since 1984, approximately 355 low cost rooms in the Coastal Zone have been demolished and not replaced, representing a loss of forty-five percent (45%) of the low cost rooms existing in the Coastal Zone as of 1984.

- (c) The vast majority of visitor accommodations in the Coastal Zone removed from the market due to demolition are low cost ledging accommodations.
- (d) The demolition of low cost lodging accommodations in combination with the replacement by, and new construction of, luxury lodging accommodations has altered the balance and has contributed to the scarcity of affordable visitor accommodations in the City. Only fifteen percent (15%) of the total hotel-motel accommodations which will exist in the Coastal Zone once the new City-approved accommodations are completed, will be low cost accommodations.
- (e) Policy 45 of the Draft Local Coastal Program provides for a mitigation fee where new development removes low cost lodging accommodations.
- (f) Pursuant to the police power, the City has the authority to address both the imbalance created by the removal of existing low cost lodging accommodations and the overall need for affordable visitor accommodations in the City.
- (g) The purpose of this Ordinance is to reduce the negative impact on affordable visitor accommodations caused by new commercial and new hotel and motel development which requires demolition of existing visitor accommodations.
- (h) New commercial and new hotel and motel development which requires demolition of existing low cost lodging accommodations is generating a reduction in the City's affordable visitor accommodations, and increases the imbalance between coastal activities and affordable visitor accommodations in the City.

- (i) The City has a continuing need for low cost visitor accommodations and such need is exacerbated by the demolition and conversion of such units and construction of new commercial developments.
- (j) Any fees collected pursuant to this Ordinance shall be used only to finance the construction of low cost lodging accommodations.
- (k) The fee requirements of this Ordinance will help diminish the overall loss of low cost lodging accommodations in the City and to mitigate the adverse consequences of removal of low cost lodging accommodations in the Coastal Zone.
- (1) The facts and evidence presented in the Draft Local Coastal Program dated October, 1989, in the "Santa Monica Coastal Zone Motel and Hotel Room Survey" prepared by Willdan Associates, dated January 18, 1990, and in the California Coastal Act of 1976, establish that there is a reasonable relationship between the need for the replacement of low cost visitor accommodations which is removed by demolition and the fee established by this Ordinance, and also that there is a reasonable relationship between the use of the fee and the type of development for which the fee is charged.
- The fees required by this Ordinance do not exceed the reasonable costs of constructing replacement units "Evaluation of Financial demonstrated the Assistance by Requirements for the City of Santa Monica's Overnight Affordable Accommodations Program," a studied prepared by Natelson Levander Whitney, Inc., dated December 11, 1989.

SECTION 2. Definitions. The following words or phrases as used in this Ordinance shall have the following meanings:

- (a) <u>Fee</u>. A fee paid to the City by a developer pursuant to this Ordinance to mitigate the removal of low cost lodging accommodations.
- (b) Low Cost Lodging Accommodation. Any hotel or motel unit, designed, occupied, or intended for occupancy, as a temporary lodging place for individuals for less than thirty (30) consecutive calendar days for which the room rate was Eighty Dollars (\$80.00) or less as of December 12, 1989, or as of the last day of operation if the hotel or motel was not in operation as of that date.
- (c) <u>Remove or Removal</u>. The demolition of low cost lodging accommodations or the conversion of such units to other use.
- (d) <u>Santa Monica Coastal Zone</u>. The approximately 1.5 square miles bounded on the west by the Pacific Ocean, on the south by the City's southern boundary, on the east by Lincoln Boulevard south of Pico Boulevard, and by 4th Street north of Pico Boulevard as far north as San Vicente Boulevard. Along the San Vicente Boulevard centerline, the boundary goes inland to 7th Street to the northern City boundary.
- (e) <u>Site</u>. One or more contiguous parcels under common ownership which have been used, developed, or built upon as a unit.

SECTION 3. Mitigation Fee Requirement.

- (a) No person shall remove low cost lodging accommodations in the Santa Monica Coastal Zone unless the person has complicate with the provisions of this Ordinance.
- (b) No permit, license, or other approval shall be issued or granted by the City for the development or use of any property from which any low cost lodging accommodations have been removed until the person seeking the license, permit, or other approval has complied with this Ordinance.

SECTION 4. Applicability. This Ordinance shall apply to:

- (a) Any development, project, or other activity involving the removal of any low cost lodging accommodations in the Santa Monica Coastal Zone. For purposes of this Ordinance, development, project, or other activity shall include the creation of a parking lot, open space, or vacant land on a site previously occupied by low cost lodging accommodations.
- (b) Any site located in the Santa Monica Coastal Zone from which the removal of low cost lodging accommodations has been approved and as to which a condition requiring the payment of a mitigation fee has been imposed by the California Coastal Commission.

SECTION 5. Fee.

- (a) The low cost lodging mitigation fee required by this Ordinance shall be satisfied by payment of a fee to the City in the amount required by this Section.
- (b) The amount of fee required pursuant to this Section shall be based on the number of units to be removed. For each

low cost lodging unit removed, a fee of Eight Thousand Dollars (\$8,000.00) shall be required.

- (c) Any fee payment required pursuant to this Section shall be adjusted for inflation by the percentage change in the Consumer Price Index ("CPI") multiplied by .65 plus the percentage change in land cost multiplied by .35 between the date of adoption of this Ordinance through the month in which payment is made.
- (1) For purposes of this Section, CPI shall mean the index for Urban Wage Earners and Clerical Workers for the Los Angeles/Long Beach/Anaheim statistical area, as published by the United States Department of Labor, Bureau of Labor Statistics.
- (2) For purposes of this Section, "land cost" shall mean the average purchase price per square foot for commercially zoned property, as determined through an independent survey performed for the Community and Economic Development Department by a qualified real estate consultant and adjusted on an annual basis.

SECTION 6. Payment of Fee.

- (a) At the time of application for a demolition permit or other approval necessary for the removal of low cost lodging accommodations located in the Santa Monica Coastal Zone, the developer shall enter into a compliance agreement for payment of the fee in accordance with the provisions of this Section.
- (b) The compliance agreement shall contain the following requirements:

- (1) At least fifty percent (50%) of the fee shall be paid prior to issuance of a demolition or building permit for a project on the site.
- (2) The balance of the fee shall be paid prior to issuance of the certificate of occupancy for any development or conversion on the subject site. If no certificate of occupancy is required for the conversion or other new activity on the subject site, the balance of the fee shall be due upon commencement of the new activity or within one year, whichever occurs sooner.
- (3) The agreement shall create a lien on the property which shall be binding on the developer and any successor of the developer, including any person acquiring an interest in the property by foreclosure, trust sale, or other proceeding.
- (4) Payments shall be adjusted annually for inflation pursuant to Section 5.
 - (5) The compliance agreement shall be recorded.
- (6) Such other provisions as are reasonably deemed necessary by the City to ensure payment of the fees required by this Ordinance.
- (c) The fee required by this Ordinance shall not become effective until sixty (60) days from its adoption, pursuant to Government Code Section 65962(a).
- SECTION 7. Deposit and Use of Fee. Any payment made pursuant to this Ordinance shall be deposited in a Reserve Account separate from the General Fund to be used only for

development of low cost lodging accommodations in the Santa Monica Coastal Zone. Any interest income earned by monies in such account shall be expended only for development of low cost lodging accommodations in the Santa Monica Coastal Zone.

SECTION 8. Applicability of Other City Ordinances and Regulations. None of the provisions in this Ordinance are intended to supersede any provisions of the City Charter, ordinances, regulations, or resolutions concerning demolition of residential housing, relocation of displaced tenants, rent control removal within fifteen (15) days after its adoption.

SECTION 9. Any provision of the Santa Monica Municipal Code or appendices thereto inconsistent with the provisions of this Ordinance, to the extent of such inconsistencies and no further, are hereby repealed or modified to that extent necessary to affect the provisions of this Ordinance.

SECTION 10. If any section, subsection, sentence, clause, or phrase of this Ordinance is for any reason held to be invalid or unconstitutional by a decision of any court, of any competent jurisdiction, such decision shall not affect the validity of the remaining portions of this Ordinance. The City Council hereby declares that it would have passed this Ordinance, and each and every section, subsection, sentence, clause, or phrase not declared invalid or unconstitutional without regard to whether any portion of the Ordinance would be subsequently declared invalid or unconstitutional.

SECTION 11. The Mayor shall sign and the City Clerk shall attest to the passage of this Ordinance. The City Clerk shall cause the same to be published once in the official newspaper within 15 days after its adoption. This Ordinance shall become effective 30 days from the date of its adoption.

APPROVED AS TO FORM:

ROBERT M. MYERS

City Attorney

Adopted and approved this 27th day of February, 1990.

Mayor Pro Tempore

I hereby certify that the foregoing Ordinance No. 1516(CCS) was duly and regularly introduced at a meeting of the City Council on the 20th day of February 1990; that the said Ordinance was thereafter duly adopted at a meeting of the City Council on the 27th day of February 1990 by the following Council vote:

Ayes: Councilmembers: Abdo, Finkel, Jennings, Katz,

Reed

Noes: Councilmembers: None

Abstain: Councilmembers: None

Absent: Councilmembers: Genser, Mayor Zane

ATTEST:



AUG 2 8 2014

BUSS-SHELGER ASSOCIATES

Real Estate Consultants

CALIFORNIA Los Angeles
COASTAL COMMISSICTELEPHONE

865 S. Figueroa Street, Suite 3338 Los Angeles, California 90017

Telephone: (213) 388-7272 Facsimile: (213) 388-5276 E-Mail: bussshelger@pacbell.net

September 6, 2013

Economic Development Division City of Santa Monica 1901 Main Street Suite D Santa Monica, CA 90405

Attention:

Ms. Nia Tang

Senior Development Analyst

Subject:

Analysis of Mitigation Fees

Removing Low Cost Lodging at Shore Hotel

1515 Ocean Avenue

Santa Monica, California 90401

Our File No. 4794-13

Ladies & Gentlemen:

This consulting report has been prepared in order to assist in determining the mitigation fee for the removal of the affordable lodging obligation at the Shore Hotel, and potentially others. As part of the process of determining the 1990 adjusted obligation in the event of non-compliance, both the CPI components and the change in commercial land values over time have been investigated and defined. As it relates to July 2013, the February 1990 base level fee of \$8,000 per unit is now indexed to the following figure:

CPI Index Component (65	%)\$ 9,507
Land Cost Index (35%)	<u>7.322</u>
Total Adjusted 2013 Fee	\$16,829

Set forth within this study are the aggregate yearly increases which can be related to different points in time, depending on City needs. As it relates to the units at the Shore Hotel, which is in question, the following mitigation fee is applicable through July 2013.

Shore Hotel - 72 units @ \$16,829/unit \$1,211,688

The ensuing report addresses the key issues which is determining the change of CPI index, and more importantly the extent of land value increase over the past 23 years.

Respectfully submitted,

BUSS-SHELGER ASSOCIATES

Olmall Bun

Ronald L Buss

James D. Joshinson

BUSS-SHELGER ASSOCIATES

BACKGROUND

Introductory Information

This report is intended for the use of the City of Santa Monica to calculate the cost of the mitigation fees associated with the removal of the low cost lodging accommodations in the Costal Zone. A major portion of this report focuses on the change of value for commercial land in Santa Monica between early 1990 and early 2013.

There is sufficient market information in this study to value the land beneath the Shore Hotel, however that is not within the scope of this assignment. The affordable lodging housing mitigation fee for 2013 is set forth on the previous transmittal page. In the event the fee determination is retrospective, the appropriate unit charge for the year in question may be found on the last page of this study.

Ordinance No. 1516

The ordinance cited above was enacted to determine mitigation fees for taking affordable lodging units off the market. The base level of these fees is \$8,000 per unit for each low cost lodging unit removed, this rate was established February 27, 1990. To take into consideration inflation, the following formula was established per Ordinance No. 1516.

- 65% of the base level fee of \$8,000 per unit is to be adjusted based on the
 percentage change in the Consumer Price Index (CPI) between the date of
 the adoption of the ordinance and the date in which payment of the
 mitigation fee is made. The CPI index will be based on the year-end 1989
 figure posted by the Bureau of Labor Statistics.
- 35% of the base level fee of \$8,000 per unit is to be adjusted based on the percentage change in the land cost between the date of adoption of the Ordinance and the date in which payment of the mitigation fees is made. Land cost shall mean the average purchase price per square foot for commercially zoned property; it is assumed to be confined to the City of Santa Monica.

CONSUMER PRICE INDEX CHANGE

Background

The Consumer Price Index (CPI) as of year-end 1989 was 127.0 increasing to 232.19 by July 2013, 23 plus years later. This report provides an annual escalation factor for each year from the beginning of 1990 through July 2013 and the attendant mitigation fee for each year. CPI refers to the index for Urban Wage Earners and Clerical Workers for the Los Angeles/Riverside/Orange County statistical area as published by the United States Department of Labor. The CPI component adopted in Ordinance No. 1516 applies a 65% factor to an \$8,000 per unit basis, this equates to \$5,200 per unit which is shown in the table below.

CPI Table

Beginning	Consumer	Percent	Base Unit
Year	Price Index	Increase	Charge
1990	127.000	Base (0%)	\$5,200
1991	135,200	6.46%	\$5,536
1992	138.600	9.13%	\$5,675
1993	143.500	12.99%	\$5,875
1994	146.700	15.51%	\$6,006
1995	148.100	16.61%	\$6,063
1996	149,400	17.64%	\$6,117
1997	152.700	20.24%	\$6,252
1998	155,300	22.28%	\$6,359
1999	157,200	23.78%	\$6,437
2000	160.600	26.46%	\$6,576
2001	166.600	31.18%	\$6,821
2002	170.700	35.20%	\$7,030
2003	176.700	39.13%	\$7,235
2004	180,200	41.89%	\$7,378
2005	188.500	48.43%	\$7,718
2006	195.500	53.94%	\$8,004
2007	202.900	59.76%	\$8,307
2008	212.282	67.15%	\$8,692
2009	211.007	66.15%	\$8,640
2010	216.233	70.26%	\$8,854
2011	219.619	72.93%	\$8,992
2012	224.444	76.73%	\$9,190
2013	228.649	80.04%	\$9,362
8/13	232.190	82.83%	\$9,507

LAND VALUE CHANGE

Background

Land purchases in the city of Santa Monica were researched for sales in the mid-year 1989/90 timeframe, as well as currently. In compliance with the Ordinance the sales data were averaged for each time frame to ascertain the average commercial land value. The average percentage change will be determined for each of the 23 yearly intervals. Sales that were not Commercial Zoned were not considered as the Ordinance specifically requires Commercial Zoned property.

1990 Price Level

Our research and previous Buss-Shelger files produced eight sales from the one-year period of mid-1989 through mid-1990. These acquisitions ranged from 4,792 square feet to 37,462 square feet, the prices paid ranged between a low of \$73 and a high of \$203 per square foot. The Ordinance addresses the average of the sales; adjustments to the sales were not made. The result was an average price per square foot of \$115 as shown below.

Transfer	Land Area	Purchas	e Price	Property
Date	(Square Feet)	Amount	Per Sq. Ft.	Location
9/1989	22,651	\$4,600,000	\$203	N/S 2 nd St., E of Santa Monica
1/1990	4,792	\$675,000	\$141	S/S 10 th St., W/S Santa Monica
1/1990	37,462	\$2,850,000	\$76	SWC 16th St. & Broadway
2/1990	7,405	\$665,000	\$90	N/S 6th St. & Broadway
2/1990	4,792	\$350,000	\$73	E/S Pico, S/O 16th Street
5/1990	16,117	\$1,600,000	\$99	SEC Ocean & Colorado Ave.
TOTALS	93,219	\$10,740,000	\$115	

Two previous independent appraisals established an affordable mitigation fee for commercially zoned land in the City at \$118 per square foot for 1990 which corresponds closely with the above, this figure has been adopted in our study.

2013 Price Levels

Due to the lengthy recessionary period now drawing to a close, it was necessary to include transfers covering a three-year period in order to provide sufficient commercial land sale data to allow an average to emerge. The acquisitions uncovered are recapped chronologically below in the same format as the 1989/1990 benchmarks.

Transfer	Land Area	Purchase Price		Property
Date	(Square Feet)	Amount	Per Sq. Ft.	Location
7/10	14,985	\$3,500,000	\$234	N/S 7th St., E/O Santa Monica
8/11	56,114	\$13,325,000	\$237	SWC 16th St. & Santa Monica
2/12	37489	\$11,250,000	\$300	SW 7th & Lincoln Blvd.
9/12	45,030	\$9,660,000	\$214	SEC 16th St. & Santa Monica
9/12	23,087	\$13,150,000	\$570	NWC Bay St. & Ocean Way
10/12	22,080	\$7,300,000	\$331	NWC Wilshire Blvd, & Stanford
TOTALS	198,785	\$58,185,000	\$293	

Correlation

The two studies produced an average commercial land base of \$118 per square foot for 1990, escalating to \$293 per square foot in 2012 recognizing no sales occurred in 2013. As a comparison, the average land value increase was \$175 per square foot for 22 years; this equates to an average of 6.74% (\$7.95 per sq. ft.) yearly, non-compounded. This annual index has been applied in the following table to the 35% component of \$8,000 per unit or \$2,800 per unit.

· Beginning Year	Value Change	Base Unit Charge
1990	100.0%	\$2,800
1991	106.74%	\$2,989
1992	113.48%	\$3,177
1993	120.22%	\$3,366
1994	126.96%	\$3,555
1995	133.70%	\$3,744
1996	140.44%	\$3,932

BUSS-SHELGER ASSOCIATES

Beginning Year	Value Change	Base Unit Charge
1997	147.18%	\$4,121
1998	154.92%	\$4,338
1999	160.66%	\$4,498
2000	167.40%	\$4,687
2001	174.14%	\$4,876
2002	180.88%	\$5,065
2003	187.62%	\$5,253
2004	194.36%	\$5,442
2005	201.10%	\$5,631
2006	207.84%	\$5,820
2007	214.58%	\$6,008
2008	221.32%	\$6,197
2009	228.06%	\$6,386
2010	234.80%	\$6,574
2011	241.54%	\$6,703
2012	248.28%	\$6,951
2013	255.02%	\$7,141
7/13	261.50%	\$7,322

ANNUAL MITIGATION FEES

Recapitulation

The anticipated price to replace a lodging unit lost in 1990 was \$8,000; the breakdown of this was 65% CPI or \$5,200, and 35% of Land Value or \$2,800 per unit. These components are to be escalated by their appropriate escalation factors. The following chart shows the total cost per unit for each year from 1990 through 2013.

		Per Lodging Unit	·
Beginning	Consumer	Land Value	Mitigation
Year	Price Index	Changes	Fees (Total)
1990	\$5,200	\$2,800	\$8,000
1991	\$5,536	\$2,989	\$8,525
1992	\$5,675	\$3,177	\$8,852
1993	\$5,875	\$3,366	\$9,241
1994	\$6,006	\$3,555	\$9,561
1995	\$6,063	\$3,744	\$9,807
1996	\$6,117	\$3,932	\$10,049
1997	\$6,252	\$4,121	\$10,373
1998	\$6,359	\$4,338	\$10,697
1999	\$6,437	\$4,498	\$11,124
2000	\$6,576	\$4,687	\$11,263
2001	\$6,821	\$4,876	\$11,697
2002	\$7,030	\$5,065	\$12,095
2003	\$7,235	\$5,253	\$12,488
2004	\$7,378	\$5,442	\$12,820
2005	\$7,718	\$5,631	\$13,349
2006	\$8,041	\$5,820	\$13,824
2007	\$8,307	\$6,008	\$14,315
2008	\$8,692	\$6,197	\$14,889
2009	\$8,640	\$6,386	\$15,026
2010	\$8,854	\$6,574	\$15,428
2011	\$8,992	\$6,703	\$15,695
2012	\$9,190	\$6,951	\$16,141
2013	\$9,362	\$7,141	\$16,503
7/13	\$9,507	\$7,322	\$16,829

RECEIVED
South Coast Region

AUG 2 8 2014

Acknowledgement and Receipt For Payment Of Affordable Lodging Witigation Fee

The undersigned, on behalf of the City of Santa Monica, acknowledges receipt of the sum of One Million Two Hundred Eleven Thousand Six Hundred Eighty Eight Dollars and no/100 (\$1,211,688.00) ("Payment") pursuant to Check No. 7010 from Sand and Sea, Inc. dba Shore Hotel, a copy of which is attached, as full and final payment for the Affordable Lodging Mitigation Fee as required by Condition No. 8 in City of Santa Monica Statement of Official Action for Development Review Permit No. 05-007, Conditional Use Permit No. 05-009, Variance No. 06-018 and General Plan Amendment No. 06-001 dated as of September 23, 2008. This Payment fulfills all of the obligations of the Shore Hotel located at 1525 Ocean Avenue under City of Santa Monica Ordinance No. 1516 (CCS).

As detailed in my September 30, 2013 letter, because this project is under the concurrent jurisdiction of the City and the California Coastal Commission, the elimination of the low cost lodging at The Short-Hotel through the payment of this fee also requires review by the Coastal Commission. $Sh_{O_{rec}}$

Dated: December___, 2013

David Martin, Director

Planning and Community Development Department

Sand & Sea, Inc. dba Shore Hotel 1515 Ocean Avenue Santa Monica, CA 90401



WELLS FARGO BANK

16-24/1220



PAY

10/3/2013
One Million Two Hundred Eleven Thousand Six Hundred Eighty-Eight and 00/100******

***1,211,688.00

PAY TO THE ORDER CITY OF SANTA MONICA TREASURY 1717 4TH STREET #150 SANTA MONICA, CA 90401



Sand & Sea, Inc. dba Shore Hotel

1515 Ocean Avenue • Santa Monica, CA: 90401

o. 7010

10/3/2013

CSMTOT 10/3/2013 CITY OF SANTA MONICA

JF100313

AFFORDABLE LODGING MITIGATION FEE

1,211,688.00



SF4001HG-1SAN

SATEGUAND LITHOUSA SPHEZ CRESHOLISZA

HEORDER FROM YOUR LOCAL SAFEGUARD DISTRIBUTOR, IF UNKNOWN, CALL 880-523-2422

1,211,688.00

سيرد

April 3, 2014

Ms. Sherilyn Sarb, Deputy Director Ms. Teresa Henry, District Manager Ms. Deborah Lee, District Manager California Coastal Commission

RE: Cost Estimates for New Hostel Development Allowing for Lower Cost Overnight Accommodations

This letter provides additional support for the current cost of establishing hostels as a form of lower cost overnight accommodations in California Coastal areas. Our organization had previously provided cost information in 2007 and although there are slight variations in our current approach the data is similar when factoring the impact of inflation.

This information is provided by Hostelling International USA, a National Non-Profit focused on cultural understanding through travel and specifically through the use of affordable hostel accommodations. Our network consists of 55 hostels through the U.S., with 34 of those locations directly operated by our organization (14 in California). This experience provides the background for defining costs of development with sustainable on-going operations. We also have a number of current development projects across the U.S. that that are either in the construction or planning stages that allow us to assess current development costs.

To support our internal data we have also engaged a construction estimator to prepare an estimate for the cost per bed specific to developing a hostel in Southern California. This cost estimate summary is attached.

We do need to highlight that there are many variables involved in arriving at the cost of construction for a hostel. Among these are:

- Number of beds, and overall square footage allocated per bed
- Size of the building
- Efficiency of the interior layout
- Cost of land/building
- New construction vs. renovation of existing structure
- Site conditions utility access, parking, storm water retention requirements
- Condition of the structure if renovating: Roof, Windows, Exterior walls, Egress, Vertical transportation, Handicap accessibility, Floor plan, Structural, Seismic, MEP systems
- Overall layout of the building
- Seismic considerations
- Parking requirements

We have previously been able to develop hostels through a variety of approaches including new construction, adaptive re-use of various building structures (both leased and owned), and transformation of previous lodging or residential buildings. For renovation projects, we have recently found that it is usually necessary to do a complete interior demolition and new build-out to meet the layout needs and regulatory code requirements for hostel use. The change of use and occupancy typically requires that all building systems be brought up to current code and this is typically accomplished through full replacement. This can include interior walls, ceilings, stairways, electric, plumbing, mechanical, fire alarm, sprinkler. We often also encounter building envelope issues such as roof replacement, repointing, masonry repairs, wood rot, sidewalk replacement, and handicap accessibility modifications. The variables are significant in these projects with a range of costs commonly approaching or exceeding the cost of new construction.

Sample Costs Estimates:

In order to provide you with a simple cost estimate for a hostel, we have made certain assumptions. These include:

- New construction
- Reinforced masonry construction
- Two story building
- 100 beds in 12,000 square feet
- Moderate sitework required
- Prevailing wages

Hard costs of construction on this sample project including construction contingency is \$3,261,000, or \$32,610 per bed. Soft costs come to \$951,000, or \$9,510 per bed. We additionally assumed \$1,200,000 for a 12,000 SF parcel of land, or \$12,000 per bed (However, land costs can vary greatly depending on location, and typically the locations that will provide sustainable operations carry a higher cost). This combines to a total development cost of \$5,412,000, or \$54,120 per bed.

Although actual cost per bed can vary substantially depending on the specifics of the site, we feel that our estimates fairly reflect new construction projects and provide a close comparison for building acquisition and renovation projects.

HI-USA has in the past been able to develop hostels at a lower cost when we have had access to long-term below market rate leases from Federal and local governments. These projects allow us to eliminate the cost of acquisition or the land portion of new construction. The cost per bed in these situations can be reduced but the opportunity is very limited.

HI-USA appreciates California Coastal Commission's commitment to lower cost overnight accommodations and the previous financial assistance the Commission has provided to hostel projects.

Sincerely,

Aaron Chaffee

Vice President of Development

Attachment

CONCEPTUAL ESTIMATE

411 South Wells Street - Suite 902 Chicago Illinois 60607

roject: .ocation: _ Owner: _	California , USA			Es	ite: timate Type:	3-31-14 Conceptual
rchitect:			Co. o I		I file Name:	1-14 Review Draft xlsx]Estimate
No_	Description	Quantity 12,000	Unit	Unit Price	Amount	Total
-	Summary	12,000	5.1			
	Two stories, No Basement, Simple design					
	Two otonice, the passing ample accept					
I.	Building Construction Costs	1				
	Seismic Bracing and Reinforcing	12,000	s.f.	\$10.00	\$120,000	
	Excavation, Foundation and Concrete Work	12,000	s.f.	\$10.61	\$127,320	
C.	Structural Work	12,000	s.f.	\$21.08	\$253,000	
D.	Masonry and Stucco Work	12,000	s.f.	\$38.28	\$459,360	
E.	Windows & H.M. Doors	12,000	s.f.	\$5.15	\$61,800	
F _c	Roof and Flashing	12,000	s.f.	\$3.03	\$36,300	
G.	Interior Drywall & Ceilings	12,000		\$12,37	\$148,400	
H.	Ceramic Tile Flooring	12,000	s.f.	\$10.44	\$125,333	
I,	Painting	12,000		\$5.20	\$62,375	
J.	Window Treatments	12,000		\$0.00		FF&E
K.	HVAC	12,000		\$23.00	\$276,000	
L,	Sprinklers	12,000		\$3,50	\$42,000	
M.	Security/Fire Alarm	12,000		\$2.00	\$24,000	
N.	Plumbing	12,000		\$13.38	\$160,600	
	Electrical	12,000		\$16.42	\$197,000	
	Millwork & Wood Doors	12,000		\$16.83	\$202,000	
	Elevator	12,000		\$4.17	\$50,000	
R,	Steel Stair and Railing	12,000		\$2.92	\$35,000	
S.	General Conditions	15%		\$2,380,488	\$357,073	\$2,737,562
	Subtotal Building Construction Estimate	12,000	S.I.	\$228.13		\$2,737,302
II.	Sitework	12,000	e f	\$18.95	\$227,363	\$227,363
	*Note: sitework can vary substaintially pending					
	Total Hard Cost - Building and Sitewo					\$2,964,924
	Total Flat a Good Ballaning and Green					
III.	Contingency	10%		\$2,964,924	\$296,492	\$296,492
	- Continue of the continue of				\$3,261,416	
IV.	Soft Costs					
Α.	CM Fee	7%		\$2,964,924	\$207,545	
В.	Architectural	9%		\$2,964,924	\$266,843	
C,	MEFP Engineering	4%		\$2,964,924	\$118,597	
D.	Civil Engineering	4%		\$2,964,924	\$118,597	
E.	Permit Expediter				\$10,000	
E,	Permit	1%		\$2,964,924	\$29,649	
G,	FF&E	100	Bed	\$2,000	\$200,000	
	Total Soft Costs		-			\$951,231
V.	Land		-			\$1,200,000
			-			65 440.045
_	Total Cost		-			\$5,412,648
	Controlled		1			\$54,126
	Cost per bed		No.			ψ0-7,120
	The following items are excluded from this est	imate:	1			
		miate.	. 1 🖽	ED Administration 8	Commissioning	
	- Special Consultant Fees - Legal Fees			erior Design Fees	. 50	
_	- Utility Company Service Fees			3 Tanks	California	Coastal Commiss

PROJECT CONTROL

411 South Wells Street - Suite 902 Chicago Illinois 60607

oject: cation:	Prototype Hostel - New Construc California , USA				3-31-14		
ner:		Date: Estimate Type:		Conceptual			
chitect:					PCI file Name:	I-14 Review Draft xlsx]Estimate	
No.	Description	Quantity	Unit	Unit Price	Amount	Total	
	- Hazardous Materials/Waste				1		
	Estimate Breakdown						
_							
Α.	Seismic					None	
1	Bracing and Reinforcing						
_	a. Structural	12,000		\$4.00	\$48,000		
	b.Architectural	12,000		\$2.00	\$24,000		
	c. Mech. Plbg. and Elect.	12,000		\$3.00	\$36,000		
	d. Fire Protection	12,000		\$1.00	\$12,000		
	Subtotal	12,000	s.f.	\$10.00		\$120,000	
_	_ ,, _ , ,,	_					
В.	Excavation, Foundation and Concrete Work		-				
1	Excavation						
-	a. Footings & Foundations	225		\$30.00	\$6,756		
_	b. SOG	222		\$30.00	\$6,667		
_	c.ElevatorPit/Stair		allow	\$4,500.00	\$4,500		
_	d. Remove off Site	447		\$28.00	\$12,527		
	e. Stone SOG	222		\$28,00	\$6,222		
_	f. Misc. Fill	1	allow	\$3,600.00	\$3,600		
2	Concrete						
	a. Footings		су	\$250.00	\$7,037		
	b. Foundations		су	\$410.00	\$17,311		
_	b. SOG	6,000	s.f.	\$6.00	\$36,000		
	c.ElevatorPit/Stair	1	allow	\$8,000.00	\$8,000		
	d. Sidewalks & Pads	0	allow	\$5,000.00	\$0	see sitework	
	e. Concrete on metal Deck	4,200	су	\$3.50	\$14,700		
	f. Misc. Concrete	1	allow	\$4,000.00	\$4,000		
	Subtotal	12,000	s.f.	\$10.61		\$127,320	
	Structural Work & Framing	-					
_	New Steel structure	12,000		\$15.00	\$180,000		
	New Steel Deck	12,000	s.f.	\$5.00	\$60,000		
	HVAC Openings		allow	\$5,000.00	\$5,000		
4	Misc. Structural		allow	\$8,000.00	\$8,000		
	Subtotal	12,000	s.f.	\$21.08		\$253,000	
	Masonry and Stucco Work						
	New Block - Exterior	9,880		\$18.00	\$177,840		
	Interior Masonry	12,900		\$12.00	\$154,800		
	Stucco - Exterior Only	9,880		\$9.00	\$88,920		
4	Masonry @ Elevator and Stair - Block	2,700	s.f.	\$14.00	\$37,800		
-	Subtotal	12,000	s.f.	\$38.28		\$459,360	

PROJECT CONTROL

411 South Wells Street - Suite 902 Chicago Illinois 60607

Prototype Hostel - New Construction Project: California, USA Location: Date: 3-31-14 Owner: Estimate Type: Conceptual Architect: PCI file Name: I-14 Review Draft xlsx]Estimate Nο Description Quantity Unit Unit Price Amount Total Estimate Breakdown Windows & Hollow Metal Doors (Verify Extent of Windows) 1 Storefront \$5,000.00 \$5,000 2 New Windows a. New Windows - Public Areas 1 allow \$12,000.00 \$12,000 c. New Windows - Rooms 25 each \$1,000.00 \$25,000 3 Blocking at Windows & Doors 1 allow \$2,000.00 \$2,000 4 Entry Storefront/Doors - w Access Control 1 pair \$3,000.00 \$3,000 5 Other Entry Doors 2 each \$1,600.00 \$3,200 6 Interior Borrowed Lite @ Front desk 1 allow \$2,000.00 \$2,000 7 New Hollow Metal Doors 4 each \$900.00 \$3,600 8 Window Security Bars - 1st Floor 12 each \$500.00 \$6,000 10 Skylights 0 each \$2,500.00 \$0 None Subtotal 12,000 s.f. \$5.15 \$61,800 F. Roofing and Flashing 1 New Roof a.New Roof w/ Flashing 6,750 s.f. \$27,000 Shingle \$4.00 b. Curbs/Flashing for HVAC 1 allow \$3,000.00 \$3,000 2 Parapet Coping 0 allow \$25.00 \$0 None 325 Lf. 3 Gutters & Downspouts \$12.00 \$3,900 Gutters & Downspouts 1 allow \$2,400.00 \$2,400 12,000 s.f. Subtotal \$3.03 \$36,300 G Interior Partitions & Ceilings 1 allow 1 Rough Carpentry \$6,000.00 \$6,000 1 Furring, Insulation & Drywall 1 side a. 1st Floor-Furring, Insulation/ Drywall 1 side 1 allow \$6,000.00 \$6,000 At Entry Only 0 s.f. b.2nd Floor-Furring, Insulation/Drywali 1 side \$4.00 \$0 Exposed Block 2 Stud walls with drywall 2 sides & sound Insulat a. 1st Floor-Stud walls w/ dry 2 sides & sound 4,800 s.f. \$7.00 \$33,600 b. 2nd Floor-Stud walls- dry 2 sides & sound 5,200 s.f. \$7.00 \$36,400 3 Blocking in walls for built-in items 1 allow \$1,400.00 \$1,400 4 Drywall Soffits Allowance 1 allow \$2,000.00 \$2,000 At Entry Only 5 Drywall Ceilings @ 2nd Floor 6,000 s.f. \$8.00 \$48,000 6 Drywall Ceilings @ 1st Floot Toilets/Bath 1,000 s.f. \$8.00 \$8,000 7 ACT Ceilings \$5,000.00 allow \$5,000 At Entry Only 1 allow 8 Misc. Drywall \$2,000.00 \$2,000 Subtotal 12.000 s.f. \$12.37 \$148,400 Ceramic Tile and Flooring H. 1,167 s.y.. 1 Carpet \$50.00 \$58.333 2 Recycled Rubber Flooring 0 s.v. \$70.00 \$0 none 3 Ceramic Tile - floors 1,000 s.f. \$14.00 \$14,000 4 Ceramic at shower Units 20 each \$2,000.00 \$40,000 5 Public Kitchen Ceramic 1 allow \$5,000.00 \$5,000 6 Vinyl Base 1 allow \$4,000.00 \$4,000 California Coastal Commission \$4,000.00 7 Floor Prep 1 allow Exhibit 5

CONCEPTUAL ESTIMATE

PROJECT CONTROL

411 South Wells Street - Suite 902 Chicago Illinois 60607

Project: Prototype Hostel - New Construction

Location: California , USA Date: 3-31-14

Owner: Estimate Type: Conceptual

Architect: PCI file Name: 1-14 Review Draft xlsx/[Estimate]

No_	Description	Quantity	Unit	Unit Price	Amount	Total
	Subtotal	12,000	s.f.	\$10.44		\$125,333
4						
	Estimate Breakdown					
1.	Painting					
1	Paint Drywall Walls	1	allow	\$8,000.00	\$8,000	
2	Paint Block Walls - Interior	1	allow	\$20,000.00	\$20,000	
3	Paint Ceilings	1	allow	\$12,000.00	\$12,000	
4	Paint Doors & Frames	35	allow	\$125.00	\$4,375	
5	Misc. Painting	1	allow	\$3,000.00	\$3,000	
6	Paint Railings & Stair	1	allow	\$3,000.00	\$3,000	
7	Exterior Painting	1	allow	\$12,000.00	\$12,000	
	Subtotal	12,000	s.f.	\$5.20		\$62,375
J.	Window Treatments	1	allow	\$0.00	\$0	FF&E
	Subtotal	12,000	s.f.			\$0
K.	H.V.A.C. System					
_	New HVAC Units and Ductwork	12,000	c f	\$23.00	\$276,000	
	Subtotal	12,000		\$23.00	\$276,000	\$276,000
	Subicial	12,000	5.1.	\$25.00		\$270,000
L.	Sprinkler System					
	Sprinkler System	12,000	s₌f.	\$3.50	\$42,000	
2	New Water Service & Street Work		allow	\$10,000.00	\$0	See Sitework
	Subtotal	12,000	s_f_	\$3.50		\$42,000
VI.	Security/Fire Alarm System					
1	Security/Fire Alarm System	12,000	s.f	\$2,00	\$24,000	
	Subtotal	12,000	s,f.	\$2,00		\$24,000
٧.	Plumbing					
	Water closet HC type	3	each	\$1,000.00	\$3,000	
	Standard water closet		each	\$900.00	\$15,300	
	Shower Sets		each	\$1,400.00	\$28,000	
	Urinal		each	\$1,000.00	\$0	
	Lavatories		each	\$600.00	\$12,000	
	Janitor's Sink		each	\$700.00	\$1,400	
	2 Compartment sink		each	\$800.00	\$800	
	Grease Trap		each	\$1,200.00	\$1,200	
	Sensors		each	\$250.00	\$5,000	
10	Floor/shower drains		each	\$400.00	\$8,000	Combo w/ Shower
	Other Floor Drains		each	\$600_00	\$3,000	
12	Trap Primers		each	\$300.00	\$1,200	
13	Clean outs		each	\$350.00	\$1,400	
14	Hose bibbs		each	\$450.00	\$900	
15	Domestic hot water heater		allow	\$8,000.00	\$8,000	
	Underground piping & sewer	12,000		\$1.00	\$12,000	
	Above grade waste and vent	12,000		\$2.00	\$24,000	
	Domestic water piping and insulation	12,000		\$2.50	\$30,000	
	Sump pump		allow	\$1,000.00		Coastal Commiss
				2 1,000 00	California	Coastal Commiss

Project:

Prototype Hostel - New Construction

PROJECT CONTROL

411 South Wells Street - Suite 902 Chicago Illinois 60607

California USA Location: Date: 3-31-14 Owner: Estimate Type: Conceptual Architect: PCI file Name: I-14 Review Draft xlsxlEstimate No Description Quantity Unit Unit Price Amount Total \$1,400.00 21 Electrical water cooler 1 each \$1,400 \$4,000.00 \$4,000 22 Gas piping allowance 1 allow Subtotal 12,000 s.f. \$13.38 \$160,600 Estimate Breakdown 0 Electrical Work 1 Electrical Installation including Lights 12,000 s.f. \$16,00 \$192,000 2 Exterior Lighting on Building 1 allow \$5,000.00 \$5,000 3 New Service - By Utility Co. 0 allow \$8,000.00 \$0 Site Specific 12,000 s.f. Subtotal \$16.42 \$197,000 P. Millwork, Doors & Specialties Sinks w/ intergral Bowls 20 allow \$1,200.00 \$24,000 Shower Base/Surround 20 each \$3,600.00 \$72,000 3 20 each Toilet Accessories \$600.00 \$12,000 4 Kitchens a. Apartment Kitchens Built-ins & Counters 1 allow \$7,000.00 \$7,000 None b. Public Kitchen Built-ins & Counters & Island 1 allow \$18,000.00 \$18,000 5 Window Sills 30 each \$200.00 \$6,000 6 New Wood Doors & Hardware w/ Card readers 25 each \$1,200.00 \$30,000 7 New Wood Doors & Hardware w/o Card reader 6 each \$900.00 \$5,400 8 Allowance for Closet Rods and Shelves 1 allow \$6,000.00 \$6,000 9 Front Desk 1 allow \$6,000.00 \$6,000 1 allow 10 Misc. Millwork \$2,000.00 \$2,000 11 Fire Extinguishers 4 each \$400.00 \$1,600 12 Flag Pole 0 allow \$2,000.00 \$0 13 Canvas Awning 1 allow \$5,000.00 \$5,000 14 Interior Signage - Rooms, Stairs & Baths 40 each \$2,000 Basic \$50.00 15 Exterior Signage \$5,000 Simple allow \$5,000.00 Subtotal 12,000 s.f. \$16.83 \$202,000 Q. Elevator New Elevator 1 allow \$50,000.00 \$50,000 12,000 s.f. Subtotal \$4.17 \$50,000 New Steel Stair and Railings 1 New Interior Stairs & Railings 2 stairs \$15,000.00 \$30,000 Simple 2 Misc Steel/Masonry Connections 1 allow \$5,000.00 \$5,000 12,000 s.f. Subtotal \$2.92 \$35,000 S. Kitchen Appliances 1 Apartment Kitchen Appliances None a. Apartment Kitchen Stoves w/ Hoods 0 each \$1,500.00 \$0 b. Apartment Kitchen - Refrigerators 0 each \$1,000.00 \$0 c. Apartment Kitchen - Microwave 0 each \$200.00 \$0 0 each d. Dishwasher \$750.00 \$0 2 Public Kitchen & Laundry Appliances - Not Cor a. Stoves w/ Hoods 2 each \$2,000.00 \$4,000 b. Refrigerators 2 each \$1,200.00 \$2,400 4 each c. Microwave \$200.00 \$800 3 Washer 2 each \$2,500.00 \$5,000 4 Dryer \$4,400 California Coastal 2 each \$2,200.00 Subtotal \$16-600bit 5

CONCEPTUAL ESTIMATE

PROJECT CONTROL

411 South Wells Street - Suite 902 Chicago Illinois 60607

 Project:
 Prototype Hostel - New Construction

 Location:
 California , USA
 Date:
 3-31-14

 Owner:
 Estimate Type:
 Conceptual

 Architect:
 PCI file Name:
 1-14 Review Draft x/sx/jEstimate

No.	Description	Quantity	Unit	Unit Price	Amount	Total
	Total Building	deddinity	- Oline	Office Fride	Amount	
	Total Building					\$2,397,088
			100			
	Estimate Breakdown					
	Estillate bleakdown					
II.	Sitework					
_		4.4.0004	-			
-	Sitework - Bassed on 10 Cars and 100' Drive			04.50		-
	a. Excavation and Removals b. New Patio and Paths at Parking (1400 s f.)	6,600	S.T.	\$1.50	\$9,900	
-	- Excavation		1	040.00		
			c.y.	\$18.00		Spread Onsite
-	- Backfill for Pavers		C.y.	\$32.00	\$1,244	
	- Permeable Pavers with Edging	1,400	S,t,	\$13.00	\$18,200	
	c. New Asphalt Paving Areas					
	- Excavation		C.V.	\$7.00		Spread Onsite
	- Backfill forNew Asphalt		c.y.	\$32.00	\$5,333	
	- New Asphalt Paving	6,000		\$3.00	\$18,000	
-	- Curbs	1	allow	\$3,000.00	\$3,000	
-	d. Parking Specialties		- 4			
	- Stall Sriping - Standard		each	\$50.00	\$350	
-	- Stall Sriping - ADA	3	each	\$200.00	\$600	
-	- Roadway Directional Signage - Surface App	1	allow	\$800.00	\$800	
	- Wheel Stops	10	each	\$50.00	\$500	
	e. Signage and Accessories					
	- New Signage (simple)	1	allow	\$6,000.00	\$6,000	_
	- Flagpoles	0	each	\$0.00	\$0	None-Verify
	- Bike Racks	0	allow	\$0.00	\$0	None-Verify
	- Trash Recptacles	0	allow	\$0.00	\$0	None-Verify
	f. Storm Sewer, Drainage & Detention	1	allow	\$35,000.00	\$35,000	
	e, Sanitary Sewer	1	allow	\$20,000.00	\$20,000	
	h. Water Main	1	allow	\$14,000.00	\$14,000	
2	Site Electrical	1				
	a. Exterior Lighting at Building and Sign	1	each	\$3,000.00	\$3,000	Simple Uplighting
	b. Utilities	1	allow	\$10,000.00		By Util Co?
3	Natural Gas	1	allow	\$5,000 00		By Util Co?
4	Landscaping and Irrigation					
	a. Site restoration	1	allow	\$1,000.00	\$1,000	
	b. Fine Grading		allow	\$2,000.00	\$2,000	
	c. New Landscaping - Allowance		allow	\$8,000.00	\$8,000	
	d. Temporary Irrigation		allow	\$4,000.00	\$4,000	
	GC & OH&P	20%		\$168,416.67	\$33,683	
	Contingency	15%		\$168,416.67	\$25,263	
	Total				\$20,200	\$227,363
	Total Sitework	/				\$227,363
	Total SiteWork	2				₽∠∠1,303
-			-			-

Maurice Robinson & Associates LLC 28 Dover Place Manhattan Beach, CA 90266 August 25, 2015

Ms. Madeline Cavalieri California Coastal Commission 725 Front Street, Suite 300 Santa Cruz, CA 95060

Re: Evaluation of Hostelling International's (HI) 'Cost Estimates for New Hostel Development Allowing for Lower Cost Overnight Accommodations,' dated April 3, 2014; and thoughts on the sufficiency of the Shore Hotel's Mitigation Fee

Dear Madeline:

1. Review of Hostelling International's Development Cost Estimates

Per your request, I have reviewed the above-referenced analysis of the cost to develop a new hostel, as well as a similar analysis prepared by HI on October, 26 2007, entitled: 'Cost Estimates for Construction of Hostels'. Because the methodologies for the two studies were a bit different, they did not lend themselves to direct comparison of the per-bed cost conclusions.

<u>The 2014 analysis</u> assumed new construction of a 100-bed hostel in a 12,000 square foot (sf) building, including purchase of a hypothetical 12,000 sf parcel of land for \$1,200,000, or \$100/sf of land. Construction costs were estimated to be \$42,120 per bed, or \$350/sf, without land. Including land, the total development costs were estimated to be \$54,120 per bed, or \$451/sf.

My conclusion is that the 2014 cost estimates for the building are very well-developed, and can be used as a guide for the construction costs to build a new 100-room hostel statewide, excluding land. The land portion, however, was not intended to be representative of a vacant lot in Santa Monica. I believe that a proper analysis must separate the two components—building and land—to be applicable to other locations in the California Coastal Zone, and for future indexing.

The cost of land in Santa Monica has increased so dramatically over the past 25 years that it is no longer representative of the vast majority of other coastal zone properties. In 1990, vacant land for the development of low-cost lodging in Santa Monica was estimated by the City and their consultants to cost \$118/sf. A follow-up study in 1999 estimated the price of land at \$143/sf. By 2013, the average price for land Citywide was estimated at \$293/sf.; additionally, in 2012, land in the more valuable coastal zone portion of the City was estimated at \$578/sf.

However, unless it is the Commission's intention to replace the 72 lost low-cost lodging units from the Shore Hotel development in the immediate area of that very desirable and high-cost site, one should not automatically apply such peak pricing to the land component of HI's estimate of the cost to develop the building.

The price for land in almost all other locations within the California Coastal Zone is much lower than in Santa Monica. In fact, HI made the assumption in their 2014 study that their hypothetical hostel would be built elsewhere, in a lower-priced location within the Southern California Coastal Zone, where land is much cheaper. Indeed, if applicants were given such flexibility, they would most likely select the cheapest land that they could find to replace low-cost lodging. Under this scenario, the \$100/sf price may be reasonable, but the replacement beds would most certainly not be located in Santa Monica. Thus, in the absence of a specific policy that requires replacement of lost low-cost lodging in the immediate location, it would be unfairly burdensome to apply the price of such high-cost land to the equation of hostel development on a statewide basis.

I believe that <u>HI</u>'s building cost estimate of \$42,120 per bed would be appropriate throughout the <u>state's Coastal Zone</u>. It includes compliance with ADA and all applicable State regulations, and includes prevailing wages. Only the land cost would change, depending where the hypothetical hostel were to be built. So, it is a very good number to use to build hostel structures.

<u>This lends itself to a two-tiered Index</u> for a representative cost to develop low-cost lodging statewide. The \$42,120 per bed estimate for the structure can be indexed on an annual basis, either by CPI or, alternatively, with a more construction industry-specific index such as the Turner Building Cost Index. (see http://www.turnerconstruction.com/cost-index)

The land component, however, is tremendously variable throughout the state. I suggest that for this portion of the costs, each time an application for mitigation is being processed, an on-line search for vacant land sales be done, to derive a current estimate of the cost for an appropriate-sized local parcel of land to support replacement lodging units. Most large real estate brokerage or appraisal firms such as CBRE or JLL will have access to such sales. Alternatively, such data can be purchased on CoStar (see www.costar.com) or similar real estate research sites.

As part of my assignment, I also reviewed HI's 2007 hostel development cost analysis. In it, HI presented two scenarios: the first assumed that an existing building and its underlying land would be acquired, gutted, and redeveloped into a 100-bed hostel. Total development costs, including land, were estimated to be \$44,898 per bed, or about \$300 per square foot for the hypothetical 15,000 sf facility. The second scenario in the 2007 analysis assumed an existing building could be leased—vs. purchased—which resulted in costs that were much lower, at \$18,300 per bed, or \$123 per square foot. Of course, in the second scenario, no land would be purchased; the leased building would have to pay additional monthly rental costs; and there would be no opportunity to realize any real estate appreciation; so the two estimates were not truly apples-to-apples.

Thus, the 2014 and 2007 analyses are not directly comparable. The building costs may have increased at a rate approximating inflation during the seven-year period, but the local land component has increased much more dramatically—perhaps at twice the rate of construction.

2. The sufficiency of the Shore Hotel's Low-Cost Lodging Mitigation Fee

Additionally, you have asked for my opinion as to whether or not the Shore Hotel project's impacts to the availability of lower-cost accommodations in the area and the lost potential of the site to provide lower-cost accommodations would be offset by the collection of fees consistent with the 2014 HI analysis. Towards this end, I have reviewed the following materials:

- Analysis of Options for the Travelodge and Pacific Sands Motels in Santa Monica, California, Prepared by PKF Consulting, June 2005;
- Analysis of Affordable Lodging for Santa Monica, California, Prepared by PKF Consulting, May 2008;
- Analysis of Mitigation Fees, Removing Low Cost Lodging at Shore Hotel, Letter to City of Santa Monica, from Buss-Shelger Associates, Real Estate Consultants, dated September 6, 2013;
- City of Santa Monica Ordinance no. 1516.

I understand that the Shore Hotel's mitigation fee, which was paid to the City in 2013, was \$1,211,688. This equates to \$16,829 per room for each of the 72 low-cost rooms that were displaced by the redevelopment and upgrading of the Travelodge and Pacific Sands motels into the current Shore Motel. My opinion is that this amount is wholly inadequate for the replacement of these lost low-cost rooms in Santa Monica.

If there were an opportunity to develop 72 new hostel beds to replace the 72 lost motel rooms, then I would suggest using the \$42,120 per bed estimate for new construction. This would result in a mitigation fee of \$3,032,640, without land.

<u>Land costs</u>, however, could vary dramatically. As noted earlier, the price of the land component of the total cost would depend greatly on the flexibility of the Commission regarding where the replacement units would be allowed to be located. The range in land costs might be as great as from \$100/sf to \$600/sf in Los Angeles County's Coastal Zone. For a 10,000 sf parcel of land, the total land costs could be anywhere from \$1 million to \$6 million—a huge range.

This variability in the price of land dwarfs the cost of providing the hostel improvements. The total cost (land and building) of the 72-bed hostel in this example would range from \$4 million to \$9 million, even though the cost of the structure alone would be constant at \$3 million.

This illustrates the need for the Commission to find alternative, lower-cost ways to acquire the <u>land</u> required to support replacement low-cost lodging. As examples, the proposed hostels could be built on land owned by the following non-private-sector types of entities:

- Public agencies, such as State Parks, which have similar social goals;
- Non-profit organizations, which may not require a market-level rate of return; or
- Quasi-public agencies, such as Port Districts, but leased at a below-market rate.

Indeed, while the cost to construct the hostel building would be expected to remain fairly constant throughout the State, the land costs could vary dramatically in each case. As I noted in my presentation at your March Public Workshop, it behooves the Commission to work closely

with its public and non-profit partners to acquire control of coastal land at below-market costs, to facilitate new low-cost lodging.

3. Final thoughts—hostels may not always be available as replacement low-cost lodging.

This review and evaluation has been based on the concept of replacing lost low-cost lodging, which are typically older motels, with hostel beds, which are much cheaper to build and operate than motel rooms. But there is a limit to the demand for hostel rooms, as compared to the much larger demand segment desiring private motel-style rooms. A bigger question for the Commission to consider is the cost of replacing the older, low-cost motel rooms with new motel rooms. Of course, this is a policy question, which would take into account both lodging economics and other social goals.

These new motel rooms would likely cost nearly \$100,000 per room to develop (excluding land), which is more than twice the cost of a hostel bed, mostly due to the fact that motels require approximately twice the gross square footage per person than hostels.

Although beyond the scope of this engagement, an analysis could be done that <u>identifies the financial subsidy required</u> to provide motel developers with sufficient economic incentive to build and operate the motels at room rates equal to (or less than) the local low-cost room rates. As a hypothetical example, developers might be willing to build 100-room motels for \$12 million (say, \$10 million for the structure and \$2 million for the land), if market-level room rates average \$200 per night, because the operating economics would provide them with a sufficient rate of return of, say, 18% on their up-front investment. If the average room rates were limited to only \$120 per night, the developers might still be able to achieve their desired rate of return, if total development costs were to be reduced to, say, \$7 million. In such an example, the subsidy would be equal to the \$5 million gap (\$12 million less \$7 million) that would be required to incentivize the developers to agree to limit their room rates. This example—which is only hypothetical—would suggest a mitigation fee of \$50,000 per unit to facilitate the development of low-cost motels.

Part of the subsidy could come in the form of land; part could be an up-front payment from the mitigation fund; and part could be the monetization of tax credits from the local public entities. There are numerous ways to produce the desired solution—the first step must be to identify the amount of subsidy needed to incentive the private sector to replace the lost low-cost rooms.

I hope this review and evaluation has been helpful. If you have additional questions, please do not hesitate to contact me at <u>Maurice@MauriceRobinson.com</u> or 310-640-9656.

Sincerely,

Maurice Robinson, ISHC, CRE, ASA

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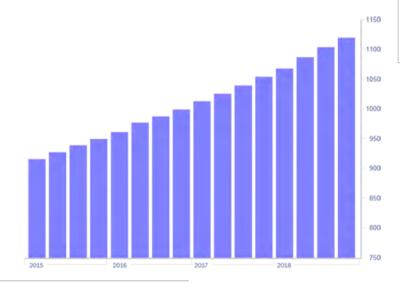
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