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April 15, 2011

Mr. David J. Gau, Deputy Director
Property and Special Taxes Department
State Board of Equalization
P.O. Box 942879
Sacramento, CA 94279-0081

Dear Mr. Gau:

POSSSSORY INTEREST USAGE REPORT (FORM BOE-502-P)

Los Angeles County has reviewed the proposed draft of the *Possessory Interests Annual Usage Report*, form BOE-502-P and the proposed draft LTA that accompanied Sherrie Kinkle's email dated April 6, 2011. Please see the attached for our comments regarding the proposed changes.

If you have any questions or concerns, please contact Eric Haagenson, Director, Major Appraisals Subdepartment, (213) 974.3301, ehaagenson@assessor.lacounty.gov or Andrew Stephens, Chief Appraiser, Assessment Services Division, (213) 974.9201, astephens@assessor.lacounty.gov.

Sincerely,

George Renkei
Assistant Assessor

GR:CA:ca

Attachment

c: John Noguez, Assessor
Ron Thomsen, CAA President
Marc Tonnesen, CAA Standards Chair
File – Appraisal Standards Section

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Property and Special Taxes Department
State Board of Equalization
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Proposed language removal (Possessory Interests Annual Usage Report – Form BOE-502-P)

~~This report is not a public document. The information contained herein will be held secret by the Assessor (Sec. 451, Rev. & Tax. Code); it can only be disclosed to the district attorney, grand jury, and other agencies specified in Sec. 408 of the Rev. & Tax. Code. Attached schedules are considered to be part of the report.~~

County of Los Angeles reply:

Along with the numerous other unfunded liabilities and duties already being required of our staff in this difficult budgetary environment, we have two concerns centering on issues that are not addressed by the proposed language change. One is over the increased administrative costs associated with responding to requests for such information. The other is regarding the greater difficulties we will encounter in obtaining requested information from the various reporting agencies, including the ensuing additional costs we incur when compliance to property usage request reporting is minimized or even avoided.