

CF 15-0790

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CALIFORNIA

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April 27, 2015

**EAST HOLLYWOOD
NEIGHBORHOOD COUNCIL**

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Los Angeles City Planning Commission
City Hall, 2nd Floor
200 N. Spring Street
Los Angeles, CA 90012

Re: CPC 2010-1554-DB-SPP; ENV 2012-110-EIR "Coronel Apartments Project," 1601 N. Hobart Blvd.
Applicant: Hollywood Community Housing Corporation.

President Ambroz and Honorable Commission members:

The Los Angeles City Planning Commission is tentatively scheduled to consider the Coronel Apartments project at its May 14, 2015 meeting.

The Board of Directors of the East Hollywood Neighborhood Council voted at its July 21, 2014 regular meeting to oppose the Coronel Apartments project, a 54-unit, 47,353 sq. ft., 45-foot-tall housing development with 56 parking spaces on a 32,540 sq. ft. lot located at 1600-1608 N. Serrano Ave. and 1601 N. Hobart Blvd. (in the R3-1XL and [Q]R4-2 Zones). The vote of the Board consisted of 9 members concurring with a motion to oppose the project, with 1 nay and one abstention.

The Board's decision to oppose the Coronel Apartments project follows a May 29, 2014 hearing of the proposed development by our neighborhood council's Planning Entitlement Review Committee. Approximately 35 area residents attended the May 29 committee meeting. Outreach consisted of extensive flier distribution to the surrounding community by door-to-door placement and U.S. mail.

At its July 21, 2014 meeting, the Board determined that further consideration of the proposed Coronel Apartments development be conditioned upon the project's representatives providing the neighborhood council with additional information repeatedly requested by the Planning Committee.

The Board requested that the applicant provide the neighborhood council with: 1) a Pro Forma containing substantial financial evidence to justify the project's extensive off-menu density bonus incentives; 2) an economic analysis comparing the benefits of the entitlements and public funding provided to the project versus the loss of the existing 27 rent controlled units currently on-site (to be demolished), based upon median income statistics for the Hollywood area, rather than the much higher income figure Citywide; and 3) a good faith preservation alternative to the project as designed by their architect.

At its July 21 meeting, the Board also took a position of strong opposition to the applicant's planned demolition of the 1601 N. Hobart Blvd. residence, a 1920 Santa Fe style home designed by Master Architect Henry Harwood Hewitt. Our neighborhood council concluded that the Los Angeles Conservancy, Hollywood Heritage, and the Los Angeles Housing Department in its Section 106 Review are correct in determining that the property, known as the "Ehrbar Residence," is eligible for the National Register of Historic Places, and that the home must be preserved and incorporated within the project as required by Sections 511 and 300 of the Hollywood Redevelopment Plan.

[Note: At the July 21, 2014 Board meeting, historian Charlie Fisher narrated a slide presentation regarding the historical significance of this home].

The Board further determined during its July 21, 2014 consideration of the Coronel Apartments project that the applicant be provided with equal time to make a formal presentation of contrary evidence regarding the historical significance of the 1601 N. Hobart Blvd. residence. The applicant, however, has not done so.

The Board also concluded that City Council funding and official statements of support for the project prior to Planning Department public hearings on the project's entitlement requests are inappropriate and premature. [Note: On May 2, 2014, the City Council passed a Motion by CD13 Councilman Mitch O'Farrell transferring \$1.5 million to the project and ordering the General Manager of the LA Housing Dept. to support the project].

Please note the following information considered by our Board in determining its position regarding the proposed Coronel Apartments project:

I. Prior Review

The Coronel Apartments project is located within the boundaries of the East Hollywood Neighborhood Council, and is proposed by applicant Hollywood Community Housing Corporation ("HCHC") to be a 54-unit joint public/private development at 1601 – 1605 N. Hobart Blvd. and 1600 – 1608 N. Serrano Avenue. Initial funding was provided in 2010 with a \$5.027 million permanent loan from the former Community Redevelopment Agency. The Coronel Apartments project was previously considered by our full Board at its September 20, 2010 regular meeting, at which approximately 80 tenants and area residents expressed concerns regarding the proposed development. The Coronel Apartments hearing attracted the largest attendance for any one agenda item that the East Hollywood Neighborhood Council has had in its 7 1/2-year history.

Following public comment and discussion at the September, 2010 meeting, the Board voted to table its consideration of the proposed HCHC development until numerous concerns regarding tenant relocation, project entitlements, historic resources and other issues were further discussed in committee. Our neighborhood council's former Planning & Beautification Committee then took further comment on the project at its October 4, 2010 meeting.

At this hearing, representatives for HCHC for the first time provided our neighborhood council with a copy of the project's Mitigated Negative Declaration ("MND"), which upon review was considered deficient in its lack of public notification and circulation, and impact analysis.

The project MND was re-circulated in October of 2010 by the former Lead Agency for the project, the Community Redevelopment Agency. Comments to the re-circulated MND by members of the public included objections to the requested entitlements, including exceptions to the Vermont/Western Transit Oriented District Specific Plan, and concerns regarding impacts to historic resources associated with the proposed demolition of the Santa Fe style Adobe residence at 1601 N. Hobart Blvd. Further consideration of the proposed development was then suspended following a Hearing Officer hearing conducted by the Department of City Planning, at which similar concerns were voiced regarding potentially significant impacts associated with the project.

II. Project History

The proposed Coronel Apartments project is a partnership between HCHC and the former Community Redevelopment Agency (CRA/LA). On June 17, 2010, the CRA/LA Board of Commissioners approved a permanent loan agreement with HCHC for \$5,027,000 in funding for the project. In October of that year, CRA/LA disbursed \$3,584,500 to HCHC to acquire the properties. Additional funds have since been released to cover HCHC's predevelopment expenses.

In November of 2012, the Landmark California Development Corporation disbursed \$600,000 to HCHC for the Coronel Apartments project. This funding fulfilled a 2008 Condition of Approval requirement attached at the last minute as a City Council amendment for a project called the Camerford Lofts, an 85-unit mixed-use development located at Melrose Ave. and Larchmont Blvd. Landmark is the successor in interest to the project's original applicant, Watt Genton, Inc. During the public hearing process for the Camerford Lofts, HCHC representatives frequently appeared and spoke in support of Watt Genton and its project.

The Camerford Lofts project is noteworthy for several reasons: 1) It was unanimously rejected by the City Planning Commission, then reinstated by the City Council upon Watt Genton's appeal; 2) In an unprecedented challenge to the Council's action, the Planning Dept. twice refused to support the City Council's findings of approval; 3) During the public hearing process it was revealed that Watt Genton had illegally evicted all 132 tenants on the site shortly after acquiring the property, including forging tenant's signatures, then demolished the 1916 craftsman bungalow structures that had been nominated for Landmark status, and also bulldozed the parcels' 113 mature trees, including protected species, prior to submitting an environmental analysis; 4) When the City Council's approval of the project resulted in a legal challenge by community members, the City Attorney's office refused to support the City Council, stating on the record at a court hearing that "we don't care about this case"; 5) The attorney representing the Camerford Lofts project served at the time on the Board of Directors of HCHC.

Similarly, approval of the Millennium Hollywood project in July of 2013 also included a last-minute amendment by CD13 directing \$400,000 to the Coronel Apartments project as a Condition of Approval.

On May 2, 2014, the City Council voted to transfer \$1.5 million to the Coronel Apartments project from the Affordable Housing Trust Fund. The Motion by CD13 Councilman Mitch O'Farrell authorizing this transfer instructs the General Manager of the Los Angeles Housing and Community Investment Dept. to amend a loan agreement with the Camden mixed-use project currently under development at Vine St. and Selma Ave. This Motion states: "I therefore Move that the Council instruct the General Manager of the Los Angeles Housing and Community Investment Department...to support the Coronel Apartments."

In November of 2013, the Los Angeles Housing and Community Investment Department had in fact refused to proceed with the processing of federal housing tax credits for the Coronel Apartments project. The Housing Dept. halted further consideration of HCHC's application after the agency's required Section 106 environmental review determined that the 1920 residence on the project site is eligible for inclusion on the National Register of Historic Places. Federal regulations prohibit the use of tax credits for projects impacting a historic resource.

As a development financed with public funds through the CRA/LA, the proposed Coronel Apartments project is required under Section 511 of the Hollywood Redevelopment Plan to preserve structures of historical significance. Section 300.00 of the Plan also requires that CRA/LA financed projects "recognize, promote and support the retention, restoration and appropriate reuse of existing buildings, groupings of buildings and other physical features...having significant historic and/or architectural value."

Section 65915 of the California Government Code and Section 12.22.A.25(g)(2)(i)(c)(ii) of the Los Angeles Municipal Code also prohibit approval of an Affordable Housing Density Bonus if doing so will have an adverse impact upon a recognized California historic resource.

Subsequently, the historic significance of any structures on the subject site must be clearly defined and reviewed by the appropriate City departments prior to any entitlement approvals or further expenditure of taxpayer funds.

III. Proposed Project

The Coronel Apartments' Draft *Environmental Impact Report* describes the project as a 3- to 4-story, 45-foot tall development of 51 new residential units plus the retention of 3 existing units, for a total 54 units comprising 46,353 sq. ft. of floor area on a 32,540 square foot lot. Parking consists of 56 spaces (39% compact) in a 1-level subterranean garage accessed from Hobart Blvd. Four existing buildings with a total of 27 units would be demolished ("Project").

The underlying zoning is [Q]R4-2 on Serrano Ave. with the permanent [Q] qualifying condition restricting density to one unit per 800 square feet of lot area; the zoning on Hobart Blvd. is R3-1XL. Forty units are permitted under the existing zoning. The Applicant initially requested the following entitlements:

- Two Off-Menu Incentives under Los Angeles Municipal Code (LAMC) Section 12.22.A.25(g)(3) to permit a 45-foot-tall building in lieu of the 30-foot height allowed in the 1XL zone, and a 45-foot-tall building in lieu of the 27-foot-tall building transitional height otherwise permitted by Section 7.D of the Vermont/Western Transit Oriented District Specific Plan (Specific Plan);
- An exception from Section 7.A of the Specific Plan to allow more than two lots to be tied together for a total area of 32,541 sq. ft. in lot area in lieu of the maximum 15,000 sq. ft. of lot area otherwise permitted to form a single building site;

- An exception from Section 7.I of the Specific Plan and Section 4.3 of the Specific Plan Development Standards to allow a portion of the required open space to be 15 feet in dimension in lieu of the required minimum 20 feet;
- An exception from Section 7.I of the Specific Plan and Section 4.14 of the Development Standards to allow windows in the project to face windows across property lines or to face private outdoor space of other residential units;
- One affordable housing menu incentive under LAMC Section 12.22.A.25(f)(8) to average density, open space and parking over the entire property, and to permit vehicular access from a less restrictive zone to a more restrictive zone. The applicant is also utilizing the provisions of California Senate Bill SB1818 for a 35% density bonus, and Parking Option 2 to allow 1 parking space per affordable unit (in lieu of the Specific Plan minimum standard under Section 7G of one parking space per dwelling unit having less than 3 habitable rooms and 1.5 parking spaces per unit of 3 habitable rooms or more, plus .25 guest parking spaces per unit);
- Approval of a Zoning Administrator's Adjustment from Section 12.21.C.5(h) of the LAMC to allow an accessory use located in the more restrictive R3 Zone to serve a main residential use in the less restrictive [Q]R4-2 Zone.

On October 31, 2013, 2 1/2 months after completion of the Project's Final *Environmental Impact Report*, and over six months after public comment was due on the Draft EIR, applicant HCHC submitted to the Planning Department a new Master Land Use Permit Application. HCHC now requests two "On Menu" Density Bonus incentives and five "Off Menu" incentives, by-passing the rigorous standard of review previously required for exceptions to the Specific Plan.

Despite this significant change in entitlement requests, and the release of two erratas related to historic resources, the Planning Department has refused to re-circulate the Project's EIR for public comment.

IV. Comments on the Draft EIR

The Draft EIR received a significant number of public comment letters, all of which expressed opposition to the proposed Project. The public comments can be delineated as follows:

A. Historic Resources.

The proposed Project would demolish all buildings on the subject property, with the exception of two small, non-historic bungalows on the Serrano Avenue parcel to be incorporated into the development.

The Draft EIR concludes that the Project site contains no significant historic resources. This conclusion is based on a Historic Resource Assessment Report prepared in July of 2012 for HCHC by PCR Services Corporation, and is subsequently used as the justification to not include a preservation alternative to the proposed Project. PCR Services' conclusion, however, conflicts with several other independent analyses of the subject property.

As acknowledged in the Draft EIR, a February, 1979 survey of the 1920 "Santa Fe Style" residence located at 1601 N. Hobart Blvd. and designed by noted architect Henry Harwood Hewitt determined that this house "appears eligible for the National Register as an individual property through survey evaluation" with a status code of 3. The Draft EIR then states: "Upon a more detailed evaluation of the subject property in 2010, one of the preparers of the 1979 survey, Christy Johnson McAvoy, later recommended the subject property ineligible for the National Register or the California Register." This statement is incorrect.

Ms. McAvoy did not conduct a "detailed evaluation of the subject property in 2010," as stated by PRC Services. The MND in fact failed to do any historical analysis of the 1920 and 1924 residential structures on Hobart Blvd. No examination or proper review was conducted. Instead, Ms. McAvoy – whose firm was contracted by HCHC to re-review the subject lot, and whose husband co-founded HCHC in 1989 -- simply submitted a brief letter for the MND that incorrectly states in part:

"The property at 1601 Hobart has not been surveyed formally. However, the block does not retain any context in which to place the building because its surroundings are heavily dominated by newer and larger apartment buildings. Therefore it is an isolated example of its type and does not meet the criteria for individual listing as a local landmark or as a contributor to a potential district."

Ms. McAvoy therefore conducted no review of the property beyond the 1979 survey, in which she and the other reviewers determined that the 1601 N. Hobart Blvd. is eligible for the National Register and assessed it a status code of 3.

PCR's evaluation of the 1920 residence at 1601 N. Hobart Blvd. further states at page 59 of the Draft EIR: "Since its 1920 construction date, the subject property has lost many of its character-defining features and it has low integrity." PCR then assessed the property a status code of 6, or no historical significance.

PCR's conclusion, however, conflicts with the analysis of historian Charlie Fisher, and the preservation organizations Hollywood Heritage and the Los Angeles Conservancy. PCR's conclusion is also at odds with the independent analysis of ICF International (formerly Jones and Stokes) as part of its Section 106 review for the Los Angeles Housing Department. The conclusion of these various organizations is that the 1601 N. Hobart Blvd. property is qualified to be on the National Register.

PCR's conclusion also contradicts its own photos of the subject property, which show the 1601 N. Hobart structure to be remarkably intact both in its exterior appearance and interior details.

PCR's photos confirm a site visit in 2010 by representatives of our neighborhood council, who found that the property retains its original kitchen cabinetry and tile work; its original bathtub and bathroom tile; its original built-in cabinets and ceiling paneling (all with the original staining); its original arched doorways and doors (again with the original staining); its original chandeliers; its original stained wainscoting; and all but two of its original main windows. The property also retains the interior staircase, which PCR incorrectly states at page 47 in the Draft EIR was removed, but in fact was merely covered up.

The exterior of the 1601 N. Hobart property is also essentially intact to its original 1920 appearance, as exemplified by a September 1923 advertisement attached to the LA Conservancy's letter to the NOP, and a 1922 photo of the property that appeared in a supplement to California Southland Magazine titled "California Homes by California Architects." Both the 1923 advertisement and 1922 photo display the impressive integrity of this 94-year-old residence.

The PCR report also acknowledges that the 1601 N. Hobart Blvd. residence is the work of a master architect (Henry Harwood Hewitt).

By multiple expert analysis and photo evidence, therefore, the 1601 N. Hobart Blvd. residence exhibits all of the integrity and qualifications necessary to be deemed a significant historic resource. However, the Project EIR failed to include a preservation alternative to the proposed Project, simply stating that no historic resources are present on the site.

Since the release of the Final EIR, however, two independent actions further conflict with the applicant's insistence that the Project site contains no significant historic resources. As previously noted, on November 21, 2013, consultant ICF International issued a report for the Los Angeles Housing and Community Investment Department that "properties eligible for and listed in the National Register of Historic Places (NRHP) are located in the project APR (Area of Potential Effects)."

ICF International is the City of Los Angeles' preservation consultant for Section 106 reviews for federal housing tax credits. Based on ICF's independent conclusion that the property is eligible for the National Register, the LA Housing Dept. initially refused to proceed with HCHC's application unless the Project was revised to eliminate demolition of the 1601 N. Hobart Blvd. residence. This objection was lifted with the City Council's May 2, 2015 vote ordering the head of the department to support the project, and the Council's allocation of California tax credits for the project that negated the historical resource restrictions.

On October 28, 2013, Charles Fisher and Robert Blue nominated the 1601 N. Hobart Blvd. residence as a City of Los Angeles Historic-Cultural Monument. On January 16, 2014, the Los Angeles Cultural Heritage Commission voted to take the nomination under consideration, scheduling a tour of the residence for February 6.

The Commission's subsequent walk-through of the property, however, did not include entry and review of the residence's main interior, which HCHC refused to provide access to, citing concern for the privacy of the tenants. Instead, Commission members were allowed access only to a vacant, second-floor conversion. Following its "tour" of the property, Commission members visited HCHC's bungalow courtyards on Serrano Avenue, a 48-unit restoration project funded with \$24 million in CRA/LA financing.

HCHC's refusal to permit the Commission access to the interior due to tenant privacy concerns contrasts sharply with the experience of our neighborhood council when dealing with the residents, who welcomed our members and allowed them unlimited access (with no objections to photos being taken of the interior).

On March 20, the Cultural Heritage Commission voted unanimously to deny the 1601 N. Hobart Blvd. residence Historic-Cultural protection. The complete application for landmark status can be viewed by clicking onto the Cultural Heritage Commission's agenda for the 1/16/14 hearing (agenda item #9).

In denying Historic-Cultural recognition for 1601 N. Hobart Blvd., dubbed the "Ehrbar Residence" by Mr. Fisher, members of the Cultural Heritage Commission stated during its March 20 hearing that the integrity of the property was compromised in 1924 when a rear patio was removed to accommodate a multi-unit apartment building. Commission Chair Richard Barron (who acknowledged during the proceedings that he and his architectural firm have in the past been employed by HCHC) also repeated the claim of HCHC's consultants that the residence was an inferior work by architect Henry Harwood Hewitt.

However, Charlie Fisher explained in his rebuttal to the Staff Recommendation Report that the two Hewitt properties that have been accorded Los Angeles Historic-Monument status are in fact inferior designs to the Ehrbar Residence. Mr. Fisher also challenged the contention that alterations to the Ehrbar Residence are of consequence, noting that the addition can be readily removed and the rear patio easily recreated.

Since its inception, the East Hollywood Neighborhood Council has been a strong advocate for preservation of our community's historic architectural and cultural heritage. Retention of the 1601 N. Hobart Blvd. residence within the Project site is consistent with prior Board support for historic preservation, and it is therefore prudent to request that the EIR be required to include an alternative to demolition of the residence. This is especially pertinent since taxpayer funds are involved and the applicant seeks several discretionary approvals, including entitlements contingent upon no historic resource being impacted.

The applicant, however, is thus far insistent upon demolishing the 1601 N. Hobart Blvd. residence. Because demolition of a historic resource is a significant environmental impact, demolishing the Ehrbar house violates the California Environmental Quality Act (CEQA) unless alternatives to demolition are infeasible. *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336; *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587.

Reasonable alternatives must be considered "even if they substantially impede the project or are more costly." *San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

An EIR "must consider a reasonable range of alternatives to the project, or to the location of the project." Guideline Section 15126.6(f)(2). *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 574-575

An EIR must consider a "range of reasonable alternatives." *Citizens of Goleta Valley v. Board of Supervisors* (Goleta II) (1990) 52 Cal.3d 553; Guideline § 15126.6(c). An EIR must include sufficient information about each alternative "to allow meaningful evaluation, analysis and comparison with the proposed project." Guideline § 15126.6(d). Each alternative "must be described in sufficient detail to permit comparison with the proposed project. The key issue is whether the selection and discussion of alternatives fosters informed decision-making and informed public participation." *Laurel Heights Improvement Association v. UC Regents* (Laurel Heights I) (1988) 47 Cal.3d 376, 404.

Since the Project EIR failed to include a preservation alternative, it has not considered a reasonable range of alternatives to the Project.

B. Aesthetics

The Draft EIR concludes that the Project's "*scale and massing would be substantially consistent with the existing urban form along Hobart Blvd. and Serrano Ave. Aesthetic impacts associated with site design and compatibility with the overall character of the neighborhood would be less than significant.*"

The Project's proposed modern design, however, is inconsistent with numerous properties lining Hobart Blvd. and Serrano Ave., streets still dominated by courtyard apartment buildings within immediate vicinity of the subject lot. The height of the proposed structure, at 45 feet, is also inconsistent with the underlying zoning and the transitional height requirement, for which the applicant is seeking exceptions.

Impacts to Aesthetics are therefore potentially significant. Possible mitigation measures include reducing the height of the structure, and choosing an architectural style more consistent with properties prevalent on both streetscapes.

C. Parking

The Final EIR contained many public comments regarding its failure to analyze the cumulative impact of providing reduced parking for tenants of affordable housing developments, which are especially concentrated within the immediate vicinity of the subject site. The proximity of the Red Line Western Ave. subway station, which has no parking facilities, further exacerbates the existing dearth of available street parking within the area. Further reducing residential parking requirements for the Project, which is comprised primarily of 2- and 3-bedroom units, will likely worsen an already critical shortage of available street parking for residents.

V. City Hearings

The Coronel Apartments Project requires careful review and analysis by the City Planning Department. This is especially significant in light of the proposed demolition of the 1601 N. Hobart Blvd. residence, and the applicant's change in its requested entitlements after the release of the Project's Final EIR.

The applicant is required under LAMC Section 12.22.A.25(g)(3)(i)(a) to provide a Pro Forma to the City Planning Commission in order to show that the waiver of the underlying zoning requirements is needed in order to make the Restricted Affordable Units economically feasible. A Pro Forma is especially critical since the Coronel Apartments Project is taxpayer funded and contains no Market Rate units (with the exception of 1 unit identified as a manager's unit). However, rather than submit a project income and expense statement to justify the off-menu incentive requests, HCHC has instead recently submitted to the Planning Department a comparison of the proposed project versus a reduced-scale development. HCHC then hired its own consultant to conduct an "independent" review of this cost comparison.

The applicant refused to make a Pro Forma available for review to our neighborhood council until the day before the March 27, 2015 Planning Department Hearing Officer hearing, despite soliciting and receiving additional public funding in the meantime to proceed with the project. Queries placed with other affordable housing developers by members of our neighborhood council confirmed that solicitation of private or public funding always requires the preparation and distribution of a Pro Forma. It is therefore incumbent upon HCHC to provide the Commission with such documentation for review.

East Hollywood NC opposition to the Coronel Apartments Project
April 27, 2015; Page ten

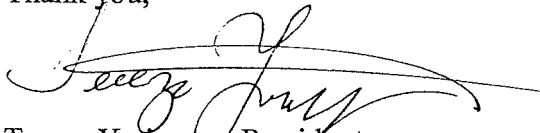
As previously noted, on May 2, 2014, the Coronel Apartments project received official City Council funding and support. The City of Los Angeles is the Lead Agency tasked with reviewing the proposed project. Since the City Council provided HCHC with official support for the Coronel Apartments project prior to completion of CEQA review/certification, and prior to Planning Dept. hearings and public participation, the city has pre-committed to the project.

The California Supreme Court has expressly identified post-hoc rationalization of CEQA to be illegal: "A fundamental purpose of an EIR is to provide decision makers with information they can use in deciding *whether* to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved. If post-approval environmental review were allowed, EIRs would likely become nothing more than *post hoc* rationalizations to support action already taken. We have expressly condemned this use of EIRs." *Laurel Heights Improvement Association v. UC Regents (Laurel Heights I)* (1988) 47 Cal.3d 376, 394.

VI. Conclusion

For the above stated reasons, the Board of Directors of the East Hollywood Neighborhood Council respectfully requests that the City Planning Commission carefully consider the Coronel Apartments project. Our neighborhood council wishes to express its opposition to the project as currently proposed.

Thank you,

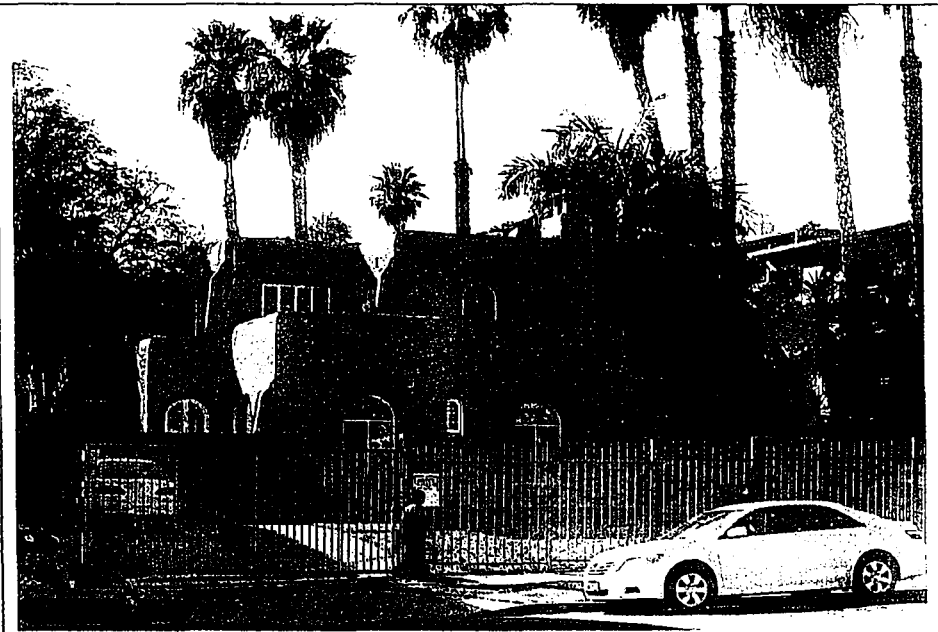


Tereza Yerimyan, President
East Hollywood Neighborhood Council

CORONEL APARTMENTS PROJECT SITE AND PARTIAL EXISTING STREETScape



Aerial view project site extending from Serrano Ave. to Hobart Blvd. Project would demolish 4 buildings totaling 27 units.



1601 N. Hobart Blvd.: 1920 Pueblo Revival style residence to be demolished. A 1924, 2-story courtyard apartment bldg is in rear



1600 - 1608 N. Serrano Ave., built 1954, to be demolished.



Courtyard apartments on Hobart Blvd. north of Project site

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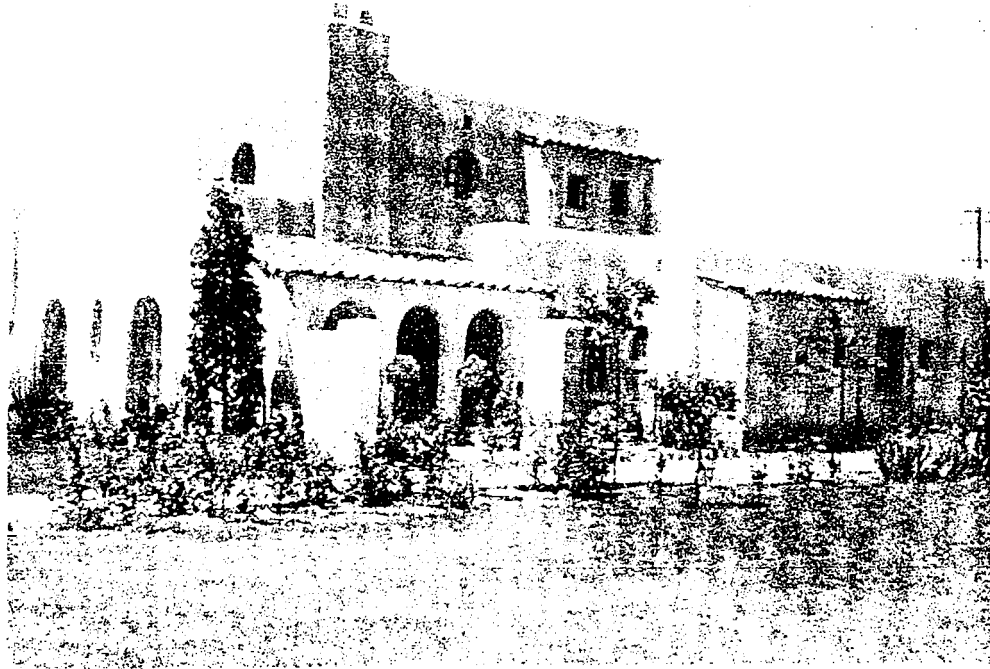
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BY
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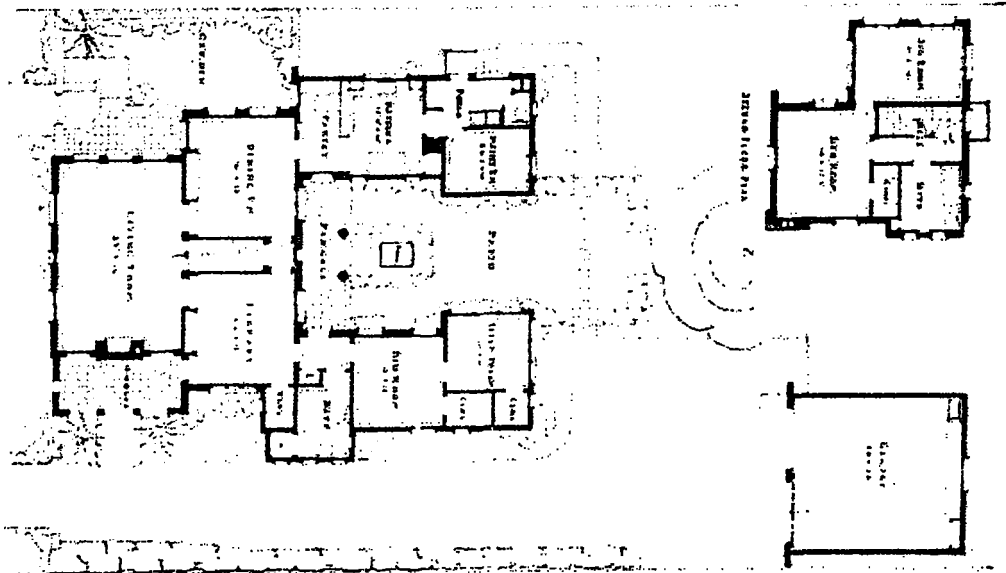
COMPILED BY
ELLEN LEECH

WITH THE APPROVAL OF THE
SOUTHERN CALIFORNIA CHAPTER
AMERICAN INSTITUTE *of* ARCHITECTS
THROUGH HENRY F. WITHEY, CHAIRMAN
PUBLIC SERVICE COMMITTEE
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LOS ANGELES, CALIFORNIA, 1922

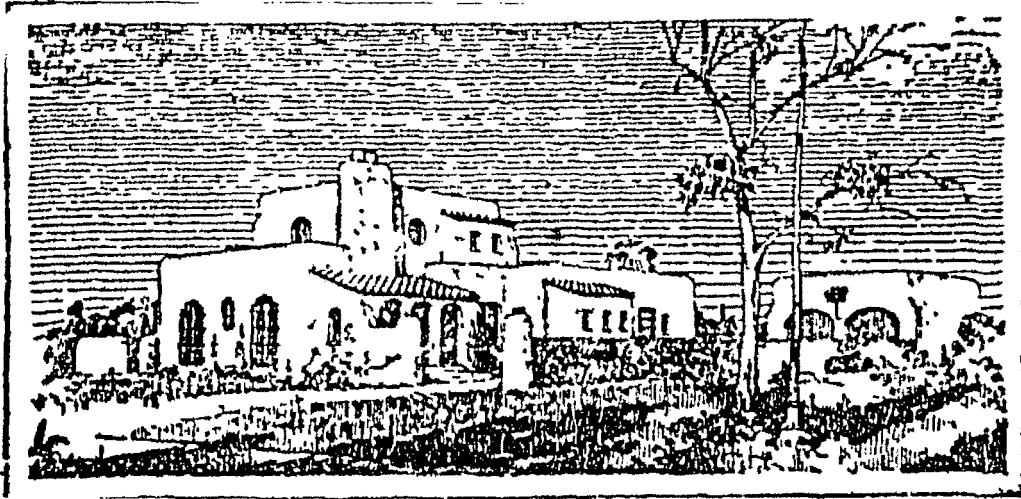


A. L. EHRBAR HOUSE, HOLLYWOOD
HARWOOD HEWITT, ARCHITECT



1601-1605 N. Hobart Boulevard Photographs

Los Angeles Times (1886-1922); Jul 18, 1920;
ProQuest Historical Newspapers Los Angeles Times (1881 - 1987)
pg. V2



Attractive Hollywood Home.

Spanish type residence to be built for Elisha Ehrbar at 1905 North Hobart Boulevard; Harwood Hewitt, architect.

This architectural rendering of the subject house was published in the Los Angeles Times on July 16, 1920 with the incorrect address of 1905 North Hobart Boulevard. The original building permit confirms the 1605 Hobart address.



A photo taken on October 8, 2010 confirms the same design, with the two replaced windows in original openings. Most of the remaining windows appear to be originals (Photograph by Charles J. Fisher)



*View of living room shows original beamed ceiling, lighting fixtures and arched doorway to dining room
(Photograph by Charles J. Fisher)*



View of living room showing original fireplace and hardwood flooring (Photograph by Charles J. Fisher)



November 21, 2013

Mr. Alex Fu
Los Angeles Housing and Community Investment Dept.
1200 W. 7th Street, 8th Floor
Los Angeles, CA 90017

**Subject: Section 106 Review for Coronel Apartments
1601-1605 N. Hobart Blvd. & 1600-1602 N. Serrano Avenue, Los Angeles, CA**

Dear Mr. Fu:

Pursuant to your request, ICF International (ICF) is carrying out a review of the undertaking at the above-referenced address under Section 106 of the National Historic Preservation Act. Acting as the City's Historic Preservation Consultant, ICF is carrying out this review under the terms of the Programmatic Agreement (PA) of September 6, 1995 among the City of Los Angeles, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation.

ICF has established an Area of Potential Effects (APE) for the proposed undertaking and conducted a review of the properties located in this area, per the requirements of Stipulation VI (Identification and Evaluation of Historic Properties) of the PA. Based on our review, we have concluded that properties eligible for and listed in the National Register of Historic Places (NRHP) are located in the project APE.

We recommend that the City consider the house at 1601 N. Hobart Boulevard NRHP eligible for the purposes of Section 106 review under the PA. There are also two other properties already listed in the NRHP located in the APE adjacent to the subject property. The bungalow courts located at 1544 and 1554 N. Serrano Avenue were identified as NRHP eligible as part of prior Section 106 review undertakings in 1994 and 2007, and listed in the NRHP in September 2010 as part of federal historic preservation tax credit projects.

The buildings on the project site were previously evaluated by historic resources assessment included as part of the draft and final Environmental Impact Reports for the project in 2012 and 2013. There are several opposing opinions expressed in these documents about whether the house at 1601 N. Hobart Boulevard is NRHP eligible, including in the submitted public comment letters. We have reviewed each of these opinions, and contacted several of the consultants and interested parties involved to better understand how this property is being considered. In addition, we conducted our own assessment of the property based on NRHP criteria for eligibility. The result is our aforementioned recommendation. We believe a strong argument can be made that 1601 N. Hobart Boulevard is NRHP eligible.

It also should be noted that several of the organizations/individuals that expressed opinions during the EIR comment period about house's NRHP eligibility would also be considered interested parties under

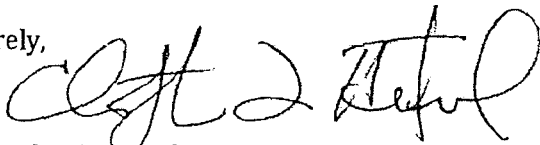
Section 106 for the for Coronel Apartments
November 21, 2013
Page 2 of 2

Section 106, and would need to be consulted as part of the Section 106 review process. According to the PA, any of these interested parties could disagree with the City's findings and force consultation with the SHPO and Advisory Council to resolve the disagreement (Stipulation XIII). Therefore, consideration of their opinions is important.

Because there are NRHP-eligible properties in the APE, under Stipulation VI.D.1.a of the PA, these properties are considered "historic properties" and the undertaking must be reviewed for conformance with the Secretary of the Interior's Standards for Rehabilitation and the California Historical Building Code. To complete a review of the undertaking on behalf of the City, the NRHP-eligibility determination for 1601 N. Hobart Boulevard will need to be submitted to the SHPO for review and concurrence. As the project currently calls for the demolition of this property, we also suggest that a meeting be scheduled to discuss whether the adverse effect can be avoided, or if the SHPO should be consulted and the process of preparing and implementing a Standard Mitigation Measures Agreement (SMMA) initiated.

Please feel free to contact me at (206) 801-2817 or Colleen Davis at (213) 312-1759 should you have any questions.

Sincerely,



Christopher J. Hetzel
Project Manager/Senior Architectural Historian

Cc: Shelly Lo



April 8, 2013

Submitted by email

Ms. Srimal Hewawitharana
 Environmental Specialist II
 Department of City Planning
 Environmental Review Section
 200 N. Spring Street, Room 750
 Los Angeles, CA 90012
 Email: srimal.hewawitharana@lacity.org

Re: Coronel Apartment Project Draft EIR, ENV-2012-110-EIR

Dear Ms. Hewawitharana:

On behalf of the Los Angeles Conservancy, we submit these comments on the Coronel Apartment Project Draft EIR providing additional information establishing the architectural significance of the Ehrbar Residence and the need to consider a preservation alternative that would reuse the structure as part of the project.

5.1

I. Ehrbar Residence at 1601 N. Hobart Blvd. has been established as a historic resource

The Conservancy maintains our belief that the Ehrbar Residence at 1601 N. Hobart Boulevard is architecturally significant and qualifies as a historic resource. The residential structure is a rare example of architecture associated with Pueblo Revival design in the City of Los Angeles and a notable design by architect Henry Harwood Hewitt that was published in the AIA-sponsored *California Homes by California Architects*.¹

While the Draft EIR's historic resource assessment prepared by PCR Services Corporation finds the Ehrbar Residence ineligible for listing as a historic resource, the consultants uncovered and included the 1979 survey of the subject property that corroborates our professional opinion and finds it eligible for listing in the National Register.

5.2

The 1979 assessment characterizes the subject property as "built in a Pueblo Indian-Spanish style" and, describing its rarity, states that "there were a few homes built in this style in Hollywood in the Twenties; very few remain."²

While the consultants for the Draft EIR acknowledge this 1979 assessment, they provide no reasons or explanation for why this finding of National Register eligibility is no longer valid. Instead, the consultants produced a new assessment that finds the subject property to be altered to a level that impacts

¹ Leech, Ellen. *California Homes by California Architects*. *California Southland Magazine*. Los Angeles, 1922: 26.

² Coronel Apartment Project Draft EIR. Appendix B: Historic Resource Assessment Reports. PCR Services Corporation, July 2012. Historic Resource Inventory, March 1979.

potential eligibility and conclude that it is an unrepresentative example of the Spanish Colonial Revival style.

II. Architectural Significance and Integrity of Ehrbar Residence at 1601 N. Hobart Blvd.

The design of the Ehrbar Residence does not exhibit all of the character defining features associated with the Pueblo Revival style, and the Draft EIR has identified the subject property as “a Spanish Colonial Revival residence with Pueblo Revival style influences, rather than a pure facsimile of the Pueblo Revival style.”³ The Conservancy has always acknowledged that the Ehrbar Residence was not a pure example of Pueblo Revival architecture, stressing instead that instances of Pueblo Revival and its stylistic expression in both pure and derivative forms is very rare in the City of Los Angeles, hence making the subject property a rare resource type.

However, the Draft EIR concludes that “while the residence is original in its use of design features, it does not represent the design principles of the Spanish Colonial Revival Style, which are based on authenticity of historic precedents from the Spanish and Mexican period of California and the Southwest, rather than a conglomeration of diverse and contrasting design features.”⁴

While the Draft EIR describes the Ehrbar Residence as an unrepresentative example of Spanish Colonial Revival, further research reveals that it can be properly classified as belonging to the flat roof subtype of the Spanish Colonial Revival/Spanish Eclectic style, as described by Virginia and Lee McAlester in their decisive architecture style guide *A Field Guide to American Houses*. The authors state:

About 10 percent of Spanish Eclectic houses have flat roofs with parapeted walls. These typically show combinations of one- and two-story units. Narrow, tile-covered shed roofs are typically added above entryways or projecting windows. This subtype, loosely based on flat-roofed Spanish prototypes, resembles the Pueblo Revival house.⁵

Rather than being non-representative of the design principles of the Spanish Colonial Revival style, as noted in the draft EIR, the Ehrbar Residence appears to be an early and highly articulated example of the flat roof subtype of the Spanish Colonial Revival style, in which character-defining features of the Pueblo Revival style are employed with greater prominence than typical for this subtype. In particular, key design elements of the subject property drawn from Pueblo Revival include walls with strongly rounded edges at the roof parapet and battered wall extensions that slope inward toward the roof parapet—design features that may be absent entirely or receive a more simplified treatment in other examples of the flat roof subtype of Spanish Colonial Revival.

Although the residence is properly classified as a subtype of the Spanish Colonial Revival style, its design and appearance strongly references the Pueblo Revival. Regardless of the distinction between pure examples of Pueblo Revival and examples of the flat roof subtype of Spanish Colonial Revival style that may incorporate Pueblo Revival influences, architecture associated with Pueblo Revival design is highly uncommon in the City of Los Angeles, thus making the Ehrbar Residence a rare resource type.

The Draft EIR finds that the Ehrbar Residence is altered to a level that impacts potential eligibility. The Conservancy disagrees with this conclusion. Despite two main areas of alteration to the design of the

³ Coronel Apartment Project Draft EIR, Appendix B: Historic Resource Assessment Reports, PCR Services Corporation, July 2012: 29.

⁴ Coronel Apartment Project Draft EIR, Appendix B: Historic Resource Assessment Reports, PCR Services Corporation, July 2012: 46.

⁵ McAlester, Virginia and Lee McAlester, *A Field Guide to American Houses*, New York: Knopf, 1985: 417.

Ehrbar Residence, a rear addition and the replacement of two historic windows on the front facade with aluminum frame versions, the Conservancy believes the structure maintains high integrity of its original design.

The patio space that originally existed between the two rear wings is now occupied by a one-story addition—though this is only visible from the rear elevation; it neither alters the general massing of the structure, nor does it alter the original appearance of the structure as viewed from either the public right of way or side elevations. Meanwhile, the original fenestration of the Ehrbar Residence remains highly intact, with the only removal of outward-facing historic windows limited to the pair of multi-pane casements windows since replaced with aluminum-framed versions. These two areas of alteration to the subject property do not significantly compromise the original design of the structure.

III. Conclusion

Because the Draft EIR concludes that the subject property is not a historic resource, no preservation alternatives were examined and only Alternative 1 (No Project Alternative) retains existing on-site structures. However, the Conservancy continues to believe that the Ehrbar Residence at 1601 N. Hobart Boulevard qualifies as a historic resource under CEQA and we request that the Final EIR be augmented to include at least one alternative that retains and reuses the structure as part of the proposed project. Additionally, the Final EIR should include a mitigation measure that would promote the relocation of the Ehrbar Residence, while meeting the Secretary of the Interior's Standards.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Thank you for the opportunity to comment on the Coronel Apartment Project Draft EIR. The Conservancy hopes to work closely with the applicant's team as this project moves forward. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

Adrian Scott Fine

Adrian Scott Fine
Director of Advocacy

Enclosure

5.3

5.4

OFFENHAUSER / MEKEEL ■
ARCHITECTS

March 10, 2014

Cultural Heritage Commission
Richard Barron, President
Commission Members

Reference: CHC-2013-3625-HCM
Ehrbar Residence
1601 N. Hobart Blvd.

Dear President Barron and Honorable Commission Members,

I am writing in support of the CHM nomination for the Ehrbar Residence.

I am the owner of Historic Cultural Monument #769, another rare single family home tucked among large apartment buildings, two blocks away from the proposed CHM. My property was in terrible disrepair when I purchased it; now it is restored, has a Mills Act contract, is screened from the nearby apartments by a tall hedge, and is productively used as rental housing.

I am writing as principal architect of a firm specializing in restoration of historic residential and commercial properties. I am also a co-founder of Hollywood Heritage.

There is broad professional support for the Ehrbar Residence nomination. The L. A. Conservancy and Hollywood Heritage strongly advocate preservation of the residence, and ICT International (Jones and Stokes) independently determined on behalf of the L. A. Housing and Community Investment Dept. under a Section 106 review that the residence qualifies to be on the National Register.

The Ehrbar Residence, constructed in 1920, is an extremely rare example of its architectural type, and has remained virtually intact both inside and out over the past 94 years. Its integrity and condition is better than my building at 1749 N. Harvard when awarded monument status. My experience shows that retention and use as apartments is financially feasible.

Sincerely,

Frances Offenhauser, Principal

:desktop folder:doug original:hchc hobart/serrano:fran ehrbar residence

Harwood Hewitt, Architect **(1874-1926)**

By Charles J. Fisher

Henry Harwood Hewitt was born in Bloomington, Illinois on August 2, 1874 to Charles Edmund and Helen M. (Thompson) Hewitt. He and his twin sister, Helen, were the youngest of four children. His older brother, Herbert Edmund Hewitt, was to become an architect as well, practicing in Peoria, Illinois. Harwood Hewitt was a graduate of the University of Chicago, the Massachusetts Institute of Technology and the Ecole de Beaux Arts, in Paris France.

On June 25, 1905, he married Elizabeth Showler Galloway (Hammell) in Port Chester, New York. That union brought in two stepdaughters, Marie J. and Anne Mae Hammell. The family settled in Denver, Colorado, and he began his architectural career as a partner in the firm of Biscoe and Hewitt, that designed the Denver Civic Center in 1908. On May 18, 1909, his son, Alvin Edmund Hewitt was born in Denver. His marriage ended in divorce on July 12 of the following year, but on Christmas Eve, the couple remarried.

The marriage lasted until June 20, 1913, when they had their second divorce. The following month, Hewitt relocated to Los Angeles become the junior partner of architect Oliver P. Dennis

Dennis had just dissolved his highly successful partnership with Lyman Farwell, who had entered politics. It's possible that Hewitt was recommended by Farwell as they had both attended MIT and the Ecole de Beaux Arts.

The partnership of Dennis and Hewitt was a productive one, producing many fine residences, commercial and school buildings, such as a 100-room Italian Renaissance hotel on Hope Street near Bunker Hill (1913), the Westlake Masonic Temple (1914), the Colonial style L. D. Hines Building at Hollywood Boulevard and St. Andrews (1915), the Mediterranean Revival George H. Huntsberger Residence in Windsor Square (1913), the Palms Grammar School (1914), Owensmouth Union High School (1915) and an apartment building for Oliver P. Dennis at 1628 Hudson, in Hollywood (1914).

The Dennis partnership ended during World War I and Hewitt continued working solo with the exception of a short-lived partnership with H. L.

Barker in 1921 that brought about the Renaissance Revival Immaculate Heart of Mary School. At some point during this period, Hewitt married his second wife, Ethelyn.

Other noted buildings that Hewitt designed during that period included the Elesha Ehrbar Residence at 1905 Hobart Boulevard in 1920, the Tudor Revival home of author-playwright Hector Turnbull in Hollywood's La Brea Canyon, also in 1920, the award winning W. H. Glover Residence at 227 S. Normandie (1921), the award winning James Shultz Residence (1921), a Spanish Colonial Revival residence in adobe for Alice Lynch (HCM No. 621) at 2414 4th Avenue in 1922 and the Mediterranean Revival C. C. Waite Residence at 2431 Hill Drive in Eagle Rock (1922).

Hewitt was a founding member and secretary for the Allied Architects Association which used the combined skills of its members to produce designs for public buildings, such as Patriotic Hall on S. Figueroa Street, the Los Angeles County Hospital, the Hall of Justice and the acute care unit for Olive View Medical Center. He was on the architectural jury that chose the design for the Los Angeles City Hall (HCM No. 150).

His interior for the G. G. Deizer Residence was featured in the Los Angeles Times in 1925 and he was awarded the world prize for residential architecture at the International Exposition of Architecture and Fine Arts in New York during the same year for his design of the W. T. Hanson House in La Cañada-Flintridge. He was also commissioned for the design of the Los Angeles Ebell Club at 4400 Wilshire Boulevard (HCM No. 250) in 1925.

Henry Harwood Hewitt died suddenly at his home on January 29, 1926 at the age of 51, at the height of his architectural career. He was at the time chairman of the architectural jury of design for the design of a major addition for the Los Angeles County General Hospital. His Ebell commission was awarded to the firm of Hunt and Burns. Sumner Hunt's wife was a member of the club and had served on the committee that had selected Hewitt for the building. It is not known how much of Hewitt's work made it into the final design for that building.

Sources: United States 1880, 1910, and 1920 Census; Landmark L.A., edited by Jeffrey Herr, 2002; Los Angeles Times Obituary, January 30, 1926; Withey, Henry, "Dictionary of American Architects, Deceased"; various Los Angeles Times articles; Builder and Contractor and Southwest Builder and Contractor citations; Los Angeles City building permits.

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15-0790



November 21, 2013

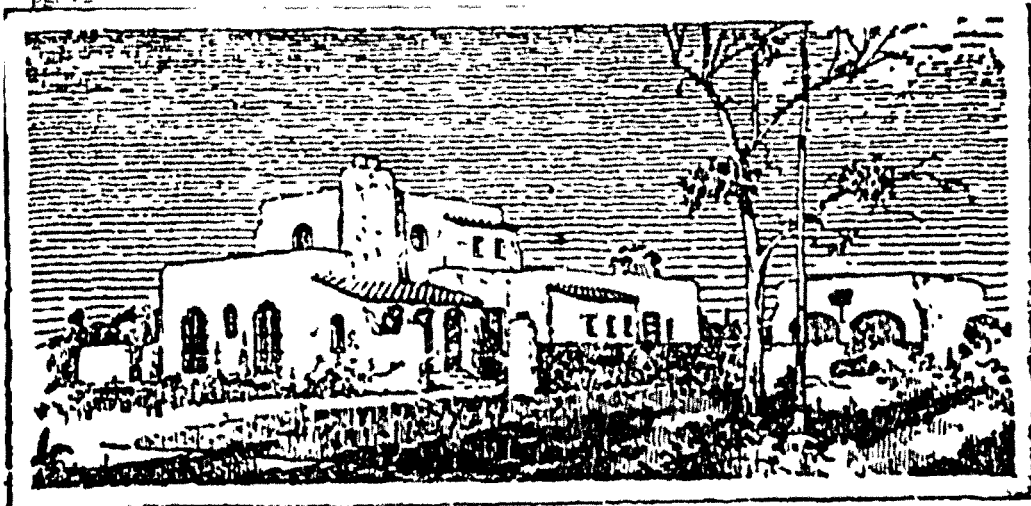
Mr. Alex Fu
Los Angeles Housing and Community Investment Dept.
1200 W. 7th Street, 8th Floor
Los Angeles, CA 90017

**Subject: Section 106 Review for Coronel Apartments
1601-1605 N. Hobart Blvd. & 1600-1602 N. Serrano Avenue, Los Angeles, CA**

We recommend that the City consider the house at 1601 N. Hobart Boulevard NRHP eligible for the purposes of Section 106 review under the PA. There are also two other properties already listed in the NRHP located in the APE adjacent to the subject property. The bungalow courts located at 1544 and 1554 N. Serrano Avenue were identified as NRHP eligible as part of prior Section 106 review undertakings in 1994 and 2007, and listed in the NRHP in September 2010 as part of federal historic preservation tax credit projects.

The buildings on the project site were previously evaluated by historic resources assessment included as part of the draft and final Environmental Impact Reports for the project in 2012 and 2013. There are several opposing opinions expressed in these documents about whether the house at 1601 N. Hobart Boulevard is NRHP eligible, including in the submitted public comment letters. We have reviewed each of these opinions, and contacted several of the consultants and interested parties involved to better understand how this property is being considered. In addition, we conducted our own assessment of the property based on NRHP criteria for eligibility. The result is our aforementioned recommendation. We believe a strong argument can be made that 1601 N. Hobart Boulevard is NRHP eligible.

Los Angeles Times (1886-1922); Jul 18, 1920;
ProQuest Historical Newspapers Los Angeles Times (1881 - 1987)
pg. V2



Attractive Hollywood Home.

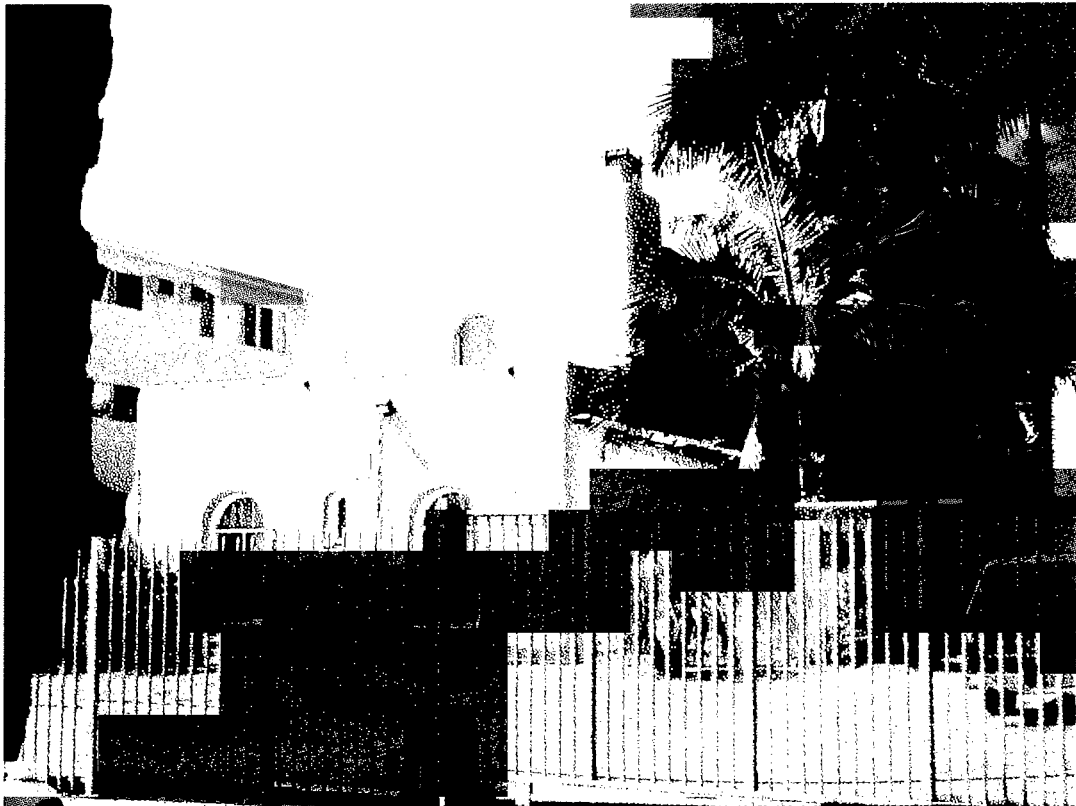
Spanish type residence to be built for Elisha Ehrbar at 1905 North Hobart
Boulevard; Harwood Hewitt, architect.



Current photo of Ehrbar Residence.



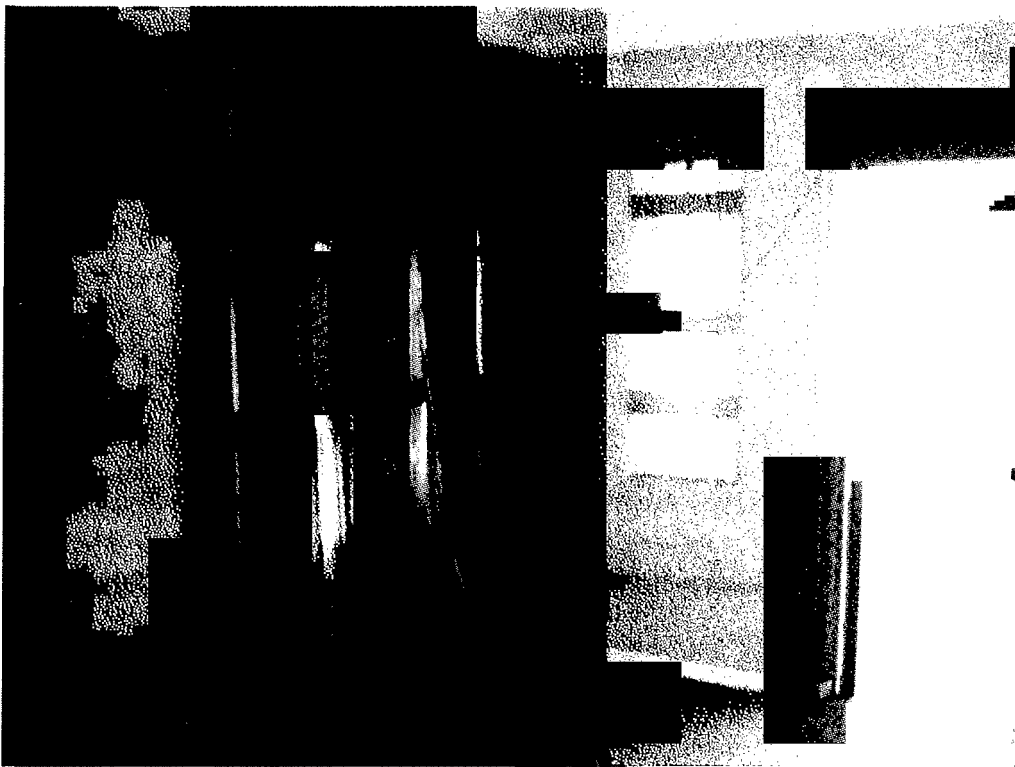
Ehrbar Residence in 1920.



Ehrbar Residence, Current View.



Ehrbar Residence, living room



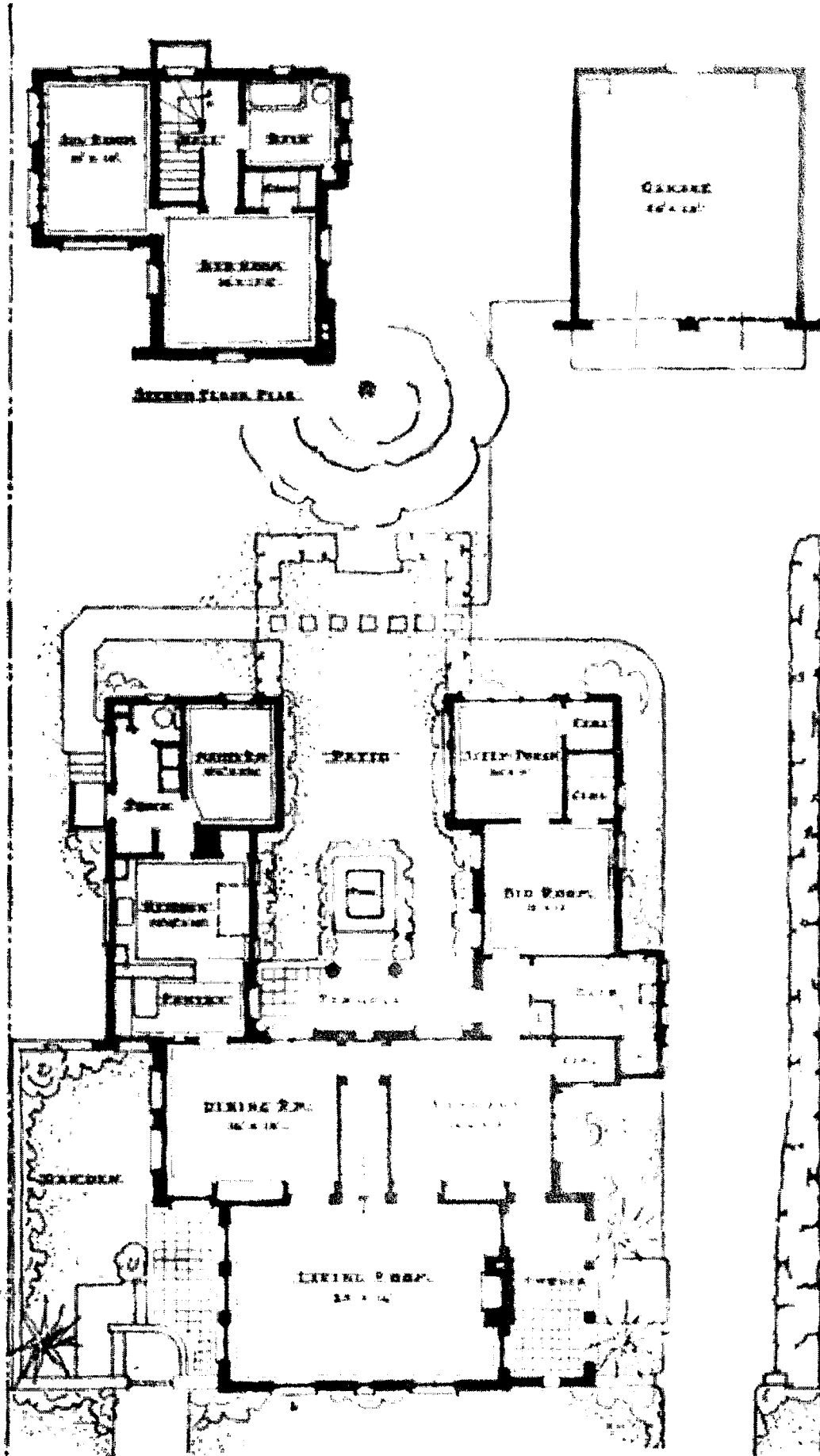
Ehrbar Residence, what was shown to Cultural Heritage Commission.

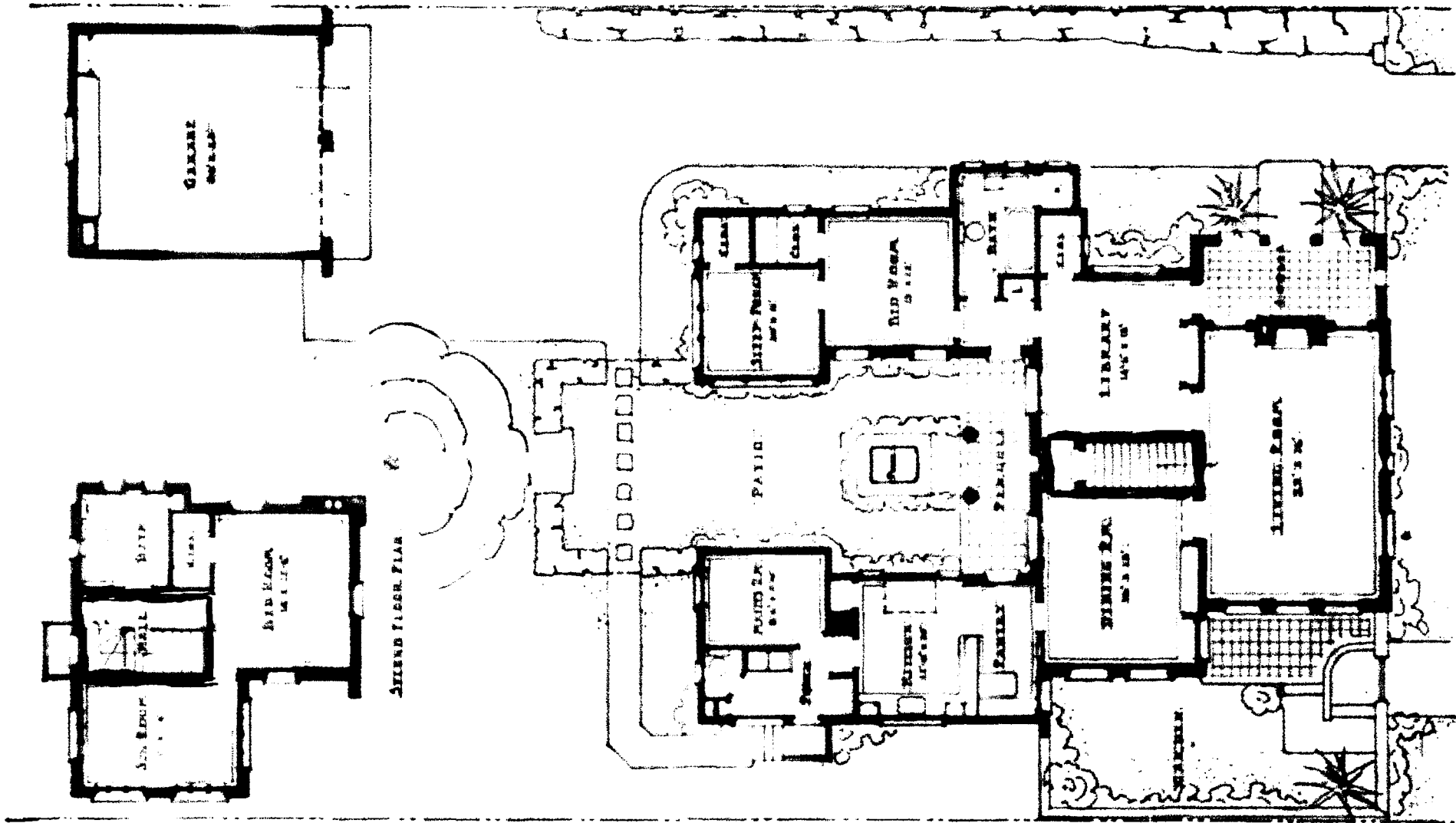


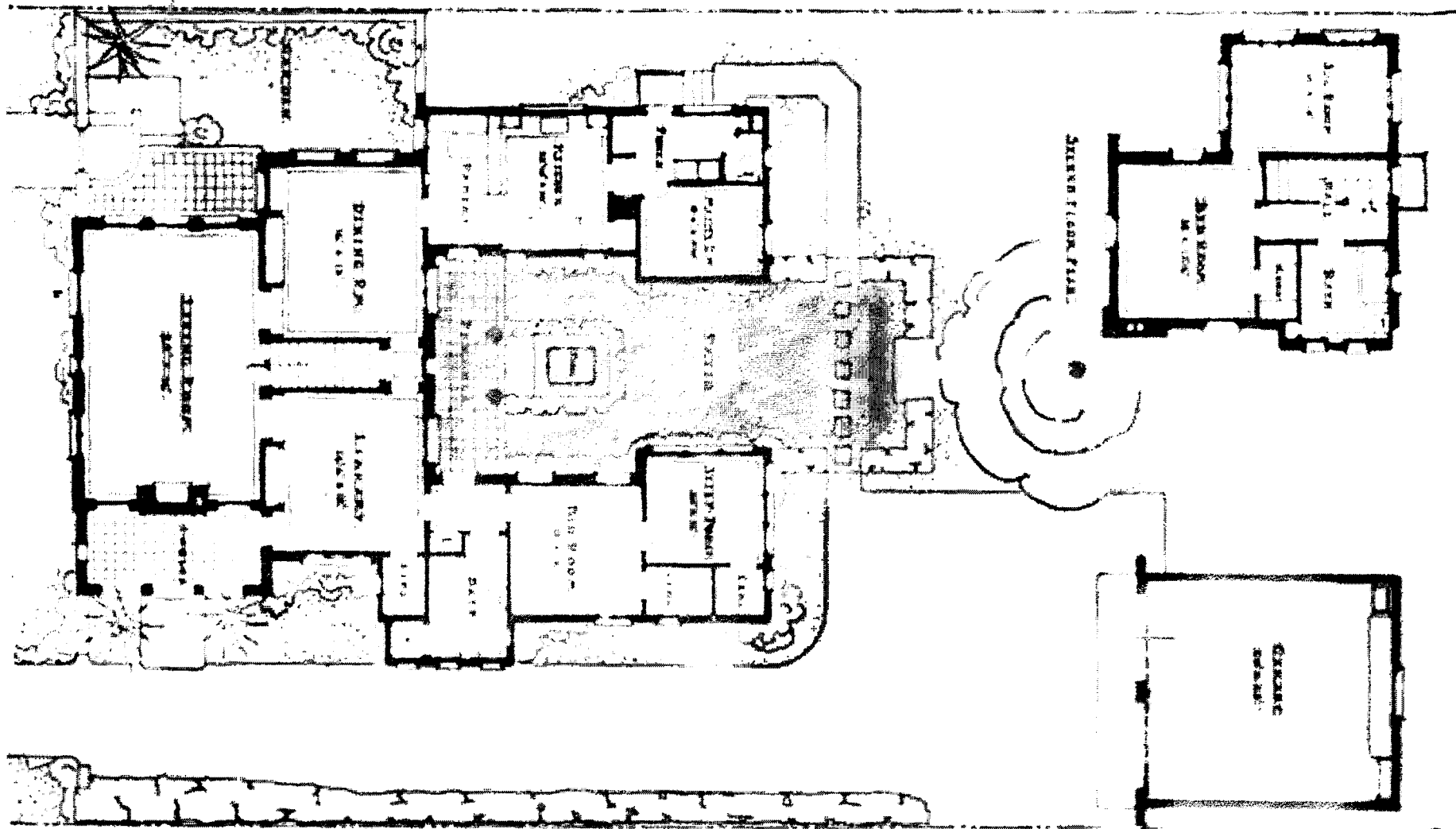
Ehrbar Residence, living room.



Ehrbar Residence, what was shown to Cultural Heritage Commission.







Hi, Blair:

Please review the following email from our consultant and let us know what is your final decision on that building, to be relocated for preservation or to be demolished as the application stated. Your prompt response will be highly appreciated.

Alex Fu

HCIDLA

----- Forwarded message -----

From: **Robert Manford** <robert.manford@lacity.org>

Date: Wed, Dec 18, 2013 at 9:44 AM

Subject: Re: Coronel Apts

To: "Hetzel, Christopher" <Christopher.Hetzel@icfi.com>

Cc: Shelly Lo <shelly.lo@lacity.org>, Alex Fu <alex.fu@lacity.org>, Alexis Baylosis <alexis.baylosis@lacity.org>, "Starzak, Richard" <Richard.Starzak@icfi.com>, "Davis, Colleen" <Colleen.Davis@icfi.com>

Alex:

I think at this point you should communicate directly with the developer and let them know the status of the environmental; review of their project. Also, find out from them regarding the possibility of relocating the property and any additional information associated with that. Also, let them know that the work associated with the historic review, after our preliminary screening and evaluation by HCID consultant, will have to be paid for by the developer. Let me know what the developer's take is.

-

[Redacted]

Dr. Robert K. Manford Environmental Affairs Officer &

Manager, Environmental and Land Use Services Unit

Finance & Development Division

Housing + Community Investment Department (HCID)

1200 W. 7th Street, 4th Floor

Los Angeles, CA 90017

☎:(213) 744-7363 | ✉: robert.manford@lacity.org

----- Forwarded message -----

From: **Hetzel, Christopher** <Christopher.Hetzel@icfi.com>

Date: Tue, Dec 17, 2013 at 5:25 PM

Subject: RE: Coronel Apts

To: Robert Manford <robert.manford@lacity.org>

Cc: Shelly Lo <shelly.lo@lacity.org>, Alex Fu <alex.fu@lacity.org>, Alexis Baylosis <alexis.baylosis@lacity.org>, "Starzak, Richard" <Richard.Starzak@icfi.com>, "Davis, Colleen" <Colleen.Davis@icfi.com>

Robert,

Following our phone conversation, I conferred with Rick and Colleen about the Coronel Apartments project, and we all seem to agree on the following points:

1. If the developer relocates the historic property, instead of demolition, we could likely justify a finding of "no adverse effect" under Section 106. This finding assumes that the house is NRHP eligible under Criterion C for its architecture and it is moved to a new lot that is in a nearby location and generally has the same characteristics (e.g., placement on the block) as its current location. There is some precedent for this on part of the SHPO, and would need to go through a consultation process with the SHPO under the Programmatic Agreement (see below).
2. If the finding under Section 106 is "no adverse effect," then preparing a FONSI under NEPA should be no problem. Rick has also pointed out that, according to the CEQ/ACHP NEPA/106 Handbook from March 2013, even an "adverse effect" determination does not necessarily rule out the possibility of a FONSI. I believe Rick has already discussed this with you and forwarded you a copy of the text with this guidance.

Moving forward with the Section 106 review for the project, the following are the next steps in the review process:

1. Prepare a formal determination of NRHP-eligibility for the Hobart house and submit it to the SHPO for concurrence, according to the requirements of the Programmatic Agreement. With your authorization, this is something that we can proceed with immediately. Time wise, we could have the determination prepared and submitted by early to mid-January. After receipt, the SHPO would have 15 days to review and comment.
2. Prepare a Finding of Effect for the project. If the Hobart house will be relocated and there is a "no adverse effect" finding, then the City would have to comply with Stipulation 'VII.D: Relocation of Historic Properties' of the Programmatic Agreement. This stipulation requires the City to forward documentation to the SHPO "that explains the need for relocation, describes the relocation site, indicates why the proposed relocation site was selected, states whether the relocation site contains archaeological properties, and summarizes the alternatives to relocation that were considered." If the SHPO agrees to the relocation after reviewing this documentation, then no other action is required. If they disagree, then further consultation with the SHPO would be necessary.

Assuming the project plans have been finalized, including the selection of a relocation site, we could have the necessary documentation prepared and submitted to the SHPO within about 2 weeks from receiving the final project plans. Following receipt of the documentation, the SHPO would have 15 days to review and

comment. If they were to disagree with relocation, the Programmatic Agreement calls for up to an additional 30 days of consultation to resolve the disagreement. If no agreement is made after 30 days, then the review gets pushed to the Standard Mitigation Measures Agreement (SMMA) process under 'Stipulation VIII: Resolution of Adverse Effects' of the Programmatic Agreement.

We prepared documentation under the Programmatic Agreement for an LAHD project that required the relocation of a historic property a couple years ago...the Taylor Yard project. A copy of the documentation is attached, to give you an idea of what type of documentation we would want to submit to the SHPO.

In contrast to all this, if the Hobart house is not relocated or there is a finding of "adverse effect," the City would need to initiate consultation with the SHPO under Stipulation 'VII.E: Demolition' and/or Stipulation 'VIII. Resolution of Adverse Effects' of the Programmatic Agreement. Both require forwarding various forms of documentation to the SHPO. The timeframe for this would likely involve longer document preparation time (to compile all the required studies, analyses, and justifications) and the same 15-day review period, plus additional to draft and execute an Standard Mitigation Measures Agreement.

That about sums it all up. I have attached a copy of the Programmatic Agreement for your convenience. Please feel free to email or call if you have any further questions.

Sincerely,

Chris

Christopher Hetzel | Project Manager/Sr Architectural Historian | 206.801.2817 | 213.840.3143
(m) | christopher.hetzel@icfi.com | icfi.com

ICF INTERNATIONAL | 710 2nd Avenue, Suite 550, Seattle, WA 98104 | 206.801.2899 (f)

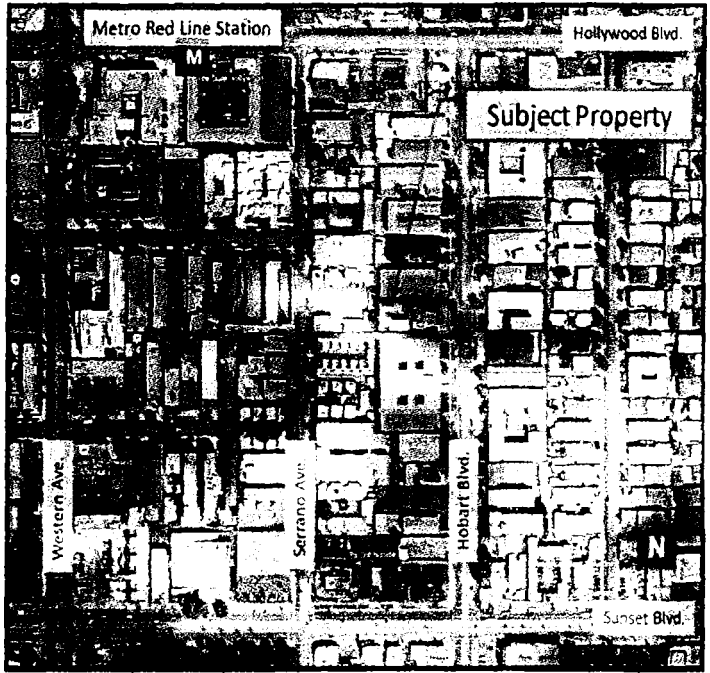
ICF INTERNATIONAL | 601 West 5th Street, Suite 900, Los Angeles, CA 90071 | (213) 312-1799 (f)

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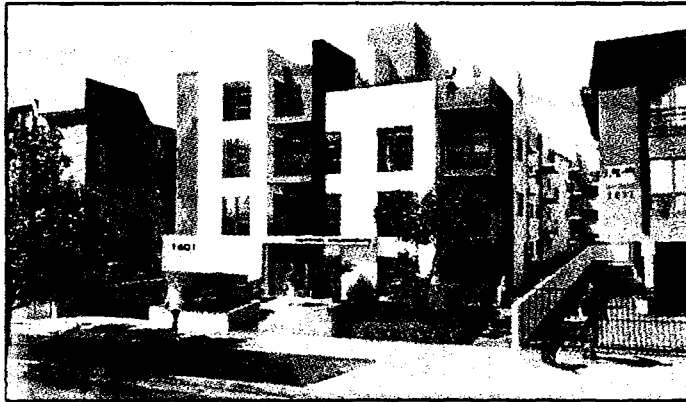
Affordable Housing in Hollywood Coronel Apartments

1600-1608 N. Serrano Ave. & 1601 N. Hobart Blvd. Hollywood, CA 90027

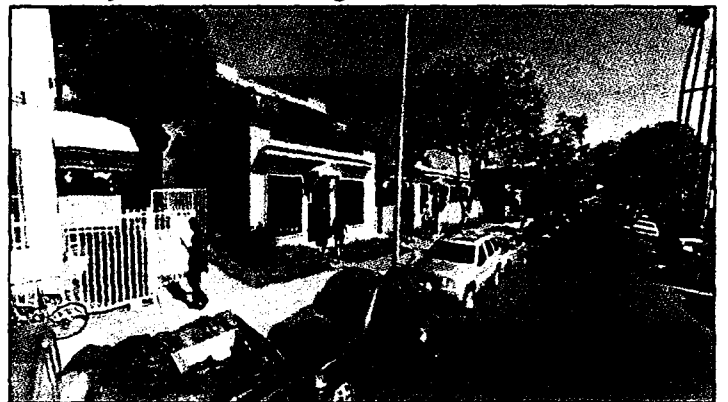
- 100% affordable housing development
- 54 units for low-income families earning up to 60% of area median income (AMI)
 - 6 units for households who are homeless or at risk of homelessness
 - 1 unrestricted unit for resident manager
- Beautiful new code compliant units that will conform to 2014 CalGreen Code
- Numerous unit and building amenities:
 - Central A/C, Energy Star Appliances, solar pre-heated hot water, community room, landscaped courtyard
- Building will achieve LEED Silver certification
- Located in amenity and transit rich neighborhood



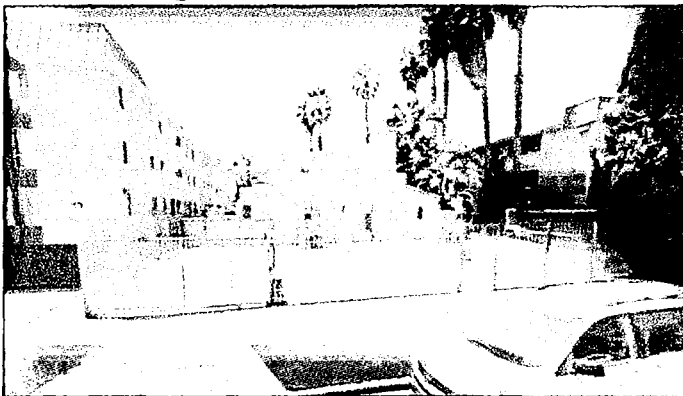
Project Rendering – Hobart Boulevard



Project Rendering – Serrano Avenue



Existing View – Hobart Boulevard



Existing View – Serrano Avenue



City of Hollywood, 1600-1608 N. Serrano Ave. & 1601 N. Hobart Blvd., Hollywood, CA 90027
 Planning Department, 1600-1608 N. Serrano Ave. & 1601 N. Hobart Blvd., Hollywood, CA 90027
 ACHC - 5127 S. Hollywood Blvd., Los Angeles, CA 90023 - 323-463-0210



**SEEKING PEOPLE TO PROVIDE PUBLIC TESTIMONY FOR PROPOSED AFFORDABLE HOUSING
@ MEETING AT CITY HALL**

Meeting Held To Hear Appeals To HCHC's Plan To Build 54-Unit Affordable Housing Development

- **Proposed Project:** Coronel Apartments, 1601 N. Hobart Blvd. Los Angeles, CA 90027
(Site spans Hobart and Serrano, between Hollywood and Sunset)
53 units of affordable housing, 1 manager's unit
Project flyer enclosed
- **Meeting:** Planning and Land Use Management Committee of the City Council
Board of Public Works Edward R. Roybal Hearing Room 350
City Hall 200 N. Spring St. LA, CA 90012
Tuesday, July 28, 2015, 2:30 pm
- **Public Testimony:** HCHC is graciously seeking people who are comfortable giving 1-2 minutes of public testimony about the need for affordable housing and/or your experience living in one of HCHC's buildings
- HCHC is working to arrange transportation. Free parking is available for those who can drive to the meeting. Please contact Eleanor Atkins (number provided below) to set up parking arrangements at least 24 hours prior to 7/28 hearing.
- Please call Lisa Ho at 323-454-6213, Katherine Mason at 323-454-6218 or Eleanor Atkins at 323-454-6207 with any questions.

THANK YOU!!!!

#6

EAST SUNSET HILLSIDE ASSOCIATION

P O BOX 26048 LOS ANGELES, CA 90026

July 28, 2015

PLEASE INCLUDE IN THE
ADMINISTRATIVE RECORD

Los Angeles City Council
Planning and Land Use Committee
200 North Spring Street
Los Angeles, CA 90012

RE: Council File 15-0790, Case No. CPC-2010-1554-DB-SPP

Address: 1600-1608 N. Serrano Ave.; 1601-1605 N. Hobart Blvd.

Dear Chair Huizar and Honorable Members of the PLUM Committee:

The project described above should not be moved through the approvals process using the Density Bonus framework. The standard and correct procedure for affordable housing projects utilizes Development Agreements and variances to relax development standards on projects that are dedicated to the production of affordable housing. The rationale for using this system is that the production of dedicated affordable housing projects is undeniably in the public interest, and that as such, reasonable variances to the local codes should be granted to provide this much needed housing. So then, why is this project seeking to utilize SB1818 for its project approvals instead of going the customary route?

SB1818 is designed to provide bonuses or incentives in the form of relaxed development standards to *mitigate financial gaps in the production of affordable units in an otherwise market-rate housing project*. This project is not market-rate, it is publicly financed, which is an "incentive" in and of itself. The developer always intended for the project to provide 100% affordable housing. He does not need SB1818 to off-set the financial burden for producing the affordable units, they are mandated through the acceptance of public funding earmarked for affordable housing production. Use of the on-menu and off-menu incentives for this project are duplicitous and cannot be supported. An affordable housing project is always granted reasonable concessions based upon the public necessity for affordable units. The developer of this project has reached beyond the standard procedure for affordable housing entitlements to disingenuously access the extraordinary protections granted by the City in its SB1818 implementation ordinance.

The project did not begin as a density bonus project, which is a requirement within the State law. The project began, as is customary, with an application that included a number of requests for relaxed development standards. As the project's requests met with numerous objections from neighbors claiming that the requests went beyond what

#6

was necessary to build the project and unnecessarily jeopardized a structure eligible for the National Register of historic places, the proponents shoe-horned it into a Density Bonus request. This should be a wake up call for the Planning and Land Use Committee. If an affordable housing project, whose benefits are undeniable, cannot hold up utilizing a standard affordable housing Development Agreement then it should be re-worked until it can exist within the context of local zoning laws. This project reached for the State law to utilize it as a weapon against the community wishing to have BOTH an affordable housing project and a project that would respect local zoning limitations.

Furthermore, this project eliminates 30 units of Rent Stabilized (RSO) housing. These 30 units will be affordable forever, technically. SB1818 units' affordability expires. The greater public interest would be served by preserving the right to "forever-affordable" RSO units, rather than temporarily affordable SB1818 units. Similarly, the cost to rehabilitate the existing units costs less, uses fewer resources and still provides excellent opportunities for local employment in the construction sector. For instance, a project alternative could rehab the 30 RSO units, preserve the historic Ehrbar Residence by moving it within the project area, and also provide additional units through infill on the lot. This is an alternative that would be embraced by the community, but the proponents have not even considered this option, in violation of the requirements under CEQA.

To sum it up, the project proponent has inappropriately accessed SB1818 to use it as a shield to potential claims that the project has not made an effort to revise its entitlements to balance the benefits of zoning laws with the necessity for affordable housing. SB1818 entitlement incentives are reserved for the production of affordable units within a market-rate project. The State law gives these market rate projects the extra layer of Teflon coating, stacking the appeals and litigation process against appellants, because it intends to protect private developers who are relieving the city of its burden to provide affordable units by producing them within market rate projects. This project should not need that kind of protection, its merits should stand up on their own.

I urge you to please take another look at this project and its abuse of SB1818 incentives. This will set a new standard for manipulation of the law to the benefit of developers, and to the detriment of the community.

Thank you for the opportunity to comment. Please add us to the list of interested parties.

Jennifer Deines, on behalf of
East Sunset Hillside Association

Cc: Sharon.gin@lacity.org

6

ARMEN MAKASJIAN & ASSOCIATES

5111 Santa Monica Blvd.
Los Angeles, CA 90029
Tel. (323) 665-5293 / Fax. (323) 665-0809
Email: armenmak@sbcglobal.net

July 27, 2015

Chairman Jose Huizar and
Honorable Council Members
Los Angeles City Council
Planning and Land Use Management Committee
200 N. Spring St.
Los Angeles, CA 90012

RE: Council File #15-0790
Coronel Apartments: Rebuttal to the Submitted Pro Forma dated July 22, 2015
(1600-1608 N. Serrano Ave. and 1601 N. Hobart Blvd. Los Angeles, CA 90027
CPC -2010-1554-DB-SPP; ENV-2012-110-EIR

Dear Chairman Huizar and Honorable Council Members;

I am a commercial property appraiser, broker, and property manager with over 25 years of professional experience. I am also a valuation instructor whose teachings include income property and highest and best use analysis. I am writing to provide my professional opinion on the submitted pro forma provided by the Hollywood Community Housing Corporation for the Coronel Apartments Project (document date July 22, 2015). Please note that over the past two years, a number of requests for a copy of the pro forma were made to the applicant by the East Hollywood Neighborhood Council; yet, a copy was submitted to your committee only six days prior to the scheduled hearing date. This does not provide ample time for a proper analysis. However given this time constraint and to the best of my knowledge and experience, it is my conclusion that 1) the applicant did not provide a reasonable range of *alternative projects* but instead, has based its conclusion on a comparison to the *absence* of the requested entitlements rather than exploring other options that could potentially allocate community funds more efficiently and better meet the needs and concerns of the community, 2) the project's operating expenses are mischaracterized and misstated.

In order to properly provide an objective analysis of the preferred project, all potential alternative projects should be analyzed. This includes, but is not limited to, the following options:

- A. Maintaining and rehabilitating all properties located at 1601-1605 N. Hobart Blvd. and 1600-1608 N. Serrano Ave:

An alternative project would maintain and rehabilitate all existing structures on the project site. This would fall in line with the city's General Plan and Hollywood Redevelopment plan to preserve the historic elements of neighborhoods while allowing additional housing by allowing conversion for affordable housing. Based on my experience as a property manager and owner, the approximate cost for rehabilitation would be \$30,000 per unit, or approximately \$1,000,000 which represents a significant

variance between the applicant's proposed project costs amounting to \$27 million. The applicant's projected cost amounts to approximately \$1,000,000 per unit to add 24 housing units. In contrast, the alternative would allocate approximately \$20 million (exclusive of acquisition costs) of taxpayer funds more efficiently, resulting in decreased costs of the project and allowing the unused portions of community funds to be allocated to other housing projects.

- B. Maintaining the historic Ehbar Residence at 1601 N. Hobart Blvd and demolishing the other multi-family properties on the project site. By doing so, it would allow the by-right construction of 40 units. The Ehbar Residence can be subdivided to provide three of these units. The application of the current density bonus of 35% to the allowable number of units would result in 54 units. The applicant can further reduce the scale of the parking garage by taking advantage of parking option 2 which allows 0.5 parking spaces per unit for affordable senior housing, simultaneously reducing the large-scale units to one and two bedroom units for senior affordable housing. This would comply with the allowable, by-right construction. By maintaining the Ehbar Residence, this alternative would reduce its overall cost by providing affordable senior resulting in a more efficient use of community funds.

The primary concern for any community housing project should be the efficient use of community funds and state and/or federal grants. As indicated above, this requires a thorough and complete analysis of all alternative projects that would satisfy the needs and concerns of the community while satisfying the need for additional housing. The alternative project as presented by the applicant can qualify as an *additional* option but instead, is presented as "the alternative" based on the absence of the requested entitlements.

Project Operating Expenses (pro forma):

I reviewed the project's operating expenses and compared them to the industry standards as published in the 2015 Apartment Building Expense Guideline and find that certain expense items are mischaracterized and misstated. The following expense items warrant a further examination and justification:

- Total Operating Expense Ratio:

Based on my experience and industry standards, overall operating expense ratios are lower for newer, multi-family buildings. The average expense ratio ranges from 20 to 25% which includes an estimated vacancy factor of 5%. Assuming that affordable housing projects will require additional administrative costs, the project's expense ratio of 68.11% still vastly exceeds the industry standards. Given the extreme time constraint of completing my analysis, I attempted to research the operating expense ratios of similar-type affordable housing projects. One project which is considered to be relatively similar is located in Old Town Calabasas, a 75 unit Affordable Senior Housing Project located at 4803 El Canon Ave. The project consists of (74) one-bedroom/one bathroom units and (1) two- bedroom/two bathroom unit with a building area of 52,843 sq.ft. Please see attached exhibit A, Old Town Calabasas 75 Unit Affordable Senior Housing Pro Forma. Its projected operating expense ratio is 52.79% which is significantly lower than the subject project's projection of 68.11%.

- Onsite Management/Maintenance Payroll and Payroll Tax:

The project has allocated a lump-sum expense of \$54,000 to cover both the on-site manager's salary and maintenance payroll. Under the expense heading "Maintenance", there is an additional allocation of \$12,000 for maintenance staff which includes supplies. A clarification is needed on this expense items to avoid "double-counting."

According to the applicant's project description, the resident manager is to be given a three-bedroom unit "rent-free". Assuming the market rent for this unit is \$2,000/month, this would represent the on-site manager's salary which would amount to \$24,000 per year. The income from this unit will not be realized and therefore should not appear as an expense item. Deducting \$24,000 from the overall expense figure of \$54,000 would leave \$30,000 for "Maintenance Payroll". Therefore there is no accountability for any of these "padded" figures.

- Resident Services Coordinator:

The allocated fee is \$25,000. Does this include managerial duties? The off-site property manager's duties include collection of rents, property maintenance, and if requested by the property owner, payment of expenses which may include mortgage debt. Advertising and leasing vacant units are additional services which are typically charged in addition to the monthly management fee. Is the resident services coordinator responsible for taking maintenance calls and handling tenant complaints? If so, then the allocated management fee of \$34,879 or 7.13% of effective gross income, is high and should be reduced to offset the salary of the resident services coordinator. Affordable housing projects typically have a more stabilized occupancy, that is, a low tenant turnover which would reduce leasing commissions and advertising expenses. The allocated \$25,000 for the resident services coordinator therefore warrants a closer examination as to what services it may cover.

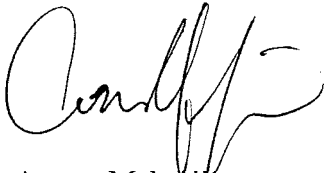
- Trash Removal:

The project's projected figure for this item is \$11,000 or \$917/month. This figure appears high and should be revised. In order to confirm this figure, I contacted Athens Waste Services which has been servicing the Hollywood area for over 15 years. I spoke to the area representative who explained that a 54-unit building would require two trash bins that would be serviced twice per week. The monthly cost would be \$330/month. There would be an additional \$40 to \$50 fee if the bins were to be carried out to the street by a scout truck. For high occupancy units, the high end for trash pickup would be \$525. This represents a cost savings of \$392/month or \$4,704 annually (Source: Athens Waste Services: Alex, (818) 768-1492).

Based on the inconsistencies and lack of transparency of the above noted expense items and others contained in the pro forma, costs associated with the proposed project appear to be significantly inflated. Therefore I strongly recommend that a thorough analysis be completed on all expense items, inconsistencies, and deviations from industry standards.

In conclusion and based on my professional expertise, the applicant did not present a complete analysis of alternative projects that could potentially result in a more efficient use of public funds. The project site therefore has, at a minimum, four options: two presented by the applicant and two additional alternatives as stated above. By maintaining the Ehbar residence and reducing the scale of the project by accommodating parking option 2 and by reducing the size of the units to accommodate affordable senior housing, the total cost of the project could be significantly lower. Therefore, all options should be considered before determining the final highest and best usage of the site geared toward affordable housing. Finally, the projected operating expenses of 68.11% is very high when compared with industry standards, particularly with comparable projects. As indicated in my analysis, a similar-type project, affordable senior housing, has an expense ratio of 52.79%. Including an assumption that the project will be geared toward high occupancy, the current expense ratio and expense characterization appears unreasonable and lacks the transparency that is required when public funds are used for funding such projects.

Respectfully,

A handwritten signature in black ink, appearing to read 'Armen Makasjian', written in a cursive style.

Armen Makasjian
Certified General Appraiser
Lic. #AG018345

EXHIBIT A

Old Town Calabasas 75 Unit Affordable Senior Housing Pro Forma
2007 TCAC Basis Cap

9% Tax Credits - 2007 Basis Cap

11-Dec-07

75
 74 One Bed
 1 Two Bed

Total Proposed Units	75
Site Area	42,176 SqFt
Residential Area:	
1st Floor	18,265 SqFt
2nd Floor	18,014 SqFt
3rd Floor	16,584 SqFt
Total Residential Area	52,843 SqFt
Gross Sq.Ft.	52,843 SqFt
Parking Area - Covered	29,817 SqFt
Landscaped Area - Estimated	10,000 SqFt
Residential Parking Spaces	76
Vacancy Factor - Residential Unit	5.00 %

Total Development Costs	\$23,836,033
Costs per Unit	\$317,814

Gross Operating Income (from page 3)	\$440,416
Expenses (\$3,100 / Unit)	\$232,500
Net Operating Income	\$207,916
Available for Debt Service	\$180,797

Maximum Permanent Loan (36 Yr)	\$2,368,338
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Owner Equity	\$11,878
Investor Equity - Tax Credits	\$11,866,411
Total Equity	\$11,878,289

Total Loan and Equity	\$14,236,627
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AHP	\$405,000
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Perm Loan Rate	7.00 %
Debt Coverage Rate	1.15 %
Current TCAC 9% Rate	8.12 %
Credit Rate (Cents per dollar)	0.98
Construction Loan Rate	9%

FINAL (GAP)/SURPLUS	(\$9,194,406)
City of Calabasas	\$750,000
County Home Funds	\$3,800,000
Prop 1C Infrastructure Assistance	\$ 4,844,406
Total Additional Assistance	\$9,194,406
Per unit	\$ 122,582

Proposition 1C Infill Incentive Grant Program provides grants for infrastructure improvements (including land purchase and ground improvements) necessary to facilitate new infill housing developments. Approximately \$240 million is available for award by June, 2008 through an application competitive process.
 Other Assumptions: \$500,000 to improve soils, \$250,000 for offsites, \$1,000,000 for upgrades in landscaping and architecture.

Tie Breaker:

0.598

ARMEN MAKASJIAN
5111 Santa Monica Blvd, #205
Los Angeles, CA 90029
(323) 665-5293 / Fax: (323) 665-0809

INDEPENDENT APPRAISER D.B.A. ARMEN MAKASJIAN AND ASSOCIATES:

(September 1995 to Present)

Independent appraisal work as a private business. Fee appraiser for mortgage lenders, banks, attorneys, and various real estate brokers involving commercial property including apartment buildings, retail stores and motels, single-family, condominiums, and two-to four-unit properties, including FHA appraisals. Geographic territory covers Los Angeles County, San Bernardino County and portions of Orange County. Expertise includes property appraisals involving nonconforming and unpermitted uses. This includes extensive research with various, city building and planning departments.

-Appraisal instructor with Real Estate Trainers Inc., teaching various courses including Advanced and Complex Appraisals, Highest and Best Use, Expert Witness, Cost Approach, Appraising Apartment Buildings, and Report Writing.

-Course Written: Appraising Apartment Buildings, March 2015

-January 2001 to January 2002)-Review appraiser for HUD focusing in the south-central Los Angeles area.

ARMEN REALTY INC: (February 1984 to Present)

Real Estate Broker: President of Armen Realty. Family real estate office established in 1963, incorporated in May 2004. Involved in real estate sales specializing in single family and apartment buildings. Provided sellers and buyers with competitive market analyses (CMA's) for property tax and probate considerations, including reports regarding city planning and use code changes. Participated in "canvassing" and solicited for property listings through "cold calls" and door-to-door farming. Rendered market opinions regarding property values based upon market comparisons and interest rate fluctuations.

Property Management: Served as off-site manager for multi-family residences. Engaged in rent collections and deposits, rental agreements/negotiations, and tenant relations. Supervised property rehabilitation and remodeling.

LANDMARK APPRAISALS: (September 1992 to September 1995)

Fee-split appraiser on single-family and one to four-unit properties. Have prepared "Broker Price Opinions" (BPO's) and full property appraisals for GMAC involving REO's and foreclosures.

During this period, briefly worked at Benjamin Tunnell Inc., preparing employee relocation appraisals.

Armen Makasjian (cont'd)

EDUCATION:

-Bachelor of Science degree in Finance (real estate option), California State University, Los Angeles, 1987. Courses included real estate principles, practices, finance, appraisal, and real estate law, Uniform Standards of Professional Appraisal Practice, (Current), Federal and State Regulations in Real Estate Appraisals, FHA and the Appraisal Process (The Appraisal Institute), Statistics, Capitalization, Partial Interests, and Reports, FHA Appraisal Practice, Environmental Issues and Obligations, Marshall & Swift Cost Seminar.

-Current completion of continuing education requirements which include the Uniform Standards of Professional Appraisal Practice (USPAP) and Federal Laws and Regulations.

PROFESSIONAL AFFILIATIONS:

- Los Angeles Board of Realtors
- California Association of Realtors

LICENSING:

- California Real Estate Appraisal License, #AG018345
- California Real Estate Broker's License, #00861276

DATA SOURCES:

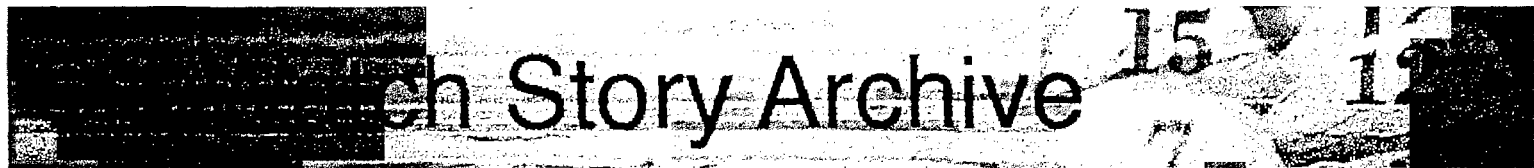
- CoStar Comps
- Real Quest (property data service)
- LoopNet (property data service)
- Multiple Listing Service
- Flood Data Services.
- Marshall and Swift Cost Estimator

CF 15-0790 #6

LOS ANGELES Wednesday, May 13th 2015 11:30

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Archive

LA Taxpayers Getting Dinged for Demolition of a Historic Hollywood Property

18 Mar 2014
Written by Ziggy Kruse



VOICES-Is the preservation of historic properties important to the people of Los Angeles and those who represent us? Should taxpayer funds be used to demolish historic buildings?

Coming from a German city that preserved its historic structures, almost destroyed during WWII, it is mindboggling to me that the City of Los Angeles would allow buildings in Hollywood with great architectural value to be demolished. And to top it off: Making the Taxpayers pay to bulldoze them down!

On Thursday, March 20 at 10 AM, the Los Angeles Cultural Heritage Commission is scheduled to vote on whether to grant Historic-Cultural Monument status to the A. L. Ehrbar residence at 1601 N. Hobart Blvd. in Hollywood, which is an extremely rare and virtually intact example of a Santa Fe Adobe style home designed in 1920 by acclaimed architect Harwood Hewitt, winner of the 1925 world prize for residential architecture.

Thursday's Commission vote is crucial for the cause of preservation in Los Angeles because a vote to deny landmark status likely means that the people of Los Angeles will be footing the bill to bulldoze this architectural gem: The Ehrbar residence is slated to be razed for a taxpayer funded, 51-unit housing project by the Hollywood Community Housing Corporation, which in 2010 received \$5.027 million from the former Community Redevelopment Agency in order to purchase the multi-parcel property that includes both

the Ehrbar residence and several other apartment buildings on the site dating from the 1920s to the 1950s. In their place, Hollywood Community Housing Corporation's intends to construct a modern-style, 4-story building called the Coronel Apartments.

In a 1979 official survey of historic Hollywood properties for the City of Los Angeles, the Ehrbar residence was identified as eligible for listing on the National Register of Historic Places. This 1979 assessment characterized the property as "built in the Pueblo Indian-Spanish style" and, describing its rarity, stated that "there were a few homes built in this style in Hollywood in the Twenties; very few remain."

In 1922, the Ehrbar residence was featured by the Southern California Chapter of the American Institute of Architects as a home of distinction in its supplement to California Southland Magazine. The residence was also featured prominently in advertisements of the era, particularly to promote luxury home fixtures.

Despite being 94 years old, the Ehrbar residence has retained a remarkable degree of integrity: its kitchen cabinetry and tile work are all original, as is the bathtub and bathroom tile, the built-in cabinets and stained ceiling paneling, the arched doorways and doors, the "wagon-wheel" chandeliers, ceiling beams and stained wainscoting, and all but two of the exterior arched windows.

Yet when Hollywood Community Housing Corporation initially sought CRA funding for its project, the developer provided the CRA with no historic review or acknowledgement of the Ehrbar residence.

This "omission" was particularly egregious because Section 511 of the Hollywood Redevelopment Plan requires the preservation of structures of historical significance when taxpayer funding is involved. When community outcry over the omission forced Hollywood Community Housing Corporation to prepare a full Environmental Impact Report, they still refused to include a preservation alternative to the proposed project, steadfastly claiming that the property has no historical significance and that its demolition would therefore result in no impacts to historic resources.

In the fall of 2013, after the release of the Project's Environmental Impact Report, Hollywood Community Housing Corporation quietly sought federal tax funds for its project. This request triggered what is known as a "Section 106 Review," a historical assessment of the project site for the Los Angeles Housing Department.

The conclusion of this independent assessment by the firm ICF International (formerly Jones & Stokes) confirmed that the Ehrbar residence qualifies to be on the National Register of Historic Places and therefore must be retained within Hollywood Community Housing Corporation's project.

Despite this conclusion, and in spite of demands for retention of the residence by preservation organizations Los Angeles Conservancy and Hollywood Heritage, Hollywood Community Housing Corporation still insists that the Ehrbar house has no historic significance whatsoever and will be demolished.

In response to the Historic-Cultural Monument nomination of the Ehrbar residence by concerned members of the community, Hollywood Community Housing Corporation retained an attorney and refused to allow members of the Cultural Heritage Commission and its staff access to the home's interior. If experience is any indication, such gamesmanship and deception will likely pay off with Commission members voting against the nomination. If so, not only will Hollywood lose yet another piece of its once diverse architectural history, but it will all be paid for with the public's dime.

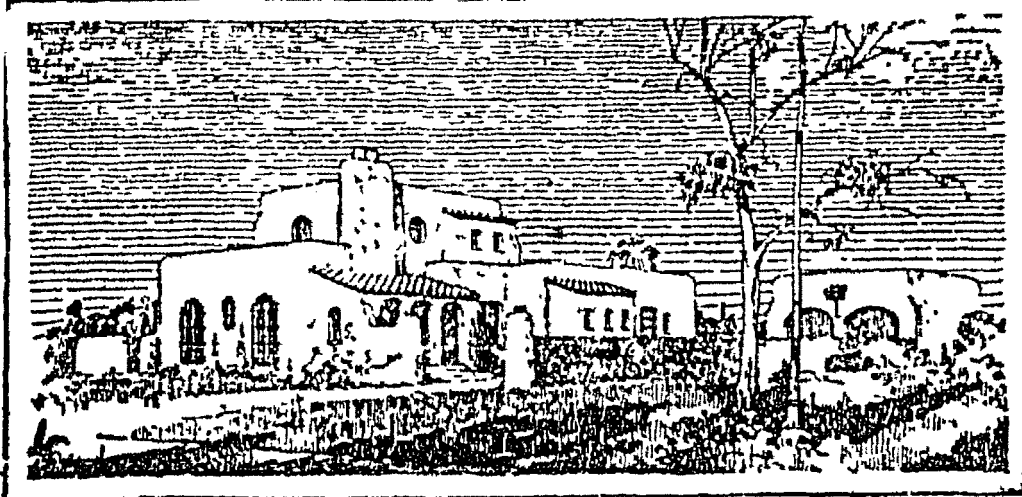
The time has come for Los Angeles to take a lesson from Europe on how to preserve its architectural heritage.

(Ziggy Kruse is an activist and reporter for www.HNN-TV.com. She is also a former Board Member of the Hollywood Studio District Neighborhood Council. Ziggy can be reached at ziggykruse@gmail.com. Ms. Kruse views are her own and do not reflect opinions of either the staff or management of CityWatch.)

1601-1605 N. Hobart Boulevard Photographs

CF 15-0790
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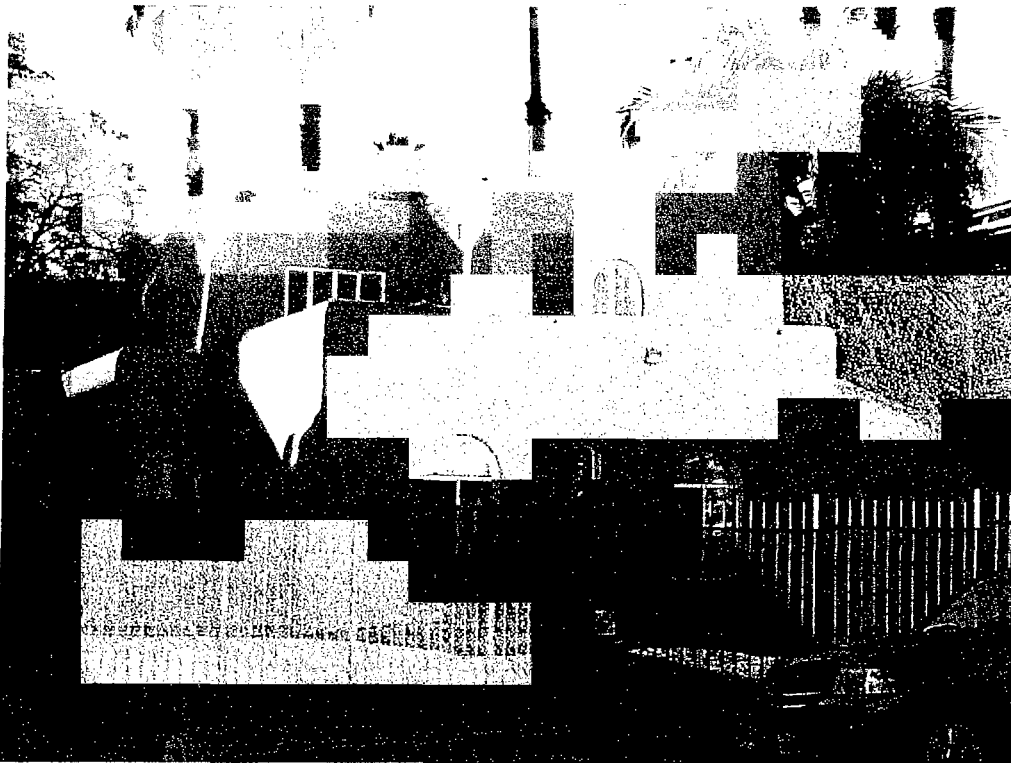
Los Angeles Times (1886-1922); Jul 18, 1920;
ProQuest Historical Newspapers Los Angeles Times (1881 - 1987)
pg. V2



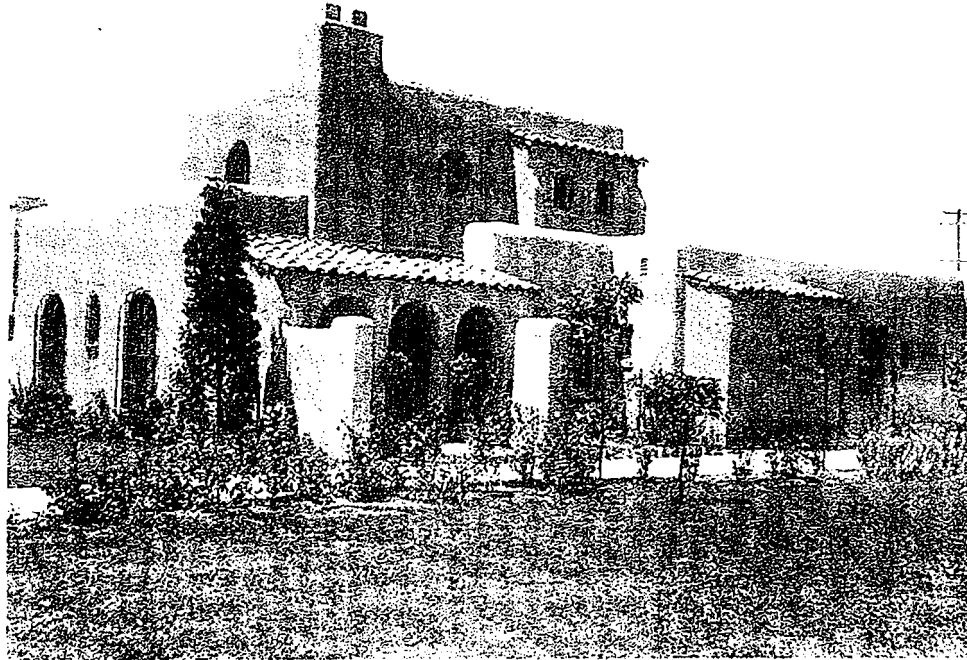
Attractive Hollywood Home.

Spanish type residence to be built for Elisha Ehrbar at 1905 North Hobart Boulevard; Harwood Hewitt, architect.

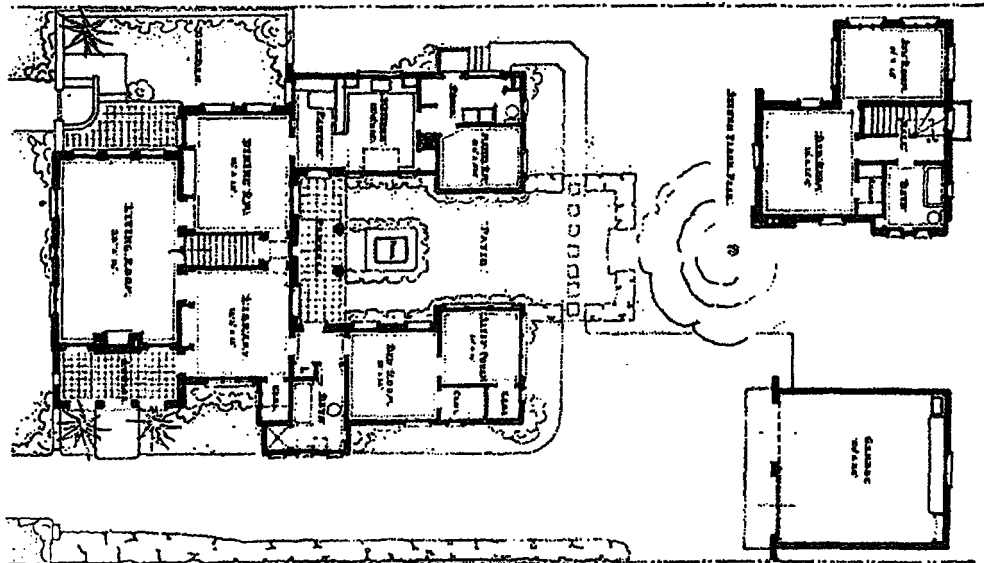
This architectural rendering of the subject house was published in the Los Angeles Times on July 16, 1920 with the incorrect address of 1905 North Hobart Boulevard. The original building permit confirms the 1605 Hobart address.



A photo taken on October 8, 2010 confirms the same design, with the two replaced windows in original openings. Most of the remaining windows appear to be originals (Photograph by Charles J. Fisher)



A. L. EHRBAR HOUSE, HOLLYWOOD
HARWOOD HEWITT, ARCHITECT



CF 15-0790-
#6

OFFENHAUSER / MEKEEL ■ ARCHITECTS

Ms. Blake Lamb
Hearing Officer
Los Angeles Department of City Planning
6262 N. Van Nuys Blvd #351
Los Angeles California 91401

Re: Coronel Apartments project (CPC 2010-1554-DB-SPP)

Dear Ms. Lamb:

In your consideration of the adequacy of the EIR for this project, I believe that the analysis of the Ehrbar House on the property—which is proposed to be demolished—is inaccurate. The conclusion that the project will not have a significant effect on an historic resource is incorrect. The EIR analysis has failed to consider substantive input subsequent to the writing of the assessment report, and this information counters the conclusions of the EIR.

As the owner of a similar property a few blocks away, and as a professional preservation architect with 50 years experience restoring landmarks from Union Station to the Beverly Hills Waterworks, I additionally have personal experience which counteracts the developer's EIR conclusion.

- I recommend that State Office of Historic Preservation be consulted. ICF, a highly-regarded historical consultant, outlined a process of consultation to resolve the seeming conflicting opinions—from the developer's consultant that the Ehrbar House has no merit, to ICF's conclusion that it is eligible for the National Register.
- The State Office has information in its records that the Ehrbar House is an historic resource. Although the Housing Department did not follow up with the State Office for formal review—maybe there are no federal funds involved any more—the record of a significance finding is there.
- I recommend that the hearing officer postpone this appeal review until the applicant has contacted the Community Redevelopment Agency. Under the extant planning authority of the Agency, no demolition or construction permits can be signed by CRA without a formal review process—including the question of the historic status of the Ehrbar House. Because the Agency did not complete its historic survey as required by the Redevelopment Plan, each resource proposed for demolition is individually reviewed. At that time the

Agency may review findings and information to update its historic survey records, and consider the assessments of consultants.

If the State Office of Historic Preservation EIR section has been consulted, and if the Redevelopment Agency has been consulted, it seems critical that this information and the results are available to the hearing officer and the public.

In addition, I recommend that a Preservation Alternative be developed and implemented which preserves the Ehrbar House, while preserving the developer's proposed project at the same time.

While the developer's EIR consultants concluded years ago that the home by architect Henry Harwood Hewitt was not historically significant, subsequent professional opinions and the Los Angeles Conservancy have found that to be wrong. The refusal of the Cultural Heritage Commission to consider the nomination is pointed to by the developer's attorneys Latham and Watkins as proof of non-significance. Unfortunately, the Commission was influenced by an inaccurate portrayal of the property—and I understand the Commissioners were actively prevented from seeing the entire property.

Inaccurate analyses include:

1. Inaccurate: That the Hobart Ehrbar house is not significant because it is not a pure example of Pueblo Revival or any nameable style: "Pure" style has never been an absolute determinant of significance. Many Los Angeles structures that are listed landmarks—including one I own—are not "pure" styles, and even hard to fit in current nomenclature. What this house does have is the criterion that is required -- high artistic achievement, and rarity. The name given to this style may be argued—especially as the naming of revival styles continues to evolve today-- but the plain fact is that doesn't change the achievement. In this case it also does not change the uniqueness and rarity – in itself an adequate basis for a finding of significance. The LA Conservancy correctly points to Virginia and Lee McAlester's "A Field Guide to American Houses" as a source for understanding the Ehrbar House style—melding the Spanish influences both from New Mexico and points West.
2. Inaccurate: That the Hobart Ehrbar house is not a notable work by the architect. This is a false argument. Major and minor works of noted architects can be listed on local and up to the National Registers. The Ehrbar House is a published work of Hewitt. More importantly, I believe this house has a feature bestowing significance which is a dawning understanding for Los Angeles houses—the

important trajectory of the development of the “patio” home, a unique Los Angeles/West Coast evolution from Spanish and Moorish patio typologies to the now-recognized mid-century modern and ranch types.

3. Inaccurate: That the integrity of the Hobart Ehrbar House is compromised. The alternations to this house are not at all substantial. 2 windows have been replaced. A patio has been enclosed. The house was painted. This effects perhaps 5% of the structure. With the patio infill reversed, the house is intact in virtually the entire exterior—in overall massing, exterior finish material and texture, and roof style. It also has a phenomenally intact interior, keeping its original room layout, finishes, light fixtures, exposed wood ceilings, authentic fireplaces, etc.
4. Inaccurate: That the loss of context disqualifies the building from having any significance. The loss of context around the Ehrbar House is sad, but has not prevented other monument listings in similar circumstances, including the one I own. When a resource exhibits rarity, it often is out of context—because other examples have been demolished! What this loss of context does mean is that the resource itself may be relocated and maintain its inherent artistic merit—as suggested in Hollywood Heritage’s letter responding to the EIR.
5. Inaccurate: That a NRHP eligibility finding is a “working hypothesis”: ICF International—a consultant of high standing certainly with equal weight to the developer’s consultant—in 2013 concluded that the City should consider the house at 1601 N. Hobart Boulevard National Register-eligible. That finding has been mischaracterized by the developers attorneys. While ICF formed that conclusion for the purposes of a Section 106 review, that does NOT mean, as stated by Latham and Watkins, that this is “as best described as a working hypothesis”. Quite the contrary—whether or not the developer withdrew whatever funding applications would have triggered the next step, it doesn’t change the fact that a qualified consultant – after extensive review—found the project National Register-eligible.

As a developer and an owner of historic properties, and as an architect, I have demonstrated that creative design and economic thinking can preserve Los Angeles’ landmarks and at the same time allow change to occur.

This developer and project can and should implement a preservation alternative. The appeal should be reckoned with—the Ehrbar House deserves fair scrutiny as an historic landmark, and the Planning process should be able to accommodate a preservation outcome.

Thank you for your attention

A handwritten signature in black ink, appearing to read "Frances Offenhauser". The signature is fluid and cursive, with a prominent loop at the beginning of the first name and a long, sweeping tail at the end.

Frances Offenhauser

#6

July 27, 2015

Doug Haines
La Mirada Avenue Neighborhood Association of Hollywood
P.O. Box 93596
Los Angeles, CA 90093-0596

Los Angeles City Council, Planning and Land Use Management Committee
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

RE: **Council File CF 15-0790**

Case No.: CPC-2010-1554-DB-SPP;

CEQA No.: ENV-2012-110-EIR; SCH #2012031014

Project Location: 1601-1605 N. Hobart Blvd; 1600-1608 N. Serrano Ave.

Chair Huizer and Honorable Planning and Land Use Management Committee members:

Please note the following comments and exhibits in response to two letters submitted into the record on July 22, 2015 by Latham & Watkins LLP, for the proposed Coronel Apartments project. The Planning and Land Use Management Committee (PLUM) is scheduled to hear four appeals of the City Planning Commission's May 14, 2015 approval of the Coronel Apartments project at its July 28, 2015 meeting.

The proposed Coronel Apartments project is a partnership between applicant Hollywood Community Housing Corporation (HCHC) and the former Community Redevelopment Agency (CRA/LA). It consists of a 54-unit, 47,353 sq. ft., 45-foot-tall housing development with 56 parking spaces on a 32,540 sq. ft. lot located at 1600-1608 N. Serrano Ave. and 1601-1605 N. Hobart Blvd. (in the R3-1XL and [Q]R4-2 Zones). (The "Project").

The Project site currently contains 30 rent-controlled residential units across its three separate city parcels, and includes a 1920 Pueblo Revival style home known as the Ehrbar Residence. Located at 1601 N. Hobart Blvd. and designed by Master Architect Henry Harwood Hewitt, expert testimony submitted into the record has repeatedly identified this residence as eligible for listing in the National Register of Historic Places. HCHC, however, intends to demolish the property as part of the Project.

On June 17, 2010, the CRA/LA Board of Commissioners approved a permanent loan agreement with HCHC for \$5,027,000 in funding for the project. In October of that year, CRA/LA disbursed \$3,584,500 to HCHC to acquire the properties. Additional funds have since been directed to the Project by the City Council.

The Applicant's representative, Duncan Moore of Latham & Watkins LLP, makes several assertions in his letters justifying the Project and discounting our neighborhood association's appeal. These assertions lack any supporting evidence. Please note the following comments in response.

I. THE EHRBAR RESIDENCE AT 1601 N. HOBART BLVD. IS ELIGIBLE TO BE ON THE NATIONAL REGISTER.

A. Christy McAvoy of Historic Resources Group did not conclude that the Ehrbar Residence does not merit preservation.

Mr. Moore references an April 9, 2010 preliminary assessment of potential cultural resources on the Project site by Christy McAvoy of Historic Resources Group, which was included in the Project's Mitigated Negative Declaration (MND). Mr. Moore states: "The appellants cannot ignore that when Ms. McAvoy evaluated the Hobart Structure in 2010 she concluded that it did not merit preservation." This statement is false.

Ms. McAvoy made no formal assessment of the Hobart Blvd. properties in her 2010 letter to the MND. The MND in fact failed to do any historical analysis of the 1920 and 1924 residential structures on Hobart Blvd. No examination or proper review was conducted. Instead, Ms. McAvoy -- whose firm was contracted by HCHC to review the subject lot, and whose husband co-founded HCHC in 1989 -- simply submitted a brief letter for the MND that incorrectly states in part:

"The property at 1601 Hobart has not been surveyed formally. However, the block does not retain any context in which to place the building because its surroundings are heavily dominated by newer and larger apartment buildings. Therefore it is an isolated example of its type and does not meet the criteria for individual listing as a local landmark or as a contributor to a potential district."

Ms. McAvoy therefore conducted no review of the property in 2010. However, as acknowledged by Mr. Moore in his July 22 letter, a February, 1979 survey by Christy McAvoy of the 1920 Ehrbar residence determined that this house "appears eligible for the National Register as an individual property through survey evaluation" with a status code of 3.

Mr. Moore further references the Draft Environmental Impact Report's historic resources analysis by Margarita Wuellner of PCR Services Corporation. Mr. Moore states that this review, submitted on behalf of the applicant, "confirmed that the Hobart Structure does not qualify as a historic resource..."

Yet Ms. Wuellner's report concludes with a recommendation that "the residence be recorded in a Historic American Buildings Survey (HABS) report prior to demolition. The HABS report would record the existing building in professional large-format photographs, document the existing and historic plans and appearance of the building, retaining information about the development of the small house type in Los Angeles, Hewitt's architecture, and the flat roof subtype of the Spanish Eclectic style with Pueblo Revival influences that may be useful for future study of 20th century American domestic architecture." Ms. Wuellner's support for a HABS report conflicts with her conclusion that the Ehrbar Residence does not qualify as a historic resource. The express purpose of a HABS report is to record properties of historic significance.

In his letter, Mr. Moore further contends “the Hobart Structure was also independently and extensively analyzed by the City’s Cultural Heritage Commission in March 2014.” This statement is also false.

The Cultural Heritage Commission, whose Chair admitted on record to being a former employee of Hollywood Community Housing Corporation, never entered the original interior of the Ehrbar Residence during its February 6, 2014 tour of the property. Hollywood Community Housing Corporation refused access to the historic interior, instead directing members of the Commission to view a vacant, second-floor conversion. At the subsequent March 20, 2014 Commission hearing on the Historic-Cultural Monument nomination, the request for landmark designation was denied with minimal comment. As stated by council district 13 planning deputy Gary Benjamin in an email to the council office:

“RE: We are on. Urgent. The CHC voted **not** to declare the Ehrbar residence historic. The vote was unanimous and no Commission members even so much as voiced hesitation.” (Emphasis in original). (See **Exhibit 1**).

The Commission’s review of the Ehrbar residence was a cursory shame, orchestrated by council district 13, which has repeatedly pushed the Coronel Apartments project forward despite broad community opposition.

B. The Project is requesting \$1,496,932 in Federal Tax Credit Assistance Program (TCAP) funds and the LA Housing and Community Investment Department is therefore REQUIRED under the National Environmental Policy Act (NEPA) to complete its Section 106 Environmental Review.

Mr. Moore states in his July 22, 2015 letter that “HCHC has never proposed any federal funding for its Project. LAHCID has confirmed the Low Income Housing Tax Credits that HCHC applied for are not considered federal funds that trigger NEPA review.” This statement falsely portrays Federal Tax Credit Assistance funds as exempt from Section 106 review, which is required under the National Environmental Policy Act (NEPA).

In a June 17, 2015 email correspondence between Maura Johnson of Hollywood Community Housing Corporation (HCHC) and Mariano Napa of the Los Angeles Housing and Community Investment Department (LAHCID) headlined “TCAC July round,” (**Exhibit 2**), Ms. Napa details HCHC’s request for Federal Tax Credit Assistance funds:

“Two weeks ago, the project manager at HCHC for the Coronel Project has confirmed that the amount of federal tax credits that will be requested by HCHC for this project is only \$1,379,372...The amount has increased ...to \$1,496,932...”

As noted in **Exhibit 3**, the U.S. Department of Housing and Urban Development (HUD) bulletin on “Implementation of the Tax Credit Assistance Program (TCAP),” “*No TCAP funds may be committed to a project before completion of the environmental review process.*” (Emphasis in original). As stated at pages 9 to 10:

National Environmental Policy Act and Related Laws (Environmental review responsibilities and implementing regulations at 24 CFR Part 58.)

Some state housing credit agencies and LIHTC owners may be unfamiliar with the NEPA requirements and the significant impact that the timing of certain decisions or actions may have on their ability to award TCAP funds. The Recovery Act expressly applies section 288 of the HOME statute, which requires the State to assume responsibility for environmental review under the National Environmental Policy Act (NEPA) of 1969 and related federal environmental authorities and regulations at 24 CFR Part 58 ‘Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities.’ The ‘State’, as defined in the home program statute (42 USC 12704(2)), means ‘any State of the United States, the District of Columbia, the Commonwealth of Puerto Rico, or any agency or instrumentality thereof that is established pursuant to legislation and designated by the chief executive officer to act on behalf of the State with regard to the provisions of this Act.’ Accordingly, the State is responsible for the environmental review, but the State may designate, if it so chooses, the state housing credit agency to perform the environmental reviews for TCAP projects on behalf of the State. ***No TCAP funds may be committed to a project before completion of the environmental review process.***

“Once an owner applies for TCAP funds, committing TCAP or any other funds to or undertaking any ‘choice-limiting’ activity prior to successful completion of the environmental clearance review (i.e. HUD approval of the Request for Release of Funds), is prohibited. This includes any activity that will result in a physical change and/or acquisition, including leasing, or disposition of real property. **Performing a choice-limiting action may disqualify a project from receiving any federal funds.**” (Bold and underlining in original).

The Housing Department is therefore illegally allocating Federal Tax Credit Assistance funds for the Coronel Apartments Project without complying with the National Environmental Policy Act’s required Section 106 review.

C. The conclusions of ICF International in its Section 106 Review of the Project were not a “preliminary step” or “working hypothesis,” but a conclusion that the Ehrbar Residence is eligible to be listed in the National Register of Historic Places.

ICF International’s determination that the Ehrbar Residence at 1601 N. Hobart Blvd. is eligible for listing on the National Register is confirmed by numerous documents submitted into the record. This conclusion was accepted by the LA Housing and Community Investment Department until 2014, when the city council passed motions transferring millions of dollars in funds to the Project while instructing the head of LAHCID to “support the Coronel Apartments.” (See La Mirada appeal pages 3 to 6).

Note at **Exhibit 4** the Thirty-Seventh Reporting Period Programmatic Agreement Compliance Report’s listing at page 3-2 of 1601 N. Hobart Blvd. as “newly listed in or determined eligible for listing in the NRHP by the City and HPC...”

In a December 17, 2013 email exchange between Christopher Hetzel of ICF International and Robert Manford of LAHCID, Mr. Hetzel refers to the Ehrbar Residence as “the historic property.” (See **Exhibit 5**). On December 18, 2013, Manford instructs LAHCID environmental specialist Alex Fu to “find out from them (Hollywood Community Housing Corporation) the possibility of relocating the property...” (See **Exhibit 6**). Later in the day, Mr. Fu states that HCHC would “like to see ICF’s summary before getting back to us on the future of that historical building.” (See **Exhibit 7**). On January 7, 2014, in response to a query from Mr. Manford regarding his wanting “to be clear as to what the situation is,” Mr. Fu responds “the developer seemed very firm that this building is ‘not a historical structure.’ I don’t where they obtained this determination...” (See **Exhibit 8**). Later that day, Mr. Fu wrote the following correspondence to Maura Johnson of HCHC:

“Have you contacted with Mr. Chris Hetzel at ICF yet regarding the status of the building located on 1601 N. Hobart Blvd.? According our consultant’s preliminary determination, this building is National Register Historic Places (NRHP). I believed that several documents from ICF were forwarded to you on 12/19/13. We are still waiting for your determination on whether you are still insisting that this building is not a NRHP and will be demolished for the new construction or you’d plan to relocate the structure in another place for the purpose of preservation. Without your firm response, our NEPA review can not be proceeded.” (**Exhibit 9**).

LA Housing Department personnel explicitly referred to the Ehrbar Residence as a property of historical significance following ICF International’s independent review. Changes to this position by Housing Dept. personnel came only **after** the City Council illegally pre-committed millions of dollars in funding and official support to the proposed Project.

D. The evidence in the record confirms that the Project EIR did NOT analyze a reasonable range of alternatives.

Mr. Moore’s July 22, 2015 letter reiterates the applicant’s tired claim that the Project EIR found no significant impacts to historic resources, and therefore a preservation alternative was not required. Mr. Moore further states: “the record is replete with evidence that the Hobart Structure is not a historic resource that should be preserved.”

Such claims are bogus. As noted in the afore mentioned emails from the LA Housing Department, independent analysis by ICF International and Housing Department staff confirm the Ehrbar Residence as a historic resource eligible for listing on the National Register. This conclusion is not a “difference of opinion among experts,” as Mr. Moore claims, but an accepted, carefully researched determination by an independent expert whose conclusions were subject to department peer review. Subsequent efforts by personnel at LAHCID to back-peddle from this position merely reflect the intense political pressure placed on the department by the city council by pre-committing to the Project. Such pressure continues to this day, with representatives of council district 13 explicitly scheduling this appeal on a fast-track to city council in order to guarantee funding for the Project. (See **Exhibit 10**).

II. THE PROJECT'S USE OF OFF-MENU INCENTIVES INSTEAD OF EXCEPTIONS TO THE SPECIFIC PLAN IS MERELY AN ATTEMPT TO CIRCUMVENT THE RIGOROUS REQUIREMENTS OF THE LOS ANGELES MUNICIPAL CODE AND CITY CHARTER.

Mr. Moore states in his July 22 letter that the applicant's change of discretionary entitlement requests -- from the rigorous findings necessary for specific plan exceptions to the nebulous review of off-menu incentives -- was required "in order to comply with the City Planning Department's October 24, 2012 memorandum entitled 'Implementation of the Multiple Approvals Ordinance-Density Bonus Projects.'" This contention is false.

The applicant's decision to change its discretionary entitlement requests in fact came with the release of the Final EIR and an errata on October 25, 2013, a full year after issuance of the referenced memorandum, and eight months after the release of the Draft EIR. This change came not at the request of City Planning, but was instead initiated by Mr. Moore after he was retained as counsel for the applicant.

Additionally, the October 24, 2012 memorandum cited by Mr. Moore is a Director of Planning interpretation and has no corresponding requirement in the Los Angeles Municipal Code. Compliance with this interpretation is therefore purely voluntary.

As noted in our appeal, the Project does not comply with the applicable regulations, findings, standards and provisions of SNAP. The Project's Permit Compliance Review has no supportive evidence to justify the numerous exceptions from the underlying zoning and is therefore without merit.

III. THE PROJECT'S COST ANALYSIS AND PRO FORMA OFFER A FALSE ALTERNATIVE TO THE PROJECT.

The applicant offered a bogus Project alternative of a development comprised of nine few units that would cost approximately \$6 million more to construct than the preferred Project. The applicant then solicited a sham letter from the LA Housing Department stating that the bogus project alternative would not receive taxpayer funding due to its higher expense. Presenting a fake alternative merely reinforced the applicant's preferred Project.

As noted by professional appraiser Armen Makasjian in his July 27, 2015 analysis of the pro forma (see **Exhibit 11**), the Project site consists of 30 rent-controlled units that could be refurbished at a cost of approximately \$30,000 per unit, or under \$1 million. Since the 54-unit Project cost is \$27,197,755, the additional 24 units proposed by the applicant pencils out to a taxpayer cost of \$982,420/unit (once acquisition expenses are deducted). Thus, the true cost of the project is being obscured by the applicant's references to a false alternative. In sum, the Project is a phenomenal waste of taxpayer funds.

VI. THE CITY CHARTER PERMITS APPEALS OF OFF-MENU INCENTIVES.

The City Charter permits appeals for all variance approvals, Conditional Use Permits, and "other approvals." Off-menu incentives are applicable to the rights embodied within this section.

Thank you -
Doug Arnold

Exhibit 1



Gary Benjamin <gary.benjamin@lacity.org>

Re: We are on. Urgent

Gary Benjamin <gary.benjamin@lacity.org>
 To: Marie Rumsey <marie.rumsey@lacity.org>
 Cc: Maura Johnson <mjohnson@hollywoodhousing.org>

Thu, Mar 20, 2014 at 11:28 AM

The CHC voted **not** to declare the Ehrbar residence historic. The vote was unanimous and no Commission members even so much as voiced hesitation.

On Thu, Mar 20, 2014 at 11:24 AM, Marie Rumsey <marie.rumsey@lacity.org> wrote:

Gary is there, right? Please let me know how it goes. Thanks

On Mar 20, 2014 10:43 AM, "Maura Johnson" <mjohnson@hollywoodhousing.org> wrote:
 Item moved up we are now on

Sent from my iPhone

On Mar 20, 2014, at 8:47 AM, Marie Rumsey <marie.rumsey@lacity.org> wrote:

I would reach out to Kevin Keller.

On Wed, Mar 19, 2014 at 5:14 PM, Blair Miller <bmillier@hollywoodhousing.org> wrote:

Hi Marie! Bill Harris wanted me to forward this to you, it's on the EHNC Facebook page. Is there anyone in the Mayor's office we should call about this?

Thanks,

Blair

East Hollywood Neighborhood Council shared a link.

2 hours ago · Edited

Save an East Hollywood Treasure!

This Thursday, March 20 at 10 AM, the Los Angeles Cultural Heritage Commission is scheduled to vote on whether to grant Historic-Cultural Monument status to the A. L. Ehrbar residence at 1601 N. Hobart Blvd. Come join members of the EHNC Planning and Entitlements Committee and voice your opinion on this matter.

<image001.png>

[LA Taxpayers Getting Dingd for Demolition of a Historic Hollywood Property](#)

www.citywatchla.com

Exhibit 2



Georgina Tamayo <georgina.tamayo@lacity.org>

RE: TCAC July round

1 message

Maura Johnson <mjohnson@hollywoodhousing.org>

Wed, Jun 17, 2015 at 5:59 PM

To: Mariano Napa <mariano.napa@lacity.org>

Cc: Magdalena Zakaryan <magdalena.zakaryan@lacity.org>, Manuel Bernal <manuel.bernal@lacity.org>, Georgina Tamayo <georgina.tamayo@lacity.org>

Hi Mariano:

We had a higher than current tax credit rate, cushion in our perm interest rate, pricing at \$1.05. After adjusting these factors and checking with some direct purchasers of credits we can make the \$1,408,585 work.

Thanks, Maura

From: Mariano Napa [mailto:mariano.napa@lacity.org]**Sent:** Wednesday, June 17, 2015 5:29 PM**To:** Maura Johnson**Cc:** Magdalena Zakaryan; Manuel Bernal; Georgina Tamayo**Subject:** Re: TCAC July round

Two weeks ago, the project manager at HCHC for the Coronel Project has confirmed that the amount of federal tax credits that will be requested by HCHC for this project is only \$1,379,372. Under this scenario, all Pipeline projects in the Geographic will be funded. This is shown in the attached chart.

In the process of finalizing the line-up of our Geographic Projects, I contacted Eleanor Atkins, the HCHC Project Manager to confirm that this requested amount is still the same. She stated in her email today that the amount is different from what she had told me two weeks ago. The amount has increased from \$1,379,372 to \$1,496,932 by \$117,560.

In the scenario where Coronel's tax credit request for federal credits is \$1,496,932, the last ranking project will not be funded. This is because the total amount available for Round 2 is only \$5,034,133 and total total request of the top-5 ranking projects is \$5,122,479. Therefore, after funding the 5-ranking project, the available balance for tax credits becomes negative (= negative \$88,346), and 125% rule would not applicable for the 6th ranking project.

I have communicated to you that if Coronel's request is brought down to \$1,408,585, under this scenario, then all projects in the Geographic will be funded. This amount is calculated by backing into the maximum of what is

available at 125% and leaving a \$1 for the last-ranked project. To test this, if Coronel's requested amount is only \$1,408,585, the total request of the top-5 is \$5,034,132. After funding the 5th-ranking project, the available balance becomes \$1, and the 6th ranking project will avail of 125% rule and therefore will be funded.

In our phone conversation today, we agreed that HCHC will make adjustments to Coronel's proforma and calculations of the basis, tax credit pricing, etc. in order to bring the tax credit request down to a workable level.

Please let me know of the status of this adjustment/s.

Thank you.

Mariano

213-999-1265

On Wed, Jun 17, 2015 at 2:55 PM, Manuel Bernal <manuel.bernal@lacity.org> wrote:

You are talking Colonel right? We have it under control.

On Jun 17, 2015 5:46 PM, "Maura Johnson" <mjohnson@hollywoodhousing.org> wrote:

Hi Manuel:

I need you guys to make sure that you do not get oversubscribed in the round and determine that NO ONE is going to accidentally ask for more than the agreed upon credit amount. Especially since we have all of this last minute credit juggling. We assume that the credit number that you are backing into is the maximum of what is available of 125%. If you aren't then a \$1 over isn't going to be a big deal.

Thanks, Maura

Maura McAniff Johnson

Housing Director

Hollywood Community Housing Corporation

5020 W. Santa Monica Blvd.

Los Angeles, CA 90029

Tel: 323-454-6211

Fax: 323-454-4677

Exhibit 3



U.S. Department of Housing and Urban Development
Community Planning and Development



Special Attention of:

All Secretary's Representatives
State Coordinators
All CPD Division Directors
All TCAP Grantees

Notice: CPD-09-03

Issued: May 4, 2009
Expires: May 3, 2010

SUBJECT: Implementation of the Tax Credit Assistance Program (TCAP)

I. PURPOSE

This notice sets forth the submission requirements, eligible uses of funds, and program requirements for the Tax Credit Assistance Program (TCAP). HUD will issue supplemental or interpretive guidance on program requirements, including the process for disbursing funds, recordkeeping, reporting, and applicable federal grant requirements, as they become available.

II. BACKGROUND

On February 17, 2009, President Obama signed the American Recovery and Reinvestment Act of 2009 (Public Law 111-5). The purpose of the Recovery Act is to jumpstart the nation's ailing economy, with a primary focus on creating and saving jobs in the near term and investing in infrastructure that will provide long-term economic benefits. Title XII of the Recovery Act appropriated \$2.250 billion under the HOME Investment Partnerships (HOME) Program heading for a grant program to provide funds for capital investments in Low-Income Housing Tax Credit (LIHTC) projects. HUD will award TCAP grants by formula to state housing credit agencies to facilitate development of projects that received or will receive LIHTC awards between October 1, 2006, and September 30, 2009. The Recovery Act requires TCAP funds to be distributed to each state housing credit agency based on the percentage of the FY 2008 HOME Program appropriation received by the state and local participating jurisdictions in the state. If an eligible housing credit agency declines its formula allocation, in whole or in part, those funds will be re-allocated to other eligible grantees in accordance with this distribution formula. Since a major purpose of TCAP funds is to immediately create new jobs or save jobs at risk of being lost due to the current economic crisis, the Recovery Act establishes deadlines for the commitment and expenditure of grant funds and requires state housing credit agencies to give priority to projects that will be completed by February 16, 2012. Although TCAP funds were appropriated under the HOME heading of the Recovery Act, HOME program requirements found in 24 CFR Part 92 and the Consolidated Planning requirements in 24 CFR Part 91 *do not* apply to TCAP funds.

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HUD 21B (3-80)

III. TCAP SUBMISSION REQUIREMENTS AND GRANT AGREEMENTS

Submission Requirements

After reviewing the requirements put forth in this Notice, any state housing credit agency interested in accepting all or a portion of its TCAP allocation must submit the following information within 30 days of the publication date of this Notice. **Any state housing credit agency which fails to submit the required TCAP Submission Packet will be considered to have declined the receipt of its entire TCAP formula allocation. HUD will not award funds to any state housing credit agency that has not provided the following information:**

A. Statement of intent to accept TCAP funds, which must include:

- 1) A statement that indicates whether the grantee intends to accept the entire amount of its TCAP formula allocation. If the state housing credit agency elects to receive less than the full formula amount, the statement should provide the exact amount of TCAP funds that it will accept. Once HUD determines that the submission packet is complete, the amount requested by the grantee cannot be changed;
- 2) A statement detailing which, if any, other federal grant funds the state housing credit agency currently administers (LIHTCs are not federal grant funds);
- 3) A statement regarding the status of its 2009 LIHTC allocation process; and
- 4) The name and contact information, including email address, phone and fax number, of the individual designated as the agency contact for TCAP.

B. Description of Competitive Selection Criteria:

As described below, the grantee must distribute the TCAP funds competitively under the requirements of the Recovery Act (i.e., give priority to projects that are expected to be completed by February 16, 2012) and pursuant to the existing Qualified Allocation Plan (QAP).

Each state housing credit agency must submit a written description of all the selection criteria and any weightings assigned that it will use to competitively award its TCAP funds. The state housing credit agency must also define an “award of LIHTCs” which can be as early as the date of public notice of the funding decision for a particular project. The same definition of an “award of LIHTCs” must be uniformly applied to all LIHTC projects for the purpose of determining project eligibility for TCAP funding.

C. Commitment and Expenditure Deadlines:

Each state housing credit agency must describe the procedures it will use to ensure it will commit and expend its TCAP funds to meet the deadlines established in the Recovery Act (see below). In addition, it must specifically describe how it will redistribute funds to more deserving projects from projects which are not in compliance with deadlines established in the written agreement between the grantee and project owners.

D. Recovery Act Accountability and Transparency Requirements:

Each state housing credit agency must submit information about how it is meeting the Recovery Act accountability and transparency requirements (see below). To implement this requirement, the state housing credit agency must make its project selection process and criteria available to the public and accept comments from the public for a period of not less than five days. The state housing credit agency must submit to HUD its website address set up for this purpose, and a description of how it met the five-day comment period. It must also provide a description of how the agency plans to ensure that it will remain in compliance with these accountability and transparency requirements for the duration of the TCAP grant.

E. Additional Elements of the Submission:

Each state housing credit agency must submit Standard Form 424 (Application for Funds) signed by a legally authorized representative of the agency. Among other identifying data elements, the form requires all potential grant recipients to have a Data Universal Numbering System (DUNS) number from Dun and Bradstreet. Grantees eligible for TCAP funds should determine if they have a DUNS number and, if not, request one as soon as possible. Organizations can receive a DUNS number at no cost by calling the dedicated toll-free DUNS Number request line at 1-866-705-5711. A sample SF-424 is attached to this Notice. The Recovery Act also requires registration in the Central Contractor Registration (CCR). To register, go to www.ccr.gov/startregistration.aspx.

The TCAP Submission must include a transmittal letter on the letterhead of the state housing credit agency and signed by the Chief Executive Officer or Chief Operating Officer of the agency.

F. Deadline for Submissions:

State housing credit agencies must send three copies of the Submission Requirements packet by Federal Express or United Parcel Service, within 30 days of the publication of this Notice, to Marcia Sigal, Director, Program Policy Division, Office of Affordable Housing Programs, Community Planning and Development, U.S. Department of Housing and Urban Development, 451 7th St., S.W. Room 7164, Washington, D.C. 20410. The submission deadline will be met if the Submission Requirements packet is sent by overnight or express delivery and is placed in transit with Federal Express or UPS on or before 30 days from the publication date of this Notice. Due to security screening procedures, submissions sent by regular U.S. Postal Service mail may not be received timely. Fax and email transmissions will not be accepted.

HUD will fund only those state housing credit agencies that provide complete TCAP Submission Requirements packets. HUD will review each TCAP Submission packet for completeness within 10 days of receipt and notify any state housing credit agency if it is found to be incomplete and provide instructions for curing the deficiency.

Grant Agreements

After HUD determines that the grantee's TCAP submission is complete, HUD will execute a grant agreement with the state housing credit agency. The grant agreement will include all applicable requirements specific to the TCAP program, federal grant requirements and reporting requirements required by the Recovery Act. In accordance with 24 CFR 85.12, if HUD determines that a grantee has a history of unsatisfactory performance, is not financially stable or has a management system that does not meet management standards set forth in 24 CFR Part 85, HUD may declare the grantee as "high risk" and attach special conditions to the grant agreement.

IV. TCAP PROGRAM REQUIREMENTS

Although TCAP funds were appropriated under the HOME Program heading of the Recovery Act, HOME statutory and regulatory requirements *do not* apply to TCAP funds, with the exception of environmental review requirements discussed below.

The Recovery Act establishes certain requirements applicable to the TCAP program, including deadlines for commitment and expenditure, transparency, and distribution of funds. This Notice sets forth these requirements. Other federal laws, such as Fair Housing, apply by their own terms.

HUD will issue guidance, including frequently asked questions on TCAP requirements, on a continuing basis, to facilitate project implementation and compliance with TCAP requirements.

A. Eligible Grantees, Projects and Uses of Funds

Grantees: The housing credit agency of each of the 50 states, the District of Columbia, and the Commonwealth of Puerto Rico are the only eligible grantees for the TCAP program. These agencies are referred to collectively as either state housing credit agencies or grantees in this notice.

Eligible Projects: By statute, projects eligible to receive TCAP assistance are rental housing projects that received or will receive an award of LIHTCs under Section 42(h) of the Internal Revenue Code of 1986, as amended, (IRC) (26 U.S.C. 42), during the period from October 1, 2006 to September 30, 2009 (federal fiscal years 2007, 2008 or 2009), and require additional funding to be completed and placed into service in accordance with the requirements of Section 42 of the IRC. Projects awarded LIHTCs that will also receive bond financing are eligible to receive TCAP funds. However, if the only source of credits for a project is the Gulf Opportunity Zone or Midwestern Disaster Area Housing Credits, it is not an eligible TCAP project since these credits were not awarded under Section 42(h) of the IRC. The state housing credit agency must also define an "award of LIHTCs" which can be as early as the date of public notice of the funding decision for a particular project. The same definition of "award of LIHTCs" must be uniformly applied to all LIHTC projects for the purpose of determining project eligibility for TCAP funding.

Eligible uses of funds: TCAP funds may be used for capital investment in eligible LIHTC projects. Capital investment means costs that are included in the ‘eligible basis’ of a project under Section 42 of the IRC. TCAP funds cannot be used for the administrative costs of TCAP grantees, including the cost of operating the program or monitoring compliance, and section 1604 of the Recovery Act specifically prohibits the use of grant funds for swimming pools.

The TCAP assistance provided to a project must be made in the same manner and subject to the same limitations (including rent, income, use restrictions and compliance monitoring) as required by the state housing credit agency with respect to an award of LIHTC to a project (i.e., as required under Section 42 of the IRC and its implementing regulations), and all other requirements of the Act.

B. TCAP Fund Distribution

The Recovery Act requires HUD to distribute TCAP funds to each state housing credit agency based on the percentage of the FY 2008 HOME Program appropriation received by the state and local HOME participating jurisdictions in the state. Following the submission and HUD’s acceptance of the materials described in above, HUD will execute a grant agreement with each grantee. The grantee may then proceed with the distribution of its TCAP funds in accordance with this Notice and the Recovery Act requirements.

The Recovery Act requires grantees to distribute TCAP funds “competitively under this heading and pursuant to their qualified allocation plan”, as defined in Section 42(m) of the IRC. The TCAP competition is limited to projects that have received or will simultaneously with TCAP funding receive a LIHTC award between October 1, 2006 and September 30, 2009 (federal fiscal years 2007, 2008, or 2009). Note that state housing credit agencies are neither required nor expected to amend their QAPs to comply with this program requirement. In states in which there are multiple housing credit agencies, a project may be selected pursuant to any housing credit agency’s qualified allocation plan (QAP). The TCAP grantee may also choose to sub-grant a portion of its TCAP grant to another housing credit agency within the state. The sub-grant agreement must contain all applicable TCAP and Federal grant requirements.

In their competitive TCAP selection process, state housing credit agencies are required to give priority to eligible projects that are expected to be completed within 3 years from the date of Recovery Act enactment (February 16, 2012). Consequently, this standard must be the main selection criterion in any TCAP competition. The grantee is otherwise free to design its competitive process and adopt any other selection criteria it chooses. For example, a grantee may choose to award TCAP funds to projects that: (1) meet a predetermined threshold of “ready-to-go”; and (2) have completed the required environmental review process (described below) because the project had already been awarded HOME or other federal financial assistance.

The grantee can also decide whether to provide TCAP funds to eligible projects through grants or loans. Each grantee should consider how these decisions, in the aggregate, may affect its ability to meet the statutory deadlines for commitment and expenditure of funds defined below. For example, if TCAP funds are provided to projects as loans, any repayment of principal or interest received during the three-year grant period is program income and must be expended before appropriated TCAP funds. (See below for a discussion of TCAP program income.)

Pursuant to the Recovery Act, the state housing credit agency's selection process must be 'transparent', as described below.

C. TCAP Commitment and Expenditure Deadlines

The Recovery Act imposes both commitment and expenditure deadlines on the grantee's use of TCAP funds. Specifically, the Recovery Act requires that the state housing credit agency:

- Commit not less than 75 percent of its TCAP grant within one year of the enactment of the Recovery Act (i.e., by February 16, 2010);
- Demonstrate that all project owners have expended 75 percent of the TCAP funds within two years of the enactment of the Recovery Act (i.e., by February 16, 2011); and
- Expend 100 percent of its TCAP grant within three years of the enactment of the Recovery Act (i.e., by February 16, 2012).

The grantee must track and report to HUD on a regular basis in IDIS its progress in committing and expending TCAP formula grant funds. Grant funds not expended by the end of the three-year performance period will be recaptured by HUD.

A **TCAP Funding Commitment** is recorded on the date of execution of the written agreement between the grantee and project owner that provides TCAP assistance to a project. (See Section IV.B. for additional information on the written agreement.) **Expenditure** means a charge against the TCAP program funds account. Expenditures may be reported on a cash or accrual basis.

D. TCAP Written Agreements and Disbursements

Written Agreements -- Grantees must execute a legally binding written agreement with each project owner. The written agreement, *called a TCAP written agreement*, must set forth all of the TCAP program and crosscutting federal grant requirements applicable to the funding, and must make these requirements enforceable through the recordation of a restriction that is binding on all owners and successors, e.g., a covenant. HUD will issue more specific guidance on the required content of a TCAP written agreement. The written agreement for a project cannot be executed until environmental clearance for the project is completed and the Request for Release of Funds (RROF) is approved. The grantee must retain a copy of the executed TCAP written agreement and make these agreements available for HUD review, upon request.

Disbursement of Funds -- The TCAP written agreement must be signed and dated by the grantee and project owner before any TCAP funds are disbursed. Federal funds cannot be drawn from the U.S. Treasury in advance of the need to pay an eligible cost. Consequently, TCAP funds cannot be drawn from the U.S. Treasury and placed in escrow or advanced in lump sums to project owners. Once funds are drawn from the grantee's U.S. Treasury account, they must be expended for an eligible TCAP cost within 3 days.

E. Program Income

Program Income -- means gross income received by the grantee generated by the use of TCAP funds during the grant period. This includes, but is not limited to, principal and interest from a loan made with TCAP funds, or other income or fees received from project owners in connection with TCAP funds, and interest earned by the grantee on program income before its disposition. The grantee must record program income receipts in HUD's Integrated Disbursement and Information System (IDIS) and use them in accordance with the TCAP requirements. The grantee must expend all program income for eligible TCAP costs before additional appropriated TCAP grant funds are drawn from the U.S. Department of Treasury. Grantees must continually monitor the amount of program income on-hand or anticipated, and be aware of these amounts when assessing their progress towards meeting the commitments and expenditure deadlines for TCAP funds.

F. The Recovery Act Accountability, Transparency and Reporting Requirements

The Recovery Act imposes significant accountability, transparency and reporting requirements for each program and expenditure under the Act, some of which are still being defined by the Office of Management and Budget (OMB). HUD will incorporate the final requirements into the TCAP grant agreement.

On February 18, 2009, OMB issued initial guidance on the implementation of Recovery Act programs, including initial reporting requirements for recipients of Recovery Act funding. All recipients of Recovery Act funds, including TCAP grantees, will be required to report to HUD, 10 days after the end of each calendar quarter starting on June 10th, 2009, information similar to the following:

- The total amount of TAP funds received;
- The amount of TCAP funds expended or obligated to projects or activities, including unobligated balances;
- A detailed list of all projects or activities for which TCAP funds were expended or obligated, including:
 - ✓ The name of the project,
 - ✓ A description of the project,
 - ✓ An evaluation of the completion status of the project, and
 - ✓ An estimate of the number of jobs created and the number of jobs retained by the project.

The Recovery Act imposes additional transparency and reporting requirements for TCAP. Each state housing credit agency must post on its website a description of its competitive selection criteria for awarding TCAP funds to eligible projects. In addition, the grantee must identify all projects selected for funding, and post the amount of each TCAP award on its website.

TCAP grantees must submit reports in a format and at such time as prescribed by HUD. In addition, HUD and Office of the Inspector General (OIG) staff must be given access, upon reasonable notice, to all information related to the selection, award and use of TCAP funds.

G. Asset Management

The Recovery Act requires state housing credit agencies to perform asset management functions, or contract for performance of these services, at the owner's expense, to ensure compliance with Section 42 of the IRC and the long term viability of projects funded by TCAP. Costs associated with asset management are administrative costs and are not eligible to be paid with TCAP funds.

H. Redistribution of TCAP Funds

The grantee is responsible for redistributing its TCAP funds to ensure compliance with the commitment and expenditure deadlines established by the Recovery Act. If a project owner fails to expend TCAP funds timely, the grantee must assess whether the delay will affect its ability to meet its TCAP deadlines, and take necessary steps to redistribute the funds to a more deserving project. Consequently, in the TCAP written agreement, the grantee must specify a schedule for the expenditure of TCAP funds and outline the circumstances under which TCAP funds will be recaptured if the project owner fails to meet the schedule. The grantee must closely monitor the progress of each TCAP project to ensure that it will meet TCAP expenditure deadlines, since failure to do so will result in recapture of funds by HUD.

V. FEDERAL GRANT REQUIREMENTS

TCAP funds are federal financial assistance and, therefore, are subject to requirements applicable to such funds. Grantees must comply with the following federal requirements:

- **Fair Housing Act** (42 U.S.C. 3601-19) and implementing regulations at 24 CFR Part 100 and the regulations at 24 CFR Part 107 (Equal Opportunity in Housing).
- **Title VI of the Civil Rights Act of 1964** (42 U.S.C. 2000(d)) (Nondiscrimination in Federally Assisted Programs) and implementing regulations at 24 CFR Part 1.
- **The Age Discrimination Act of 1975** (42 U.S.C. 6101-07) and implementing regulations at 24 CFR Part 146 "Nondiscrimination on the Basis of Age in HUD Programs or Activities Receiving Federal Financial Assistance."
- **Affirmatively Furthering Fair Housing**

HUD has responsibility to affirmatively further fair housing in the programs it administers. To meet this obligation, each TCAP grantee must establish an affirmative fair housing marketing plan for its TCAP projects and require project owners to follow its plan when marketing TCAP units.

Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market to the available housing without regard to race, color, national origin, sex, religion, familial status or disability. The affirmative marketing requirements and procedures adopted must include:

- Methods for informing the public, owners and potential tenants about Federal fair housing laws and the grantee's affirmative marketing policy:

- Requirements and practices each owner must adhere to in order to carry out the grantee’s affirmative marketing procedures and requirements;
 - Procedures to be used by owners to inform and solicit applications from persons in the housing market areas that are not likely to apply for the housing without special outreach. Special outreach, as appropriate, includes but is not limited to, the translation of marketing material for persons who are limited English proficient; the placement of translated marketing material in minority owned media; and the provision of meaningful access concerning the residential rental project (e.g. providing translated information about application procedures, tenancy and other project amenities);
 - Records that will be kept describing actions taken by the grantee and by owners to affirmatively market units and records to assess the results of these actions; and
 - A description of how the grantee will annually assess the success of affirmative marketing actions and what corrective actions will be taken where affirmative marketing requirements are not met,
- **Section 504 of the Rehabilitation Act of 1973** (29 U.S.C. 794) and implementing regulations at 24 CFR Part 8 “Nondiscrimination Based on Handicap in Federally Assisted Programs and Activities of the Department of Housing and Urban Development.”

Section 504 of the Rehabilitation Act of 1973 applies to all TCAP projects. For new construction projects and projects undergoing substantial rehabilitation, five percent of the units must be accessible to persons with mobility impairments and two percent of the units must be accessible to persons with hearing or vision impairments (See 24 CFR 8.22.) Substantial rehabilitation for a multifamily rental project is defined in Section 24 CFR 8.23 as a project with 15 or more units for which the alterations would equal more than 75 percent of the replacement cost for the facility.

Modifications to projects to comply with Section 504 requirements are eligible costs under TCAP. However, compliance with Section 504 requirements may be infeasible or impracticable for some projects, depending on where they are in the development process. If a new construction or substantial rehabilitation project is underway or has already been completed, and it cannot be modified to meet the accessibility requirements established by Section 504, it is ineligible to receive TCAP assistance.

For projects in which the rehabilitation would not be considered substantial, the Section 504 provisions are applicable only to the maximum extent feasible, i.e., not required if it would impose undue financial and administrative burden. See 24 CFR 8.23.

- **National Environmental Policy Act and Related Laws** (Environmental review responsibilities) and implementing regulations at 24 CFR Part 58.

Some state housing credit agencies and LIHTC owners may be unfamiliar with the NEPA requirements and the significant impact that the timing of certain decisions or actions may have on their ability to award TCAP funds. The Recovery Act expressly applies section 288 of the HOME

statute, which requires the State to assume responsibility for environmental review under the National Environmental Policy Act (NEPA) of 1969 and related federal environmental authorities and regulations at 24 CFR Part 58 “Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities.” The “State”, as defined in the HOME program statute (42 USC 12704(2)), means “any State of the United States, the District of Columbia, the Commonwealth of Puerto Rico, or any agency or instrumentality thereof that is established pursuant to legislation and designated by the chief executive officer to act on behalf of the State with regard to the provisions of this Act.” Accordingly, the State is responsible for the environmental review, but the State may designate, if it so chooses, the state housing credit agency to perform the environmental reviews for TCAP projects on behalf of the State. ***No TCAP funds may be committed to a project before completion of the environmental review process.***

Once an owner applies for TCAP funds, committing TCAP or any other funds to or undertaking any “choice-limiting” activity prior to successful completion of the environmental clearance review (i.e., HUD approval of the Request for Release of Funds), is prohibited. This includes any activity that will result in a physical change and/or acquisition, including leasing, or disposition of real property. **Performing a choice-limiting action may disqualify a project from receiving any federal funds.** See 24 CFR Part 58 for general information about environmental review requirements at http://www.access.gpo.gov/nara/cfr/waisidx_04/24cfr58_04.html or <http://www.hud.gov/offices/cpd/environment/index.cfm>.

If a federal environmental review has already been completed for a project, providing TCAP funds to the project may not require an additional environmental review. For example, if the state housing credit agency or another agency or department of the State performed an earlier environmental clearance for HUD assistance on the project that is now receiving TCAP assistance from the state, and neither the project nor the environmental conditions have changed since the previous review, then no new environmental clearance is required. See 24 CFR 58.35(b)(7).

State housing credit agencies and LIHTC project owners are strongly advised to seek technical assistance and training regarding compliance with NEPA requirements. Environmental officers stationed in HUD field offices are ready to assist.

- **The Lead-Based Paint Poisoning Prevention Act and the Residential Lead-Based Paint Hazard Reduction Act of 1992** and implementing regulations at 24 CFR Part 35 are applicable to housing that receives Federal assistance.

Guidance on the applicability of these requirements to TCAP projects will be provided separately.

- **Davis-Bacon Prevailing Wages** Under section 1606 of Division A of the American Recovery and Reinvestment Act of 2009, contractors and subcontractors hired with Recovery Act funds are required to pay prevailing wages to laborers and mechanics in compliance with the Davis-Bacon Act. In the case of projects already under construction, it may be possible to obtain a determination, under 29 CFR 1.6(g), that Davis-Bacon requirements apply prospectively to the construction project, as of the date of the TCAP award. Labor Relations Specialists in HUD Field Offices are available to assist grantees with questions related to these requirements.

- **“Anti-Lobbying” Restrictions** (Restrictions on lobbying in 31 USC 1352 and implementing regulations at 24 CFR Part 87 “New Restrictions on Lobbying”.) This statute prohibits the use of funds appropriated by any act by the recipient of a Federal contract, grant, loan, or cooperative agreement to pay any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with covered Federal action.
- **The Drug-Free Workplace Act of 1988** (41 U.S.C. 701 et seq., as implemented at 24 CFR Part 21 “Government-Wide Requirements for Drug-Free Workplace (Grants)”.) This statute prohibits the receipt of a grant from any Federal agency unless the recipient agrees to provide and certify to a drug-free workplace.
- **OMB Regulations and Circulars** The following government-wide requirements are applicable to HUD grant programs, pursuant to Executive Orders requiring federal agencies to impose the requirements on all Federal grants:

The following requirements apply to TCAP grantees, not TCAP project owners:

- 24 CFR Part 85 “Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments;”
- 2 CFR Part 222 “Cost Principles for State, Local, and Indian Tribal Governments” (OMB Circular A-87); and
- OMB Circular A-133 “Audits of Institutions of Higher Education and Other Nonprofit Institutions.”

The following requirement applies to the grantee and project owners:

- 2 CFR Part 2424 “Non-procurement Debarment and Suspension.”

VI. TRAINING AND TECHNICAL ASSISTANCE

HUD is aware that some state housing credit agencies may lack the knowledge or experience needed to administer federal grant programs. In these cases, it would be advisable for the grantee to partner with a State agency, such as the State HOME participating jurisdiction, to help train the staff of the state housing credit agency to perform required tasks. Alternately, the grantee may wish to consider contracting with persons or organizations that have the requisite knowledge and experience to train staff or assist in administering the program.

It may also be advisable for grantees to encourage or require project owners to retain subject matter experts to help them comply with federal requirements. Such steps may help avoid delays in committing and expending funds and findings of noncompliance: Costs incurred by project owners to comply with federal grant requirements are eligible TCAP costs. HUD intends to offer training and technical assistance to grantees regarding compliance with federal grant requirements. Information on these trainings will be posted on the TCAP webpage.

Exhibit 4

**THIRTY-SEVENTH REPORTING PERIOD
PROGRAMMATIC AGREEMENT COMPLIANCE REPORT**

JULY 1, 2013 TO DECEMBER 31, 2013

SUBMITTED TO:

California State Historic Preservation Officer
Advisory Council on Historic Preservation

PREPARED FOR:

Los Angeles Housing and Community Investment Department
1200 West 7th Street, 8th Floor
Los Angeles, CA 90017
Contact: Shelly Lo
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PREPARED BY:

ICF International
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January 2014



ICF International. 2014. Thirty-Seventh Reporting Period Programmatic Agreement Compliance Report, July 1, 2013 to December 31, 2013. July (ICF 0490.09). Los Angeles, California. Prepared for Los Angeles Housing and Community Investment Department, Los Angeles, California.

CERTIFICATION OF ACTIVITIES

January 31, 2014

The undersigned hereby certifies as required by Stipulation IV.C of the Programmatic Agreement, that all work subject to the Programmatic Agreement was carried out in compliance with the terms of the Programmatic Agreement, including any undertakings subject to Appendix A of the Programmatic Agreement.

By: _____
Shelly Lo, Environmental Specialist II
Los Angeles Housing and Community Investment Department

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Acronyms and Abbreviations

ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
ARLS	archaeological site records and literature search
BSO	Building, Structure, and Object Record
CEQA	California Environmental Quality Act
CHBC	California Historical Building Code
DOE	Determinations of Eligibility
HPC	Historic Preservation Consultant
HPOZ	Historic Preservation Overlay Zone
HRI	California Historic Resources Inventory
HUD	U. S. Department of Housing and Urban Development
ICF	ICF International
IRC	Internal Revenue Code
LACDD	Los Angeles Community Development Department
LAHD	Los Angeles Housing Department
NHPA	National Historic Preservation Act
NPS	National Park Service
NRHP	National Register of Historic Places
OHP	California Office of Historic Preservation
PA	Programmatic Agreement
PACR	Programmatic Agreement Compliance Report
QC	Cultural Resources Records Search Quick Check
SHPO	State Historic Preservation Officer
SMMA	Standard Mitigation Measures Agreement
Standards	Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings

1.1 Overview

On September 6, 1995 a Programmatic Agreement (PA) was executed among the City of Los Angeles (City), the California State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP) to fulfill the requirements of Section 106 of the National Historic Preservation Act of 1966 as amended (NHPA) for federal undertakings administered by the City of Los Angeles. Specifically, the City of Los Angeles administers and funds programs with revenues from the Community Development Block Grant Program of the U. S. Department of Housing and Urban Development (HUD) under Title I of the Housing and Community Development Act of 1974; the Rental Rehabilitation Block Grant Program of HUD under Section 17 of the U. S. Housing Act of 1937; the McKinney Act Homeless Programs, including the Emergency Shelter Grants Program, Transitional Housing, Permanent Housing for the Homeless Handicapped, and Supplemental Assistance for Facilities to Assist the Homeless; Home Investment Partnership Funds; and the Shelter Plus Care Program. The City has determined that implementation of these programs may have an effect upon properties included in or eligible for inclusion in the National Register of Historic Places (NRHP). Therefore, the PA provides stipulations to satisfy the City's Section 106 responsibilities for all individual undertakings of the above-referenced programs and any other program delegated to the City of Los Angeles by HUD pursuant to 24 CFR Part 58.

To assist in completing the requirements of Section 106 under the PA, Stipulation IV.A of the PA requires the City to retain the services of a qualified Historic Preservation Consultant (HPC). The City first contracted with ICF International (ICF) in April 2006 to serve as the City's HPC for an initial contract term of three years. Second and third contract terms were initiated with ICF, extending the duration of service. ICF is currently serving as the City's HPC under the third contract term, which ends in April 2016. ICF has prepared this report, on behalf of the City, in compliance with Stipulation XVIII of the PA, which calls for the documentation in writing of all actions taken pursuant to the PA every six months in a Programmatic Agreement Compliance Report (PACR) and copies provided to the SHPO and the ACHP.

1.2 Statement of Purpose

The purposes of the PACR are to:

- Summarize for the SHPO and the ACHP the activities carried out under the PA from July 1, 2013 through December 31, 2013;
- Document all decisions made with respect to the "Identification and Evaluation of Historic Properties," the "Treatment of Historic Properties," the "Resolution of Adverse Effects," the "Consideration and Treatment of Archeological Resources," and "Exempt Projects" as required by the PA;
- Provide copies of all Standard Mitigation Measures Agreements (SMMA) executed during the reporting period;

- Present the views of the City regarding the usefulness of the PA in promoting the efficiency and effectiveness of both the programs and the consideration of historic properties; and
- Inform the public of the activities carried out under the terms of the PA by making the PACR available for public inspection and comment.

This chapter summarizes the methodology used by the City of Los Angeles and the HPC to carry out the requirements of the PA. Copies of the historic resources inventory forms and other documentation prepared under the PA have not been included in this report, but are available upon request.

2.1 Defining the Undertaking

For all projects that involve funding from a federally sponsored program, the City prepares an environmental checklist that provides general information about the undertaking and the subject property. This information includes the name and address of the undertaking, a project description and/or scope of work, and the undertaking's funding source. As part of the checklist, the City also obtains photographs of the subject property and, in some cases, building permits or other documentation. The environmental checklist is then sent to the HPC with a request from the City to conduct a Section 106 review per the requirements of the PA. Upon receipt of the environmental checklist, the HPC opens a case file for the undertaking and enters the project information into a database, which is used to track undertakings subject to the PA.

2.1.1 Undertakings Not Requiring Review

Stipulation III (Undertakings Not Requiring Review by SHPO or ACHP) of the PA delineates specific types of undertakings that do not require an extensive review. These include undertakings affecting properties that are less than 50 years old, undertakings that are limited exclusively to interior portions of single family residences, and undertakings that are limited exclusively to the activities listed in Appendix A of the PA.

Following review of the environmental checklist and accompanying information submitted by the City for each new undertaking, the HPC determines whether the project is exempt from review under the PA. In some cases, additional site-specific research is necessary to determine the construction date of a property before a determination is made. If the undertaking is determined to be exempt from review, the reason for the determination is documented in a letter from the HPC to the City.

Under the terms of the PA, "exempt" determinations are not submitted to the SHPO for concurrence, but are documented in the PACR. Upon completion of the review, the City authorizes exempt undertakings to proceed without further review in accordance with Stipulation III of the PA.

2.1.2 Area of Potential Effects

If the HPC determines that the undertaking is not exempt from Section 106 review under the PA, the HPC then considers whether the undertaking has the potential to affect a historic property within the undertaking's Area of Potential Effects (APE). For those undertakings that are limited to the rehabilitation of a property's interior and exterior features, the APE is defined as the legal lot lines of

a property, per Stipulation V.A of the PA. In all other cases, the APE is established by the City based on the undertaking's scope of work.

2.2 Methodology for Identification and Evaluation

The identification and evaluation of historic properties is accomplished by conducting research and by reviewing existing information for each of the properties within an undertaking's APE. All properties are subject to a basic level of research that involves a review of existing historical inventories and survey listings, a visual inspection of the property, and the acquisition of basic property information, such as that documented by an original building permit. The HPC uses this information to evaluate whether a property is eligible for listing in the NRHP. If a property is determined to be eligible for the NRHP, individually or as a contributor to a NRHP eligible historic district, additional research is conducted in the preparation of a formal determination of eligibility.

2.2.1 Review of Existing Data

The HPC reviews existing historical inventories and survey lists to determine whether the properties within an undertaking's APE have been previously listed in the NRHP or otherwise evaluated by any prior historic resources survey, or other environmental or planning document. The existing data and databases regularly searched include:

- The California State Historic Resources Inventory (HRI). This database of historic resources in California includes properties listed in the NRHP, determined eligible for listing in the NRHP by federal or state action in some form of environmental review or through the historic preservation tax credit certification process, and historic resources surveys reviewed by the SHPO.
- Historic resources surveys prepared by or for local agencies including the City of Los Angeles Community Redevelopment Agency of the City of Los Angeles, the Los Angeles Department of City Planning, and the Los Angeles Bureau of Engineering. These surveys include the published results of SurveyLA, the citywide survey effort sponsored by the Los Angeles Office of Historic Resources, which is currently underway.
- Landmark lists and files of the Los Angeles Cultural Heritage Commission and the Los Angeles Historic Preservation Overlay Zones (HPOZ). This information is currently available through the City of Los Angeles Department of City Planning's online ZIMAS system.
- Historical inventories and survey records for areas within the City of Los Angeles conducted by and/or maintained by the HPC.
- Listings of prior Section 106 reviews completed by the City under the PA, maintained by the HPC.

2.2.2 Field Survey and Photography

Photographs of the properties within an undertaking's APE are typically included as part of the environmental checklist submitted to the HPC by the City when a review is first initiated. These photographs are used to determine the integrity and condition of properties in the APE, and in evaluating their eligibility for the NRHP. When photographs are not provided or when the

photographs do not adequately document a property, the HPC obtains photographs of properties in the APE and conducts a visual evaluation of the properties by visiting the project site.

If it is determined that a property may be a contributor to a potential NRHP eligible historic district, through research or visual inspection, the HPC conducts a field survey of the APE and surrounding neighborhood. The potential historic district is documented with representative photographs, and a determination of eligibility considered.

2.2.3 Site Specific Research

The HPC conducts site specific research for all properties in an undertaking's APE. The following sources are consulted:

Building Permits. Building permits are obtained and reviewed for information on each property's *date of construction, architect, builder, owner, and alterations* (Source: City of Los Angeles, Department of Building and Safety).

Sanborn Maps. These fire insurance maps provide information on the development of a property over time; provide a general range of construction dates when such dates are not otherwise available; and aid in the identification and evaluation of historic districts (Sources: Los Angeles Public Library, History, Geography and Genealogy online database).

Parcel Maps. These maps illustrate parcel and lot lines in their context by block, but do not include building footprints. Both Sanborn Maps and parcel maps are used in the determining APEs, and parcel maps serve as definitive location maps for the boundaries of an undertaking (Source: Los Angeles County Tax Assessor's online database).

Tax Assessor Map Books. These map books cover the period roughly between 1900 and 1960, *documenting the year that improvements were made to properties and the names of the property owners.* The map books are consulted when no other information is available on a property's year of construction and/or when the name of the original owner is needed to determine the significance of a property (Source: Los Angeles County Archives).

Tract Maps. These maps provided tract and subdivision information, which informs the development history of a property and is used in the identification of potential historic districts (Source: City of Los Angeles Department of Engineering's online database).

Local Landmark Information. Files on buildings and districts designated as local landmarks are reviewed for *architectural descriptions, history, and significance* (Source: City of Los Angeles Cultural Heritage Commission files).

State Historic Resources Inventory Forms (DPR 523 Forms). DPR 523 Forms for previously evaluated properties are obtained and reviewed for architectural descriptions, history, and significance. These forms include those reviewed and entered into the HRI, as well as forms that may have been submitted for review but not yet entered into the state inventory or forms prepared by preservation consultants but not submitted to the SHPO (Sources: Office of Historic Preservation, South Central Coastal Information Center of the California Historical Resources File System at the Department of Anthropology at California State University, Fullerton, and local repositories).

Historic Preservation Overlay Zone Information. Evaluations and historical contexts related to City HPOZs are reviewed for architectural descriptions, history, and significance (Source: City of Los Angeles Planning Department).

Previous Determinations of NRHP Eligibility. Prior determinations of eligibility made as part of Section 106 reviews and compliance with the California Environmental Quality Act (CEQA), and not entered in the State Historic Resources Inventory, are reviewed for information on architectural descriptions, history, and significance (Sources: OHP and public agencies responsible for environmental review).

NRHP Nomination Forms. Original NRHP nomination forms for NRHP listed properties are reviewed for information on architectural descriptions, history, and significance (Source: South Central Coastal Information Center of the California Historical Resources File System at the Department of Anthropology at California State University, Fullerton).

Los Angeles Central Library. The photograph and local history collections of the Los Angeles Central Library are researched for information relating to the history and development of properties, their historic contexts, and significance related to associated architects, builders, and owners. Secondary source literature on the history of Southern California, building trade publications, newspapers, and other periodicals, city directories, and period photographs are also utilized.

Local Historical Societies and Historic Preservation Organizations. Members of historical societies and other interested organizations and individuals are consulted to ascertain the local significance of buildings and associated individuals and to determine the cultural significance of resources.

2.2.4 Preparation of Inventory Forms

The City and the HPC prepare State DPR 523 forms for properties that have not been previously documented, and in cases where existing forms are not adequate or are outdated. The forms are prepared using the California Office of Historic Preservation's (OHP) Instructions for Recording Historical Resources, dated March 1995. The forms prepared may include a Primary Record; Building, Structure, and Object Record (BSO); District Record; Map Sheet; and Continuation Sheet. New California historical source status codes adopted in December 2003 are used in assigning evaluations to properties.

For properties previously listed in the NRHP or previously determined eligible for listing, no inventory forms are prepared under the PA. Buildings determined to be individually eligible for listing in the NRHP, which have not been previously evaluated, are recorded on Primary Record and BSO forms and include both an architectural description and a statement of significance. *These properties are assigned a NRHP status code of "2S2" (Individual property determined eligible for the NRHP by a consensus through Section 106 process).* Properties determined eligible as contributors to a NRHP eligible historic district are recorded on Primary Record and BSO forms and are assigned an evaluation of "2D2" (Contributor to a district determined eligible for NRHP by consensus through Section 106 process).

Where applicable, DPR 523 District Record forms, Continuation Sheet(s), and Location Maps are also prepared for eligible historic districts, which have not been previously evaluated. As approved by OHP staff, Continuation Sheets with a list of the blocks and/or addresses of properties within the

boundaries of an eligible historic district are provided with a District Record, instead of a Primary Record and BSO for each individual property, as specified in the instruction manual.

Buildings that are determined to be ineligible for listing in the NRHP are documented on DPR 523 Primary Record forms only. An architectural description indicating the architectural style, number of stories, building type and material, roof configuration, integrity, condition and primary character-defining features is provided. Ineligible properties are assigned an evaluation of "6Y" (Determined ineligible for NRHP by consensus through Section 106 process).

For undertakings on vacant land, a DPR 523 Primary Record form and Continuation Sheets are used to document the properties in the APE. The Primary Record provides a general description of the APE, including the number of buildings and estimated ages. In addition, each building in the APE is reviewed for potential NRHP eligibility. Ineligible properties are documented on Continuation Sheets, which contain the addresses and a photograph of each building in the APE. Eligible properties in the APE are documented as described below and submitted to OHP for concurrence.

In consultation with OHP, it was determined that several fields of the Primary Record were not essential for the completion of DPR 523 forms under the PA. For example, UTM coordinates and other location data such as parcel numbers or legal descriptions are not provided, and if the name of property owners is not readily available for ineligible properties, it is noted as "unknown."

2.2.5 City Determinations of Eligibility

The City and the HPC determine the NRHP eligibility of all properties in an undertaking's APE that have not been previously listed or evaluated. Under the PA, these determinations of eligibility (DOE) are made as either eligible or ineligible for listing in the NRHP. Evaluations of architectural integrity and historic significance are based on the NRHP Criteria pursuant to 36 CFR Section 60.4 and the evaluation system for historic resources surveys developed by OHP.

As stated above, each determination of eligibility made by the City and the HPC is documented on a Primary Record and BSO forms, and submitted with a cover letter by the City to the SHPO for concurrence. Determinations of ineligibility are documented in a letter from the HPC to the City and accompanied by a Primary Record form and a map with the APE delineated. Under the terms of the PA, determinations of ineligibility are not submitted to the SHPO for concurrence, but are documented in the PACR.

2.2.6 SHPO Concurrence with Determinations of Eligibility

Under the PA, the SHPO is provided 15 calendar days to concur or not concur with the determinations of eligibility made by the City and the HPC. If the SHPO does not respond within this time period, the PA states that the City may assume the SHPO does not object to the determination and proceed.

2.3 Methodology for Findings of Effect

This section summarizes the process used by the City and the HPC in evaluating an undertaking's potential effects on historic properties in the APE, per the requirements of Stipulation VII of the PA.

2.3.1 Rehabilitation - Option 1

Undertakings that conform to Stipulation VII.B (Rehabilitation Option 1) of the PA, which involve rehabilitation and are not exempt from review, are reviewed to determine the conformance of the undertaking with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards) and the California Historical Building Code (CHBC). As part of this process, the City and HPC review the appropriate project documents, conduct a site visit to inspect and photograph the property, and meet once with the project applicant and City representative administering the project to discuss technical issues. If necessary, the HPC provides technical assistance to the applicant as part of the project review process, including recommendations on qualified contractors and consultants, copies of the Standards, Preservation Briefs, and other technical publications. When required, meetings are held between the City, the HPC, and applicants and their consultants in order to discuss the review process, appropriate treatment methods, and conformance with the Standards.

When initiating the Section 106 review under the PA, if the City and the HPC determine that the proposed undertaking does not meet the Standards, then the applicant is provided with recommendations on how to bring the undertaking into conformance with the Standards. If the changes are adopted, the construction documents for the undertaking are revised. The review of the undertaking for conformance with the Standards is documented in a Finding of Effect Memorandum. The Finding of Effect Memorandum documents the undertaking, including the proposed scope of work and a description of property, and evaluates the undertaking's potential impact on the character-defining features of historic properties in the APE. The Finding of Effect Memorandum concludes with a determination of whether the undertaking conforms to the Standards and would constitute no adverse effect on historic properties in the APE, or whether the project would meet the Standards only if specific conditions are met. Photographs of the character-defining features and a map delineating the APE are also provided.

Under the terms of the PA, this documentation is not submitted to the SHPO for review, but is recorded in the PACR. Finding of Effect Memorandums are prepared by the HPC and submitted to the City. When a finding of "no adverse effect" is made, the City may authorize the undertaking to proceed. A finding of "no adverse effect with conditions" is made when some aspect of the undertaking requires further refinement. When this type of finding of effect is made, the City may authorize the undertaking to proceed while working with the project applicant to satisfy the conditions for approval.

The City and the HPC together monitor completion of the undertaking and compliance with the Finding of Effect Memorandum. The City and HPC typically conduct walk-through inspections of undertakings at their 50% and 100% points of completion. Once a project is complete and any conditions for approval are satisfied, the HPC documents the undertaking's conformance with the Standards and submits this documentation to the City. If a completed undertaking does not comply with the conditions set out for a project, the City and the HPC proceeded under the applicable provisions of Stipulation VII and/or Stipulation XI of the PA.

When the City and the HPC determine that an undertaking does not conform to the Standards, changes are recommended. If the changes are not adopted, the City would enter into consultation with the SHPO to determine if the effects of the undertaking could be resolved by executing a SMMA under Stipulation VIII of the PA. If an SMMA is determined by the SHPO to be appropriate, the City and the SHPO would consult to develop an SMMA in compliance with Appendix B of the PA. In

addition to carrying out the terms of the SMMA, the City would document the agreement in the PACR.

2.3.2 Rehabilitation - Option 2 - IRC

When the owner of a property subject to the terms of the PA applies for investment tax credits pursuant to the Internal Revenue Code (IRC) and submits a Part 2 Historic Preservation Certification Application to the National Park Service (NPS), the review required by the certification process supersedes the Option 1 review process under described above, according to Stipulation VII.A of the PA. If the Part 2 or Part 3 was certified by the NPS without conditions, the project is deemed to conform to the Standards and requires no further review under the PA.

2.4 Methodology for Undertakings on Vacant Land

When an undertaking involves new construction on vacant land, the undertaking is considered to be a project that involves ground disturbing activities, which have the potential to affect archaeological resources. For these projects, as required by Stipulation X of the PA, the City and the HPC request the South Central Coastal Information Center at California State University, Fullerton, conduct an archaeological site records and literature search (ARLS) or a Cultural Resources Records Search Quick Check (QC) for each undertaking's APE. In addition, the buildings in the APE are documented on inventory forms as outlined in Section 2.1.6 of this report. These actions are documented in a letter from the HPC to the City and accompanied by a Primary Record form and Continuation Sheets for the APE; the ARLS or QC; the SHPO's comments on archaeological resources (when required by the PA); a Phase I archaeological survey (if required by the SHPO), and a map with the project site and APE delineated. The documentation identifies if any historic properties are located within the APE and, if so, assesses whether the undertaking would constitute an adverse effect on the historic property.

Under the terms of the PA, these undertakings are not submitted to the SHPO for concurrence (unless comments regarding the consideration of archeological resources is required or an historic property is identified within the APE), but are documented in the PACR.

3.1 Summary of Activities

This section summarizes the specific activities carried out under the PA between July 1, 2013 and December 31, 2013, the Thirty-Seventh PACR period. An activity report for each of the following is included at the end of this PACR:

- Summary of Activities – Includes a list by property address of all undertakings;
- Identification and Evaluation of Historic Properties – Includes a list of all properties identified and evaluated for NRHP eligibility;
- Treatment of Historic Properties – Includes a list of all undertakings reviewed for conformance with the Standards and documented in a Finding of Effect Memorandum;
- Resolution of Adverse Effects – Includes a list of all undertakings determined not to conform to the Standards, and requiring a resolution of adverse effects;
- Consideration and Treatment of Archaeological Resources – Includes a list of all undertakings that required a consideration of archaeological resources due to ground disturbing activities; and
- Undertakings Not Requiring Review – Includes a list of all undertakings that were determined to be exempt from Section 106 review under the PA.

No SMMAs were prepared or executed during this reporting period, although the fulfillment of one SMMA from a previous period continues to be monitored.

The City and the HPC worked on the review of undertakings involving 109 properties under the PA during the Thirty-Seventh reporting period.

3.2 Identification and Evaluation

This report documents the identification and evaluation of 71 properties.

3.2.1 Listed and Eligible Properties

Of the properties for which identification and evaluation are documented in this PACR, 10 were previously evaluated for listing in the NRHP. These properties included the following:

1010 E. Jefferson Boulevard (1S)	1554 N. Serrano Avenue (1S)
2100 S. Portland Street (1D)	1600-1606 N. Serrano Avenue (6Y)
252 S. Rampart Boulevard (6U)	1608 N. Serrano Avenue (6Y)
1544 N. Serrano Avenue (1S)	2415-2417 E. 1st Street (2S2)

912 W. 20th Street (1D)

916 W. 20th Street (1D)

Twenty-five properties were newly listed in or determined eligible for listing in the NRHP by the City and HPC during this period. These included 22 properties recorded as contributors to three newly identified NRHP-eligible historic districts and two individually eligible properties. The properties included the following:

- 126-130 N. Avenue 57 (2D2—Contributor to North Avenue 57 Historic District)
- 132-136 N. Avenue 57 (2D2—Contributor to North Avenue 57 Historic District)
- 138 N. Avenue 57 (2D2—Contributor to North Avenue 57 Historic District)
- 1601 N. Hobart Boulevard (2S2—Single Family Residence)
- 551 S. Kingsley Avenue (2S2—Single Family Residence)
- 200 N. New Hampshire (2D2—Contributor to Ambassador Heights Multiple-Family Residence Historic District)
- 206 N. New Hampshire (2D2—Contributor to Ambassador Heights Multiple-Family Residence Historic District)
- 210-212 N. New Hampshire (2D2—Contributor to Ambassador Heights Multiple-Family Residence Historic District)
- 216-218 N. New Hampshire (2D2—Contributor to Ambassador Heights Multiple-Family Residence Historic District)
- 222-224 N. New Hampshire (2D2—Contributor to Ambassador Heights Multiple-Family Residence Historic District)
- 226-230 N. New Hampshire (2D2—Contributor to Ambassador Heights Multiple-Family Residence Historic District)
- 232-234 N. New Hampshire (2D2—Contributor to Ambassador Heights Multiple-Family Residence Historic District)
- 236-238 N. New Hampshire (2D2—Contributor to Ambassador Heights Multiple-Family Residence Historic District)
- 240 N. New Hampshire (2D2—Contributor to Ambassador Heights Multiple-Family Residence Historic District)
- 721-729 E. Washington Boulevard (2S2—Scully Building)
- 722 E. 20th Street (2D2—Contributor to East 20th Street Historic District)
- 732 E. 20th Street (2D2—Contributor to East 20th Street Historic District)
- 740 E. 20th Street (2D2—Contributor to East 20th Street Historic District)
- 741 E. 20th Street (2D2—Contributor to East 20th Street Historic District)
- 748 E. 20th Street (2D2—Contributor to East 20th Street Historic District)

Exhibit 5

Robert Manford <robert.manford@lacity.org>

Tue, Dec 17, 2013 at 4:54 PM

To: "Starzak, Richard" <Richard.Starzak@icfi.com>

Cc: "Hetzel, Christopher" <Christopher.Hetzel@icfi.com>, Shelly Lo <shelly.lo@lacity.org>, Alex Fu <alex.fu@lacity.org>, Alexis Baylosis <alexis.baylosis@lacity.org>

Thanks Rick. This is very helpful



Dr. Robert K. Manford Environmental Affairs Officer &
Manager, Environmental and Land Use Services Unit
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Los Angeles, CA 90017
☎: (213) 744-7363 | ✉: robert.manford@lacity.org

[Quoted text hidden]

Hetzel, Christopher <Christopher.Hetzel@icfi.com>

Tue, Dec 17, 2013 at 5:25 PM

To: Robert Manford <robert.manford@lacity.org>

Cc: Shelly Lo <shelly.lo@lacity.org>, Alex Fu <alex.fu@lacity.org>, Alexis Baylosis <alexis.baylosis@lacity.org>, "Starzak, Richard" <Richard.Starzak@icfi.com>, "Davis, Colleen" <Colleen.Davis@icfi.com>

Robert,

Following our phone conversation, I conferred with Rick and Colleen about the Coronel Apartments project, and we all seem to agree on the following points:

1. If the developer relocates the historic property, instead of demolition, we could likely justify a finding of "no adverse effect" under Section 106. This finding assumes that the house is NRHP eligible under Criterion C for its architecture and it is moved to a new lot that is in a nearby location and generally has the same characteristics (e.g., placement on the block) as its current location. There is some precedent for this on part of the SHPO, and would need to go through a consultation process with the SHPO under the Programmatic Agreement (see below).
2. If the finding under Section 106 is "no adverse effect," then preparing a FONSI under NEPA should be no problem. Rick has also pointed out that, according to the CEQ/ACHP NEPA/106 Handbook from March 2013, even an "adverse effect" determination does not necessarily rule out the possibility of a FONSI. I believe Rick has already discussed this with you and forwarded you a copy of the text with this guidance.

Moving forward with the Section 106 review for the project, the following are the next steps in the review

process:

1. Prepare a formal determination of NRHP-eligibility for the Hobart house and submit it to the SHPO for concurrence, according to the requirements of the Programmatic Agreement. With your authorization, this is something that we can proceed with immediately. Time wise, we could have the determination prepared and submitted by early to mid-January. After receipt, the SHPO would have 15 days to review and comment.
2. Prepare a Finding of Effect for the project. If the Hobart house will be relocated and there is a "no adverse effect" finding, then the City would have to comply with Stipulation 'VII.D: Relocation of Historic Properties' of the Programmatic Agreement. This stipulation requires the City to forward documentation to the SHPO "that explains the need for relocation, describes the relocation site, indicates why the proposed relocation site was selected, states whether the relocation site contains archaeological properties, and summarizes the alternatives to relocation that were considered." If the SHPO agrees to the relocation after reviewing this documentation, then no other action is required. If they disagree, then further consultation with the SHPO would be necessary.

Assuming the project plans have been finalized, including the selection of a relocation site, we could have the necessary documentation prepared and submitted to the SHPO within about 2 weeks from receiving the final project plans. Following receipt of the documentation, the SHPO would have 15 days to review and comment. If they were to disagree with relocation, the Programmatic Agreement calls for up to an additional 30 days of consultation to resolve the disagreement. If no agreement is made after 30 days, then the review gets pushed to the Standard Mitigation Measures Agreement (SMMA) process under 'Stipulation VIII: Resolution of Adverse Effects' of the Programmatic Agreement.

We prepared documentation under the Programmatic Agreement for an LAHD project that required the relocation of a historic property a couple years ago...the Taylor Yard project. A copy of the documentation is attached, to give you an idea of what type of documentation we would want to submit to the SHPO.

In contrast to all this, if the Hobart house is not relocated or there is a finding of "adverse effect," the City would need to initiate consultation with the SHPO under Stipulation 'VII.E: Demolition' and/or Stipulation 'VIII. Resolution of Adverse Effects' of the Programmatic Agreement. Both require forwarding various forms of documentation to the SHPO. The timeframe for this would likely involve longer document preparation time (to compile all the required studies, analyses, and justifications) and the same 15-day review period, plus additional to draft and execute a Standard Mitigation Measures Agreement.

That about sums it all up. I have attached a copy of the Programmatic Agreement for your convenience. Please feel free to email or call if you have any further questions.

Sincerely,

Exhibit 6


Chris

Christopher Hetzel | Project Manager/Sr Architectural Historian | 206.801.2817 | 213.840.3143
(m) | christopher.hetzel@icfi.com | icfi.com

ICF INTERNATIONAL | 710 2nd Avenue, Suite 550, Seattle, WA 98104 | 206.801.2899 (f)

ICF INTERNATIONAL | 601 West 5th Street, Suite 900, Los Angeles, CA 90071 | (213) 312-1799 (f)

2 attachments

 **LACDD_Section106_Programmatic_Agreement.pdf**
1842K

 **SanFernandoRd1545_FOE.pdf**
1043K

Robert Manford <robert.manford@lacity.org>

Wed, Dec 18, 2013 at 9:44 AM

To: "Hetzel, Christopher" <Christopher.Hetzel@icfi.com>

Cc: Shelly Lo <shelly.lo@lacity.org>, Alex Fu <alex.fu@lacity.org>, Alexis Baylosis <alexis.baylosis@lacity.org>, "Starzak, Richard" <Richard.Starzak@icfi.com>, "Davis, Colleen" <Colleen.Davis@icfi.com>

Alex:

I think at this point you should communicate directly with the developer and let them know the status of the environmental; review of their project. Also, find out from them regarding the possibility of relocating the property and any additional information associated with that. Also, let them know that the work associated with the historic review, after our preliminary screening and evaluation by HCID consultant, will have to be paid for by the developer. Let me know what the developer's take is.




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Manager, Environmental and Land Use Services Unit
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Los Angeles, CA 90017
☎: (213) 744-7363 | ✉: robert.manford@lacity.org

----- Forwarded message -----

From: **Hetzel, Christopher** <Christopher.Hetzel@icfi.com>
Date: Tue, Dec 17, 2013 at 5:25 PM
Subject: RE: Coronel Apts
[Quoted text hidden]

2 attachments

 **LACDD_Section106_Programmatic_Agreement.pdf**
1842K

 **SanFernandoRd1545_FOE.pdf**
1043K

Alex Fu <alex.fu@lacity.org>
To: Robert Manford <robert.manford@lacity.org>

Wed, Dec 18, 2013 at 9:49 AM

I made two calls in the past hour and left messages but have not heard from them yet. Will try again later.

Alex Fu
[Quoted text hidden]

Robert Manford <robert.manford@lacity.org>
To: Alex Fu <alex.fu@lacity.org>

Wed, Dec 18, 2013 at 9:49 AM

Please follow-up with an email, so that you can have a paper trail



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[Quoted text hidden]

Alex Fu <alex.fu@lacity.org>
To: Blair Miller <bmillier@hollywoodhousing.org>

Wed, Dec 18, 2013 at 10:41 AM

Hi, Blair:

Please review the following email from our consultant and let us know what is your final decision on that building, to be relocated for preservation or to be demolished as the application stated. Your prompt response will be highly appreciated.

Alex Fu
HCIDLA

----- Forwarded message -----

Exhibit 7

From: **Robert Manford** <robert.manford@lacity.org>
Date: Wed, Dec 18, 2013 at 9:44 AM
Subject: Re: Coronel Apts
To: "Hetzel, Christopher" <Christopher.Hetzel@icfi.com>
[Quoted text hidden]

2 attachments

 **LACDD_Section106_Programmatic_Agreement.pdf**
1842K

 **SanFernandoRd1545_FOE.pdf**
1043K

Alex Fu <alex.fu@lacity.org>
To: Robert Manford <robert.manford@lacity.org>

Wed, Dec 18, 2013 at 10:44 AM

I just got their call and they'd like to see ICF's summary before getting back to us on the future of that historical building.

Alex Fu
[Quoted text hidden]

Blair Miller <bmillier@hollywoodhousing.org>
To: Alex Fu <alex.fu@lacity.org>

Wed, Dec 18, 2013 at 10:52 AM

Thank you Alex! We will review and be in touch.

From: Alex Fu [mailto:alex.fu@lacity.org]
Sent: Wednesday, December 18, 2013 10:42 AM
To: Blair Miller
Subject: Fwd: Coronel Apts

[Quoted text hidden]

Robert Manford <robert.manford@lacity.org>
To: Alex Fu <alex.fu@lacity.org>

Wed, Dec 18, 2013 at 10:55 AM

You can send them ICF's letter that they sent us about a month ago



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That's most helpful, thank you.

From: Alex Fu [mailto:alex.fu@lacity.org]
Sent: Wednesday, December 18, 2013 11:07 AM
To: Blair Miller
Subject: Fwd: Coronel Apts

Hi, Blair:


[Quoted text hidden]

Alex Fu <alex.fu@lacity.org>
To: Maura Johnson <mjohnson@hollywoodhousing.org>

Thu, Dec 19, 2013 at 1:59 PM

fyi

----- Forwarded message -----
From: **Alex Fu** <alex.fu@lacity.org>
Date: Wed, Dec 18, 2013 at 11:07 AM
Subject: Fwd: Coronel Apts
[Quoted text hidden]

 **HobartBlvd1601-1605n_RequestLtr_20131121.pdf**
167K

Robert Manfred <robert.manford@lacity.org>
To: Alex Fu <alex.fu@lacity.org>

Fri, Jan 3, 2014 at 10:01 AM

Alex:

Is the developer willing to proceed with relocation of the property? What was their response when you contacted them?



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----- Forwarded message -----
From: **Hetzel, Christopher** <Christopher.Hetzel@icfi.com>
Date: Thu, Dec 19, 2013 at 9:27 AM
Subject: RE: Coronel Apts

To: Robert Manford <robert.manford@lacity.org>

Robert,

Just to clarify, given your email to Alex below, should we proceed with preparation of the determination of eligibility for the Hobart house and it's submission to the SHPO under our contract with you? Or would that be something you are going to ask the developer to pay for? I'm assuming that preparation of the Finding of Effect would be paid for by the developer. I'm just trying to determine more clearly where the line is being drawn.

Thanks,

Chris

From: Robert Manford [mailto:robert.manford@lacity.org]
Sent: Wednesday, December 18, 2013 9:45 AM
To: Hetzel, Christopher
Cc: Shelly Lo; Alex Fu; Alexis Baylosis; Starzak, Richard; Davis, Colleen
Subject: Re: Coronel Apts

[Quoted text hidden]

Robert Manford <robert.manford@lacity.org>
To: Ken Bernstein <ken.bernstein@lacity.org>
Cc: Alex Fu <alex.fu@lacity.org>

Mon, Jan 6, 2014 at 12:49 PM

Hello Ken:

FYI, I wanted to let you know the status of our NEPA review here at HCID. We are waiting for the developer to confirm whether they want to relocate the property. No relocation means preparation of an EIS (I believe it would have been better to have prepared a joint EIR/EIS in that regard if we knew ahead of time). Nonetheless, should they consider not using any federal funds because of the Contentions with the EIR, we may not pursue the NEPA documentation.

Kindly keep us informed of any developments after the January 16 hearing. Thanks again.

Robert



Dr. Robert K. Manford Environmental Affairs Officer &

Exhibit 8

To: Alex Fu <alex.fu@lacity.org>

Yes, but can you confirm from them, so we can put this matter to rest? I'm getting somewhat conflicting information from Snr. Management, and I want to be clear as to what the situation is.



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On Tue, Jan 7, 2014 at 6:45 AM, Alex Fu <alex.fu@lacity.org> wrote:

As I remembered at the time, the developer seemed very firm that this building is "not a historical structure". I don't know where they obtained this determination. Submitted documents for the "Call for Projects" showed no information regarding the status or records of historic structure on site.

Alex Fu

[Quoted text hidden]

Robert Manford <robert.manford@lacity.org>

Tue, Jan 7, 2014 at 11:26 AM

To: Alex Fu <alex.fu@lacity.org>

Ok, please document all calls/communication with the developer, and if possible, follow-up with an email for tracking purposes. I know why I'm saying this. Also, make sure you communicate the issues regarding Florence Mills with them and document it as well.



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On Tue, Jan 7, 2014 at 11:04 AM, Alex Fu <alex.fu@lacity.org> wrote:

I left message to the developer this morning but have not heard from them yet.

By the way, this developer also involves with the Florence Mills project which has a noise level over 79 dB and one of the existing 8-unit apt building, would be demolished, is determined to be "Eligible" by ICF. Since the noise is not the only issue for this project, the EIS Waiver may not be applicable for Florence Mills project at this time.

Alex Fu

Exhibit 9

Fax: 323-454-4677

From: Alex Fu [mailto:alex.fu@lacity.org]
Sent: Tuesday, January 07, 2014 12:29 PM
To: Maura Johnson
Cc: Robert Manford; Alexis Baylosis
Subject: Coronel Apts

Hi, Ms. Johnson:

Have you contacted with Mr. Chris Hetzel at ICF yet regarding the status of the building located on 1601 N. Hobart Blvd.? According our consultant's preliminary determination, this building is National Register Historic Places (NRHP). I believed that several documents from ICF were forwarded to you on 12/19/13. We are still waiting for your determination on whether you are still insisting that this building is not a NRHP and will be demolished for the new construction or you'd plan to relocate the structure to another place for the purpose of preservation. Without your firm response, our NEPA review can not be proceeded.

Alex Fu

Exhibit 10



Gary Benjamin <gary.benjamin@lacity.org>

CF 15-0790 Request for Council placeholder

Gary Benjamin <gary.benjamin@lacity.org>
 To: Maura Johnson <mjohnson@hollywoodhousing.org>

Thu, Jun 25, 2015 at 12:58 PM

FYI: Placeholder approved for 7/29.

----- Forwarded message -----

From: David Giron <david.giron@lacity.org>

Date: Thu, Jun 25, 2015 at 12:51 PM

Subject: Re: CF 15-0790 Request for Council placeholder

To: Andrew Westall <andrew.westall@lacity.org>

Cc: Tanner Blackman <tanner.blackman@lacity.org>, Justin Wesson <justin.wesson@lacity.org>, Sharon Gin <sharon.gin@lacity.org>, Kevin Ocubillo <Kevin.Ocubillo@lacity.org>, Star Parsamyan <star.parsamyan@lacity.org>, Gary Benjamin <gary.benjamin@lacity.org>, Roberto Mejia <roberto.mejia@lacity.org>, Patrice Lattimore <patrice.lattimore@lacity.org>, Alan Alietti <alan.alietti@lacity.org>, Shannon Hoppes <shannon.hoppes@lacity.org>, Brian Walters <brian.walters@lacity.org>

Thanks all!

WE NEED YOUR INPUT: TAKE THE SMALL BUSINESS SURVEY !


David Giron

Legislative Director

Councilmember Mitch O'Farrell

200 N. Spring Street, Room 450, Los Angeles, CA 90012

(213) 473-7013 tel | (213) 473-7734 fax | www.cd13.org

Find the Councilmember on: 

On Thu, Jun 25, 2015 at 12:48 PM, Andrew Westall <andrew.westall@lacity.org> wrote:
 Placeholder fine for the Wed. July 29th Council agenda.

On Thu, Jun 25, 2015 at 12:24 PM, Tanner Blackman <tanner.blackman@lacity.org> wrote:
 Thanks, David. Yes. cD14 supports a placeholder.

Sent from my iPhone

On Jun 25, 2015, at 12:19 PM, David Giron <david.giron@lacity.org> wrote:

Hello Andrew,

Our office has a high priority affordable housing project at 1601 N. Hobart that has an appeal at PLUM on July 28. In order to ensure that it does not lose funding, the appeal must be acted on by Council by July 29. We would like to request that we get a placeholder for CF 15-0790 for the July 29 Council date.

The Chair of PLUM is cc'd and in agreement.



Gary Benjamin <gary.benjamin@lacity.org>

CD 13 request for 7/29 City Council placeholder for CF 15-0790

Gary Benjamin <gary.benjamin@lacity.org>

Thu, Jun 25, 2015 at 12:10 PM

To: David Giron <david.giron@lacity.org>, Star Parsamyan <star.parsamyan@lacity.org>

Hello Andrew and Justin,

Our office has a high priority affordable housing project at 1601 N. Hobart that has an appeal at PLUM on July 28. In order to ensure that it does not lose funding, the appeal must be acted on by Council by July 29. We would like to request that we get a placeholder for CF 15-0790 for the July 29 Council date. Please let me know if you are able to accommodate this request.

<http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=15-0790>

Best Regards,

Gary

—
Gary Benjamin
Planning Deputy
LA City Council District 13
Office: (213) 473-7569
Cell: (213) 265-6353
gary.benjamin@lacity.org

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Gary Benjamin <gary.benjamin@lacity.org>

Request to get placeholder for PLUM appeal on July 29 Council schedule

Gary Benjamin <gary.benjamin@lacity.org>

Wed, Jun 24, 2015 at 12:20 PM

To: David Giron <david.giron@lacity.org>, Star Parsamyan <star.parsamyan@lacity.org>

Cc: Jeanne Min <jeanne.min@lacity.org>

Hello David and Star,

An appeal for one of the affordable housing projects that the CM has championed, the Coronel Project at 1601 N. Hobart, needs to be heard at City Council on July 29 if it is to be eligible for this year's tax credit funding cycle. It is currently scheduled for PLUM on July 28, but we now need to get a placeholder for the July 29 CC date.

I spoke with Sharon Gin from the City Clerk's office and she said we should send a request to Andrew Westall, Justin Wesson and Tanner to seek their approval for the placeholder. She added that there may be resistance as that is the first CC date back from recess. Let me know your thoughts on this, and if you think its okay, I can send the request to CD 10 and CD 14.

<http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=15-0790>

Best Regards,

Gary

—
Gary Benjamin
Planning Deputy
LA City Council District 13
Office: (213) 473-7569
Cell: (213) 265-6353
gary.benjamin@lacity.org

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Gary Benjamin <gary.benjamin@lacity.org>

Re: Appeals of CPC-2010-1554-DB-SPP - PLUM Coordination

Gary Benjamin <gary.benjamin@lacity.org>
To: Maura Johnson <mjohnson@hollywoodhousing.org>

Fri, Jun 19, 2015 at 12:23 PM

Thanks, Maura. I sent a follow-up message to Tanner regarding this issue and will let you know what I hear back.

Best Regards,

Gary

On Fri, Jun 19, 2015 at 11:59 AM, Maura Johnson <mjohnson@hollywoodhousing.org> wrote:

FYI

Maura McAniff Johnson
Housing Director
Hollywood Community Housing Corporation
5020 W. Santa Monica Blvd.
Los Angeles, CA 90029
Tel: 323-454-6211
Fax: 323-454-4677

From: Christopher Murray [mailto:chris@raa-inc.com]
Sent: Thursday, June 18, 2015 6:01 PM
To: Maura Johnson; Eleanor Atkins
Subject: Fwd: Appeals of CPC-2010-1554-DB-SPP - PLUM Coordination

FYI

Christopher Murray
Vice President
Rosenheim & Associates, Inc.
21600 Oxnard Street, Suite 630
Woodland Hills, California 91367
Office: (818) 716-2782
Mobile: (818) 599-5469
Fax: (818) 593-6184

Begin forwarded message:

From: Tanner Blackman <tanner.blackman@lacity.org>
Subject: Re: Appeals of CPC-2010-1554-DB-SPP - PLUM Coordination
Date: June 18, 2015 at 5:59:14 PM PDT
To: Christopher Murray <chris@raa-inc.com>
Cc: "Mr. Kevin Ocubillo" <kevin.ocubillo@lacity.org>, Clare Eberle <claire.eberle@lacity.org>

Thanks for reaching out, Chris.

Will touch base with CD13 regarding scheduling. Thanks.

Tanner Blackman

Planning Director

Office of Councilmember José Huizar

City of Los Angeles | 14th District

City Hall

200 N. Spring St | Room 465

213.473.7014 office | 213.369.5107 cell



Gary Benjamin <gary.benjamin@lacity.org>

CD 13 and resyndication

Gary Benjamin <gary.benjamin@lacity.org>
To: Maura Johnson <mjohnson@hollywoodhousing.org>

Tue, Jun 9, 2015 at 4:27 PM

Hello Maura,

I have a message in with Tanner and Kevin regarding confirmation of scheduling. Sharon Gin handles scheduling for the City Clerk. Could you spell out for me again why 7/28 is the PLUM date you're shooting for? Is it not possible to go sooner?

Gary

On Tue, Jun 9, 2015 at 12:37 PM, Maura Johnson <mjohnson@hollywoodhousing.org> wrote:
Not yet.

Sent from my iPhone

On Jun 9, 2015, at 11:00 AM, "Gary Benjamin" <gary.benjamin@lacity.org> wrote:

You're welcome! Did I get back to you on your question from the other day, regarding who to check in with regarding scheduling?

Gary

On Mon, Jun 8, 2015 at 7:45 PM, Maura Johnson <mjohnson@hollywoodhousing.org> wrote:
Thank you!!

Sent from my iPhone

On Jun 8, 2015, at 5:38 PM, "Gary Benjamin" <gary.benjamin@lacity.org> wrote:

Hello Maura,

Letter is attached!

Gary

On Mon, Jun 8, 2015 at 5:27 PM, Maura Johnson
<mjohnson@hollywoodhousing.org> wrote:

Thanks Gary. Wishing you a great evening.

Maura McNiff Johnson

Housing Director

Hollywood Community Housing Corporation

5020 W. Santa Monica Blvd.



Gary Benjamin <gary.benjamin@lacity.org>

Coronel scheduling for PLUM 7/28, CC 7/29

Gary Benjamin <gary.benjamin@lacity.org>

Wed, Jun 17, 2015 at 9:52 AM

To: Maura Johnson <mjohnson@hollywoodhousing.org>

Cc: David Giron <david.giron@lacity.org>, Star Parsamyan <star.parsamyan@lacity.org>

Thank you, Maura.

Best Regards,

Gary

On Tue, Jun 16, 2015 at 5:43 PM, Maura Johnson <mjohnson@hollywoodhousing.org> wrote:

Hi Gary:

I spoke to Blake today. Charlie Fisher filed an appeal but because he is not an abutting property owner/resident he could not appeal the density bonus. Blake is watching our file but thinks another appeal will be filed.

This keeps us to our same timeframe. Blake is going to work with the City Planning Commission staff to make sure that they get out everything they need to in order to ensure that Notice for the PLUM meeting is sent on or before July 2.

I will keep all of you in the loop and will send periodic updates and then a reminder.

All the best, Maura

From: Gary Benjamin [mailto:gary.benjamin@lacity.org]

Sent: Tuesday, June 16, 2015 3:09 PM

To: Maura Johnson

Cc: David Giron; Star Parsamyan

Subject: Coronel scheduling for PLUM 7/28, CC 7/29

Hello Maura,

Thank you for the detailed explanation of the Coronel scheduling requirements. It was very helpful in getting the full understanding of the timing. I have not gotten any indication from CD 14 that PLUM will be cancelled on July 28. We can make the request that PLUM not be cancelled, stating that we have a priority item we hope to have heard, but there is no guarantee that something won't come up and compel the Chair to cancel

the meeting.

Sharon Gin is the City Clerk that usually handles PLUM scheduling. Our leg team and I can also work with the City Clerk to get a place-holder on the July 29 City Council schedule, pending approval at PLUM on July 28. If you need any contacts or have any follow-up questions, please let me know, and please send me a reminder as we get closer to the end of July.

Best Regards,

Gary

Gary Benjamin

Planning Deputy

LA City Council District 13

Office: (213) 473-7569

Cell: (213) 265-6353

gary.benjamin@lacity.org

Find the Councilmember on Facebook, Twitter and YouTube!

Gary Benjamin

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LA City Council District 13

Office: (213) 473-7569

Cell: (213) 265-6353

gary.benjamin@lacity.org

Find the Councilmember on Facebook, Twitter and YouTube!



Gary Benjamin <gary.benjamin@lacity.org>

FW: CPC Clerk - CPC letter of determination

Gary Benjamin <gary.benjamin@lacity.org>
To: Maura Johnson <mjohnson@hollywoodhousing.org>
Cc: Eleanor Atkins <eatkins@hollywoodhousing.org>

Mon, Jun 1, 2015 at 9:37 AM

Hello Maura,

Sorry I couldn't take the call before - I was just about to step into a meeting, but then we pushed it back a bit. I just gave Blake Lamb a call regarding the LOD and got her voicemail. I see on ZIMAS that the LOD info was sent to the CEA on 5/22, but I'm not sure what CEA refers to. I'll try James as well and let you know what I hear. Any other suggestions for people to contact would be helpful.

Best Regards,

Gary

On Fri, May 29, 2015 at 5:55 PM, Maura Johnson <mjohnson@hollywoodhousing.org> wrote:

Hi Gary:

We tried to gauge where in the issuance process our letter of determination lies by going on-line. Unfortunately we cannot tell. And we have not heard back from James Williams.

Our concern is that we have to have run our appeal period prior to applying for tax credits. **Our tax credit application is due on July 1.** Working backwards with the assumption that Doug files an appeal, we only have one remaining possible opportunity to go to PLUM and then City Council.

The schedule would require that the Determination letter be issued between Monday June 1 and Wednesday June 3 as we are assuming that Doug will file the appeal on the last possible date which would be 15 days after the letter of determination is issued. We would only be able to make the June 23rd PLUM meeting. And then City Council on June 26 or 29th.

We will check in again with James on Monday morning. We would appreciate any additional help you can provide in reaching James and explaining the situation.

Wishing you a great weekend.

All the best, Maura

Maura McAniff Johnson

Housing Director

Hollywood Community Housing Corporation

5020 W. Santa Monica Blvd.

Los Angeles, CA 90029

Tel: 323-454-6211

Fax: 323-454-4677

From: Eleanor Atkins

Sent: Thursday, May 28, 2015 1:42 PM

To: Maura Johnson

Subject: CPC Clerk - CPC letter of determination

Blake directed me to James Williams, who is the Clerk for the CPC. His number is 213-978-1295.

He has not returned my call yet.

Eleanor Atkins

Project Manager

Hollywood Community Housing Corporation

5020 Santa Monica Blvd. Los Angeles, CA 90029

W: (323) 454-6207

F: (323) 454-4679

www.facebook.com/HollywoodHousing

Gary Benjamin
Planning Deputy
LA City Council District 13
Office: (213) 473-7569
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gary.benjamin@lacity.org

Find the Councilmember on Facebook, Twitter and YouTube!



Gary Benjamin <gary.benjamin@lacity.org>

Coronel Apartments

Gary Benjamin <gary.benjamin@lacity.org>
To: Maura Johnson <mjohnson@hollywoodhousing.org>

Tue, Jun 2, 2015 at 12:02 PM

Hello Maura - Just a heads-up - I spoke with James and the letter will go out tomorrow. He said it is on his desk right now and it is a priority and will go out tomorrow.

Gary

On Tue, Jun 2, 2015 at 10:00 AM, Gary Benjamin <gary.benjamin@lacity.org> wrote:
Sure, that works for me. Talk soon!

On Tue, Jun 2, 2015 at 7:57 AM, Maura Johnson <mjohnson@hollywoodhousing.org> wrote:
2 pm. would be great. Shall I call you?

Sent from my iPhone

On Jun 1, 2015, at 7:04 PM, "Gary Benjamin" <gary.benjamin@lacity.org> wrote:

Hello Maura,

I didn't hear back from James today, but just sent him a follow up message marked 'urgent' and will follow up with him in the morning and express the importance of expediency in releasing the letter and the high priority the project represents for CM O'Farrell. I'm free to chat about the resyndication deal again tomorrow afternoon. Are you free at 2 PM?

Gary

On Mon, Jun 1, 2015 at 10:57 AM, Maura Johnson <mjohnson@hollywoodhousing.org> wrote:

Gary, YOU ARE THE BEST!!!!!!!!!!!!!!

Thank you so much for lending the Council Office support to getting our Determination letter out the door. Please extend our heartfelt thanks to the Councilman and the entire team over there. We will be making a schedule breaking down the appeal period and our one chance to get to PLUM and City Council prior to the TCAC deadline of July 1. We will have that over to you before the end of the day.

I would also like to chat with you about the resyndication when you have a minute. Yaneli Ruiz from HCID mentioned that they were trying to find out if they could recast the CRA loans – pay them off during the acquisition of the buildings by the new limited partnership using bond proceeds and then reissue that CRA loan plus the accrued interest once construction is complete and we pay off the construction financing with the new permanent financing. Just to give you a quick idea of what this means in terms of this transaction. Without the CRA loan and accrued interest being paid off when we issue the bonds we need to ask for a little over \$3 million in accrued interest forgiveness.

If we can use our bond proceeds to pay off that loan and then have HCID issue a new loan for the original principal amount plus accrued interest we only have to ask for less than \$100,000 in interest forgiveness. This is due to the 50% test regulations surrounding the use of tax exempt bonds and 4% tax credits.

We have not heard back about HCID's ability to recast the CRA loans yet. I believe that management is reviewing the issue.

Thanks, Maura

From: Christopher Murray [mailto:chris@raa-inc.com]
Sent: Monday, June 01, 2015 9:51 AM
To: Eleanor Atkins; Maura Johnson
Subject: Coronel

Maura and Eleanor:

I just received a message from the City Planning Commission Office that the determination letter will be mailed tomorrow.

Chris

Christopher Murray
Vice President
Rosenheim & Associates, Inc.
21600 Oxnard Street, Suite 630
Woodland Hills, California 91367
Office: (818) 716-2782
Mobile: (818) 599-5469
Fax: (818) 593-6184

Gary Benjamin

Exhibit 11

ARMEN MAKASJIAN & ASSOCIATES

5111 Santa Monica Blvd.
Los Angeles, CA 90029
Tel. (323) 665-5293 / Fax. (323) 665-0809
Email: armenmak@sbcglobal.net

July 27, 2015

Chairman Jose Huizar and
Honorable Council Members
Los Angeles City Council
Planning and Land Use Management Committee
200 N. Spring St.
Los Angeles, CA 90012

RE: Council File #15-0790
Coronel Apartments: Rebuttal to the Submitted Pro Forma dated July 22, 2015
(1600-1608 N. Serrano Ave. and 1601 N. Hobart Blvd. Los Angeles, CA 90027
CPC -2010-1554-DB-SPP; ENV-2012-110-EIR

Dear Chairman Huizar and Honorable Council Members;

I am a commercial property appraiser, broker, and property manager with over 25 years of professional experience. I am also a valuation instructor whose teachings include income property and highest and best use analysis. I am writing to provide my professional opinion on the submitted pro forma provided by the Hollywood Community Housing Corporation for the Coronel Apartments Project (document date July 22, 2015). Please note that over the past two years, a number of requests for a copy of the pro forma were made to the applicant by the East Hollywood Neighborhood Council; yet, a copy was submitted to your committee only six days prior to the scheduled hearing date. This does not provide ample time for a proper analysis. However given this time constraint and to the best of my knowledge and experience, it is my conclusion that 1) the applicant did not provide a reasonable range of *alternative projects* but instead, has based its conclusion on a comparison to the *absence* of the requested entitlements rather than exploring other options that could potentially allocate community funds more efficiently and better meet the needs and concerns of the community, 2) the project's operating expenses are mischaracterized and misstated.

In order to properly provide an objective analysis of the preferred project, all potential alternative projects should be analyzed. This includes, but is not limited to, the following options:

- A. Maintaining and rehabilitating all properties located at 1601-1605 N. Hobart Blvd. and 1600-1608 N. Serrano Ave:

An alternative project would maintain and rehabilitate all existing structures on the project site. This would fall in line with the city's General Plan and Hollywood Redevelopment plan to preserve the historic elements of neighborhoods while allowing additional housing by allowing conversion for affordable housing. Based on my experience as a property manager and owner, the approximate cost for rehabilitation would be \$30,000 per unit, or approximately \$1,000,000 which represents a significant

variance between the applicant's proposed project costs amounting to \$27 million. The applicant's projected cost amounts to approximately \$1,000,000 per unit to add 24 housing units. In contrast, the alternative would allocate approximately \$20 million (exclusive of acquisition costs) of taxpayer funds more efficiently, resulting in decreased costs of the project and allowing the unused portions of community funds to be allocated to other housing projects.

- B. Maintaining the historic Ehbar Residence at 1601 N. Hobart Blvd and demolishing the other multi-family properties on the project site. By doing so, it would allow the by-right construction of 40 units. The Ehbar Residence can be subdivided to provide three of these units. The application of the current density bonus of 35% to the allowable number of units would result in 54 units. The applicant can further reduce the scale of the parking garage by taking advantage of parking option 2 which allows 0.5 parking spaces per unit for affordable senior housing, simultaneously reducing the large-scale units to one and two bedroom units for senior affordable housing. This would comply with the allowable, by-right construction. By maintaining the Ehbar Residence, this alternative would reduce its overall cost by providing affordable senior resulting in a more efficient use of community funds.

The primary concern for any community housing project should be the efficient use of community funds and state and/or federal grants. As indicated above, this requires a thorough and complete analysis of all alternative projects that would satisfy the needs and concerns of the community while satisfying the need for additional housing. The alternative project as presented by the applicant can qualify as an *additional* option but instead, is presented as "the alternative" based on the absence of the requested entitlements.

Project Operating Expenses (pro forma):

I reviewed the project's operating expenses and compared them to the industry standards as published in the 2015 Apartment Building Expense Guideline and find that certain expense items are mischaracterized and misstated. The following expense items warrant a further examination and justification:

- Total Operating Expense Ratio:

Based on my experience and industry standards, overall operating expense ratios are lower for newer, multi-family buildings. The average expense ratio ranges from 20 to 25% which includes an estimated vacancy factor of 5%. Assuming that affordable housing projects will require additional administrative costs, the project's expense ratio of 68.11% still vastly exceeds the industry standards. Given the extreme time constraint of completing my analysis, I attempted to research the operating expense ratios of similar-type affordable housing projects. One project which is considered to be relatively similar is located in Old Town Calabasas, a 75 unit Affordable Senior Housing Project located at 4803 El Canon Ave. The project consists of (74) one-bedroom/one bathroom units and (1) two- bedroom/two bathroom unit with a building area of 52,843 sq.ft. Please see attached exhibit A, Old Town Calabasas 75 Unit Affordable Senior Housing Pro Forma. Its projected operating expense ratio is 52.79% which is significantly lower than the subject project's projection of 68.11%.

- Onsite Management/Maintenance Payroll and Payroll Tax:

The project has allocated a lump-sum expense of \$54,000 to cover both the on-site manager's salary and maintenance payroll. Under the expense heading "Maintenance", there is an additional allocation of \$12,000 for maintenance staff which includes supplies. A clarification is needed on this expense items to avoid "double-counting."

According to the applicant's project description, the resident manager is to be given a three-bedroom unit "rent-free". Assuming the market rent for this unit is \$2,000/month, this would represent the on-site manager's salary which would amount to \$24,000 per year. The income from this unit will not be realized and therefore should not appear as an expense item. Deducting \$24,000 from the overall expense figure of \$54,000 would leave \$30,000 for "Maintenance Payroll". Therefore there is no accountability for any of these "padded" figures.

- Resident Services Coordinator:

The allocated fee is \$25,000. Does this include managerial duties? The off-site property manager's duties include collection of rents, property maintenance, and if requested by the property owner, payment of expenses which may include mortgage debt. Advertising and leasing vacant units are additional services which are typically charged in addition to the monthly management fee. Is the resident services coordinator responsible for taking maintenance calls and handling tenant complaints? If so, then the allocated management fee of \$34,879 or 7.13% of effective gross income, is high and should be reduced to offset the salary of the resident services coordinator. Affordable housing projects typically have a more stabilized occupancy, that is, a low tenant turnover which would reduce leasing commissions and advertising expenses. The allocated \$25,000 for the resident services coordinator therefore warrants a closer examination as to what services it may cover.

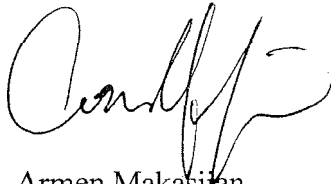
- Trash Removal:

The project's projected figure for this item is \$11,000 or \$917/month. This figure appears high and should be revised. In order to confirm this figure, I contacted Athens Waste Services which has been servicing the Hollywood area for over 15 years. I spoke to the area representative who explained that a 54-unit building would require two trash bins that would be serviced twice per week. The monthly cost would be \$330/month. There would be an additional \$40 to \$50 fee if the bins were to be carried out to the street by a scout truck. For high occupancy units, the high end for trash pickup would be \$525. This represents a cost savings of \$392/month or \$4,704 annually (Source: Athens Waste Services: Alex, (818) 768-1492).

Based on the inconsistencies and lack of transparency of the above noted expense items and others contained in the pro forma, costs associated with the proposed project appear to be significantly inflated. Therefore I strongly recommend that a thorough analysis be completed on all expense items, inconsistencies, and deviations from industry standards.

In conclusion and based on my professional expertise, the applicant did not present a complete analysis of alternative projects that could potentially result in a more efficient use of public funds. The project site therefore has, at a minimum, four options: two presented by the applicant and two additional alternatives as stated above. By maintaining the Ehbar residence and reducing the scale of the project by accommodating parking option 2 and by reducing the size of the units to accommodate affordable senior housing, the total cost of the project could be significantly lower. Therefore, all options should be considered before determining the final highest and best usage of the site geared toward affordable housing. Finally, the projected operating expenses of 68.11% is very high when compared with industry standards, particularly with comparable projects. As indicated in my analysis, a similar-type project, affordable senior housing, has an expense ratio of 52.79%. Including an assumption that the project will be geared toward high occupancy, the current expense ratio and expense characterization appears unreasonable and lacks the transparency that is required when public funds are used for funding such projects.

Respectfully,

A handwritten signature in black ink, appearing to read 'Armen Makasjian', written in a cursive style.

Armen Makasjian
Certified General Appraiser
Lic. #AG018345

EXHIBIT A

Old Town Calabasas 75 Unit Affordable Senior Housing Pro Forma
2007 TCAC Basis Cap

9% Tax Credits - 2007 Basis Cap

11-Dec-07

75
74 One Bed
1 Two Bed

Total Proposed Units	75
Site Area	42,176 SqFt
Residential Area:	
1st Floor	18,265 SqFt
2nd Floor	18,014 SqFt
3rd Floor	16,564 SqFt
Total Residential Area	52,843 SqFt
Gross Sq.Ft.	52,843 SqFt
Parking Area - Covered*	29,617 SqFt
Landscaped Area - Estimated	10,000 SqFt
Residential Parking Spaces	76
Vacancy Factor - Residential Units	5.00 %

Total Development Costs	\$23,836,033
Costs per Unit	\$317,814

Gross Operating Income (from page 3)	\$440,416
Expenses (\$3,100 / Unit)	\$232,500
Net Operating Income	\$207,916
Available for Debt Service	\$180,797

Maximum Permanent Loan (35 Yr)	\$2,358,338
---------------------------------------	--------------------

Owner Equity	\$11,878
Investor Equity - Tax Credits	\$11,866,411
Total Equity	\$11,878,289

Total Loan and Equity	\$14,236,627
------------------------------	---------------------

AHP	\$405,000
------------	------------------

Perm Loan Rate	7.00 %
Debt Coverage Rate	1.15 %
Current TCAC 9% Rate	8.12 %
Credit Rate (Cents per dollar)	0.98
Construction Loan Rate	9%

FINAL (GAP)/SURPLUS	(\$9,194,406)
City of Calabasas	\$750,000
County Home Funds	\$3,600,000
Prop 1C Infrastructure Assistance	\$ 4,844,406
Total Additional Assistance	\$9,194,406
Per unit	\$ 122,592

Proposition 1C Infill Incentive Grant Program provides grants for infrastructure improvements (including land purchase and ground improvements) necessary to facilitate new infill housing developments. Approximately \$240 million is available for award by June, 2008 through an application competitive process.
Other Assumptions: \$500,000 to improve soils, \$250,000 for offsites, \$1,000,000 for upgrades in landscaping and architecture.

Tie Breaker:

0.598

ARMEN MAKASJIAN
5111 Santa Monica Blvd, #205
Los Angeles, CA 90029
(323) 665-5293 / Fax: (323) 665-0809

INDEPENDENT APPRAISER D.B.A. ARMEN MAKASJIAN AND ASSOCIATES:

(September 1995 to Present)

Independent appraisal work as a private business. Fee appraiser for mortgage lenders, banks, attorneys, and various real estate brokers involving commercial property including apartment buildings, retail stores and motels, single-family, condominiums, and two-to four-unit properties, including FHA appraisals. Geographic territory covers Los Angeles County, San Bernardino County and portions of Orange County. Expertise includes property appraisals involving nonconforming and unpermitted uses. This includes extensive research with various, city building and planning departments.

-Appraisal instructor with Real Estate Trainers Inc., teaching various courses including Advanced and Complex Appraisals, Highest and Best Use, Expert Witness, Cost Approach, Appraising Apartment Buildings, and Report Writing.

-Course Written: Appraising Apartment Buildings, March 2015

-January 2001 to January 2002)-Review appraiser for HUD focusing in the south-central Los Angeles area.

ARMEN REALTY INC: (February 1984 to Present)

Real Estate Broker: President of Armen Realty. Family real estate office established in 1963, incorporated in May 2004. Involved in real estate sales specializing in single family and apartment buildings. Provided sellers and buyers with competitive market analyses (CMA's) for property tax and probate considerations, including reports regarding city planning and use code changes. Participated in "canvassing" and solicited for property listings through "cold calls" and door-to-door farming. Rendered market opinions regarding property values based upon market comparisons and interest rate fluctuations.

Property Management: Served as off-site manager for multi-family residences. Engaged in rent collections and deposits, rental agreements/negotiations, and tenant relations. Supervised property rehabilitation and remodeling.

LANDMARK APPRAISALS: (September 1992 to September 1995)

Fee-split appraiser on single-family and one to four-unit properties. Have prepared "Broker Price Opinions" (BPO's) and full property appraisals for GMAC involving REO's and foreclosures.

During this period, briefly worked at Benjamin Tunnell Inc., preparing employee relocation appraisals.

Armen Makasjian (cont'd)

EDUCATION:

-Bachelor of Science degree in Finance (real estate option), California State University, Los Angeles, 1987. Courses included real estate principles, practices, finance, appraisal, and real estate law, Uniform Standards of Professional Appraisal Practice, (Current), Federal and State Regulations in Real Estate Appraisals, FHA and the Appraisal Process (The Appraisal Institute), Statistics, Capitalization, Partial Interests, and Reports, FHA Appraisal Practice, Environmental Issues and Obligations, Marshall & Swift Cost Seminar.

-Current completion of continuing education requirements which include the Uniform Standards of Professional Appraisal Practice (USPAP) and Federal Laws and Regulations.

PROFESSIONAL AFFILIATIONS:

-Los Angeles Board of Realtors
-California Association of Realtors

LICENSING:

-California Real Estate Appraisal License, #AG018345
-California Real Estate Broker's License, #00861276

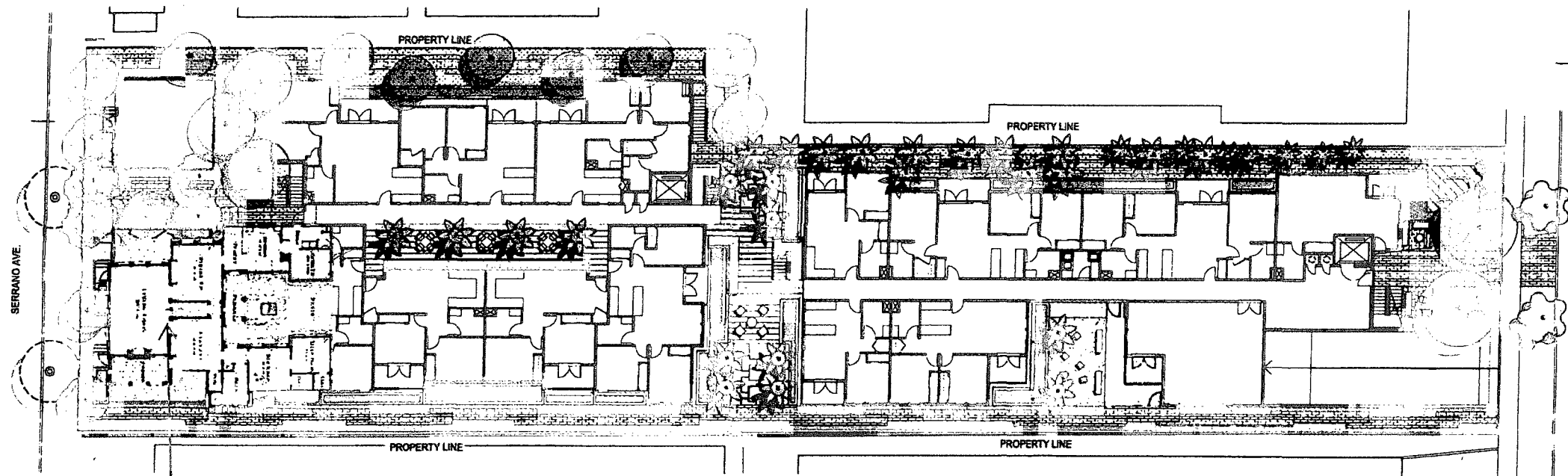
DATA SOURCES:

-CoStar Comps
Real Quest (property data service)
-LoopNet (property data service)
-Multiple Listing Service
-Flood Data Services.
-Marshall and Swift Cost Estimator

CF 15-0790
#6

COMMON OPEN SPACE DIAGRAM

57 SF 128 SF



LANDSCAPE PLAN **EHRBAR HOUSE**

SYMBOL	DESCRIPTION	SIZE & SPACING	REMARKS
(Symbol)	4" x 4" x 4" (12" H) PLANTER	4" x 4" x 4" (12" H)	PLANTER WITH 12" H PLANT
(Symbol)	6" x 6" x 6" (18" H) PLANTER	6" x 6" x 6" (18" H)	PLANTER WITH 18" H PLANT
(Symbol)	8" x 8" x 8" (24" H) PLANTER	8" x 8" x 8" (24" H)	PLANTER WITH 24" H PLANT
(Symbol)	10" x 10" x 10" (30" H) PLANTER	10" x 10" x 10" (30" H)	PLANTER WITH 30" H PLANT
(Symbol)	12" x 12" x 12" (36" H) PLANTER	12" x 12" x 12" (36" H)	PLANTER WITH 36" H PLANT
(Symbol)	14" x 14" x 14" (42" H) PLANTER	14" x 14" x 14" (42" H)	PLANTER WITH 42" H PLANT
(Symbol)	16" x 16" x 16" (48" H) PLANTER	16" x 16" x 16" (48" H)	PLANTER WITH 48" H PLANT
(Symbol)	18" x 18" x 18" (54" H) PLANTER	18" x 18" x 18" (54" H)	PLANTER WITH 54" H PLANT
(Symbol)	20" x 20" x 20" (60" H) PLANTER	20" x 20" x 20" (60" H)	PLANTER WITH 60" H PLANT
(Symbol)	22" x 22" x 22" (66" H) PLANTER	22" x 22" x 22" (66" H)	PLANTER WITH 66" H PLANT
(Symbol)	24" x 24" x 24" (72" H) PLANTER	24" x 24" x 24" (72" H)	PLANTER WITH 72" H PLANT
(Symbol)	26" x 26" x 26" (78" H) PLANTER	26" x 26" x 26" (78" H)	PLANTER WITH 78" H PLANT
(Symbol)	28" x 28" x 28" (84" H) PLANTER	28" x 28" x 28" (84" H)	PLANTER WITH 84" H PLANT
(Symbol)	30" x 30" x 30" (90" H) PLANTER	30" x 30" x 30" (90" H)	PLANTER WITH 90" H PLANT
(Symbol)	32" x 32" x 32" (96" H) PLANTER	32" x 32" x 32" (96" H)	PLANTER WITH 96" H PLANT
(Symbol)	34" x 34" x 34" (102" H) PLANTER	34" x 34" x 34" (102" H)	PLANTER WITH 102" H PLANT
(Symbol)	36" x 36" x 36" (108" H) PLANTER	36" x 36" x 36" (108" H)	PLANTER WITH 108" H PLANT
(Symbol)	38" x 38" x 38" (114" H) PLANTER	38" x 38" x 38" (114" H)	PLANTER WITH 114" H PLANT
(Symbol)	40" x 40" x 40" (120" H) PLANTER	40" x 40" x 40" (120" H)	PLANTER WITH 120" H PLANT
(Symbol)	42" x 42" x 42" (126" H) PLANTER	42" x 42" x 42" (126" H)	PLANTER WITH 126" H PLANT
(Symbol)	44" x 44" x 44" (132" H) PLANTER	44" x 44" x 44" (132" H)	PLANTER WITH 132" H PLANT
(Symbol)	46" x 46" x 46" (138" H) PLANTER	46" x 46" x 46" (138" H)	PLANTER WITH 138" H PLANT
(Symbol)	48" x 48" x 48" (144" H) PLANTER	48" x 48" x 48" (144" H)	PLANTER WITH 144" H PLANT
(Symbol)	50" x 50" x 50" (150" H) PLANTER	50" x 50" x 50" (150" H)	PLANTER WITH 150" H PLANT
(Symbol)	52" x 52" x 52" (156" H) PLANTER	52" x 52" x 52" (156" H)	PLANTER WITH 156" H PLANT
(Symbol)	54" x 54" x 54" (162" H) PLANTER	54" x 54" x 54" (162" H)	PLANTER WITH 162" H PLANT
(Symbol)	56" x 56" x 56" (168" H) PLANTER	56" x 56" x 56" (168" H)	PLANTER WITH 168" H PLANT
(Symbol)	58" x 58" x 58" (174" H) PLANTER	58" x 58" x 58" (174" H)	PLANTER WITH 174" H PLANT
(Symbol)	60" x 60" x 60" (180" H) PLANTER	60" x 60" x 60" (180" H)	PLANTER WITH 180" H PLANT
(Symbol)	62" x 62" x 62" (186" H) PLANTER	62" x 62" x 62" (186" H)	PLANTER WITH 186" H PLANT
(Symbol)	64" x 64" x 64" (192" H) PLANTER	64" x 64" x 64" (192" H)	PLANTER WITH 192" H PLANT
(Symbol)	66" x 66" x 66" (198" H) PLANTER	66" x 66" x 66" (198" H)	PLANTER WITH 198" H PLANT
(Symbol)	68" x 68" x 68" (204" H) PLANTER	68" x 68" x 68" (204" H)	PLANTER WITH 204" H PLANT
(Symbol)	70" x 70" x 70" (210" H) PLANTER	70" x 70" x 70" (210" H)	PLANTER WITH 210" H PLANT
(Symbol)	72" x 72" x 72" (216" H) PLANTER	72" x 72" x 72" (216" H)	PLANTER WITH 216" H PLANT
(Symbol)	74" x 74" x 74" (222" H) PLANTER	74" x 74" x 74" (222" H)	PLANTER WITH 222" H PLANT
(Symbol)	76" x 76" x 76" (228" H) PLANTER	76" x 76" x 76" (228" H)	PLANTER WITH 228" H PLANT
(Symbol)	78" x 78" x 78" (234" H) PLANTER	78" x 78" x 78" (234" H)	PLANTER WITH 234" H PLANT
(Symbol)	80" x 80" x 80" (240" H) PLANTER	80" x 80" x 80" (240" H)	PLANTER WITH 240" H PLANT
(Symbol)	82" x 82" x 82" (246" H) PLANTER	82" x 82" x 82" (246" H)	PLANTER WITH 246" H PLANT
(Symbol)	84" x 84" x 84" (252" H) PLANTER	84" x 84" x 84" (252" H)	PLANTER WITH 252" H PLANT
(Symbol)	86" x 86" x 86" (258" H) PLANTER	86" x 86" x 86" (258" H)	PLANTER WITH 258" H PLANT
(Symbol)	88" x 88" x 88" (264" H) PLANTER	88" x 88" x 88" (264" H)	PLANTER WITH 264" H PLANT
(Symbol)	90" x 90" x 90" (270" H) PLANTER	90" x 90" x 90" (270" H)	PLANTER WITH 270" H PLANT
(Symbol)	92" x 92" x 92" (276" H) PLANTER	92" x 92" x 92" (276" H)	PLANTER WITH 276" H PLANT
(Symbol)	94" x 94" x 94" (282" H) PLANTER	94" x 94" x 94" (282" H)	PLANTER WITH 282" H PLANT
(Symbol)	96" x 96" x 96" (288" H) PLANTER	96" x 96" x 96" (288" H)	PLANTER WITH 288" H PLANT
(Symbol)	98" x 98" x 98" (294" H) PLANTER	98" x 98" x 98" (294" H)	PLANTER WITH 294" H PLANT
(Symbol)	100" x 100" x 100" (300" H) PLANTER	100" x 100" x 100" (300" H)	PLANTER WITH 300" H PLANT

PLANT, TREE & GROUNDCOVER LEGEND:

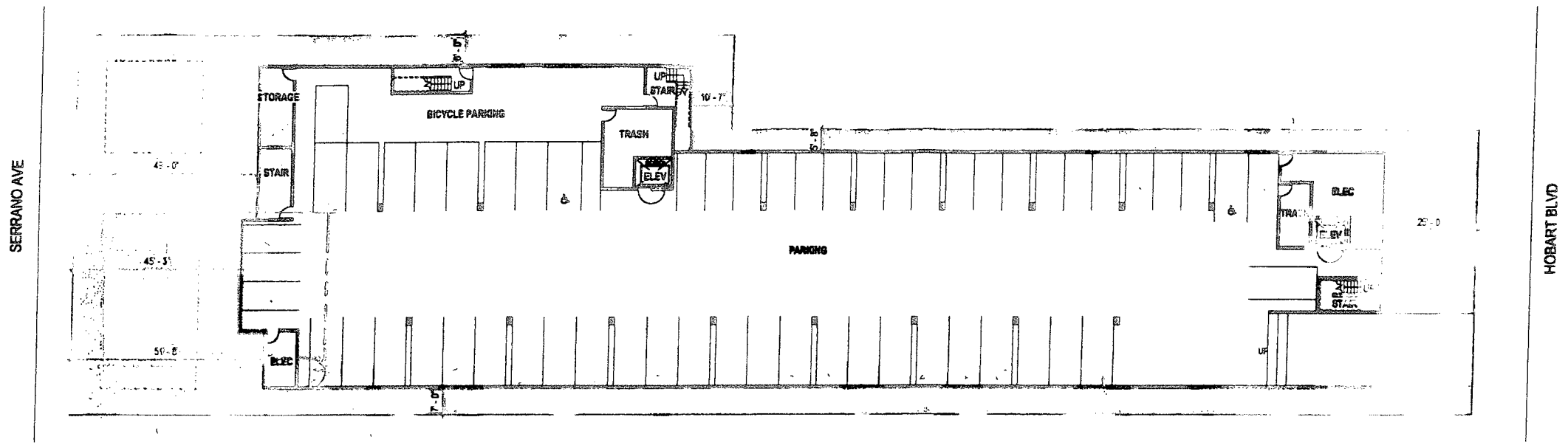
SYMBOL	BOTANICAL NAME	SIZE & SPACING	REMARKS
(Symbol)	SPREADER	10' DIA	SPREADER WITH 10' DIA
(Symbol)	SPREADER	12' DIA	SPREADER WITH 12' DIA
(Symbol)	SPREADER	14' DIA	SPREADER WITH 14' DIA
(Symbol)	SPREADER	16' DIA	SPREADER WITH 16' DIA
(Symbol)	SPREADER	18' DIA	SPREADER WITH 18' DIA
(Symbol)	SPREADER	20' DIA	SPREADER WITH 20' DIA
(Symbol)	SPREADER	22' DIA	SPREADER WITH 22' DIA
(Symbol)	SPREADER	24' DIA	SPREADER WITH 24' DIA
(Symbol)	SPREADER	26' DIA	SPREADER WITH 26' DIA
(Symbol)	SPREADER	28' DIA	SPREADER WITH 28' DIA
(Symbol)	SPREADER	30' DIA	SPREADER WITH 30' DIA
(Symbol)	SPREADER	32' DIA	SPREADER WITH 32' DIA
(Symbol)	SPREADER	34' DIA	SPREADER WITH 34' DIA
(Symbol)	SPREADER	36' DIA	SPREADER WITH 36' DIA
(Symbol)	SPREADER	38' DIA	SPREADER WITH 38' DIA
(Symbol)	SPREADER	40' DIA	SPREADER WITH 40' DIA
(Symbol)	SPREADER	42' DIA	SPREADER WITH 42' DIA
(Symbol)	SPREADER	44' DIA	SPREADER WITH 44' DIA
(Symbol)	SPREADER	46' DIA	SPREADER WITH 46' DIA
(Symbol)	SPREADER	48' DIA	SPREADER WITH 48' DIA
(Symbol)	SPREADER	50' DIA	SPREADER WITH 50' DIA
(Symbol)	SPREADER	52' DIA	SPREADER WITH 52' DIA
(Symbol)	SPREADER	54' DIA	SPREADER WITH 54' DIA
(Symbol)	SPREADER	56' DIA	SPREADER WITH 56' DIA
(Symbol)	SPREADER	58' DIA	SPREADER WITH 58' DIA
(Symbol)	SPREADER	60' DIA	SPREADER WITH 60' DIA
(Symbol)	SPREADER	62' DIA	SPREADER WITH 62' DIA
(Symbol)	SPREADER	64' DIA	SPREADER WITH 64' DIA
(Symbol)	SPREADER	66' DIA	SPREADER WITH 66' DIA
(Symbol)	SPREADER	68' DIA	SPREADER WITH 68' DIA
(Symbol)	SPREADER	70' DIA	SPREADER WITH 70' DIA
(Symbol)	SPREADER	72' DIA	SPREADER WITH 72' DIA
(Symbol)	SPREADER	74' DIA	SPREADER WITH 74' DIA
(Symbol)	SPREADER	76' DIA	SPREADER WITH 76' DIA
(Symbol)	SPREADER	78' DIA	SPREADER WITH 78' DIA
(Symbol)	SPREADER	80' DIA	SPREADER WITH 80' DIA
(Symbol)	SPREADER	82' DIA	SPREADER WITH 82' DIA
(Symbol)	SPREADER	84' DIA	SPREADER WITH 84' DIA
(Symbol)	SPREADER	86' DIA	SPREADER WITH 86' DIA
(Symbol)	SPREADER	88' DIA	SPREADER WITH 88' DIA
(Symbol)	SPREADER	90' DIA	SPREADER WITH 90' DIA
(Symbol)	SPREADER	92' DIA	SPREADER WITH 92' DIA
(Symbol)	SPREADER	94' DIA	SPREADER WITH 94' DIA
(Symbol)	SPREADER	96' DIA	SPREADER WITH 96' DIA
(Symbol)	SPREADER	98' DIA	SPREADER WITH 98' DIA
(Symbol)	SPREADER	100' DIA	SPREADER WITH 100' DIA

GRASS, TREE & GROUNDCOVER LEGEND:

SYMBOL	BOTANICAL NAME	SIZE & SPACING	REMARKS
(Symbol)	GRASS	10' DIA	GRASS WITH 10' DIA
(Symbol)	GRASS	12' DIA	GRASS WITH 12' DIA
(Symbol)	GRASS	14' DIA	GRASS WITH 14' DIA
(Symbol)	GRASS	16' DIA	GRASS WITH 16' DIA
(Symbol)	GRASS	18' DIA	GRASS WITH 18' DIA
(Symbol)	GRASS	20' DIA	GRASS WITH 20' DIA
(Symbol)	GRASS	22' DIA	GRASS WITH 22' DIA
(Symbol)	GRASS	24' DIA	GRASS WITH 24' DIA
(Symbol)	GRASS	26' DIA	GRASS WITH 26' DIA
(Symbol)	GRASS	28' DIA	GRASS WITH 28' DIA
(Symbol)	GRASS	30' DIA	GRASS WITH 30' DIA
(Symbol)	GRASS	32' DIA	GRASS WITH 32' DIA
(Symbol)	GRASS	34' DIA	GRASS WITH 34' DIA
(Symbol)	GRASS	36' DIA	GRASS WITH 36' DIA
(Symbol)	GRASS	38' DIA	GRASS WITH 38' DIA
(Symbol)	GRASS	40' DIA	GRASS WITH 40' DIA
(Symbol)	GRASS	42' DIA	GRASS WITH 42' DIA
(Symbol)	GRASS	44' DIA	GRASS WITH 44' DIA
(Symbol)	GRASS	46' DIA	GRASS WITH 46' DIA
(Symbol)	GRASS	48' DIA	GRASS WITH 48' DIA
(Symbol)	GRASS	50' DIA	GRASS WITH 50' DIA
(Symbol)	GRASS	52' DIA	GRASS WITH 52' DIA
(Symbol)	GRASS	54' DIA	GRASS WITH 54' DIA
(Symbol)	GRASS	56' DIA	GRASS WITH 56' DIA
(Symbol)	GRASS	58' DIA	GRASS WITH 58' DIA
(Symbol)	GRASS	60' DIA	GRASS WITH 60' DIA
(Symbol)	GRASS	62' DIA	GRASS WITH 62' DIA
(Symbol)	GRASS	64' DIA	GRASS WITH 64' DIA
(Symbol)	GRASS	66' DIA	GRASS WITH 66' DIA
(Symbol)	GRASS	68' DIA	GRASS WITH 68' DIA
(Symbol)	GRASS	70' DIA	GRASS WITH 70' DIA
(Symbol)	GRASS	72' DIA	GRASS WITH 72' DIA
(Symbol)	GRASS	74' DIA	GRASS WITH 74' DIA
(Symbol)	GRASS	76' DIA	GRASS WITH 76' DIA
(Symbol)	GRASS	78' DIA	GRASS WITH 78' DIA
(Symbol)	GRASS	80' DIA	GRASS WITH 80' DIA
(Symbol)	GRASS	82' DIA	GRASS WITH 82' DIA
(Symbol)	GRASS	84' DIA	GRASS WITH 84' DIA
(Symbol)	GRASS	86' DIA	GRASS WITH 86' DIA
(Symbol)	GRASS	88' DIA	GRASS WITH 88' DIA
(Symbol)	GRASS	90' DIA	GRASS WITH 90' DIA
(Symbol)	GRASS	92' DIA	GRASS WITH 92' DIA
(Symbol)	GRASS	94' DIA	GRASS WITH 94' DIA
(Symbol)	GRASS	96' DIA	GRASS WITH 96' DIA
(Symbol)	GRASS	98' DIA	GRASS WITH 98' DIA
(Symbol)	GRASS	100' DIA	GRASS WITH 100' DIA

FINISH SCHEDULE:

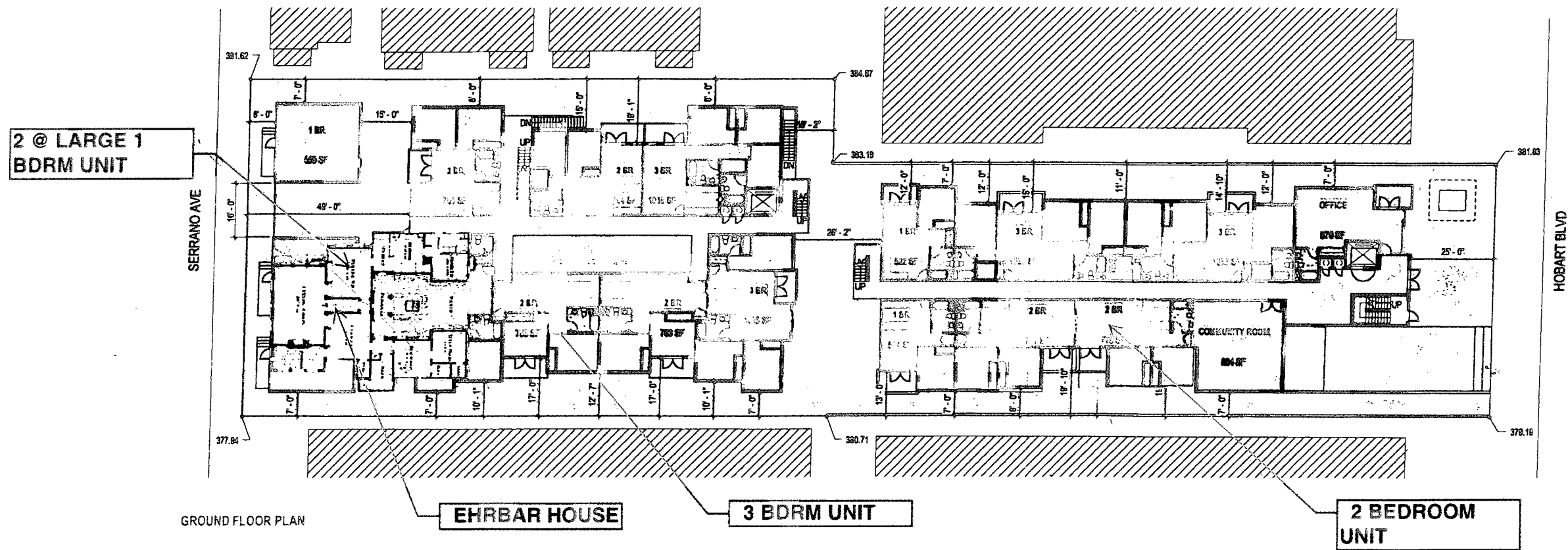
KEY	MATERIAL	COLOR	FINISH	COMMENTS
1	CONCRETE	RED	AS PER SPEC	
2	PAVING	RED	AS PER SPEC	
3	GRASS	RED	AS PER SPEC	
4	LANDSCAPE	RED	AS PER SPEC	
5	PLANTING	RED	AS PER SPEC	
6	IRRIGATION	RED	AS PER SPEC	
7	LANDSCAPE	RED	AS PER SPEC	
8	PLANTING	RED	AS PER SPEC	
9	IRRIGATION	RED	AS PER SPEC	
10	LANDSCAPE	RED	AS PER SPEC	
11	PLANTING	RED	AS PER SPEC	
12	IRRIGATION	RED	AS PER SPEC	
13	LANDSCAPE	RED	AS PER SPEC	
14	PLANTING	RED	AS PER SPEC	
15	IRRIGATION	RED	AS PER SPEC	
16	LANDSCAPE	RED	AS PER SPEC	
17	PLANTING	RED	AS PER SPEC	
18	IRRIGATION	RED	AS PER SPEC	
19	LANDSCAPE	RED	AS PER SPEC	
20	PLANTING	RED	AS PER SPEC	
21	IRRIGATION	RED	AS PER SPEC	
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23	PLANTING	RED	AS PER SPEC	
24	IRRIGATION	RED	AS PER SPEC	
25	LANDSCAPE	RED	AS PER SPEC	
26	PLANTING	RED	AS PER SPEC	
27	IRRIGATION	RED	AS PER SPEC	
28	LANDSCAPE	RED	AS PER SPEC	
29	PLANTING	RED	AS PER SPEC	
30	IRRIGATION	RED	AS PER SPEC	
31	LANDSCAPE	RED	AS PER SPEC	
32	PLANTING	RED	AS PER SPEC	
33	IRRIGATION	RED	AS PER SPEC	
34	LANDSCAPE	RED	AS PER SPEC	
35	PLANTING	RED	AS PER SPEC	
36	IRRIGATION	RED	AS PER SPEC	
37	LANDSCAPE	RED	AS PER SPEC	
38	PLANTING	RED	AS PER SPEC	
39	IRRIGATION	RED	AS PER SPEC	
40	LANDSCAPE	RED	AS PER SPEC	
41	PLANTING	RED	AS PER SPEC	
42	IRRIGATION	RED	AS PER SPEC	
43	LANDSCAPE	RED	AS PER SPEC	
44	PLANTING	RED	AS PER SPEC	
45	IRRIGATION	RED	AS PER SPEC	
46	LANDSCAPE	RED	AS PER SPEC	
47	PLANTING	RED	AS PER SPEC	
48	IRRIGATION	RED	AS PER SPEC	
49	LANDSCAPE	RED	AS PER SPEC	
50	PLANTING	RED	AS PER SPEC	
51	IRRIGATION	RED	AS PER SPEC	
52	LANDSCAPE	RED	AS PER SPEC	
53	PLANTING	RED	AS PER SPEC	
54	IRRIGATION	RED	AS PER SPEC	
55	LANDSCAPE	RED	AS PER SPEC	
56	PLANTING	RED	AS PER SPEC	
57	IRRIGATION	RED	AS PER SPEC	
58	LANDSCAPE	RED	AS PER SPEC	
59	PLANTING	RED	AS PER SPEC	
60	IRRIGATION	RED	AS PER SPEC	
61	LANDSCAPE	RED	AS PER SPEC	
62	PLANTING	RED	AS PER SPEC	
63	IRRIGATION	RED	AS PER SPEC	
64	LANDSCAPE	RED	AS PER SPEC	
65	PLANTING	RED	AS PER SPEC	
66	IRRIGATION	RED	AS PER SPEC	
67	LANDSCAPE	RED	AS PER SPEC	
68	PLANTING	RED	AS PER SPEC	
69	IRRIGATION	RED	AS PER SPEC	
70	LANDSCAPE	RED	AS PER SPEC	
71	PLANTING	RED	AS PER SPEC	
72	IRRIGATION	RED</		



LEVEL P1 PLAN

- LEGEND
- PARKING
 - UNEXCAVATED EARTH
 - PRIMARY ROOMS
 - SECONDARY ROOMS
 - LANDSCAPE/HARDSCAPE
 - CORRIDORS/BALCONIES/DRIVEWAY
 - ADJACENT BUILDINGS
 - ROOF

**NO CHANGE
IN UNIT COUNT
THIS FLOOR**



GROUND FLOOR PLAN

CASE #: APCC-2010-1554-SPE-ZV-DB-SPP

EXHIBIT 1A - FLOOR PLANS (P1-1)

CORONEL APARTMENTS

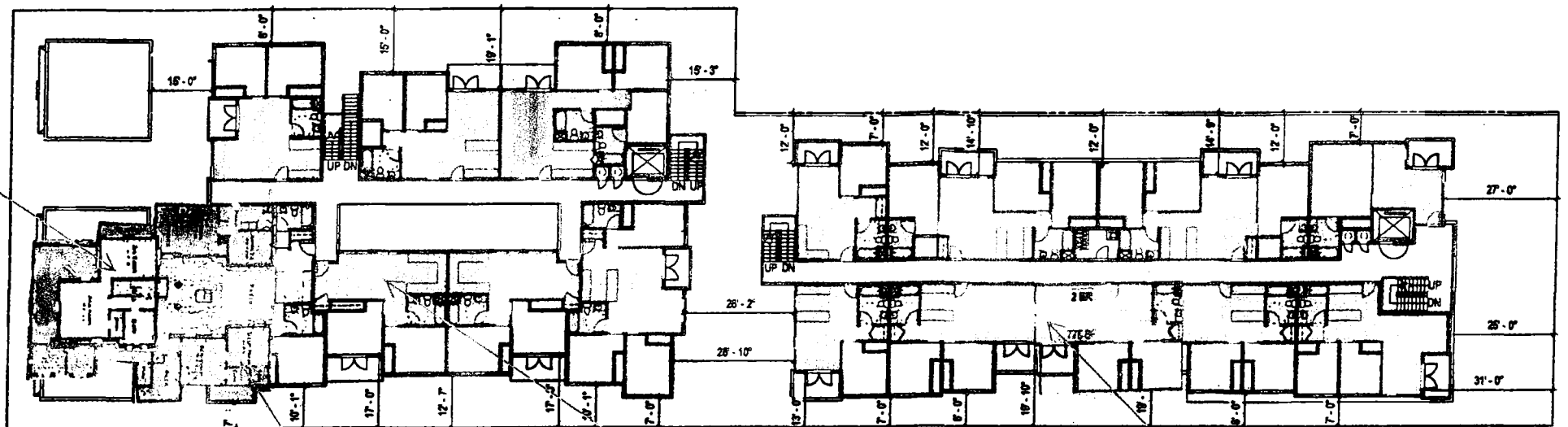
PRESERVATION ALTERNATIVE

1600-1606 N. SERRANO AVE / 1601 N. HOBART BLVD
LOS ANGELES CA 90027
OCTOBER 1, 2010



Office of Planning Architects

EXTRA 1 BDRM UNIT



2ND FLOOR PLAN (3RD FLOOR SIM)

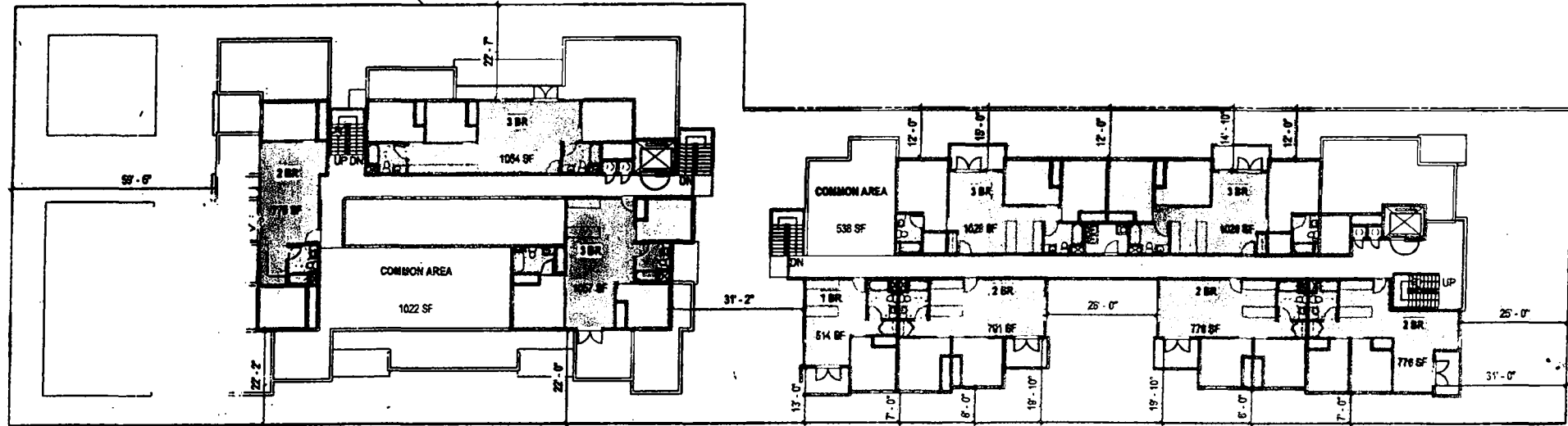
EHRBAR HOUSE

3 BDRM UNIT

2 BEDROOM UNIT

- LEGEND
- PARKING
 - UNEXCAVATED EARTH
 - PRIMARY ROOMS
 - SECONDARY ROOMS
 - LANDSCAPE/HARDSCAPE
 - CORRIDORS/BALCONIES/DRIVEWAY
 - ADJACENT BUILDINGS
 - ROOF

NET ADD ONE UNIT THESE FLOORS



4TH FLOOR PLAN

CASE #: APCC-2010-1554-SPE-ZV-DB-SPP

EXHIBIT 1B - FLOOR PLANS (2-4)

CORONEL APARTMENTS

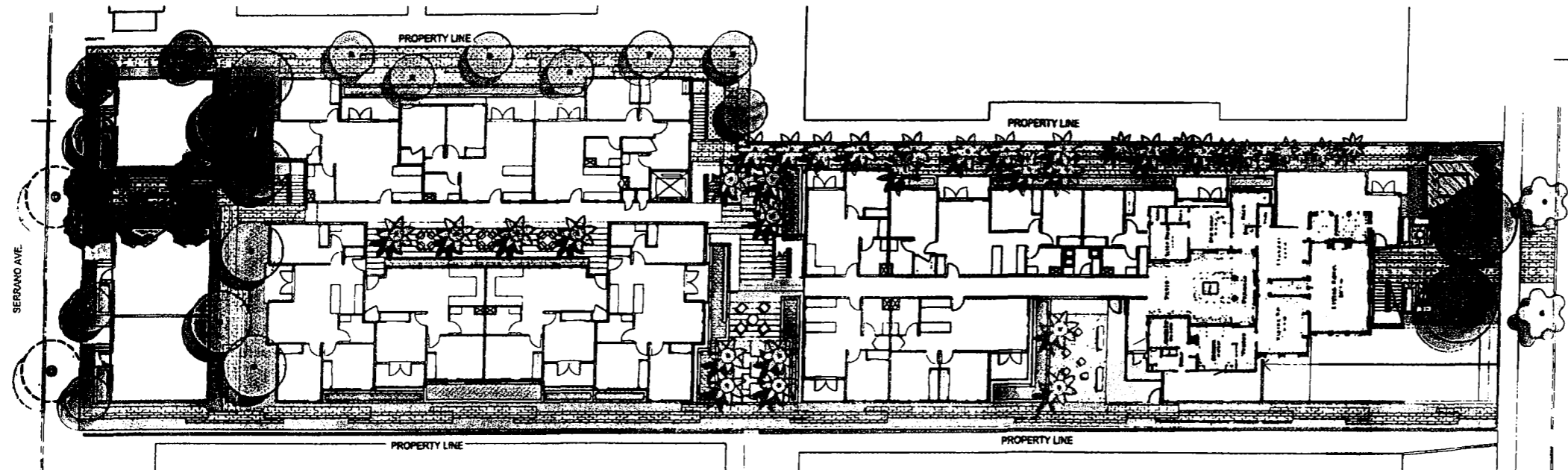
PRESERVATION ALTERNATIVE

1600-1608 N. SERRANO AVE / 1601 N. HOBART BLVD
LOS ANGELES CA 90027
OCTOBER 1, 2010



COMMON OPEN SPACE DIAGRAM

57 SF 128 SF



LANDSCAPE PLAN

SYMBOL	DESCRIPTION	SIZE & SPACING	REMARKS
(Tree symbol)	PLANT SPECIES	12" DIA.	PLANT IN PLACE
(Shrub symbol)	PLANT SPECIES	12" DIA.	PLANT IN PLACE
(Planting symbol)	PLANT SPECIES	12" DIA.	PLANT IN PLACE
(Planting symbol)	PLANT SPECIES	12" DIA.	PLANT IN PLACE
(Planting symbol)	PLANT SPECIES	12" DIA.	PLANT IN PLACE
(Planting symbol)	PLANT SPECIES	12" DIA.	PLANT IN PLACE

PLANT, TREE, & GROUNDCOVER LEGEND:

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE & SPACING	REMARKS
(Tree symbol)	PLANT SPECIES	COMMON NAME	12" DIA.	PLANT IN PLACE
(Shrub symbol)	PLANT SPECIES	COMMON NAME	12" DIA.	PLANT IN PLACE
(Planting symbol)	PLANT SPECIES	COMMON NAME	12" DIA.	PLANT IN PLACE
(Planting symbol)	PLANT SPECIES	COMMON NAME	12" DIA.	PLANT IN PLACE
(Planting symbol)	PLANT SPECIES	COMMON NAME	12" DIA.	PLANT IN PLACE
(Planting symbol)	PLANT SPECIES	COMMON NAME	12" DIA.	PLANT IN PLACE

SITE RECLAMATION TABLE:

TREE	REMARKS
Tree 1	REMARKS
Tree 2	REMARKS
Tree 3	REMARKS

FINISH SCHEDULE:

NO.	ITEM	DATE	REMARKS
1	ITEM	DATE	REMARKS
2	ITEM	DATE	REMARKS

CASE #: APCC-2010-1554-SPE-ZV-DB-SPP

CORONEL APARTMENTS

1600-1608 N. SERRANO AVE / 1601 N. HOBART BLVD
 LOS ANGELES CA 90027
 OCTOBER 1, 2010

EXHIBIT 2 - LANDSCAPE/OPEN SPACE

