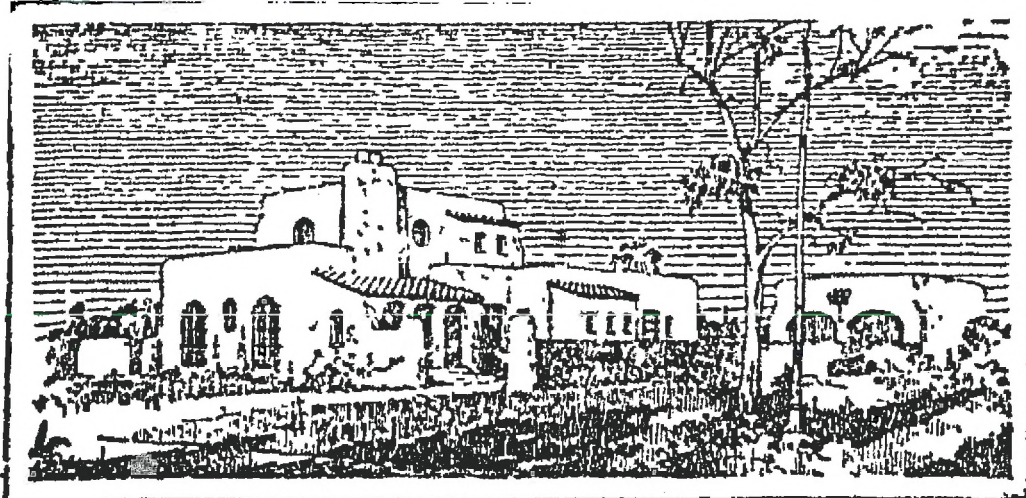


1601-1605 N. Hobart Boulevard Photographs

CF 15-0790
#6

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



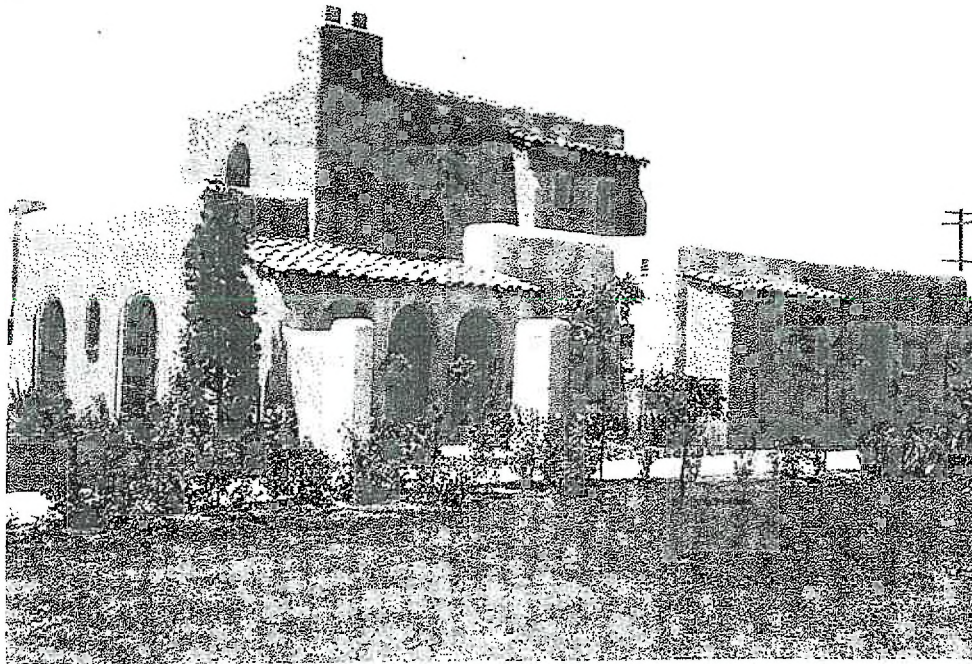
Attractive Hollywood Home.

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

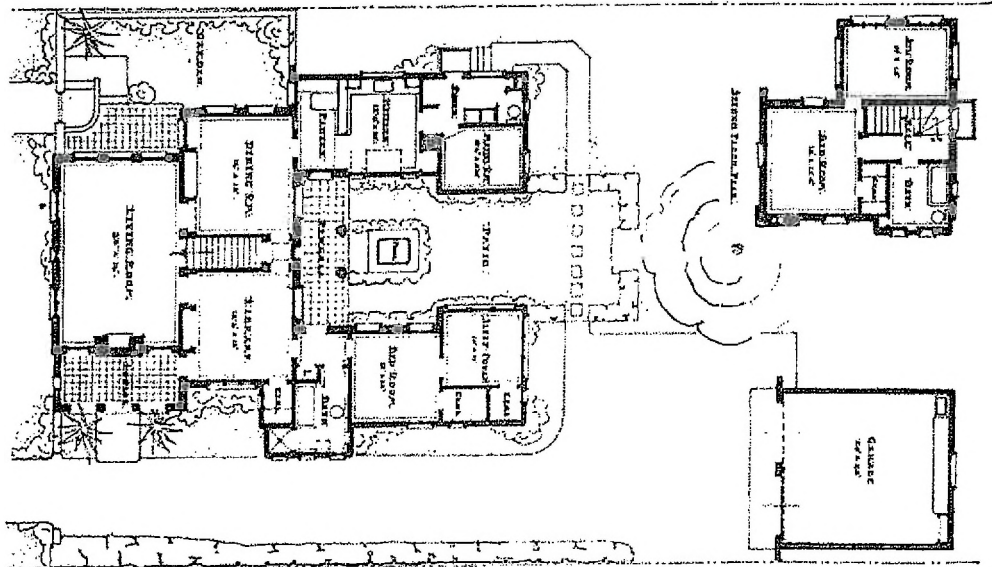
This architectural rendering of the subject house was published in the Los Angeles Times on July 16, 1920 with the incorrect address of 1905 North Hobart Boulevard. The original building permit confirms the 1605 Hobart address.



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



#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.

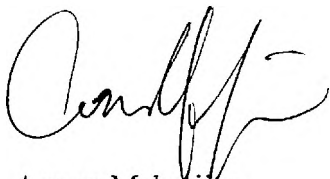
- Trash Removal:

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', with a stylized, flowing script.

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	18,584 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 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
--------------------------------	-------------

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 Ratio	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

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.)



Etta Armstrong <etta.armstrong@lacity.org>

Fwd: PLUM agenda CF 15-0790

1 message

Sharon Gin <sharon.gin@lacity.org>

Tue. Jul 28. 2015 at 11:06 AM

To: Sharon Dickinson <sharon.dickinson@lacity.org>. Etta Armstrong <etta.armstrong@lacity.org>

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

From: **Frances Offenhauser** <offenhauser@oma-la.com>

Date: Tue. Jul 28. 2015 at 11:03 AM

Subject: RE: PLUM agenda CF 15-0790

To: Blake Lamb <blake.lamb@lacity.org>

Cc: Sharon Gin <sharon.gin@lacity.org>

Hi Blake-- I have also provided a very quick Preservation Alternative which Doug Haines will bring to your hearing.

Based on my experience, moving the Ehrbar house to the Serrano side of the site is technically very easy. (If the developer needs assistance, we can refer movers who do this regularly).

I was able to put together a plan in a few hours which provides an equal number of units, and hardly changes the project design. It keeps the house as 3 @ 1Br units-- as a substitute for the 2 Serrano bungalows. Costwise it is likely a wash with the current project, and clearly an environmentally superior alternative.

From: Blake Lamb [mailto:blake.lamb@lacity.org]

Sent: Tuesday, July 28, 2015 9:01 AM

To: Frances Offenhauser

Cc: Sharon Gin

Subject: Re: PLUM agenda CF 15-0790

Thank you I have received this.

Blake

On Mon. Jul 27. 2015 at 5:33 PM. Frances Offenhauser <offenhauser@oma-la.com> wrote:

hi Blake: Please review the attached letter --recommending that you take the time now to look at an

alternative project which will preserve the Ehrbar House (and meet the developer's criteria). given the wide difference of professional opinion on the significance of the house being torn down.

Additionally, I did not see the findings of the State Historic Preservation Office or the Community redevelopment Agency in the EIR documents I reviewed. These EIRs are enormous. so it is possible I missed it.

Hi Sharon: Will you kindly distribute this information to the PLUM members?

Thank you both.

Frances Offenhauser

Offenhauser/Mekeel Architects

8762 Holloway Drive

West Hollywood. CA 90069

V [310.659.6600](tel:310.659.6600)

F [310.659.6001](tel:310.659.6001)

Authentic California Architecture

www.oma-la.com



This email has been checked for viruses by Avast antivirus software.
www.avast.com



Blake E. Lamb, City Planner

Plan Implementation Division - Metro Neighborhood Projects

200 N. Spring Street. Room 621

Los Angeles. CA 90012

(213) 978-1167

* Your first stop for most City Planning questions regarding your property will usually begin at the Development Service Center (DSC). Click the following link for DSC contact information:
<http://www.planning.lacity.org/PublicCounter.html>

In addition, two City Planning Department on-line systems can provide a variety of information – Zoning Information and Map Access Systems (ZIMAS) and Planning Case Tracking System (PCTS). ZIMAS provides a property's zoning designation, potential hazard zones, County Assessor's data, and economic development incentives among other information. It can be accessed at zimas.lacity.org. PCTS provides a summary of information regarding cases that were submitted to the Planning Department and can be accessed at http://planning.lacity.org/cts_internet/



This email has been checked for viruses by Avast antivirus software.

www.avast.com

Sharon Gin
City of Los Angeles
Office of the City Clerk
213.978.1074
Sharon.Gin@lacity.org



3 attachments

Ehrbar 4- serrano side.pdf
3888K



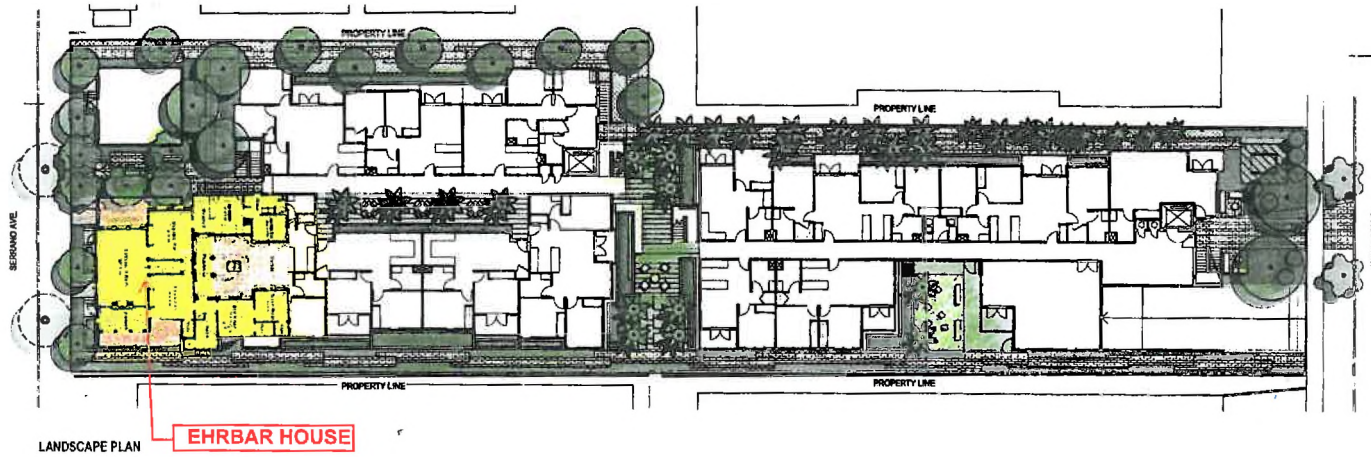
Ehrbar 5- serrano side 1st floor.pdf
4747K



Ehrbar 6 serrano side 2nd,3rd,4th floor.pdf
4558K

COMMON OPEN SPACE DIAGRAM

57' 0" 128' 0"



LANDSCAPE PLAN

EHRBAR HOUSE

ITEM	DESCRIPTION	QTY	UNIT	PRICE	TOTAL
1	1" x 6" x 8" PLANK	100	LF	1.50	150.00
2	2" x 6" x 8" PLANK	100	LF	2.50	250.00
3	4" x 6" x 8" PLANK	100	LF	4.00	400.00
4	6" x 6" x 8" PLANK	100	LF	6.00	600.00
5	8" x 6" x 8" PLANK	100	LF	8.00	800.00
6	10" x 6" x 8" PLANK	100	LF	10.00	1000.00
7	12" x 6" x 8" PLANK	100	LF	12.00	1200.00
8	14" x 6" x 8" PLANK	100	LF	14.00	1400.00
9	16" x 6" x 8" PLANK	100	LF	16.00	1600.00
10	18" x 6" x 8" PLANK	100	LF	18.00	1800.00

ITEM	DESCRIPTION	QTY	UNIT	PRICE	TOTAL
1	1" x 6" x 8" PLANK	100	LF	1.50	150.00
2	2" x 6" x 8" PLANK	100	LF	2.50	250.00
3	4" x 6" x 8" PLANK	100	LF	4.00	400.00
4	6" x 6" x 8" PLANK	100	LF	6.00	600.00
5	8" x 6" x 8" PLANK	100	LF	8.00	800.00
6	10" x 6" x 8" PLANK	100	LF	10.00	1000.00
7	12" x 6" x 8" PLANK	100	LF	12.00	1200.00
8	14" x 6" x 8" PLANK	100	LF	14.00	1400.00
9	16" x 6" x 8" PLANK	100	LF	16.00	1600.00
10	18" x 6" x 8" PLANK	100	LF	18.00	1800.00

ITEM	DESCRIPTION	QTY	UNIT	PRICE	TOTAL
1	1" x 6" x 8" PLANK	100	LF	1.50	150.00
2	2" x 6" x 8" PLANK	100	LF	2.50	250.00
3	4" x 6" x 8" PLANK	100	LF	4.00	400.00
4	6" x 6" x 8" PLANK	100	LF	6.00	600.00
5	8" x 6" x 8" PLANK	100	LF	8.00	800.00
6	10" x 6" x 8" PLANK	100	LF	10.00	1000.00
7	12" x 6" x 8" PLANK	100	LF	12.00	1200.00
8	14" x 6" x 8" PLANK	100	LF	14.00	1400.00
9	16" x 6" x 8" PLANK	100	LF	16.00	1600.00
10	18" x 6" x 8" PLANK	100	LF	18.00	1800.00

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

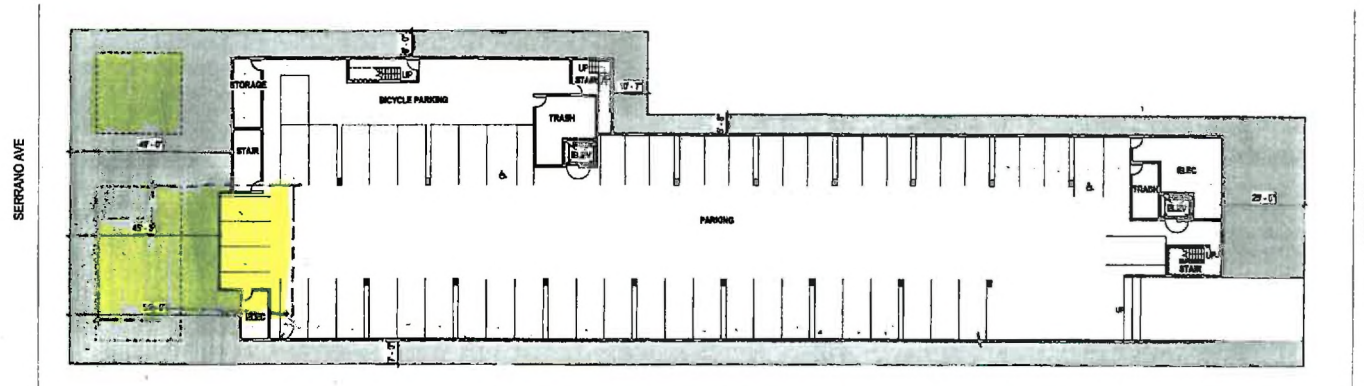
EXHIBIT 2 - LANDSCAPE/OPEN SPACE

CORONEL APARTMENTS

PRESERVATION ALTERNATIVE

1800-1808 N. SERRANO AVE / 1801 N. HOBART BLVD
LOS ANGELES CA 90027
OCTOBER 1, 2010



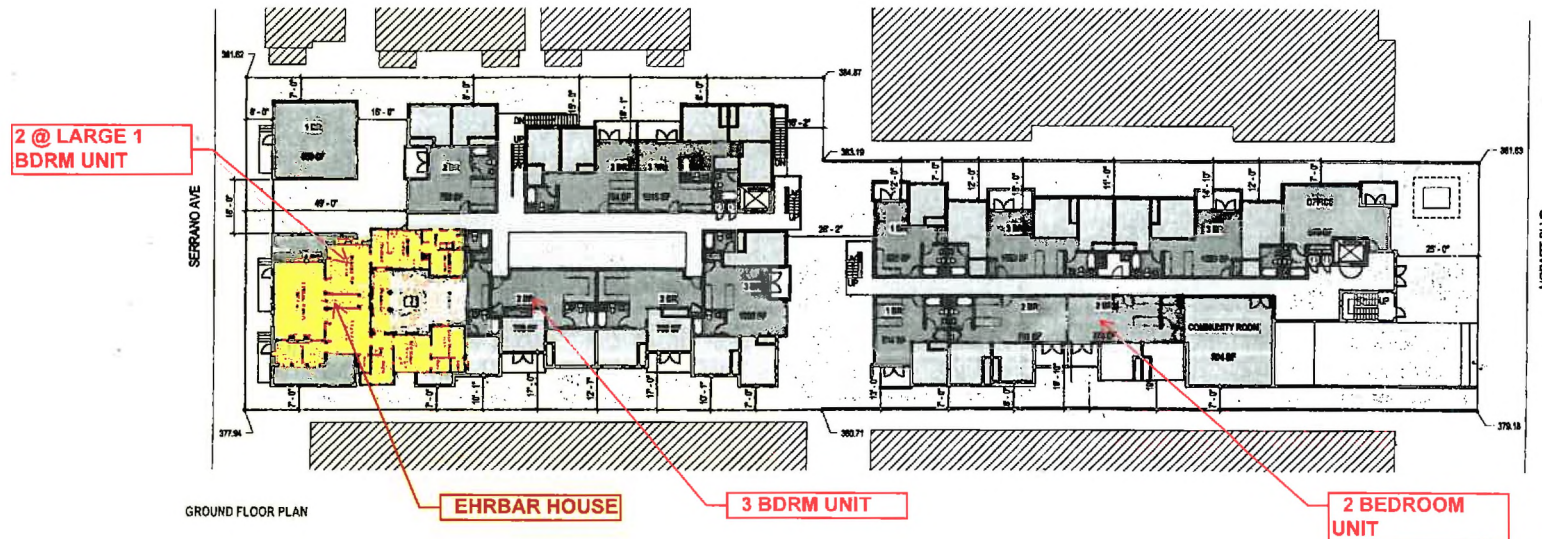


LEVEL P1 PLAN

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

CORONEL APARTMENTS

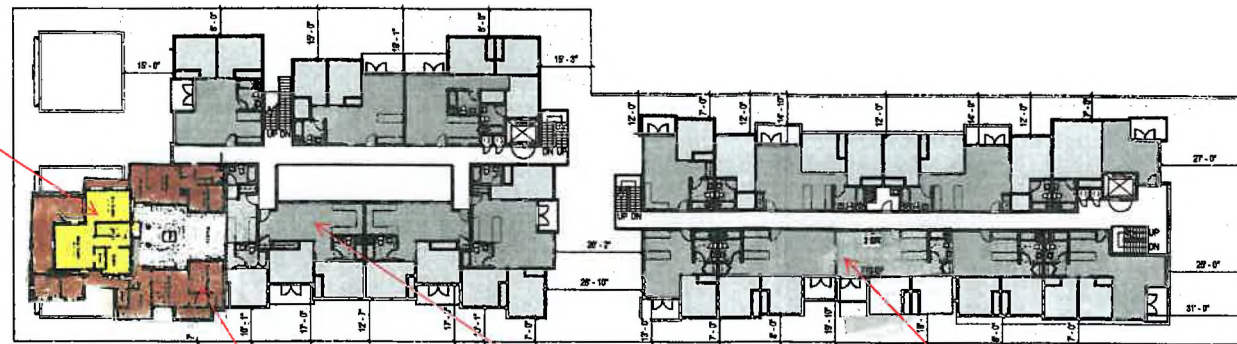
1600-1608 N. SERRANO AVE / 1601 N. HOBART BLVD
LOS ANGELES CA 90027
OCTOBER 1, 2010

PRESERVATION ALTERNATIVE

EXHIBIT 1A - FLOOR PLANS (P1-1)



EXTRA 1 BDRM
UNIT



2ND FLOOR PLAN (3RD FLOOR SIM)

EHRBAR HOUSE

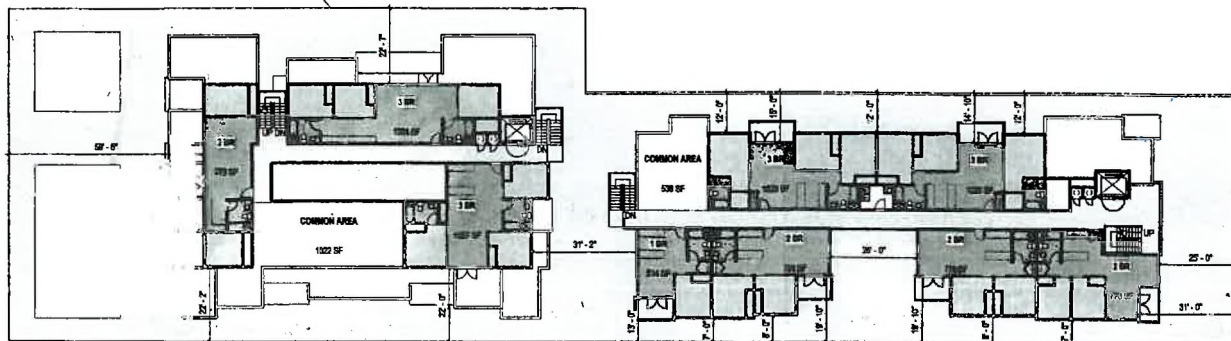
3 BDRM UNIT

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

CORONEL APARTMENTS

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

PRESERVATION ALTERNATIVE

EXHIBIT 1B - FLOOR PLANS (2-4)



July 25, 2015

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

ATTN: Sharon Gin, Legislative Assistant

VIA EMAIL

**RE: Coronel Apartments Project (CPC-2010-1554-DB-SPP: ENV 2012-110-EIR)
- Council File 15-0790 ✓**

Dear Chair Huizar and Committee Members:

I respectfully request that this letter and attachments be put into Council File 15-0790 to be included as part of the record.

I am responding to the July 22, 2015 Letter by Mr. Duncan Moore of Latham & Watkins submitted on behalf of Mr. Bill Harris and Hollywood Community Housing Corporation (HCHC), which tries to unsuccessfully refute the facts of the project and fails to rebut the appeals against it.

Though, dense in its verbiage, their document rather helps illustrate the case against the current project presented by HCHC. It continually tries to circumvent the host of damning facts and seemingly hopes to distract from issues mounting against it.

Most surprisingly, is that Mr. Moore seems to not fully understand the issues of contention in the appeals, and seems unaware of an email trail from the City that consistently contradicts his increasingly strained positions on behalf of HCHC.

1/ Mr. Moore and HCHC try unsuccessfully to assert that the Ehrbar House was not a Historical Resource, claiming the independent report (the Section 106 Review) by ICF on behalf of the City was only a 'preliminary review' – But the conclusions of the report clearly suggest requiring retention or relocation of Ehrbar—in no ambiguous terms.

Moreover, emails between Robert Manford of HCID, Ken Berstein, Chris Hertz, and Alexis Baylosis of LAHCID between November 2013 and January 2014 clearly counter the claim that it was only a 'working hypothesis'. The documented discussion between all of these persons focuses on how to apply these considerations appropriately to the project. (Please see attached documents)

2/ Again HCHC is keen to distract from the \$1,496,932 in Federal tax credits allotted to them, and wants to ignore the requirements for preservation that come along

with this generous incentive. Mr. Moore asserts that the Low Income Housing Tax Credits are not federal funds that trigger a NEPA review, but that is not the case and to move ahead without these requirements would mean LAHCID would be illegally approving Federal tax credits without the historic review required.

Again, this is substantiated by emails which HCHC's attorney is either unaware of or chooses to ignore. Either way, that does not change the obligation on HCHC or LAHCID's part in this regard.

3/ HCHC wishes that it wasn't required to present an alternative plan that included the retention and/or relocation of Ehrbar. However, in light of the above points they clearly were required to do so. Moreover, HCHC never made any effort to present a reasonable range of alternatives under CEQA. Instead, Mr. Moore seems far too keen to skirt the Hollywood Redevelopment Plan issues and pretend that Ehrbar wasn't on the eligibility list for the National Register.

4/ Ms. Delila Sotelo of the Sotelo group confirmed in a conversation with me a few months ago that she was never asked by HCHC to consider any possible plans that included preservation of Ehrbar. In fact, she was never even presented with the facts or issues surrounding Ehrbar and its preservation issues. This shows a clear intent on HCHC's part to avoid the requirements around Ehrbar. One gets the impression that Mr. Moore hopes that under the cloak of 'unfeasibility' HCHC can hide their dereliction of responsibility.

5/ HCHC cannot have it both ways. It cannot seek Federal tax credits and then blatantly try to avoid the requirements that come with those funds, or encourage the City of LA to do so. It cannot call it itself a 'Community' organization that promotes 'low income housing' and then tear down a community resource to provide housing whose affordable rates are not congruent with actual Hollywood area low-income levels.

This project can work and can provide reasonable affordable housing, but to do so HCHC must comply with the legal requirements and make the appropriate adjustments. Failure to do so would only generate unnecessary problems and possible litigation to no one's benefit.

A reasonable compromise is what is required and within reach. HCHC has expended our taxpayer dollars in an effort to enlist lawyers and consultants in order to dodge responsibilities. But, generating unconvincing and faulty responses to legitimate community concerns is not a viable solution for any respectable organization who seeks to help people. It's time for them to act responsibly in this matter.

Sincerely,

Bill Zide
(323) 466-3353/billzide@aol.com



Shelly Lo <shelly.lo@lacity.org>

Re: Coronel Apts. project, Jones and Stokes historic assessment

1 message

Alex Fu <alex.fu@lacity.org>

Wed. Jan 15. 2014 at 9:49 AM

To: Suriya Prasad <prasad.suriya@yahoo.com>

Cc: Robert Manford <robert.manford@lacity.org>. Alexis Baylosis <alexis.baylosis@lacity.org>. Shelly Lo <shelly.lo@lacity.org>

Hi. Doug/Suriya:

Here is what we received from our consultant. ICF. re. Coronel Apts project in last November. Please feel free to contact us if there is further development about the CEQA status for this project. Thanks.

Alex Fu

On Wed. Jan 15. 2014 at 9:29 AM. Suriya Prasad <prasad.suriya@yahoo.com> wrote:

Alex: Per our Wednesday morning conversation. please forward any information you have available regarding the Historic Resources assessment of the property at 1601 N. Hobart Blvd.. as well as any other information you believe may be helpful in our neighborhood council's analysis of this project.

My neighbor is letting me use her email. Her email address is: prasad.suriya@yahoo.com.

Thanks again. I appreciate your help, and please keep me informed on your department's review of this matter. I can always be reached at [310 281-7625](tel:3102817625).

Best,

Doug Haines, Chair
Planning Entitlement Review Committee
East Hollywood Neighborhood Council

**HobartBlvd1601-1605n_RequestLtr_20131121.pdf**

167K



Shelly Lo <shelly.lo@lacity.org>

RE: Coronel Apts

1 message

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

Wed. Nov 20. 2013 at 10:24 PM

To: "Shelly H Lo (Shelly.Lo@lacity.org)" <Shelly.Lo@lacity.org>. "Alex Fu (alex.fu@lacity.org)" <alex.fu@lacity.org>
Cc: Alexis Baylosis <alexis.baylosis@lacity.org>. "Starzak, Richard" <Richard.Starzak@icfi.com>. "Davis, Colleen" <Colleen.Davis@icfi.com>. "Robert Manford (robert.manford@lacity.org)" <robert.manford@lacity.org>

Alex and Shelly,

Please see the attached letter, which summarizes our recommendations on the Section 106 review for the Coronel Apartments project. Feel free to contact us, should you have any questions.

Sincerely,

Chris

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

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

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Shelly Lo <shelly.lo@lacity.org>

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Cc: "Shelly H Lo (Shelly.Lo@lacity.org)" <Shelly.Lo@lacity.org>. "Alex Fu (alex.fu@lacity.org)"

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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

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Shelly Lo <shelly.lo@lacity.org>

RE: Coronel Apts

1 message

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 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

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2 attachments



LACDD_Section106_Programmatic_Agreement.pdf
1842K



SanFernandoRd1545_FOE.pdf
1043K



Shelly Lo <shelly.lo@lacity.org>

Re: Coronel Apts

1 message

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



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On Tue, Dec 17, 2013 at 4:41 PM, Starzak, Richard <Richard.Starzak@icfi.com> wrote:

FYI, This is from the CEQ/ACHP NEPA/106 Handbook March 2013.

4. FONSI or EIS?

The resolution of adverse effects to historic properties through the Section 106 process is a factor to consider in determining whether, for NEPA purposes, there are any potentially significant effects that require the preparation of an EIS. An adverse effect in the Section 106 process does not necessarily mean an agency will be unable to reach a FONSI. The Section 106 regulations state that the NEPA determination of whether an undertaking is a “major Federal action significantly affecting the quality of the human environment” that requires preparation of an EIS should include consideration of the likely effects on historic properties.⁴³ However, neither NEPA nor Section 106 requires the preparation of an EIS solely because the proposed undertaking has the potential to adversely affect a historic property.⁴⁴ Consequently, the agency will still need to determine whether the environmental effects of the action on historic properties are “significant” (or are still “significant”) within the

meaning of 40 C.F.R. § 1508.27.

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ICF INTERNATIONAL | 601 West 5th Street, Suite 900, Los Angeles, CA 90071 | +1.213.840.7480 mobile

Note new address and direct line.

Connect with us on [social media](#).

From: Robert Manford [<mailto:robert.manford@lacity.org>]
Sent: Tuesday, December 17, 2013 3:14 PM
To: Hetzel, Christopher
Cc: Shelly Lo; Alex Fu; Alexis Baylosis; Starzak, Richard
Subject: Fwd: Coronel Apts

Hello Christopher:

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To: "Hetzel, Christopher" <Christopher.Hetzel@icfi.com>. Ken Bernstein <ken.bernstein@lacity.org>
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NEPA_NHPA_Section_106_Handbook_Mar2013.pdf
4032K



Shelly Lo <shelly.lo@lacity.org>

Re: Coronel Apts

1 message

Robert Manfred <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.



Dr. Robert K. Manfred 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 Manfred <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 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](tel:206.801.2817) | [213.840.3143](tel:213.840.3143)
(m) | christopher.hetzel@icfi.com | icfi.com

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

ICF INTERNATIONAL | 601 West 5th Street, Suite 900, Los Angeles, CA 90071 | [\(213\) 312-1799](tel:213.312.1799) (f)

2 attachments

 **LACDD_Section106_Programmatic_Agreement.pdf**
1842K

 **SanFernandoRd1545_FOE.pdf**
1043K

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
(213) 808-8957

PREPARED BY:

ICF International
601 West 5th Street, Suite 900
Los Angeles, CA 90071
Contact: Christopher Hetzel
(213) 312-1800

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.

Chapter 2

Methodology

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 conformation 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 SMMA's 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)

749 E. 20th Street (2D2—Contributor to East 20th Street Historic District)

756 E. 20th Street (2D2—Contributor to East 20th Street Historic District)

757 E. 20th Street (2D2—Contributor to East 20th Street Historic District)

807 E. 20th Street (2D2—Contributor to East 20th Street Historic District)

815 E. 20th Street (2D2—Contributor to East 20th Street Historic District)

Three properties were determined eligible for listing during this or a previous reporting period and submitted to the SHPO for concurrence during this period. Of these, the SHPO formally concurred with the submitted determination for the following properties, which are contributors to the North Avenue 57 Historic District:

126-130 N. Avenue 57

138 N. Avenue 57

132-136 N. Avenue 57

There were 11 determinations of eligibility submitted to which the SHPO did not respond within 15 days. One was for the East 20th Street Historic District and its contributors. These properties included:

721-729 E. Washington Boulevard

749 E. 20th Street

722 E. 20th Street

756 E. 20th Street

732 E. 20th Street

757 E. 20th Street

740 E. 20th Street

807 E. 20th Street

741 E. 20th Street

815 E. 20th Street

748 E. 20th Street

Two projects were cancelled prior to the City submitting a determination of eligibility for a property to the SHPO. These projects involved determinations of eligibility for the following properties:

251 S. Berendo Street

1601 N. Hobart Boulevard

Determinations of eligibility for the remaining properties are being prepared and will be submitted to the SHPO for concurrence during the next reporting period.

3.2.2 Ineligible Properties

Of the properties for which identification and evaluation were carried out during this reporting period, the City and the HPC determined that 36 properties are ineligible for listing in the NRHP. The City was not required by the PA to submit these determinations to the SHPO for review, but has documented them in this PACR. The addresses for the evaluated properties can be found in the activity report in Appendix 3.2 Identification and Evaluation of Historic Properties at the end of this document. These properties shall not be considered historic properties under the PA for a period of five years following the date of the determination, and need not be re-evaluated during this time unless any signatory to the PA notifies the other signatories in writing that changing perceptions of significance justify re-evaluation.

Of the properties for which identification and evaluation were carried out during this PACR period, one property was determined ineligible within the past five years.

3.2.3 Summary of Results

As a result of the review under Stipulation VI (Identification and Evaluation) of the PA during this PACR period, the City and the HPC determined 37 properties not to be historic properties and 33 to be eligible for listing in the NRHP (including those identified as eligible in a previous PACR period). There were no properties with pending evaluations at the end of the PACR period.

3.3 Treatment of Historic Properties

Twenty-eight undertakings were at various stages of review by the City and the HPC under Stipulation VII (Treatment of Historic Properties) during this PACR period. These include undertakings identified as historic properties during this PACR period as well as properties whose reviews were pending at the time of the previous PACR.

3.3.1 Rehabilitation - Option 1

Of the undertakings that were started or underway during this reporting period, 13 are being reviewed under Rehabilitation Option 1 (Stipulation VII.B.). This stipulation requires the City to ensure that plans for the undertakings conform to the Standards and to the greatest feasible extent the CHBC.

Of the undertakings being reviewed under Option 1, the following also involve new construction:

4219-4263 S. Central Avenue	3011 S. Western Avenue
722-736 E. Washington Boulevard	

During this PACR period, review under Rehabilitation Option 1 was completed for three projects. These projects were evaluated by City and the HPC with a finding of no adverse effect, with conditions, during this or a prior PACR period. A Finding of Effect Memorandum was prepared for each, and the undertakings determined to be completed with no adverse effect to historic properties. They include the following:

4219-4263 S. Central Avenue	722-736 E. Washington Boulevard
4225 S. Central Avenue	

At the end of this PACR period, there were six projects evaluated with a finding of no adverse effect, with conditions. For some of these undertakings, this determination was made during a previous reporting period. A Finding of Effect Memorandum was prepared for each, but all of the conditions have not yet been met, so the Section 106 review process remains open for the following projects:

1115 S. Alvarado Street	603-607 S. Park View St./2400-2416 W. 6th St.
1129 S. Alvarado Street	3011 S. Western Avenue
929 Cypress Avenue	3341 W. 43rd Place

The City and the HPC will continue to monitor the undertakings listed above that were determined to have no adverse effect, with conditions, for compliance in the manner described in Section 2.3.1 above.

Review is pending on the following projects because required information is not yet available for review by the HPC or because the City has asked that the project be put on hold. In most cases, either plans or revised plans have not yet been submitted for review by the City to the HPC:

634-640 S. Alvarado Street

10526 Pace Avenue

401-449 N. Avenue 19

During this PACR period, two undertakings involving Rehabilitation Option 1 were canceled prior to the work beginning. These involved the projects at 664 S. Catalina Street and 10526 Pace Avenue.

3.3.2 Foreclosure

There were no projects in this category during this PACR period.

3.3.3 Rehabilitation - Option 2 - IRC

Of the 28 undertakings requiring review, three were reviewed under Rehabilitation Option 2 - IRC of Stipulation VII during this PACR period. The following projects are undergoing review under Option 2:

1040-1058 S. Doreen Place/1002-1012 E. Elkgrove Avenue (Lincoln Place Apartments)

610-630 S. Saint Louis Street (Santa Fe Coast Lines Hospital/Linda Vista Hospital)

112 S. 5th Street (Rosslyn Hotel)

No projects were completed under Rehabilitation Option 2 during this PACR period.

3.3.4 New Construction and Relocation of Non-Historic Properties

Thirteen undertakings were in various stages of being reviewed under Stipulation VII.F – New Construction and Relocation of Non-Historic Properties of the PA during this PACR period. This stipulation requires the City to ensure that the design of any new construction, infill construction or of additions to historic properties is compatible with the historic qualities of a historic property (either on the project site or in the APE), of any historic district or of adjacent historic buildings in terms of size, scale, massing, color, features, and materials and that the design is responsive to the recommended approaches for new construction set forth in the Standards.

The following undertakings were reviewed under this stipulation in addition to review under Rehabilitation Option 1. Most consist of an addition to a historic property or related new construction:

4219-4263 S. Central Avenue

3011 S. Western Avenue

722-736 E. Washington Boulevard

The following undertakings were reviewed under this stipulation and involve new construction only:

251 N. Berendo Street	900-906 S. Crenshaw Boulevard/540-542 S. Kingsley Drive
900-924 N. Broadway/215-219 W. College Street	1601-1605 N. Hobart Boulevard/1600-1602 N. Serrano Avenue
Broadway between 2nd Street and Olympic Boulevard	538-548 S. Normandie Avenue
811-825 S. Carondelet Street	

Seven undertakings involving new construction and relocation were completed in this PACR period. These projects were evaluated by the City and the HPC with a finding of no adverse effect during this or a prior PACR period. A Finding of Effect Memorandum was prepared for each. They included the following:

900-924 N. Broadway/215-219 W. College Street	5712 Marmion Way/124 N. Avenue 59
4219-4263 S. Central Avenue	722-736 E. Washington Boulevard
9800 Grape Street	1750 E. 1st Street
5400 Hollywood Boulevard	

During this PACR period, two undertakings involving New Construction were canceled prior to the work beginning. These involved the projects at 251 S. Berendo Street and 1601-1605 N. Hobart Boulevard/1600-1602 N. Serrano Avenue.

3.3.5 Special Review

Two undertakings involving new construction and the relocation of a history property were under consideration during this PACR period. The City continues to monitor the undertaking that involves the relocation of the historic Dayton Tower at 1545 San Fernando Road for compliance in the manner described in section 2.3.1 above. The City and HPC also reviewed an undertaking at 2407-2421 E. 1st Street, which involves new construction and the relocation of a historic property, known as the Peabody/Werden House, at 2415-2417 E. 1st Street. The City and HPC reviewed the undertaking and prepared a Finding of Effect Memorandum, which concluded the project would have no adverse effect to historic property. Information about the undertaking and the relocation of the historic property was submitted to the SHPO during this period, per Stipulation VII.D.1.a of the PA. The SHPO did not respond to the submittal within 15 days. Therefore, the City assumed the SHPO agreed to the proposed relocation. The City and the HPC will continue to monitor the undertaking for compliance in the manner described in Section 2.3.1 above.

3.4 Resolution of Adverse Effects

No findings of adverse effect were made during this PACR period, and no new SMMA's were prepared. However, the City and HPC continue to monitor the undertaking at 500-502 S. Main Street

to ensure compliance with the terms of the SMMA executed for the project on March 27, 2013, during a prior PACR period.

3.5 Consideration and Treatment of Archaeological Resources

During this PACR period, the City and the HPC determined that under the terms of Stipulation X (Consideration and Treatment of Archaeological Resources) of the PA, 23 undertakings involved ground disturbing activities. Because these projects had the potential to affect archaeological resources, the City and the HPC requested an ARLS or QC for each undertaking.

In response to 15 requests, the South Central Coastal Information Center did not recommend that an archaeologist conduct a survey of the APE. Therefore, under Stipulation X, no further consideration of archaeological resources was required for the undertaking. There were no pending reviews of undertakings by the South Central Coastal Information Center at the end of this PACR period.

The South Central Coastal Information Center recommended that a Phase I archaeological survey be performed by a qualified archaeologist in eight cases. The City and the HPC proceeded to conduct a Phase 1 archaeological survey without SHPO comment, due to a need to expedite the review process, for the following projects:

13366-13368 W. Beach Avenue	20750 W. Sherman Way
3314-3330 W. Beverly Boulevard	3101 W. Venice Boulevard/1547 S. Arlington Avenue
5712 Marmion Way/124 N. Avenue 59	1750 E. 1st Street
3500 N. Marmion Way	
252 S. Rampart Boulevard	

Under Stipulation X.D.1 of the PA, the City engaged a qualified archaeologist to conduct a Phase 1 archaeological survey of the APE and prepare a written report for these eight undertakings. All of the Phase 1 archaeological surveys were conducted by the HPC. None of the surveys identified the presence of archaeological resources.

There are no additional undertakings for which the City needs to forward the South Central Coastal Information Center's recommendation for a Phase 1 archaeological survey to the SHPO for comment.

3.6 Exempt Projects

The HPC received one undertaking from the City during this PACR period that involved properties less than 50 years old. The undertaking was the project at 320-340 N. Madison Avenue/335 N. Westmoreland Avenue.

Additional projects exempt from review by the SHPO and the Advisory Council under the PA were not submitted to the HPC, were not tracked by the City, and are not documented in this PACR.

3.7 Undertakings on Vacant Land

All undertakings involving new construction on vacant land are indicated as “not extant” in the Summary of Activities attached to this report and were documented as outlined in Section 2.3.

Chapter 4

Programmatic Agreement Compliance

4.1 Interested Parties

Interested parties are consulted by the City and the HPC for information regarding potential historic properties in their area of influence and expertise. Among the groups routinely contacted by the City and the HPC are the City of Los Angeles Department of City Planning, Office of Historic Resources, the Los Angeles Conservancy, representatives of Los Angeles Historic Preservation Overlay Zones, Hollywood Heritage, the Society of Architectural Historians, the West Adams Heritage Association, and the Hollywood Chamber of Commerce. When provided, the input of interested parties is incorporated into the review process. When new construction projects will be built in or adjacent to historic neighborhoods, the City has put in place a system whereby potential interested parties, identified by the City Council District Office, will receive a letter notifying them of new construction projects proposed for areas determined by the City and the HPC to be historically or architecturally sensitive.

4.2 Effectiveness of Programmatic Agreement

As of 2014, the PA has been in place for 19 years. The City continues to find it an efficient and effective tool for considering historic properties while carrying out its Section 106 review responsibilities. The PA adequately streamlines the Section 106 review process, which enables the City to conduct project reviews quickly and efficiently. This accomplishment in turn helps ensure the successful completion of undertakings and satisfaction of other City programs and obligations.

Several elements of the PA are particularly helpful in streamlining the Section 106 process:

- The time frames for review are shorter than the regular Section 106 review process, because activities such as determinations of ineligibility and plan review for eligible properties are not submitted to the SHPO for concurrence.
- The 15-day response periods for the SHPO to concur with determinations of eligibility and to comment on the treatment of potential archaeological resources shorten the review process from the customary 30-day response period.
- The HPC is able to expedite the plan review process by making determinations of no adverse effect, with conditions, in cases where some aspect of a project needs further refinement. In these cases, the project is not delayed because the City authorizes the undertaking to proceed while monitoring the applicant's compliance with the conditions.
- The PA enhances the identification process by recognizing previous determinations of eligibility and determination of ineligibility within the past five years, thus shortening the identification process to the length of time it takes to confirm a previous determination.
- Relying on Quick Checks has served to shorten the review time of undertakings involving ground-disturbing activities.

- By providing clear specifications for undertakings not requiring review by the SHPO or the Advisory Council, the PA allows a quick determination of which projects are exempt and thus saves review time.
- By working with applicants under the PA, the City and HPC have been able to educate those using federal funds about the Standards. Through this education and the City's commitment to project conformance with the Standards to expedite review and to avoid adverse effects, undertakings under the PA resulting in a Finding of Adverse Effect have been few.
- When used, Rehabilitation Option-2, which allows the tax certification review process to supersede the Rehabilitation Option-1 process, is efficient by eliminating project review by the City and the HPC.

Although implementation of the PA successfully facilitates fulfillment of the City's Section 106 responsibilities, 19 years of use has revealed opportunity for improvements in some areas. Over the past several years, there have been both informal and formal discussions about amending the PA. However, no action has yet been taken in this regard. The City understands that other jurisdictions have implemented similar agreements, which are improvements upon the PA, and is interested in continuing to consider possible amendments to the document. Possible improvements to the PA include the following:

- Updating the regulatory language in the PA to make it consistent with current legislation.
- Incorporating provisions for cancelled and/or unfunded projects.
- Adding clarification for when previously evaluated properties listed in the HRI with "3B," "3S," or "3D" status codes (i.e., appears eligible for NRHP listing) need to be re-evaluated and documented with a category "2" status.
- Adding provisions for the identification, evaluation, and documentation of historic districts.
- Providing exemptions for maintenance assistance programs, such as the City's "Handyworker Program," that involve minimal levels of federal funding, which are sometimes less than the cost of the Section 106 review.
- Updating the list of exemptions in Appendix A to better clarify its applicability.
- Including provisions for the inclusion of cultural resources surveys and assessments conducted by a project applicant in the Section 106 review process, to help reduce costs and eliminate duplicative efforts.
- Adding provisions for submitting copies of documentation to the California Historical Resources Inventory System.
- Further refining the archaeological review process under the PA to improve the timeliness of the review for major projects.
- Providing more guidance on how to acknowledge and integrate Part I and Part II application tax certifications not completed by the City or the HPC.

Overall, the City is pleased with the continuing efficiency of the PA. Project applicants, interested parties, the City, the SHPO, and the Advisory Council all continue to benefit from its implementation.

Chapter 5

Conclusion

This Thirty-Seventh PACR summarizes for the SHPO and the ACHP the activities carried out under the PA in the period from July 1, 2013 through December 31, 2013. The report is also available to inform the public of the activities carried out under the PA. A copy of the Thirty-Sixth Reporting Period PACR was provided to HUD in December 2013. The City placed a notice in the Los Angeles Daily Journal announcing the availability of the Thirty-Sixth Reporting Period PACR for public review. The City will place a similar notice in the newspaper to announce the availability of this Thirty-Seventh Reporting Period PACR.

This Thirty-Seventh Reporting Period PACR documents all decisions made with respect to Identification and Evaluation of Historic Properties, Treatment of Historic Properties, Resolution of Adverse Effects, Consideration and Treatment of Archeological Resources, and Undertakings Not Requiring Review between July 1, 2013 and December 31, 2013. It also documents the City's views regarding the usefulness of the PA in promoting the efficiency and effectiveness of both the Programs and the consideration of historic properties. The next PACR, reflecting the activities carried out under the PA between January 1, 2014 and June 30, 2014, will be submitted to the SHPO and the Advisory Council upon its completion.

Appendix A

CITY OF LOS ANGELES

JANUARY 31, 2014

PROGRAMMATIC AGREEMENT COMPLIANCE REPORT (PACR) TO CALIFORNIA STATE HISTORIC PRESERVATION OFFICER AND ADVISORY COUNCIL ON HISTORIC PRESERVATION

3.1 SUMMARY OF ACTIVITIES

ADDRESS	DEPT	DOE	PROJ REV	AE RES	ARCHEO	EXEMPT	Review Complete
10019-10035 S ALAMEDA ST	LAHD	X					X
10127 S ALAMEDA ST	LAHD	X					X
10211 S ALAMEDA ST	LAHD	X					X
10229 S ALAMEDA ST	LAHD	X					X
634-640 S ALVARADO ST	CDD		X				
1115 S ALVARADO ST	CDD		X				
1129 S ALVARADO ST	CDD		X				
401-449 N AVENUE 19	CDD		X				
126-130 N AVENUE 57	LAHD	X					X
132-136 N AVENUE 57	LAHD	X					X
138 N AVENUE 57	LAHD	X					X
13366-13368 W BEACH AVE	LAHD				X		X
251 S BERENDO ST	LAHD	X	X				X
3314-3330 W BEVERLY BLVD	<i>Not Extant</i> LAHD				X		X
900-924 N BROADWAY/215-219 W COLLEGE STREET	LAHD		X				X
BROADWAY BETWEEN 2ND ST AND OLYMPIC BLVD	CDD		X				
3754 S BUCKINGHAM RD	LAHD	X					X
811-825 S CARONDELET ST	<i>Not Extant</i> LAHD		X				X

CITY OF LOS ANGELES

JANUARY 31, 2014

PROGRAMMATIC AGREEMENT COMPLIANCE REPORT (PACR) TO CALIFORNIA STATE HISTORIC PRESERVATION OFFICER AND ADVISORY COUNCIL ON HISTORIC PRESERVATION

3.1 SUMMARY OF ACTIVITIES

ADDRESS	DEPT	DOE	PROJ REV	AE RES	ARCHEO	EXEMPT	Review Complete
664 S CATALINA ST	CDD		X				X
8781 CATTARAUGUS AVE	LAHD	X					X
4219-4263 S CENTRAL AVE	LAHD		X				X
4225 S CENTRAL AVE	LAHD		X				X
900-906 S CRENSHAW BLVD/540-542 S KINGSLEY DR	LAHD		X		X		
900 S CRENSHAW BLVD	LAHD	X					X
906 S CRENSHAW BLVD	LAHD	X					X
929 CYPRESS AVE	CDD		X				
1040-1058 S DOREEN PL/1002-1012 E ELKGROVE AVENUE	LAHD		X				
4121-4123 N EAGLE ROCK BLVD	LAHD	X			X		X
13951 GARBER ST	LAHD	X					X
10626 S GRAMERCY PL	LAHD	X					X
9800 GRAPE ST	LAHD	X	X		X		X
1601-1605 N HOBART BLVD/1600-1602 N SERRANO AVE	LAHD		X		X		X
1601 N HOBART BLVD	LAHD	X					X
5400 HOLLYWOOD BLVD	<i>Not Extant</i> LAHD		X		X		X
2646 W JAMES M WOOD BLVD	LAHD	X					X
1010 E JEFFERSON BLVD	LAHD	X					X

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3.1 SUMMARY OF ACTIVITIES

ADDRESS	DEPT	DOE	PROJ REV	AE RES	ARCHEO	EXEMPT	Review Complete
551 S KINGSLEY DR	LAHD	X					
11642 KLING ST	LAHD	X					X
7843 N LANKERSHIM BLVD	LAHD	X			X		X
320-340 N MADISON AVE/335 N WESTMORELAND AVE	LAHD	X			X	X	X
500-502 S MAIN ST	LAHD			X			
5712 MARMION WY/124 N AVENUE 59	LAHD		X		X		X
3500 N MARMION WY	<i>Not Extant</i> LAHD				X		X
200 N NEW HAMPSHIRE AVE	LAHD	X					
206 N NEW HAMPSHIRE AVE	LAHD	X					
210-212 N NEW HAMPSHIRE AVE	LAHD	X					
216-218 N NEW HAMPSHIRE AVE	LAHD	X					
222-224 N NEW HAMPSHIRE AVE	LAHD	X					
226-230 N NEW HAMPSHIRE AVE	LAHD	X					
232-234 N NEW HAMPSHIRE AVE	LAHD	X					
236-238 N NEW HAMPSHIRE AVE	LAHD	X					
240 N NEW HAMPSHIRE AVE	LAHD	X					
2003-2027 S OAK ST/904 W 20TH ST	<i>Not Extant</i> LAHD				X		
10526 PACE AVE	LAHD		X				X

CITY OF LOS ANGELES

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PROGRAMMATIC AGREEMENT COMPLIANCE REPORT (PACR) TO
CALIFORNIA STATE HISTORIC PRESERVATION OFFICER
AND ADVISORY COUNCIL ON HISTORIC PRESERVATION

3.1 SUMMARY OF ACTIVITIES

ADDRESS	DEPT	DOE	PROJ REV	AE RES	ARCHEO	EXEMPT	Review Complete
603-607 S PARK VIEW ST/2400-2416 W 6TH ST	CDD		X				X
2100 S PORTLAND ST	LAHD	X					X
252 S RAMPART BLVD	LAHD	X			X		X
610-630 S SAINT LOUIS ST	LAHD		X				
1545 N SAN FERNANDO RD	LAHD		X				
1544 N SERRANO AVE	LAHD	X					X
1554 N SERRANO AVE	LAHD	X					X
1600-1606 N SERRANO AVE	LAHD	X					X
1608 N SERRANO AVE	LAHD	X					X
20750 W SHERMAN WY	<i>Not Extant</i> LAHD				X		X
3101 W VENICE BLVD/1547 S ARLINGTON AVE	<i>Not Extant</i> LAHD				X		X
211-241 N VERMONT	LAHD	X					
215 N VERMONT AVE	LAHD				X		
721-729 E WASHINGTON BLVD	LAHD	X					X
722-736 E WASHINGTON BLVD	LAHD		X		X		X
722 E WASHINGTON BLVD	LAHD	X					X
726 E WASHINGTON BLVD	LAHD	X					X
732 E WASHINGTON BLVD	LAHD	X					X

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3.1 SUMMARY OF ACTIVITIES

ADDRESS	DEPT	DOE	PROJ REV	AE RES	ARCHEO	EXEMPT	Review Complete
736 E WASHINGTON BLVD	LAHD	X					X
6558-6572 1/2 S WEST BLVD	LAHD				X		X
6558 S WEST BLVD	LAHD	X					X
6560 S WEST BLVD	LAHD	X					X
3015-3031 1/2 S WEST VIEW ST	LAHD				X		X
3015 S WEST VIEW ST	LAHD	X					X
3017-3017 1/2 S WEST VIEW ST	LAHD	X					X
3019-3019 1/2 S WEST VIEW ST	LAHD	X					X
3023-3023 1/2 S WEST VIEW ST	LAHD	X					X
3025-3025 1/2 S WEST VIEW ST	LAHD	X					X
3027-3031 1/2 S WEST VIEW ST	LAHD	X					X
3011 S WESTERN AVE	CDD		X				X
3830 S WESTSIDE AVE	LAHD	X					X
1750 E 1ST ST	<i>Not Extant</i> LAHD		X		X		X
2407-2421 E 1ST ST	LAHD		X		X		
2407-2411 1/2 E 1ST ST	LAHD	X					X
2415-2417 E 1ST ST	LAHD	X					X
2419-2421 1/2 E 1ST ST	LAHD	X					X

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PROGRAMMATIC AGREEMENT COMPLIANCE REPORT (PACR) TO CALIFORNIA STATE HISTORIC PRESERVATION OFFICER AND ADVISORY COUNCIL ON HISTORIC PRESERVATION

3.1 SUMMARY OF ACTIVITIES

ADDRESS	DEPT	DOE	PROJ REV	AE RES	ARCHEO	EXEMPT	Review Complete
112 S 5TH ST	LAHD		X				
1901-1919 W 6TH ST/515 S BONNIE BRAE AVE	<i>Not Extant</i> LAHD				X		X
749 20TH ST	LAHD	X					X
732 E 20TH ST	LAHD	X					X
740 E 20TH ST	LAHD	X					X
741 E 20TH ST	LAHD	X					X
748 E 20TH ST	LAHD	X					X
756 E 20TH ST	LAHD	X					X
757 E 20TH ST	LAHD	X					X
807 E 20TH ST	LAHD	X					X
815 E 20TH ST	LAHD	X					X
912 W 20TH ST	LAHD	X					X
916 W 20TH ST	LAHD	X					X
722 E 20TH ST	LAHD	X					X
1036-1046 E 35TH ST/3501-3515 S CENTRAL AVE	LAHD				X		
1036-1038 E 35TH ST	LAHD	X					X
3341 W 43RD PL	CDD		X				
1848 W 91ST PL	LAHD	X					X

CITY OF LOS ANGELES

JANUARY 31, 2014

PROGRAMMATIC AGREEMENT COMPLIANCE REPORT (PACR) TO
CALIFORNIA STATE HISTORIC PRESERVATION OFFICER
AND ADVISORY COUNCIL ON HISTORIC PRESERVATION

3.1 SUMMARY OF ACTIVITIES

ADDRESS	DEPT	DOE	PROJ REV	AE RES	ARCHEO	EXEMPT	Review Complete
210 W 105TH ST	LAHD	×					×

Appendix B

CITY OF LOS ANGELES

JANUARY 31, 2014

PROGRAMMATIC AGREEMENT COMPLIANCE REPORT (PACR) TO CALIFORNIA STATE HISTORIC PRESERVATION OFFICER AND ADVISORY COUNCIL ON HISTORIC PRESERVATION

3.2 IDENTIFICATION AND EVALUATION OF HISTORIC PROPERTIES

ADDRESS STIPULATION	PREV EVAL DATE	CITY EVAL DATE	YEAR CONSTRUCTED
10019-10035 S ALAMEDA ST <i>VI.D.2 Not Eligible as determined by City.</i>	6Y	8/24/2013	1930. 1968 (E) Tax Assessor
10127 S ALAMEDA ST <i>VI.D.2 Not Eligible as determined by City.</i>	6Y	8/24/2013	1947 (E) Tax Assessor
10211 S ALAMEDA ST <i>VI.D.2 Not Eligible as determined by City.</i>	6Y	8/24/2013	1960. 1946. 1970 (E) Tax Assessor
10229 S ALAMEDA ST <i>VI.D.2 Not Eligible as determined by City.</i>	6Y	8/24/2013	1947. 1949 (E) Tax Assessor
126-130 N AVENUE 57 <i>VI.D.1.a SHPO concurs with City determination of Eligibility.</i>	2D2	10/14/2013	1901. 1951 (E) Tax Assessor
132-136 N AVENUE 57 <i>VI.D.1.a SHPO concurs with City determination of Eligibility.</i>	2D2	10/14/2013	1900. 1925 (E) Tax Assessor
138 N AVENUE 57 <i>VI.D.1.a SHPO concurs with City determination of Eligibility.</i>	2D2	10/14/2013	1900 (E) Tax Assessor
251 S BERENDO ST <i>Project canceled before City's determination of Eligibility submitted to SHPO.</i>	2D2	12/12/2013	1924 (F) Building Permit
3754 S BUCKINGHAM RD <i>VI.D.2 Not Eligible as determined by City.</i>	6Y	10/2/2013	1945 (F) Building Permit
8781 CATTARAUGUS AVE <i>VI.D.2 Not Eligible as determined by City.</i>	6Y	9/12/2013	1953 (F) Building Permit
900 S CRENSHAW BLVD <i>VI.D.2 Not Eligible as determined by City.</i>	6Y	11/8/2013	1921/1963 (F) Building Permits
906 S CRENSHAW BLVD <i>VI.D.2 Not Eligible as determined by City.</i>	6Y	11/8/2013	1921 (F) Building Permit

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ADDRESS STIPULATION	PREV EVAL DATE	CITY EVAL DATE	YEAR CONSTRUCTED
4121-4123 N EAGLE ROCK BLVD <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/22/2013	1920/1928/1948 (E) Tax Assessor
13951 GARBER ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/2/2013	1953 (F) Building Permit
10626 S GRAMERCY PL <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 8/29/2013	1940 (F) Building Permit
9800 GRAPE ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 8/24/2013	1955 (F) Building Permit
1601 N HOBART BLVD <i>Project canceled prior to City's determination of eligibility submitted to SHPO.</i>		2S2 11/21/2013	1921 (F) Building Permit
2646 W JAMES M WOOD BLVD <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 11/8/2013	1905 (E) Tax Assessor
1010 E JEFFERSON BLVD <i>VI.B Previously listed on the National Register.</i>	1S 3/17/2009	11/8/2013	1934 (F) Building Permit
551 S KINGSLEY DR <i>City's determination of Eligibility to be submitted to SHPO</i>		2S2 11/8/2013	1911 (E) Tax Assessor
11642 KLING ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 9/12/2013	1949 (F) Building Permit
7843 N LANKERSHIM BLVD <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/22/2013	1957 (E) Tax Assessor
320-340 N MADISON AVE/335 N WESTMORELAND AVE <i>Exempt from review.</i>		12/3/2013	1965/1968/1991 Building Permits
200 N NEW HAMPSHIRE AVE <i>City's determination of Eligibility to be submitted to SHPO</i>		2D2 8/14/2013	1923 (F) Building Permit

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3.2 IDENTIFICATION AND EVALUATION OF HISTORIC PROPERTIES

ADDRESS STIPULATION	PREV EVAL DATE	CITY EVAL DATE	YEAR CONSTRUCTED
206 N NEW HAMPSHIRE AVE <i>City's determination of Eligibility to be submitted to SHPO</i>		2D2 8/14/2013	1923 (F) Building Permit
210-212 N NEW HAMPSHIRE AVE <i>City's determination of Eligibility to be submitted to SHPO</i>		2D2 8/14/2013	1923 (F) Building Permit
216-218 N NEW HAMPSHIRE AVE <i>City's determination of Eligibility to be submitted to SHPO</i>		2D2 8/14/2013	1922 (F) Building Permit
222-224 N NEW HAMPSHIRE AVE <i>City's determination of Eligibility to be submitted to SHPO</i>		2D2 8/14/2013	1922 (F) Building Permit
226-230 N NEW HAMPSHIRE AVE <i>City's determination of Eligibility to be submitted to SHPO</i>		2D2 8/14/2013	1922 (F) Building Permit
232-234 N NEW HAMPSHIRE AVE <i>City's determination of Eligibility to be submitted to SHPO</i>		2D2 8/14/2013	1922 (F) Building Permit
236-238 N NEW HAMPSHIRE AVE <i>City's determination of Eligibility to be submitted to SHPO</i>		2D2 8/14/2013	1922 (F) Building Permit
240 N NEW HAMPSHIRE AVE <i>City's determination of Eligibility to be submitted to SHPO</i>		2D2 8/14/2013	1921 (F) Building Permit
2100 S PORTLAND ST VI.B <i>Previously listed on the National Register.</i>	1D 9/27/1991	11/8/2013	1902 (F) NRHP
252 S RAMPART BLVD VI.C <i>Determined Not Eligible in an evaluation within the past five years.</i>	6U 5/4/2009	10/14/2013	1913 (E) Tax Assessor
1544 N SERRANO AVE VI.B <i>Previously listed on the National Register.</i>	1S 9/16/2010	11/21/2013	1925 (F) NRHP
1554 N SERRANO AVE VI.B <i>Previously listed on the National Register.</i>	1S 9/16/2010	11/21/2013	1921 (F) NRHP

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3.2 IDENTIFICATION AND EVALUATION OF HISTORIC PROPERTIES

ADDRESS STIPULATION	PREV EVAL DATE	CITY EVAL DATE	YEAR CONSTRUCTED
1600-1606 N SERRANO AVE <i>VI.D.2 Not Eligible as determined by City.</i>	6Y 4/17/1994	6Y 11/21/2013	1920 (F) Building Permit
1608 N SERRANO AVE <i>VI.D.2 Not Eligible as determined by City.</i>	6Y 4/17/1994	6Y 11/21/2013	1953 (F) Building Permit
211-241 N VERMONT <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 8/14/2013	1950/1986 (F) Building Permits
721-729 E WASHINGTON BLVD <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2S2 12/30/2013	1923/1930 (F) Building Permit
722 E WASHINGTON BLVD <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 9/20/2013	1930 (E) Tax Assessor
726 E WASHINGTON BLVD <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 8/14/2013	1925 (E) Tax Assessor
732 E WASHINGTON BLVD <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 8/14/2013	1957 (F) Building Permit
736 E WASHINGTON BLVD <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 8/14/2013	1923 (E) Tax Assessor
6558 S WEST BLVD <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/14/2013	1948 (E) Tax Assessor
6560 S WEST BLVD <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/14/2013	1964 (E) Tax Assessor
3015 S WEST VIEW ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/14/2013	1929 (E) Tax Assessor
3017-3017 1/2 S WEST VIEW ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/14/2013	1929 (F) Building Permit

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3.2 IDENTIFICATION AND EVALUATION OF HISTORIC PROPERTIES

ADDRESS STIPULATION	PREV EVAL DATE	CITY EVAL DATE	YEAR CONSTRUCTED
3019-3019 1/2 S WEST VIEW ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/14/2013	1929 (F) Building Permit
3023-3023 1/2 S WEST VIEW ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/14/2013	1934 (E) Tax Assessor
3025-3025 1/2 S WEST VIEW ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/14/2013	1929 (F) Building Permit
3027-3031 1/2 S WEST VIEW ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/14/2013	1924 (E) Tax Assessor
3830 S WESTSIDE AVE <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 9/12/2013	1941 (F) Building Permit
2407-2411 1/2 E 1ST ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 8/14/2013	1905/1912 (F) Building Permit
2415-2417 E 1ST ST <i>VI.B Previously determined Eligible for listing on the National Register.</i>	2S2 12/5/2001	8/14/2013	1895 (E) Tax Assessor
2419-2421 1/2 E 1ST ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 8/14/2013	1890 (E) Tax Assessor
749 20TH ST <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2D2 12/30/2013	1902 (E) Tax Assessor
732 E 20TH ST <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2D2 12/30/2013	1901 (E) Tax Assessor
740 E 20TH ST <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2D2 12/30/2013	1910 (E) Tax Assessor

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3.2 IDENTIFICATION AND EVALUATION OF HISTORIC PROPERTIES

ADDRESS STIPULATION	PREV EVAL DATE	CITY EVAL DATE	YEAR CONSTRUCTED
741 E 20TH ST <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2D2 12/30/2013	1902 (E) Tax Assessor
748 E 20TH ST <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2D2 12/30/2013	1901 (E) Tax Assessor
756 E 20TH ST <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2D2 12/30/2013	1901 (E) Visual Inspection
757 E 20TH ST <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2D2 12/30/2013	1901 (E) Tax Assessor
807 E 20TH ST <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2D2 12/30/2013	1903 (E) Tax Assessor
815 E 20TH ST <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2D2 12/30/2013	1903 (E) Tax Assessor
912 W 20TH ST <i>VI.B Previously listed on the National Register.</i>	1D 7/22/1991	11/8/2013	1903 (F) NRHP
916 W 20TH ST <i>VI.B Previously listed on the National Register.</i>	1D 7/22/1991	11/8/2013	1904 (F) NRHP
722 E 20TH ST <i>VI.D.1.c SHPO does not respond within 15 days; City assumes SHPO does not object to City determination.</i>		2S2 12/30/2013	1903 (E) Tax Assessor

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3.2 IDENTIFICATION AND EVALUATION OF HISTORIC PROPERTIES

ADDRESS STIPULATION	PREV EVAL DATE	CITY EVAL DATE	YEAR CONSTRUCTED
1036-1038 E 35TH ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 11/8/2013	c1920 (E) Map Research
1848 W 91ST PL <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 8/29/2013	1941 (F) Building Permit
210 W 105TH ST <i>VI.D.2 Not Eligible as determined by City.</i>		6Y 10/22/2013	1947 (F) building permit

Appendix C

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3.3 TREATMENT OF HISTORIC PROPERTIES

ADDRESS
STIPULATION

UNDERTAKING

634-640 S ALVARADO ST <i>Review pending.</i>	Rehabilitation - Option 1
1115 S ALVARADO ST <i>Conforms to Standards, with conditions; project being monitored for conformance.</i>	Rehabilitation - Option 1
1129 S ALVARADO ST <i>Conforms to Standards, with conditions; project being monitored for conformance.</i>	Rehabilitation - Option 1
401-449 N AVENUE 19 <i>Review pending.</i>	Rehabilitation - Option 1
251 S BERENDO ST <i>Project canceled prior to work beginning.</i>	New Construction and Relocation
900-924 N BROADWAY/215-219 W COLLEGE STREET <i>VII.F.1.b Conforms to Standards.</i>	New Construction and Relocation
BROADWAY BETWEEN 2ND ST AND OLYMPIC BLVD <i>Conforms to Standards, with conditions; project being monitored for conformance.</i>	New Construction and Relocation
811-825 S CARONDELET ST <i>Review pending.</i>	<i>Not Extant</i> New Construction and Relocation
664 S CATALINA ST <i>Project canceled prior to work beginning.</i>	Rehabilitation - Option 1
4219-4263 S CENTRAL AVE <i>VII.B.1.b Conforms to Standards, with conditions.</i>	Rehabilitation - Option 1 New Construction and Relocation
4225 S CENTRAL AVE <i>VII.B.1.b Conforms to Standards, with conditions.</i>	Rehabilitation - Option 1
900-906 S CRENSHAW BLVD/540-542 S KINGSLEY DR <i>Review pending.</i>	New Construction and Relocation

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3.3 TREATMENT OF HISTORIC PROPERTIES

ADDRESS
STIPULATION

UNDERTAKING

929 CYPRESS AVE

Conforms to Standards, with conditions; project being monitored for conformance.

Rehabilitation - Option 1

1040-1058 S DOREEN PL/1002-1012 E ELKGROVE AVENUE

Conforms to Standards, with conditions; project being monitored for conformance.

Rehabilitation - Option 2 - IRC

9800 GRAPE ST

VII.F.1.b Conforms to Standards.

New Construction and Relocation

1601-1605 N HOBART BLVD/1600-1602 N SERRANO AVE

Project canceled prior to work beginning.

New Construction and Relocation

5400 HOLLYWOOD BLVD

VII.F.1.b Conforms to Standards.

Not Extant

New Construction and Relocation

5712 MARMION WY/124 N AVENUE 59

VII.F.1.b Conforms to Standards.

New Construction and Relocation

10526 PACE AVE

Project canceled prior to work beginning.

Rehabilitation - Option 1

603-607 S PARK VIEW ST/2400-2416 W 6TH ST

Conforms to Standards, with conditions; project being monitored for conformance.

Rehabilitation - Option 1

610-630 S SAINT LOUIS ST

VII.C.1.a Phase 1 Conforms to Standards. Review is pending for Phase 2.

Rehabilitation - Option 2 - IRC

1545 N SAN FERNANDO RD

Conforms to Standards, with conditions; project being monitored for conformance.

Relocation of Historic Properties

722-736 E WASHINGTON BLVD

VII.B.1.a Conforms to Standards.

Rehabilitation - Option 1
New Construction and Relocation

3011 S WESTERN AVE

Conforms to Standards, with conditions; project being monitored for conformance.

Rehabilitation - Option 1
New Construction and Relocation

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3.3 TREATMENT OF HISTORIC PROPERTIES

ADDRESS
STIPULATION

UNDERTAKING

1750 E 1ST ST

Not Extant

New Construction and Relocation

VII.F.1.b Conforms to Standards.

2407-2421 E 1ST ST

Relocation of Historic Properties

VII.D.1 SHPO does not respond within 15 days; City assumes SHPO agrees to proposed relocation.

112 S 5TH ST

Rehabilitation - Option 2 - IRC

Conforms to Standards, with conditions; project being monitored for conformance.

3341 W 43RD PL

Rehabilitation - Option 1

Conforms to Standards, with conditions; project being monitored for conformance.

Appendix D

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3.4 RESOLUTION OF ADVERSE EFFECTS

ADDRESS
STIPULATION

UNDERTAKING

500-502 S MAIN ST

REHABILITATION - OPTION 1

Project being monitored for conformance.

Appendix E

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3.5 CONSIDERATION AND TREATMENT OF ARCHAEOLOGICAL RESOURCES

ADDRESS
STIPULATION

13366-13368 W BEACH AVE

X.D.2 *Phase I survey does not identify presence of resource.*

3314-3330 W BEVERLY BLVD

X.D.2 *Phase I survey does not identify presence of resource.*

900-906 S CRENSHAW BLVD/540-542 S KINGSLEY DR

X.C *Information Center does not identify presence of resource.*

4121-4123 N EAGLE ROCK BLVD

X.C *Information Center does not identify presence of resource.*

9800 GRAPE ST

X.C *Information Center does not identify presence of resource.*

1601-1605 N HOBART BLVD/1600-1602 N SERRANO AVE

X.C *Information Center does not identify presence of resource.*

5400 HOLLYWOOD BLVD

X.C *Information Center does not identify presence of resource.*

7843 N LANKERSHIM BLVD

X.C *Information Center does not identify presence of resource.*

320-340 N MADISON AVE/335 N WESTMORELAND AVE

X.C *Information Center does not identify presence of resource.*

5712 MARMION WY/124 N AVENUE 59

X.D.2 *Phase I survey does not identify presence of resource.*

3500 N MARMION WY

X.D.2 *Phase I survey does not identify presence of resource.*

2003-2027 S OAK ST/904 W 20TH ST

X.C *Information Center does not identify presence of resource.*

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3.5 CONSIDERATION AND TREATMENT OF ARCHAEOLOGICAL RESOURCES

ADDRESS
STIPULATION

252 S RAMPART BLVD

X.D.2 *Phase I survey does not identify presence of resource.*

20750 W SHERMAN WY

X.D.2 *Phase I survey does not identify presence of resource.*

3101 W VENICE BLVD/1547 S ARLINGTON AVE

X.D.2 *Phase I survey does not identify presence of resource.*

215 N VERMONT AVE

X.C *Information Center does not identify presence of resource.*

722-736 E WASHINGTON BLVD

X.C *Information Center does not identify presence of resource.*

6558-6572 1/2 S WEST BLVD

X.C *Information Center does not identify presence of resource.*

3015-3031 1/2 S WEST VIEW ST

X.C *Information Center does not identify presence of resource.*

1750 E 1ST ST

X.D.2 *Phase I survey does not identify presence of resource.*

2407-2421 E 1ST ST

X.C *Information Center does not identify presence of resource.*

1901-1919 W 6TH ST/515 S BONNIE BRAE AVE

X.C *Information Center does not identify presence of resource.*

1036-1046 E 35TH ST/3501-3515 S CENTRAL AVE

X.C *Information Center does not identify presence of resource.*

Appendix F

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3.6 UNDERTAKINGS NOT REQUIRING REVIEW

ADDRESS
STIPULATION

320-340 N MADISON AVE/335 N WESTMORELAND AVE

III.A No review required; property is less than 50 years old.



Phase One Environmental Site Assessment

Future Coronel Village Apartments
1601 North Hobart Boulevard and
1600-1608 North Serrano Avenue
Los Angeles, California 90027

Prepared for:

Hollywood Community Housing Corporation
5020 West Santa Monica Boulevard
Los Angeles, California 90029

Prepared by:

Pacific Environmental Company
28202 Cabot Road, Suite 300
Laguna Niguel, California 92677

April 26, 2013

Project Number: 13049

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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,



Armen Makasjian
Certified General Appraiser
Lic. #AG018345

EXHIBIT A

Old Town Calabasas 75 Unit Affordable Senior Housing Pro Forma

9% Tax Credits - 2007 Basis Cap

11-Dec-07

2007 TCAC Basis Cap

75
74 One Bed
1 Two Bed

Total Proposed Units	75
Site Area	42,176 SqFt
Residential Area:	
1st Floor	18,255 SqFt
2nd Floor	18,014 SqFt
3rd Floor	16,664 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 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 (35 Yr)	\$2,358,338
--------------------------------	-------------

Owner Equity	\$11,078
Investor Equity - Tax Credits	\$11,866,411
Total Equity	\$11,877,489

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

#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 Haines*

Exhibit 1



Gary Benjamin <gary.benjamin@lacity.org>

Re: We are on. Urgent

Gary Benjamin <gary.benjamin@lacity.org>

Thu, Mar 20, 2014 at 11:28 AM

To: Marie Rumsey <marie.rumsey@lacity.org>

Cc: Maura Johnson <mjohnson@hollywoodhousing.org>

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.

DGH: Distribution: W-3-1
Previous Editions are Obsolete

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
(213) 808-8957

PREPARED BY:

ICF International
601 West 5th Street, Suite 900
Los Angeles, CA 90071
Contact: Christopher Hetzel
(213) 312-1800

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.

Chapter 2

Methodology

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
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

[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 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,

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.



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
[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



Dr. Robert K. Manford Environmental Affairs Officer &
Manager, Environmental and Land Use Services Unit
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Housing + Community Investment Department (HCID)
1200 W. 7th Street, 4th Floor
Los Angeles, CA 90017
☎: (213) 744-7363 | ✉: robert.manford@lacity.org

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 Manford <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?



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: 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.



Dr. Robert K. Manford Environmental Affairs Officer &
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Housing + Community Investment Department (HCID)
1200 W. 7th Street, 4th Floor
Los Angeles, CA 90017
☎: (213) 744-7363 | ✉: robert.manford@lacity.org

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.



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

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>

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

Find the Councilmember on Facebook, Twitter and YouTube!



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>

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 it's 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

Find the Councilmember on Facebook, Twitter and YouTube!



Gary Benjamin <gary.benjamin@lacity.org>

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

Gary Benjamin <gary.benjamin@lacity.org>

Fri, Jun 19, 2015 at 12:23 PM

To: Maura Johnson <mjohnson@hollywoodhousing.org>

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>

Tue, Jun 9, 2015 at 4:27 PM

To: Maura Johnson <mjohnson@hollywoodhousing.org>

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 McAniff 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

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Cell: (213) 265-6353

gary.benjamin@lacity.org

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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
Cell: (213) 265-6353
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>

Tue, Jun 2, 2015 at 12:02 PM

To: Maura Johnson <mjohnson@hollywoodhousing.org>

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.

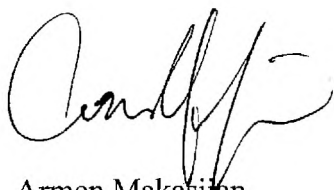
- Trash Removal:

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', with a stylized flourish at the end.

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 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 (35 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)	0.88
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	\$ 122,592

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