

LATHAM & WATKINS LLP

July 29, 2015

VIA EMAIL AND HAND DELIVERY

Los Angeles City Council
City Hall
200 North Spring Street, Room 360
Los Angeles, CA 90012
Attn: Holly Wolcott, City Clerk

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Re: Coronel Apartments Project (Council File No. 15-0790); Case Nos. CPC-2010-1554-DB-SPP; ENV 2012-110-EIR

Dear Honorable Councilmembers::

On behalf of Hollywood Community Housing Corporation (“HCHC”), we write in response to allegations made during the Planning and Land Use Management (“PLUM”) Committee’s consideration of HCHC’s proposed Coronel Apartments Project (the “Project”) at its July 28, 2015, meeting. We appreciate the Committee’s unanimous recommendation that Council deny the appeals filed against the Project. However, we must correct the record regarding several inaccurate statements that were made during the PLUM Committee’s hearing.

- First, appellant William Zide referred to a letter he submitted to the PLUM Committee this week contending that the Project Site is located outside of the CRA/LA East Hollywood/Beverly Normandie Project Area, and therefore that the building located at 1601 N. Hobart Boulevard (“Hobart Structure”) was never surveyed by CRA/LA as part of any survey to identify potential historic resources in the area. Mr. Zide’s claim is wrong. The portion of the Project Site containing the Hobart Structure **is located entirely within the CRA/LA East Hollywood/Beverly Normandie Project Area**, and therefore should have been evaluated in any CRA/LA historic resource surveys covering the Project Area. *See, e.g.,* Draft EIR, Appendix B at 43.¹ We have neither seen evidence nor been provided with any rationale why a property clearly located within the CRA/LA’s Project Area would have been excluded from a survey of potential resources.² Regardless of Mr. Zide’s claims, as described in detail in our July 22, 2015, submittal, the Hobart Structure does not fall within the Hollywood Redevelopment Plan’s definition of a building with historical or architectural significance: “Buildings listed as Cultural-

¹ A map of the CRA/LA East Hollywood/Beverly Normandie Project Area is available at http://www.crala.org/internet-site/Projects/East_Hollywood/upload/East-Hollywood-Map-in-PDF.pdf.

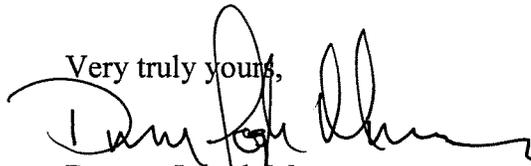
² We note that we have not been able to review a copy of the letter Mr. Zide said he submitted to the PLUM Committee, so this letter can respond only to the statements Mr. Zide made at yesterday’s PLUM Committee hearing.

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Historic Monuments by the City and listed in, determined or appear [sic] to be eligible for listing in the National Register of Historical Places.” Because the Hobart Structure is not a Cultural-Historic Monument and has not been determined to be eligible for the National Register by any governmental entity with review authority over the Project or the property, there is no Hollywood Redevelopment Plan requirement to preserve the Hobart Structure.

- Second, certain Project opponents asserted that alleged new information about the owner of the Hobart Structure and a police raid on the house in the 1920s demonstrate that the Hobart Structure has historic significance and should be preserved. This information does not change the Environmental Impact Report’s (“EIR”) conclusion that **the Hobart Structure is not a historic resource under CEQA**, or the Cultural Heritage Commission’s unanimous determination that **this building does not meet the criteria for a Historic Cultural Monument**. The EIR provided a detailed description of the occupancy and ownership history of the Hobart Structure, including information about the original owners, and none of those individuals were determined to be historically significant. *See* Draft EIR at IV.G-22 to IV.G-25. Accordingly, information about the Hobart Structure’s ownership was known prior to the Cultural Heritage Commission’s determination. Further, the fact that a police raid occurred at the Hobart Structure in the 1920s due to illegal activities happening in the house has no effect on history; simply put, the occurrence of a generic police raid does not constitute a historically significant event.
- Finally, certain Project opponents claimed that the pro formas submitted by HCHC on July 22, 2015, demonstrate that a reduced project alternative is financially feasible. That is not true. As described in the July 21, 2015, letter from The Sotelo Group, who provided an independent, third-party review of the Project’s Cost Analysis and pro formas, **the pro formas demonstrate that the density bonus incentives requested by HCHC are necessary to make the Project financially feasible**. Further, Ms. Dalila Sotelo testified during the PLUM Committee hearing that the opponents’ claims were wrong—and that an alternative project without the requested density bonus incentives would be financially infeasible.

We appreciate the opportunity to respond to these comments and correct the record on these issues. We will bring hard copies of this letter to today’s Council meeting, and will be happy to answer any questions you may have.

Very truly yours,

Duncan Joseph Moore
of LATHAM & WATKINS^{LLP}

cc: Gary Benjamin, Council District 13
Bill Harris and Maura Johnson, Hollywood Community Housing Corporation
Christopher Murray, Rosenheim & Associates, Inc.
Shane Parker, Parker Environmental Consultants