



DEPARTMENT OF CITY PLANNING

STAFF RECOMMENDATION REPORT

Central Area Planning Commission

Date: October 22, 2024
Time: After 4:30 p.m.*
Place: 200 South Spring Street
10th Floor, Room 1010
Los Angeles, CA 90012

Public Hearing: Required

Expiration Date: November 9, 2024

PROJECT LOCATION: 252 South June Street,
Los Angeles CA 90004

PROPOSED PROJECT: Demolition of an existing two-story, 3,454-square-foot single-family residence and detached garage on a Contributing lot in the Hancock Park Historic Preservation Overlay Zone.

REQUESTED ACTION: 1. Pursuant to Los Angeles Municipal Code (LAMC) Section 13B.8.6, a Certificate of Appropriateness for Demolition, and
2. Pursuant to California Environmental Quality Act (CEQA) Guidelines, an Exemption from CEQA pursuant to CEQA Guidelines, Section 15301, Class 1, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

Case No.: DIR-2024-5160-COA
CEQA No.: ENV-2024-5161-CE
Incidental Cases: None
Related Cases: None
Council No.: 5 - Yaroslavsky
Plan Area: Wilshire
Neighborhood: Greater Wilshire
Council:
Zone: RE11-1-HPOZ
Legal Description: Lot 326,
Tract 8320

Applicant: Elliott Liebhard

Representative: Suren Vardanyan

RECOMMENDED ACTION:

1. **Deny**, pursuant to Los Angeles Municipal Code (LAMC) Section 13B.8.6, a Certificate of Appropriateness for Demolition,
2. **Find** that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15061(b)(4) and 15270, as a Project that is disapproved*, and
3. **Adopt** the attached Findings.

*Pursuant to Public Resources Code Section 21080(b)(5), CEQA does not apply to "projects which a public agency rejects or disapproves."

VINCENT P. BERTONI, AICP
Director of Planning



Ken Bernstein, AICP
Principal City Planner



Christina Park
City Planner



Shannon Ryan
Senior City Planner



Suki Gershenhorn, City Planning Associate
(213) 847-3675

TABLE OF CONTENTS

Project Analysis.....	Page 4
Decision Body	
Project Description	
Subject Property	
Background	Page 5
Public Hearing	Page 6
Findings	Page 7
Conclusion.....	Page 8
Exhibits:	
Exhibit A: Project Plans	
Exhibit B: Historical Resource Assessment Report	
Exhibit C: Field Observation Report	
Exhibit D: Economic Feasibility Analysis	
Exhibit E: Cost Breakdown	
Exhibit F: Notice of Exemption	
Exhibit G: Historic Resources Survey Page	
Exhibit H: LAMC Section 13B.8.6	

ADVICE TO PUBLIC: * The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 532, City Hall, 200 North Spring Street, Los Angeles, CA 90012 (Phone No. 213-978-1300)*. While all written communications are given to the Commission for consideration, the initial packets are sent to the Commission's Office a week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to the agency at or prior to the public hearing. As a covered entity under Title II of the American Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

1. PROJECT ANALYSIS

DECISION BODY

Pursuant to Section 13B.8.6 of the Los Angeles Municipal Code (LAMC), a request for a Certificate of Appropriateness for Demolition (COA-DEM) is heard by the Area Planning Commission. The decision of the Area Planning Commission is appealable to the City Council.

The majority of cases within the City's historic districts, called Historic Preservation Overlay Zones (HPOZs), are ministerial in nature, and City Staff or the designated HPOZ Board is the decision maker. Known as Conforming Work cases, these are limited to repair, rehabilitation, and minor additions that adhere to the district's Preservation Plan guidelines. Larger or street-visible additions, or infill projects on Non-Contributing lots, require HPOZ entitlements called Certificates of Appropriateness or Certificates of Compatibility. The Director of Planning is the decision maker, and takes input from the designated HPOZ Board as well as the Cultural Heritage Commission designee. The Area Planning Commission is the appellate body for these discretionary cases.

The subject application, a request for a Certificate of Appropriateness for Demolition, is the only HPOZ entitlement for which the Area Planning Commission is the deciding body.

PROJECT DESCRIPTION

The project includes the demolition of an existing two-story, 3,454-square-foot single-family residence and detached garage on a Contributing lot in the Hancock Park Historic Preservation Overlay Zone. Should the COA-DEM be granted, a future application would be filed to develop a new house on the property. That future project is not a part of this request.

SUBJECT PROPERTY

Located within the Hancock Park Historic Preservation Overlay Zone, the approximately 13,351-square-foot site is currently developed with a two-story, 3,454-square-foot Monterey Revival-style house built in 1933. The house is a Contributing Feature (Altered) to the Hancock Park HPOZ. The property was characterized as such due to its alterations that included re-stuccoing the exterior, adding stone veneer wall cladding, and window replacements. The property is still considered a Contributing feature because it was built within the HPOZ's period of significance and the nature and extent of alterations are determined to be reversible by the Historic Resources Survey.

In 2018, the property was damaged in a fire. Per LAMC 13B.8.1.B.2.a, a project for the correction of Emergency or Hazardous Conditions where the Department of Building and Safety, the Housing Department, or other enforcement agency has determined that emergency or hazardous conditions currently exist, and the emergency or hazardous conditions must be corrected in the interest of public health, safety and welfare, is exempt from HPOZ regulations and process. Although the 2018 fire caused significant damage to the interior of the structure, the Los Angeles Department of Building and Safety did not deem the property an Imminent Hazard, instead issuing an abatement order. The property has been unoccupied since, and was purchased in 2022 by the current owner.

The Hancock Park HPOZ is a district of 1,282 parcels, mostly single-family residential, developed with structures built primarily between 1922 and 1956. The district was formally adopted as an HPOZ in 2006. The residential subdivision of Hancock Park was developed by G. Allan Hancock, in the 1920s.

DIR-2024-5160-COA
Certificate of Appropriateness for Demolition Request

Outstanding architects of the era designed the palatial two-story, single-family residences in various Period Revival styles. Physical changes to the exterior of a property are required to be reviewed by the appointed Hancock Park HPOZ Board and/or Department of City Planning Staff, pursuant to the provisions of Los Angeles Municipal Code Section 13B.8.

2. BACKGROUND

The City's local historic districts program aims to identify and protect the distinctive architectural and cultural resources of Los Angeles's historic neighborhoods, or HPOZs. Each property in an HPOZ is designated either as a Contributing Feature or a Non-Contributing Feature. A Contributor is any structure identified by a Historic Resources Survey as contributing to the historic significance of the area. The subject property is classified as a Contributor (Altered), meaning that the property was constructed during the period of significance, and has retained its integrity despite some alterations that have been deemed reversible. Contributors (Altered) are considered to be significant resources and are subject to the same design review guidelines and procedure as Contributing Features.

A Non-Contributing Feature is any structure within the HPOZ that is not identified as a Contributing Feature by a Historic Resources Survey. Generally, a property is classified as non-contributing because it has undergone extensive or irreversible alterations, or the structure was built outside of the HPOZ's Period of Significance. The Period of Significance for the Hancock Park HPOZ is 1922-1956.



Image 1: 252 South June Street, Hancock Park Historic Resources Survey, September 2001.



Image 2: 252 South June Street, Google Street View, July 2022.

Consistent with the Hancock Park Preservation Plan's mission statement goal of "[p]reventing tear downs and extensive demolition of Contributing Buildings," Staff recommends that the property either be rehabilitated or reconstructed in-kind. Both options would fall within the threshold of Conforming Work, a streamlined ministerial action that does not trigger CEQA.

Because the subject property's designation is Contributor (Altered), it will require a COA-DEM entitlement for demolition to be considered.

Per LAMC Section 13B.6.E.1 Standards for Review and Required Findings, "No Certificate of Appropriateness (Demolition, Removal, or Relocation) shall be issued for Demolition, removal, or relocation of any contributing building, structure, Landscaping, Natural Feature or Lot within an HPOZ that is designated as a Contributing Element unless the Owner can demonstrate to the Area Planning Commission that the Owner would be deprived of all economically viable use of the property."

DIR-2024-5160-COA
Certificate of Appropriateness for Demolition Request

A finding threshold of "deprivation of all economically viable use" is high by intent, and should be distinguished from mere diminishment of property value or reduction of the attractiveness or utility of the property to the owner. Deprivation of all economically viable use means that the owner cannot derive any economic benefit from ownership of the property.

As part of the application requirements, the applicant provided reports for the Area Planning Commission to consider, including a Field Observation Report, a Historic Resources Assessment Report, an Economic Feasibility Report, and a Notice of Exemption. These reports are to be used to help the APC determine whether the owner would be deprived of all economically viable use of the property if the demolition request was denied.

The Field Observation Report prepared by Mercado Associates documented extensive fire damage on the property, including structural damage to approximately 80-90% of the primary structure's framing. The report recommends removing the building framing entirely, and testing the strength and damage of the foundation for future use.

The Historic Resources Assessment Report, prepared by Historic Resources Group, determined that rehabilitation is not feasible due to the extent and severity of the fire damage. The report also argues the alterations prior to 2001 compromise the building's integrity as an intact Contributor to the HPOZ. However, the Historic Resources Survey was prepared by a consultant meeting the Secretary of the Interior's Professional Qualification Standards in architectural history, and subsequently certified by the City Council. Evaluation of an application for re-designation of an individual property in an HPOZ from a Contributor to a Non-Contributor, or vice versa, is a separate process known as a Technical Correction. The procedures are outlined in LAMC 13B.8.2.B.3.e. The COA-DEM does not consider a Technical Correction.

The Economic Feasibility Analysis provides a comparison of the costs associated with rehabilitation of the existing structure and its demolition and replacement with the substantially larger single-family residence desired by the owner.

The applicant also submitted a Notice of Exemption Report, which found that the project is eligible for Class 2 Categorical Exemption under CEQA, Guidelines Section 15302. This Categorical Exemption is not applicable, since a replacement project is not part of the scope of the COA-DEM application.

3. PUBLIC HEARING AND CULTURAL HERITAGE COMMISSION AND HPOZ BOARD RECOMMENDATIONS

On September 25, 2024, the Hancock Park HPOZ Board held a public hearing on the subject application. No written or oral comments were received.

With a four-member quorum, the Hancock Park HPOZ Board unanimously recommended approval of the demolition of the primary structure and accessory structure, citing the property as a long-term nuisance in the neighborhood. The HPOZ Board did not comment on whether or not the owner would be deprived of all economically viable use of the property should the demolition request be denied, nor did they consider the economic feasibility of a potential rehabilitation project.

The Cultural Heritage Commission (CHC) designee did not review the project and has therefore forfeited their jurisdiction to make a recommendation on the subject application.

4. FINDINGS

As discussed above, per LAMC Section 13B.8.6.E.1 Standards for Review and Required Findings, “[n]o Certificate of Appropriateness (Demolition, Removal, or Relocation) shall be issued for Demolition, removal, or relocation of any contributing building, structure, Landscaping, Natural Feature or Lot within an HPOZ that is designated as a Contributing Element unless the Owner can demonstrate to the Area Planning Commission that the Owner would be deprived of all economically viable use of the property.”

The applicant is seeking to demolish the single-family house and garage on the property and has provided supporting documentation explaining why the owner would be deprived of all economically viable use of the property unless the Contributing structures are demolished. However, the documentation falls short of making that finding, because the deprivation of all economically viable use does not equate to a decrease in property value, or reduction of attractiveness in the property to the owner, or the denial of the ability to exploit a property right the owner previously believed was available.

The Economic Feasibility Analysis did not provide evidence that denying the request for demolition would deprive the owner of all economically viable use of the property. In fact, the cost breakdown demonstrates that rehabilitation is an overall more cost-effective approach. The cost of demolition and new construction was estimated at \$7,390,600, while the cost of rehabilitation of the historic residence was estimated at \$6,765,440. Not only does the applicant’s analysis fail to demonstrate deprivation of all economically viable use of the property, it actually highlights the comparatively lower financial cost of rehabilitation.

The property’s land value was assessed at \$1,744,441 by the Los Angeles County Assessor in 2022. This benchmark land value will remain intact following any decision on the subject application, and will not change whether the existing home is retained or demolished. Hence, denial of the demolition will not deprive the owner of all economically viable use of the property.

The property is located on a parcel that is zoned R-1. The existing single-family residence is proposed for demolition, and the eventual replacement project will also be a single-family residence. The parcel’s allowable use will not change, and the owner will not be deprived of all economically viable use of the property as a result of not being granted the request for demolition.

The HPOZ Board unanimously recommended granting the request for demolition of the property, citing the property as a long-term nuisance to the neighborhood. The Field Observation Report and Historic Resource Assessment Report demonstrate that the property sustained significant damage in the fire, and the Board’s basis for the recommendation was that the residence in its current state is dangerous and unsightly. Although the Board reviewed the cost analysis provided by the applicant, they did not make the finding that the applicant would be deprived of all economically viable use of the property.

The purpose of the HPOZ ordinance is to protect the historic resources within Los Angeles’s local historic districts. The findings required to justify demolition of a Contributing building are intentionally rigorous and difficult to make. In spite of the substantial damage caused by the fire, staff is unable to make the finding that the property owner would be deprived of all economically viable use of the property without demolition of the Contributing structures on the lot.

5. ENVIRONMENTAL REVIEW

Due to the recommendation of denial of the application, no environmental clearance is recommended for adoption.

CONCLUSION

Staff recommends denial of the Certificate of Appropriateness for Demolition, per Los Angeles Municipal Code (LAMC) Section 13B.8.6, for the demolition of an existing primary structure and accessory structure on a Contributing lot in the Hancock Park HPOZ. Demolition of the existing structures does not meet the threshold of deprivation of all economically viable use of the property.

Exhibit A

NOTE TO PLAN CHECKER AND
BUILDING INSPECTOR

These plans, including conditions of approval, shall be complied with and the height, size, shape, location, texture, color, or material shall not differ from what the Director of Planning has approved under DIR-2021-763-CCMP. Any change to the project shall require review by the Director of Planning and may require additional review by the Historic Preservation Overlay Zone (HPOZ) Board. A request for variation shall be submitted in writing and include a specific notation of the variation(s) requested. Should any change be required by a public agency then such requirement shall be documented in writing.

PROJECT DESCRIPTION:
NEW 2 STORY S.F.D. OVER BASEMENT & DETACHED GARAGE

LIEBHARD Residence

PROJECT: 22LA004

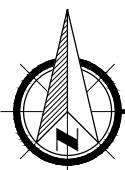
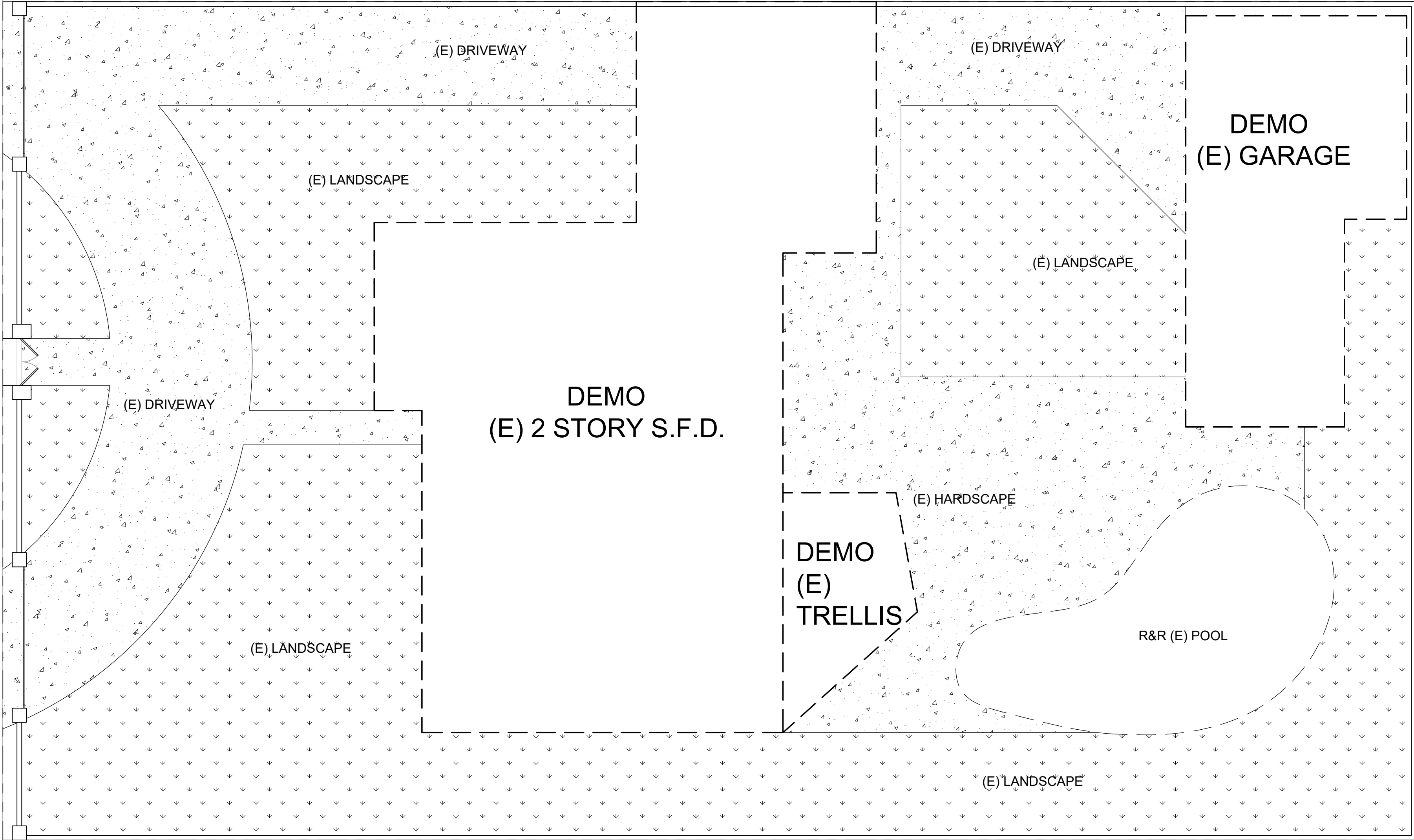
PROJECT ADDRESS:
252 June St., Los Angeles, CA 90004

REV.	DESCRIPTION	DATE

DATE
10/20/2023

SHEET

D-1.0



DEMO PLAN
Scale: 1/8" = 1'-0"

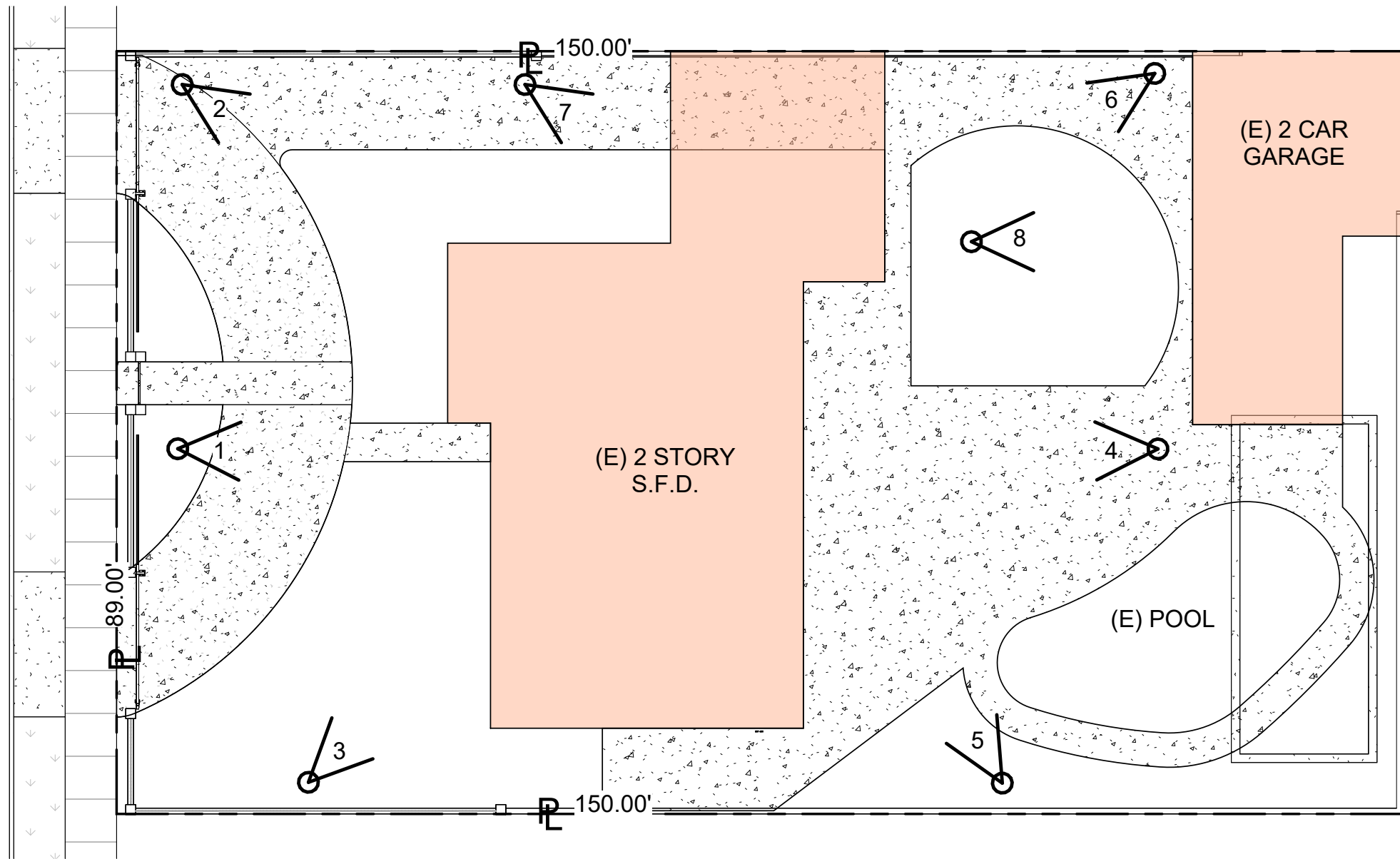
ON SITE VERIFICATION OF ALL DIMENSIONS AND CONDITIONS SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR (SUBCONTRACTOR). SUCH VERIFICATION SHALL BE MADE BEFORE ORDERING MATERIALS, PREFABRICATED ITEMS, AND COMMENCING ANY PORTION OF THE WORK. THESE DRAWINGS, SPECIFICATIONS, IDEAS, DESIGNS, DETAILS AND FINAL ARRANGEMENTS REPRESENTED HERE WITH IN ARE AND SHALL REMAIN THE PROPERTY OF BA-VA, LLC.



1. West View



2. North / West View



1 Existing Site Plan
1/16" = 1'-0"



3. South / West View



4. East View



5. South / East View



6. North / East View



7. North View



8. West View (Accessory Structure)

BA-VA

BAVA, LLC.
info@ba-va.com

NOTE TO PLAN CHECKER AND
BUILDING INSPECTOR

These plans, including conditions of approval, shall be complied with and the height, size, shape, location, texture, color, or material shall not differ from what the Director of Planning has approved under DIR-2021-763-CCMP. Any change to the project shall require review by the Director of Planning and may require additional review by the Historic Preservation Overlay Zone (HPOZ) Board. A request for variation shall be submitted in writing and include a specific notation of the variation(s) requested. Should any change be required by a public agency then such requirement shall be documented in writing.

PROJECT DESCRIPTION:
NEW 2 STORY S.F.D. OVER BASEMENT & DETACHED GARAGE

LIEBHARD Residence

PROJECT: 22LA004

PROJECT ADDRESS:
252 June St., Los Angeles, CA 90004

DATE

DESCRIPTION

REV.

DATE

10/20/2023

SHEET

D-2.0

ON SITE VERIFICATION OF ALL DIMENSIONS AND CONDITIONS SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR (SUBCONTRACTOR). SUCH VERIFICATION SHALL BE MADE BEFORE ORDERING MATERIALS, PREPARING ITEMS, AND COMMENCING ANY PORTION OF THE WORK. THESE DRAWINGS, SPECIFICATIONS, IDEAS, DESIGNS, DETAILS AND FINAL ARRANGEMENTS REPRESENTED HERE WITH IN ARE AND SHALL REMAIN THE PROPERTY OF BA-VA, LLC.

Exhibit B

HISTORIC RESOURCES GROUP

HISTORICAL RESOURCE ASSESSMENT REPORT 252 S. JUNE STREET, LOS ANGELES AUGUST 2022



12 S. Fair Oaks Avenue, Suite 200
Pasadena, CA 91105

Tel 626-793-2400
historicrosourcesgroup.com

prepared for

Elliott Liebhard

252 S. June Street

Los Angeles, CA 90004


TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY	2
2.0 LOCATION.....	3
3.0 PREVIOUS EVALUATIONS/DESIGNATIONS.....	5
HANCOCK PARK HPOZ.....	5
BUILT ENVIRONMENT RESOURCES DIRECTORY (BERD).....	5
4.0 ARCHITECTURAL DESCRIPTION	6
5.0 INTEGRITY ANALYSIS.....	15
6.0 FEASIBILITY ANALYSIS	17
7.0 DISCUSSION OF POTENTIAL IMPACTS.....	18
8.0 RECOMMENDATIONS	19
9.0 SOURCES.....	20
APPENDIX A	21

1.0 EXECUTIVE SUMMARY

The applicant is proposing to demolish the remains of the single-family residence located at 252 South June Street in the City of Los Angeles, which was severely damaged by fire on October 14, 2018 and has remained vacant since. The property is listed as an “altered contributor” to the Hancock Park Historic Preservation Overlay Zone (HPOZ) which was designated by the City of Los Angeles in 2008. The HPOZ is considered an historical resource as defined by the California Environmental Quality Act (CEQA).

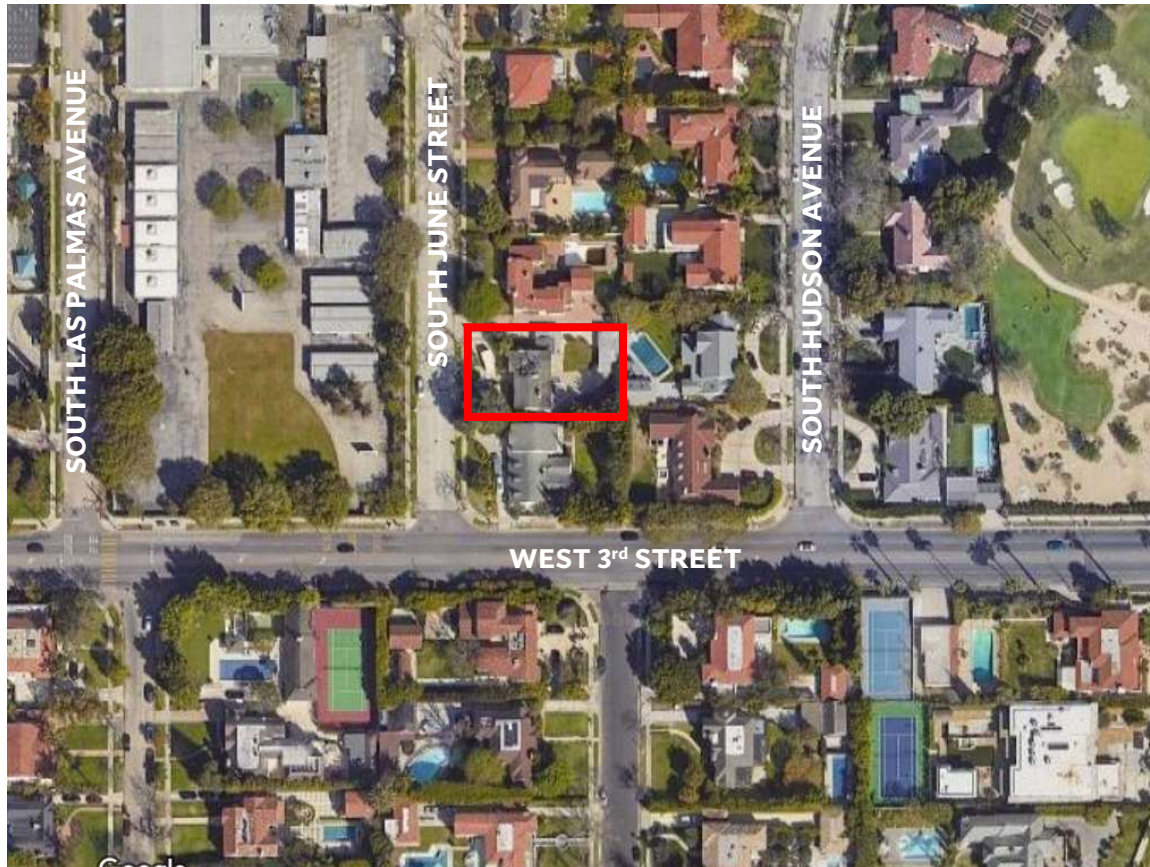
The purpose of this report is to determine if the property at 252 South June Street retains sufficient historic integrity for continued listing as an “altered contributor” to the Hancock Park HPOZ; to evaluate the feasibility of rehabilitating the property in lieu of demolition; and to identify potential impacts of demolition on the Hancock Park HPOZ. This evaluation is based on an observation of existing conditions on the site; the findings of a structural assessment prepared by Mercado Associates, Inc., Structural Engineers; and an analysis under the relevant eligibility criteria and integrity thresholds.

This report has determined that, due to previous alterations and the damage sustained in the 2018 fire, the residence at 252 South June Street does not retain sufficient historic integrity for continued listing as a contributor to the Hancock Park HPOZ; and  rehabilitation is not feasible due to the extent and severity of the damage. Because of the exceptionally high percentage of contributors in the Hancock Park HPOZ, the demolition of 252 South June Street would not substantially alter the ratio of contributors to non-contributors and would have no impact on the district’s historic integrity and significance. The demolition would therefore not result in a significant adverse change to an historical resource as defined by CEQA.

2.0 LOCATION

252 South June Street is located within the designated Hancock Park HPOZ, in the Wilshire Community Plan Area (CPA) of the City of Los Angeles. The HPOZ is generally bounded by Melrose Avenue on the north, Rossmore Avenue on the east, Wilshire Boulevard on the south, and Highland Avenue on the west. 252 South June Street is located on the east side of June Street between 2nd Street and 3rd Street. A location map is included in Figure 1 below; a map of the HPOZ is included in Figure 2 on page 4.

FIGURE 1: LOCATION MAP



252 South June Street outlined in red

FIGURE 2: HANCOCK PARK HPOZ



252 South June Street indicated by red star

3.0 PREVIOUS EVALUATIONS/DESIGNATIONS

Hancock Park HPOZ

252 South June Street is an “altered contributor” to the Hancock Park HPOZ, adopted by City Council in 2008. The Hancock Park Historic Resources Survey was completed by Myra L. Frank and Associates in 2001 and was revised in 2004 and 2006 before it was certified by the Cultural Heritage Commission in 2006. The Survey concluded that “Hancock Park meets the criteria for HPOZ designation because the majority of the buildings are the original structures from the development of this part of Los Angeles, which largely occurred between 1922 and 1956.”¹ The HPOZ includes 1,282 structures and sites, of which 1,113 (86%) were identified as contributing resources.² The period of significance is 1920-1956.

The district is generally composed of two-story, single-family residences on spacious lots. The vast majority of the homes were built during the 1920s in one the Period Revival styles that were popular at the time. The Tudor, English, Spanish Colonial, and Mediterranean Revival styles are the most common, with some representation of the Monterey, American Colonial, and French Revival styles. Although these styles are commonly found throughout Los Angeles, the examples in Hancock Park are set apart by the quality of their design and construction. Streetscapes are distinguished by the continuity of deep setbacks, raised front yards with gentle manicured slopes and mature landscaping, brick or concrete steps and walks, and side driveways generally leading through porte-cochères to detached rear garages.³

Built Environment Resources Directory (BERD)

The California Office of Historic Preservation (OHP) maintains the Built Environment Resource Directory (BERD), a database of previously evaluated resources throughout the state. The BERD contains information only for cultural resources that have been processed through OHP. This includes resources reviewed for eligibility for the National Register of Historic Places and the California Historical Landmarks programs through federal and state environmental compliance laws, and resources nominated under federal and state registration programs. 252 South June Street is not listed in the BERD.⁴

¹ “Hancock Park Preservation Plan,” November 8, 2007, 15.

² “Hancock Park Preservation Plan,” 15.

³ “Hancock Park Preservation Plan,” 18.

⁴ California Office of Historic Preservation, “Built Environment Resource Directory: Los Angeles County,” 2021.

4.0 ARCHITECTURAL DESCRIPTION

The parcel at 252 South June Street is occupied by a single-family residence designed by architect Earl T. Heitschmidt and constructed in 1933. There is a detached accessory structure, formerly a two-car garage, at the rear. The residence is set back from the sidewalk on June Street by a semicircular concrete driveway and planting beds with palm trees and a large cedar. The driveway continues along the north side of the property and under a porte-cochere to the detached former garage, located at the northeast corner of the parcel.

The two-story, Monterey Revival style residence has a roughly rectangular plan, complex massing, and asymmetrical composition. It has a low-pitched cross gable roof with asphalt composition shingle roofing, open eaves with shaped rafter tails, louvered circular gable vents, and two exterior chimneys. A portion of the roof on the north end of the house is missing. The exterior walls are finished in textured cement plaster; the first-floor walls at the northwest corner are veneered in rubble stone. The second floor of the front-facing gable overhangs the first, supported on wood corbels. There is a partial-width covered, cantilevered second-floor balcony on the west (primary) façade, with a metal balustrade and decorative metal frames supporting the roof. Fenestration appears to have consisted primarily of jalousie windows set in wood frames; most windows are now missing and the first-floor openings are boarded with plywood. The primary entrance is asymmetrically located on the west façade and consists of a recessed doorway, now boarded with plywood, accessed by a brick porch with a flat roof and metal balustrade supported on decorative metal frames.

The interior has been almost completely gutted by fire. Some remnants of plaster wall and ceiling finishes and wood casework remain, but the interior consists primarily of exposed, charred wood framing.

Photographs of existing conditions are provided below.

PHOTOGRAPHS OF EXISTING CONDITIONS

Historic Resources Group, August 2022



Image 1: Primary (west) façade, general view southeast from June Street



Image 2: Primary (west) façade, view southeast from driveway



Image 3: Primary (south) façade, view northeast from driveway



Image 4: Collapsed roof, view northeast from June Street



Image 5: Damage on primary (west) façade, view east from driveway



Image 6: Missing doors at primary (south) façade and gutted interior, view southeast from driveway



Image 7: Damage at balcony roof, view northeast from driveway



Image 8: Missing window and gutted interior, view east from driveway

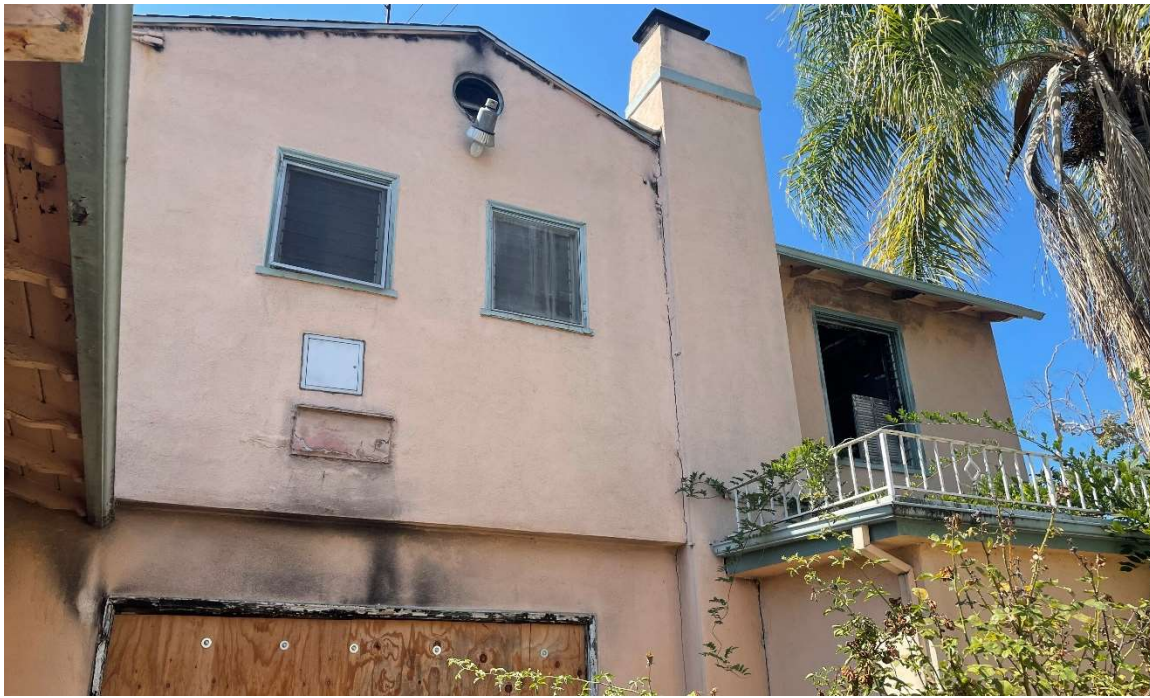


Image 9: North façade, view southwest from driveway



Image 10: Porte-cochère, view east from driveway



Image 11: Rear (east) façade, view west from rear yard



Image 12: Rear (east) façade, view west through missing window to gutted interior and collapsed roof



Image 13: Rear (east) façade, missing windows and smoke-damaged walls

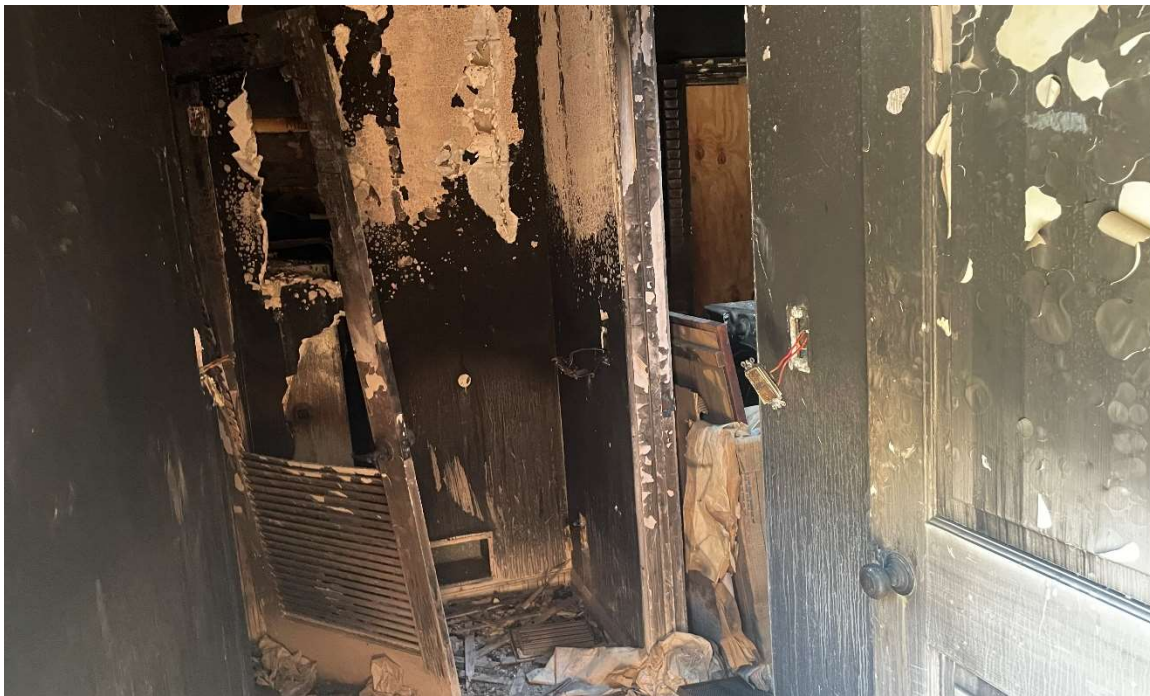


Image 14: Interior, view northwest



Image 15: Interior, view northwest



Image 16: Interior, view southwest

5.0 INTEGRITY ANALYSIS

The residence at 252 South June Street was identified in the Hancock Park Historic Resources Survey as an “altered contributor” to the HPOZ “because it was built within the HPOZ’s period of significance and the nature and extent of alterations are determined to be reversible by the Historic Resources Survey.”⁵

The property had in fact been substantially altered between its initial construction in 1933 and the time the survey was undertaken in 2001. The survey notes that all the building’s windows had been replaced (primarily with incompatible metal-framed jalousie windows); the exterior walls had been re-plastered with an incompatible textured stucco finish; and the first-floor walls at the northwest corner had been veneered in an incompatible, Mid-century Modern style stone. In addition, there were some substantial alterations not noted in the survey findings: a Mid-century Modern style porte-cochère with steel pipe columns and a flat roof was added in 1963;⁶ and it appears that the front entrance porch was added, and the second-floor balcony posts and balustrades replaced. There is no documentation of a porch addition or balcony alterations in the permit record; however, the style of these features and the quality of their design and execution are not compatible with the original 1933 Monterey Revival design by Earl T. Heitschmidt. A covered entrance porch was not a typical feature of the style, and the cantilevered balcony would typically have had simple wood posts and balustrades. The metal lattice supports and minimalist balustrades currently in place are of a style and quality typically found after World War II, and appear to have been installed as part of an attempted “modernization” of the property in the early 1960s, along with the added stone veneer, new porte-cochère, window replacement, and re-plastering of the exterior walls.

Historic integrity is the ability of a property to convey its historic significance and is defined as the “authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s prehistoric or historic period.”⁷ The National Park Service defines seven aspects of integrity for historic resources. These are *location, design, setting, materials, workmanship, feeling, and association*.

The integrity of 252 South June Street is evaluated below based on these seven aspects.


- *Location:* The residence at 252 South June Street remains on its original site and therefore retains integrity of *location*.
- *Design:* As noted above, the residence was already substantially altered by the time it was evaluated in the 2001 survey: the exterior walls had been re-

⁵ City of Los Angeles, Zone Information and Map Access System (ZIMAS).

⁶ City of Los Angeles building permit 44631, August 7, 1963.

⁷ U. S. Department of the Interior, National Park Service, *National Register Bulletin 16A: How to Complete the National Register Nomination Form* (Washington, DC: 1997), 4.

plastered with an incompatible textured stucco; all windows had been replaced, primarily with incompatible jalousie windows; incompatible stone veneer had been added to the primary façade; an incompatible Mid-century Modern style porte-cochere had been added; an incompatible front entrance porch had been added; and the cantilevered front balcony had been altered with incompatible metal trellis supports and balustrade. The building then suffered extensive damage in a 2018 fire; the interior was completely gutted, a portion of the roof collapsed, and the wood framing was badly charred and structurally compromised. The remains of the house no longer reflect its original 1933 Monterey Revival design, and the property therefore no longer retains integrity of *design*.

- *Setting*: The area around 252 South June remains a single-family neighborhood with curvilinear streets, deep setbacks, mature landscaping, and two-story Period Revival homes. It therefore retains integrity of *setting*.
- *Materials*: As noted above, the residence at 252 South June Street was substantially altered in the early 1960s and was severely damaged by fire in 2018. Almost all exterior materials and finishes were replaced prior to the 2001 survey, leaving intact only the general massing; the 2018 fire destroyed or severely damaged what little remained. As a result, it no longer retains integrity of *materials*. 
- *Workmanship*: The property does not retain integrity of *design* or *materials*, and thus no longer exhibits the physical evidence of the crafts of early-1930s Period Revival residential design and construction. It therefore does not retain integrity of *workmanship*.
- *Feeling*: 252 South June Street does not retain integrity of *design*, *materials*, or *workmanship*, and thus no longer expresses the aesthetic and historic sense of early residential development in Hancock Park in the 1920s and 1930s. It therefore does not retain integrity of *feeling*.
- *Association*: The property does not retain integrity of *design*, *materials*, *workmanship*, or *feeling*, and thus no longer reflects its direct link to the early development of Hancock Park in the 1920s and 1930s. It therefore does not retain integrity of *association*.

252 South June Street retains integrity of *location* and *setting* but does not retain integrity of *design*, *materials*, *workmanship*, *feeling*, or *association*. It therefore lacks sufficient integrity to convey its association with the development of Hancock Park in the early 1930s and can no longer be considered an “altered contributor” to the Hancock Park HPOZ.

6.0 FEASIBILITY ANALYSIS

As noted in the preceding analysis of historic integrity, the single-family residence at 252 South June Street was substantially altered by the time the property was surveyed in the 2001 Hancock Park Historic Resources Survey. The exterior walls had been replastered with an incompatible textured stucco; all windows had been replaced, primarily with incompatible jalousie windows; incompatible stone veneer had been added to the primary façade; an incompatible Mid-century Modern style porte-cochère had been added on the north façade; an incompatible front entrance porch had been added on the primary (west) façade; and the cantilevered front balcony had been altered with incompatible metal trellis supports and balustrade. In 2018 the house was gutted by fire, causing partial roof collapse. The building has since been abandoned and exposed to the elements and cannot be considered a contributor to the Hancock Park HPOZ.

The generally poor level of historic integrity resulting from the previous alterations to the property has been substantially exacerbated by the damage caused by the 2018 fire. The structural analysis prepared by Mercado Associates Inc. dated August 26, 2022, notes that approximately 80% to 90% of the framing has been structurally compromised by the fire; the building is unstable and could potentially collapse from any additional loading including wind, seismic activity, or attempted repair work.⁸

Due to the poor historic integrity of the property and the extensive structural damage caused by the fire, repair and rehabilitation of the residence at 252 South June Street is not feasible.

⁸ Mercado Associates Inc., Structural Engineers, "252 South June Street, Los Angeles, CA 90004, Field Observation Report – Fire Damage," August 26, 2022.

7.0 DISCUSSION OF POTENTIAL IMPACTS

The Los Angeles City Council adopted the ordinance enabling the creation of HPOZs in 1979; most recently, this ordinance was amended in 2017. An HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.⁹ Each HPOZ is established with a historic resources survey, a historic context statement, and a preservation plan. The historic resources survey identifies all contributing and non-contributing features and lots. The context statement identifies the historic context, themes, and subthemes of the HPOZ as well as the period of significance. The preservation plan contains guidelines that inform appropriate methods of maintenance, rehabilitation, restoration, and new construction. Contributing elements are defined as any building, structure, landscaping, or natural feature identified in the historic resources survey as contributing to the historic significance of the HPOZ, including a building or structure which has been altered, where the nature and extent of the alterations are determined reversible by the historic resources survey.¹⁰ For CEQA purposes, contributing elements are treated as contributing features to a historic district, which is the historical resource. Non-contributing elements are any building, structure, landscaping, natural feature identified in the Historic Resources Survey as being built outside of the identified period of significance or not containing a sufficient level of integrity. For CEQA purposes, non-contributing elements are not treated as contributing features to a historical resource.

The Hancock Park HPOZ includes 1,282 parcels bounded roughly by Melrose Avenue on the north, Rossmore Avenue on the east, Wilshire Boulevard on the south, and Highland Avenue on the west. The 2001 Historic Resources Survey (updated in 2004) identified 1,113 of these, approximately 86.8% of the total, as Contributing resources to the historic district.

The residence at 252 South June Street was identified as an “altered contributor” to the Hancock Park HPOZ. However, as discussed previously in this report, the building had been substantially altered by the time the HPOZ was adopted, including alterations not noted in the Survey; and in 2018 it was severely damaged by fire. This report has demonstrated that the property lacks integrity of *design, materials, workmanship, feeling, and association*, and therefore does not contribute to the historic significance of the Hancock Park HPOZ; and that rehabilitation is not feasible. The demolition of 252 South June Street would reduce the number of HPOZ contributors from 1,113 or 86.8% of the total number of parcels, to 1,112 or approximately 86.7%, representing a change of approximately one-tenth of one percent. Demolition would therefore have no impact on the historic significance and integrity of the Hancock Park HPOZ.

⁹ City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

¹⁰ City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

8.0 RECOMMENDATIONS

The existing single-family residence at 252 South June Street was identified as an “altered contributor” to the Hancock Park HPOZ. However, the building was substantially altered by the time it was evaluated in the 2001 Hancock Park Historic Resources Survey, including some alterations that were not identified in the Survey. Alterations include the replacement of the exterior plaster with incompatible textured plaster; replacement of all windows, primarily with incompatible jalousie windows; addition of incompatible stone veneer to the primary west façade; addition of an incompatible Mid-century modern style porte-cochere on the north façade; addition of an incompatible entrance porch on the primary façade; and alteration of the cantilevered balcony on the primary façade with incompatible metal trellis supports. The building was severely damaged by fire in 2018 and has been abandoned and exposed since. It does not retain historic integrity and rehabilitation is not feasible; in its current state the property poses a danger and an eyesore to the community.

The remains of the existing single-family residence at 252 South June Street should be demolished to prevent possible collapse. The demolition will have no impact on the historic integrity and significance of the Hancock Park HPOZ. A new residence should be constructed in compliance with the Residential Infill design guidelines of the Hancock Park Preservation Plan.

9.0 SOURCES

California Office of Historic Preservation. Built Environment Resource Directory, Los Angeles County, 2020.

City of Los Angeles Department of Building and Safety. Online Building Records. <http://ladbsdoc.lacity.org/ldispublic/> (accessed August 2022).

City of Los Angeles Department of City Planning. "Hancock Park Preservation Plan," November 8, 2007. [https://planning.lacity.org/odocument/cefc3a2c-c04b-443c-8d87-6f46b48c048f/Hancock-Park-Preservation-Plan-Text_\(no_cover\).pdf](https://planning.lacity.org/odocument/cefc3a2c-c04b-443c-8d87-6f46b48c048f/Hancock-Park-Preservation-Plan-Text_(no_cover).pdf) (accessed August 2022).

County of Los Angeles Department of Public Works. Land Records Information. <http://dpw.lacounty.gov/smpm/landrecords/TractMaps.aspx> (accessed July 2022).

Mercado Associates Inc. Structural Engineers. "252 South June Street, Los Angeles, CA 90004 Field Observation Report – Fire Damage." August 26, 2022.

State of California, Department of Parks and Recreation. "California Office of Historic Preservation Technical Assistance Series #6: California Register and National Register: A Comparison." Sacramento, CA: Office of Historic Preservation, 2011.

U.S. Department of the Interior. *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington D.C.: National Park Service, 1997.

U.S. Department of the Interior. *National Register Bulletin 16: How to Complete the National Register Registration Form*. Washington, D.C.: National Park Service, 1997.

APPENDIX A

RESUMES OF AUTHORS/CONTRIBUTORS

HISTORIC RESOURCES GROUP

12 S. Fair Oaks Avenue, Suite 200
Pasadena, CA 91105

Tel 626-793-2400
historicalresourcesgroup.com



JOHN LOCASCIO, AIA *Principal Architect*

Experience Profile
Years of Experience: 29

John LoCascio has been with HRG since 2011, involved in historic preservation since 2002, and a licensed, practicing architect since 1993. John's California Architect license number is C24223.

John's areas of focus at HRG include historic architecture and technology, building conservation, historic structure reports and federal historic rehabilitation tax credit projects. He provides technical assistance for construction documents, advises on compliance with the Secretary of the Interior's Standards and the use of the State Historic Building Code, provides construction monitoring, and paint and materials sampling and analysis services.

John has worked on a wide variety of buildings and structures in California as well as in other states. He is currently advising on historic tax credit projects in Los Angeles, the San Francisco Bay area and Washington State. In addition, John regularly provides historic architecture consultation for numerous LAUSD campus modernization projects.

Prior to joining HRG, John served as Executive Director of Claremont Heritage, including reviewing environmental documents and advising the City of Claremont on planning and design issues. John also worked for 14 years as a project architect in private practice, specializing in custom residential projects.

John LoCascio meets the *Secretary of the Interior's Professional Qualifications Standards* in Architecture and Historic Architecture.

HISTORIC RESOURCES GROUP

12 S. Fair Oaks Avenue, Suite 200
Pasadena, CA 91105

Tel 626-793-2400
historicresourcesgroup.com

Selected Projects

28th Street YMCA Rehabilitation and Adaptive Reuse, Los Angeles
Academy Museum of Motion Pictures Rehabilitation, Hollywood
CBS Columbia Square Rehabilitation and Adaptive Reuse, Hollywood
Century 21 Coliseum Architectural Consultation, Seattle
Constance Hotel Historic Tax Credit Project, Pasadena
Grand Central Air Terminal Rehabilitation & Adaptive Reuse, Glendale
Forum Rehabilitation and Historic Tax Credit Project, Inglewood
Los Angeles International Airport Preservation Plan and HSRs
Painted Desert Visitors' Center Rehabilitation, Arizona
Venice High School Comprehensive Modernization, Los Angeles

Education

Master's Degree in Historic Preservation
University of Southern California
Bachelor of Architecture
University of Southern California

Honors and Awards

Los Angeles Conservancy Preservation Awards

- Angelus Funeral Home/Paul Williams Family Apartments, 2021
- Beverly Gardens, 2020
- Grand Central Air Terminal, 2017
- CBS Columbia Square, 2016
- 28th Street YMCA, 2013

California Preservation Foundation Preservation Design Awards

- Angelus Funeral Home/Paul Williams Family Apartments, 2021
- CBS Columbia Square, 2017
- Grand Central Air Terminal, 2016
- 28th Street YMCA, 2013

City of Pasadena Historic Preservation Award

- Constance Hotel, 2015

AIA Institute Honor Award

- 28th Street YMCA, 2015

Professional Affiliations

American Institute of Architects

HISTORIC RESOURCES GROUP

12 S. Fair Oaks Avenue, Suite 200
Pasadena, CA 91105

Tel 626-793-2400
historicresourcesgroup.com



ROBBY ARANGUREN

Planning Associate/GIS Specialist

Experience Profile

Years of Experience: 12

Robby Aranguren has been with HRG since 2009 and specializes in database management, GIS, and research.

At HRG, Robby provides mapping, database creation and management, photography, and research for historic assessments. He also provides assistance with character-defining features inventories and paint analysis studies. He is proficient with the Microsoft Access Database, FiGSS GIS Survey System, Photoshop, Google SketchUp, ESRI ArcMap and ArcCatalog. He has worked on numerous large-scale historic resources surveys, building and manipulating large databases.

Prior to joining HRG, Robby worked at the City of Los Angeles, Office of Historic Resources, Department of Planning, preparing staff reports for Historic-Cultural Monument applications, preparing E-newsletters, Guide. Robby also served as acting secretary at Cultural Heritage Commission meetings and conducted building permit research.

Robby Aranguren meets the *Secretary of the Interior's Professional Qualifications Standards* in History and Architectural History.

HISTORIC RESOURCES GROUP

12 S. Fair Oaks Avenue, Suite 200
Pasadena, CA 91105

Tel 626-793-2400
historicresourcesgroup.com

Selected Projects

SurveyLA, Los Angeles
CBS Columbia Square Paint Sampling
Chapman University VPOA Window Survey
City of Riverside Modernism Survey
City of Palm Springs Citywide Survey
City of South Pasadena Citywide Survey Update
Glendale Central Air Terminal Paint Sampling
South Glendale Historic Context Statement & Historic Resources Survey
Jordan House Rehabilitation & Construction Monitoring, Whittier
Lincoln Place Apartments Historic Tax Credit, Los Angeles
UC Riverside Citrus Experiment Station Character-defining Features Inventory
Villa Elaine Character-defining Features Inventory
Wallace Annenberg Center for the Performing Arts Adaptive Reuse and Historic Tax Credit, Beverly Hills

Education

Bachelor of Arts, Interdisciplinary Studies: Architecture, Urban Planning and Business (Real Estate)
University of Texas, Arlington, 2009

Honors and Awards

California Preservation Foundation Preservation Design Awards

- Wallis Annenberg Center for the Performing Arts, 2014
- Lincoln Place Apartments, 2015

Professional Affiliations

Los Angeles Conservancy
Los Angeles GIS Portal
California Preservation Foundation

Exhibit C



MERCADO ASSOCIATES INC.
STRUCTURAL ENGINEERS

August 26, 2022

Los Angeles City Planning
Preservation Division Department

RE: 252 South June Street, Los Angeles, CA 90004
Field Observation Report – Fire Damage

To Whom It May Concern:

The purpose of this letter is to express our observation and conclusion based on our field investigation performed at the property located at 252 S June Street, Los Angeles, California 90004 on June 27, 2022.

The existing structure is a two-story residential building with exterior wall stucco finish and shingle roofing with drive thru carport and detached garage structure. The residential building is mainly of wood floor and roof framing construction with 2x joists framing and plywood sheathing. The walls are of 2x stud wood framing construction over raised wood floor foundation. The detached single story garage structure is on the east side of the property.

We observed fire damage on most rooms and areas of the main residential building. Approximately 80% to 90% of the building framing has been compromised by the fire exposure. Building framing damage can be observed from all exterior faces (See Photo No. 1 thru Photo No. 5) of the building and from the areal roof view (See Photo No. 8). Floor framing members, roof framing members, and interior and exterior walls framing members have been affected and partially burned by the fire incident reducing and on some of them eliminating their structural strength to support building vertical and lateral loads (See Photo No. 6 and Photo No. 7). The building unstable framing condition poses a very high risk for any person or crew to perform any work in it. The potential for partial or total collapse may occur caused by any additional load on the interior of the structure or inadvertently by exterior forces as wind or seismic loads.

We conclude the existing main building framing shall be completely removed to allow for construction and rebuild of the existing structure. We recommend the existing concrete foundation to be examined and tested by a certified testing laboratory for adequacy and strength to support new framing due to fire exposure and possible damage.

Our professional services have been performed using the degree of care and skill ordinarily exercised under similar circumstances by reputable structural engineers practicing in this locality. No other warranty, expressed or implied, is made as to the professional opinions included in this report.

We hope this letter provides all the information you need at this time. Please do not hesitate to contact us should you have any questions.

Sincerely,

MERCADO ASSOCIATES INC.



Lizandro Mercado, P.E., S.E.
Principal





Photo No. 1 West Façade



Photo No. 2 - East Façade

11500 Olympic Blvd. Suite 400, Los Angeles, CA 90064
27240 Turnberry Lane, Suite 200, Valencia, CA 91355
(661) 753-9295 (310) 560-1832



Photo No. 3 East-North Façade



Photo No. 4 - North Façade

11500 Olympic Blvd. Suite 400, Los Angeles, CA 90064
27240 Turnberry Lane, Suite 200, Valencia, CA 91355
(661) 753-9295 (310) 560-1832



Photo No. 5 - South Façade



Photo No. 6 - Interior View

11500 Olympic Blvd. Suite 400, Los Angeles, CA 90064
27240 Turnberry Lane, Suite 200, Valencia, CA 91355
(661) 753-9295 (310) 560-1832



Photo No. 7 - Interior Roof View



Photo No. 8 – Aerial Roof View

11500 Olympic Blvd. Suite 400, Los Angeles, CA 90064
27240 Turnberry Lane, Suite 200, Valencia, CA 91355
(661) 753-9295 (310) 560-1832

Exhibit D

ECONOMIC FEASIBILITY ANALYSIS

252 S. June Street, Los Angeles, CA 90004

The decision to rehabilitate an existing structure or engage in new construction is a critical consideration in determining the appropriate path to undertaking a project. Both options have their merits, and the choice often depends on factors such as budget, goals, and the condition of the existing building. While rehabilitation/reconstruction is often seen as a cost-effective approach, there are circumstances where it can be more expensive than new construction. In this analysis, we have explored circumstances of the existing building and site conditions in detail, providing insights into the factors that result in the construction of a new single-family residence (even if 2,827 square feet larger), being more cost effective than the rehabilitation of the 3,454 square foot fire damaged and structurally imperiled building.

To perform an economic feasibility analysis for the options of complete renovation and new construction of a fire-damaged structure at 252 S. June Street in Los Angeles, we will consider various factors such as the scope of work, the duration of construction for both options and the resulting cost of new construction versus rehabilitation/reconstruction.

One of the primary factors that can make rehabilitation more expensive than new construction is the structural integrity of the existing building. If the structure has suffered significant damage due to fire, water, or other disasters, extensive repairs may be necessary. These repairs can include rebuilding damaged load-bearing walls, foundations, and structural elements.

In 2018 there was a significant fire at 252 S. June Street, which resulted in the complete destruction of the physical structure. The fire damage resulted in extreme structural damage that resulted from a long period of intense heat from the fire, and the collapse of walls and ceilings throughout the 3,454 square foot house. As detailed in the structural report the structure is therefore not safe. The fire destroyed the structural integrity of the building including damage to foundation and 90% of the framing. The fire also affected the waterproofing membrane of the structure. It is not feasible to replace drywall, insulation and remove wall studs individually from which they are attached to 1"-1.5" stucco surfaces without completely destroying the stucco. Rehabilitation in this case will therefore be almost a full reconstruction.

In addition, there is tremendous smoke and water damage and largely charred spaces at 252 S. June Street. Discoloration and smoke damage are still evident throughout the downstairs common spaces, and in most of the viewable open spaces above. Seventy percent of the roof and the second story flooring has been completely destroyed, thus views from the ground are to the sky above.

Furthermore, over the past five years, the exposure of the structure to the elements due to the largely non-existent roof, has caused further deterioration. It has been impossible to secure

the home, as a result the rainstorms and other climate variations have resulted in a completely dilapidated structure. The porous interior materials such as the drywall seem to have absorbed significant water over the years, creating visible mold growth in a few areas of the house. The interior wood structure has evidence of rot and has collapsed in a myriad of locations throughout the ground floor. Given the lack of structural integrity of the building, it is impossible and dangerous to attempt to gain access to the second floor. As a result, the building has been red tagged by Building and Safety and deemed uninhabitable in its current state. It will need substantial foundational and structural improvements as a prerequisite to any rehabilitation being undertaken.

Another factor for older buildings is compliance with modern building codes and regulations for roofing, plumbing, electrical, exhaust and mechanical. Bringing the existing structure up to code in this circumstance will be a costly endeavor and equal to a new building as all interior wiring and plumbing, as well as the heating and cooling, security, and low voltage systems have either been destroyed in the fire, or stolen over time by squatters and others. The new construction of this house will allow for compliance with current building codes from the outset, potentially reducing the need for expensive accommodations and compromises. While any restoration of the existing structure will be subject to the California State Historic Building Code, and thus can voluntarily alleviate compliance with certain building codes, there is precedent and guideline in the purpose of the code that specifically encourages “reasonable safety from fire, seismic forces or other hazards for occupants and users of such buildings.” Furthermore, as clearly denoted in the building code, in all circumstances, “...(d) Regulations adopted by the State Fire Marshal pursuant to this part shall be enforced in the same manner as regulations are enforced under Sections 13145, 13146, and 13146.5.” All the systems that have been destroyed will need to be reconstructed in full, and the work has to be done as new.

It is likely that a house built in 1933, renovated in 1937 and again in 1962 and 1974 would contain some hazardous material. To date, there has not been an opportunity to test as the structure is too dangerous for any consultants to enter. Older buildings of the generation when 252 S. June Street was originally constructed are assumed to contain hazardous materials such as lead-based paint, asbestos, or outdated insulation materials that must be safely removed and replaced during rehabilitation. These abatement and remediation processes, if necessary, are not only expensive but also time-consuming, as they often require meticulous removal, handling, and disposal. In this instance, the overwhelming damage and danger caused by the fire requires laborious shoring of the building and underpinning of the structure. Given that the existing building is at risk of partial or total collapse, the building warrants meticulous and painstaking hand demolition for safety, and just in case any hazardous material is found to be prevalent.

New construction, on the other hand, while requiring the same demolition standards, allows for the use of modern, environmentally friendly materials and construction techniques for much of the work. This can result in a more energy-efficient and sustainable building, potentially lowering long-term operational costs and meeting sustainability targets.

The goals of a project can also influence whether rehabilitation is more expensive than new construction. If the aim is to achieve a dramatically different functional outcome from the original structure, extensive modifications or additions may be necessary during rehabilitation. These changes can be costly and may involve architectural complexities, especially when attempting to stay within an existing footprint. Albeit rehabilitation/reconstruction does not prohibit new additions, however, in this instance the cost of the rehabilitation with an addition will exceed the cost of new construction based on the cost per square foot provided by the builder. (Option 1 and 2 below). The new owners of the site have indicated that they would like a contextually appropriate but much larger home, with a more efficient layout and more conducive to their family size. The house that they desire is approximately 2,800 square feet larger than the current fire damaged shell on site.

The home at 252 S. June Street was noted as an altered contributor to the Historic Preservation Overlay Zone. Specifically, regarding this property, there were at least three known alterations to the original structure: in 1937, in 1962 and 1974. Usually, an altered contributor to a Historic District would still contribute to the significance and integrity of the district as there would be elements of the property that would still contribute. Whatever alterations may have been made, would usually be able to be reversed to continue to maintain the designation, or the historic elements could be incorporated in the new rehabilitation. In this instance however, given the extensive damage of the fire, there is not much of the façade or other important elements of the existing shell that could be reversed, and there is very little that can be adapted or saved.

The construction of a new home instead of the rehabilitation of the existing structure on site enables a blank canvas that will be significantly less costly to build. A financial analysis has been undertaken by a Real Estate advisory consultant, Ryan Aubry, who analyzed the costs of rehabilitation vs. that of new construction and analyzed the market conditions. Mr. Aubry currently an independent consultant, has previously served as Senior Vice President of Kosmont Companies, a real estate advisory firm that provides financing strategies for public agencies and municipalities. Also, Mr. Aubry was the Director of Development for Greenland USA, and Vice President of Strategic Development of Primestor Development.

Option 1: ACTUAL Complete Renovation (3454 Square Feet)

- Purchased in 2021: \$2.8 million
- April 2023 appraisal: \$1.6 million (net loss of value \$1.2 million)
- “Entitlement consultant cost, COA and permits and fees: \$203,040
- Section by section hand demolition: \$480,000 (6 months)

Section by section hand demolition is a slower and more laborious demolition process that is a result of the danger that abounds from the lack of structural integrity in the remnants of the building. The process enables systematically dismantling the building piece by piece and bit by bit. It is most commonly done with hand tools, including jackhammers, sledgehammers, picks instead of large-scale mechanical equipment.

- Shoring of structure: \$175,000 (45 days)
- Underpinning: \$870,000 (4 months)
- Estimated Renovation Cost: \$600 per square foot totals \$2,072,400 (18 months)

(Provided by David Elliott Builders, attached)

- Renovation Timeline: 29.5 months (additional 5.5 months is \$165,000 cost)
- Total Renovation Cost: **\$6,765,440** or \$1,959 per square foot**

***Does not include financing/carrying cost.*

Option 2: ACTUAL New Construction (6281 square feet)

- Purchased in 2021: \$2.8 million
- April 2023 appraisal: \$1.6 million (net loss of value \$1.2 million)
- Entitlement consultant cost, Demolition COA and permits and fees: \$342,000
- Section by section hand demolition: \$480,000 (6 months)
- Estimated Construction Cost: \$600 per square foot \$3,768,600 (18 months)

(Provided by David Elliott Builders, attached)

- Total Construction Cost: **\$7,390,600 or \$1,177 per square foot**
- Construction Timeline: 24 months
- ***Does not include financing/carrying costs.*

Comparison of the two options:

1. Cost Analysis (comparison of the same square footage rehabilitation vs. new construction):

- Complete Renovation Cost for 3,454 sq. ft. : **\$6,765,440****

- Complete Construction Cost for 3,454 sq. ft.: **\$4,065,358**
- Complete Construction Cost for 6,281 sq. ft.: **\$7,390,600**

Both options do not include financing/carrying costs and interest.

***Includes financing/carrying cost for additional time of 5.5 months translating to another additional \$165,000.*

In this analysis, the complete renovation option is half the size of the proposed new home square footage, and yet only \$625,200 less than the new construction option of a house that is almost double the size. The rehabilitated house will take longer to complete as it requires approximately 5.5 additional months than the new construction option for shoring and underpinning. Securing approval and permitting are assumed to be the same for both options. As a result, if compared apples to apples with equal square footage, **the cost of a rehabilitated structure is \$2,700,082 more than a 3,454 square foot newly constructed house.** While additional square footage or additional elements to the massing can be achieved with renovation, it will be difficult to achieve the desired square footage due to the current siting of the existing structure and would not be easy to achieve the varying rooflines, forms and values and stepped planes that would be necessary to break the massing. It is not feasible to implement the proposed new design and keep elements of the existing shell.

Given the significant cost differential between a renovation and new construction and the additional time required for the renovation versus the new construction, the owner would be denied the economically viable use of the property should they not be able to demolish and build a new home. Given that there was only a \$625,160 differential between a 3,454 square foot house and a 6,281 square foot house, the renovation of the existing fire damaged structure would deprive the owners of the ability to maximize their resources, and would financially disadvantage them by ensuring that they pay a much higher per square foot cost for a house that is half the size. Moreover, the rehabilitation would be for naught as it relates to the historic district, as it would not result in salvaging any historic integrity. A new construction would be the economically superior option as it would be significantly less expensive on a square footage basis. and would maximize the square footage, enabling the owners to build the home of their dreams.

2. Time Analysis:

- Renovation Timeline: 29.5 months
- Construction Timeline: 24 months

Timeline of COA Dem, Technical Correction and CCMP will apply in both cases (renovation and new construction) because in both cases it will be considered significant work; especially reconstruction/rehabilitation with an addition exceeding 80% of existing building.

The renovation option takes more time to complete compared to new construction as the demolition and shoring process requires more time-consuming approaches such as underpinning and shoring of the fire damaged structure.

3. Benefits and Considerations:

- Renovation can have additional hidden costs which can increase the total cost. In this circumstance, the renovation would be a completely new structure but within the existing footprint and thus negate any benefits of a home that meets the needs and requirements of the new owners. Also, there are no historic elements to salvage as this is a significantly altered contributor to the district that has had the important “historic” elements destroyed. Thus, there is no immediate benefit of renovation as to the Historic District.
- New construction easily offers the advantage of a larger building footprint (6281 sq. ft.), which may be more suitable for the family’s needs.
- The existing shell may have limitations in terms of layout and design compared to a new construction project, as the attempt to save the significantly altered façade and/or attempting to mass the new building largely within the existing footprint would limit the new home and be more costly.
- Consider the potential rental or resale value of the property after completion. A larger, newly constructed building may have a higher market value after completion.

CONCLUSION:

FOR AN ADDITIONAL COST OF \$625,200 ABOVE THE REHABILITATION COST, THE OWNERS CAN BUILD A NEW HOUSE THAT IS ALMOST DOUBLE THE SQUARE FOOTAGE OF THE RENOVATED 3,454 SQUARE FOOT HOUSE. AN APPLES-TO-APPLES COMPARISON OF THE SAME SIZE HOUSE AS THE ONE THAT CURRENTLY EXISTS ON SITE RESULTS IN A HIGHER COST FOR RENOVATION OPTION OF \$2,700,082.

IT IS SIGNIFICANTLY MORE COST-EFFICIENT AND THUS A MORE VIABLE ECONOMIC ALTERNATIVE TO DEMOLISH THE EXISTING FIRE DAMAGED HOUSE IN FAVOR OF A NEW AND LARGER HOME THAT MEETS THE FAMILY’S NEEDS.

Exhibit E



252 S June St - CUSTOM RESIDENCE

Code Budget

1-000 SITE / GENERAL CONDITIONS

1-010	Mobilization	Per Plan	\$1,000.00
1-020	Construction Fencing	Per Plan	\$3,500.00
1-025	Temporary Facilities	Per Plan	\$2,500.00
1-055	Scaffolding	Per Plan	\$12,000.00
1-060	Site Grading after construction	Per Plan	\$8,000.00
1-065	General Labor	Per Plan	\$60,000.00
1-090	Project Superintendant	Per Plan	\$120,000.00
1-095	Trash Bins / Removal	Per Plan	\$20,000.00
1-100	Final Rough Cleaning	Per Plan	\$4,000.00

3-000 CONCRETE

3-020	House Foundation/Garage Foundation / Footings/Slab/	Per Plan	\$248,000.00
-------	---	----------	--------------

5-000 STEEL – METAL

5-025	Steel Beams & Columns	Per Plan	\$125,000.00
5-030	Railings / Handrails / Ironwork	Per Plan	\$50,000.00
5-040	Gutters / Downspouts (Non-Copper)	Per Plan	\$6,000.00

5-045	Step Ladders for Emergency Egress	Per Plan	\$1,000.00
5-055	Sheet Metal	Per Plan	\$15,000.00

6-000 WOOD & PLASTICS

6-005	Lumber and Hardware	Per Plan	\$200,000.00
6-010	Framing	Per Plan	\$110,000.00
6-030	Finish Lumber	Per Plan	\$60,000.00
6-035	Finish Carpentry	Per Plan	\$60,000.00
6-040	Cabinets/Closet (Kitchens, Lavs etc...)	Per Plan	\$300,000.00

8-000 DOORS & WINDOWS

8-010	Windows & Exterior Doors	Per Plan	\$240,000.00
8-015	Window & Ext Door Installations	Per Plan	\$30,000.00
8-020	Interior Doors	Per Plan	\$40,000.00
8-025	Interior Door Installation	Per Plan	\$20,000.00
8-035	Finish Hardware	Per Plan	\$20,000.00

7-000 THERMAL/MOIS. PROT.

7-005	Roof	Per Plan	\$45,000.00
7-015	Waterproofing And Methane	Per Plan	\$30,000.00
7-020	Attic access door	Per Plan	\$1,500.00
7-025	Shower Pan/Balcony Waterproofing (Included 7-015)	Per Plan	\$30,000.00
7-035	Insulation	Per Plan	\$20,000.00

9-000 FINISHES

9-010	Lath & Plaster	Per Plan	\$80,000.00
9-015	Drywall & Taping	Per Plan	\$75,000.00
9-020	Interior painting	Per Plan	\$35,000.00

9-050	Counter Tops / Stone & Fabrication	Per Plan	\$60,000.00
9-055	Tile	Per Plan	\$80,000.00
9-060	Flooring	Per Plan	\$130,000.00
10-000	SPECIALTIES		
10-010	Bathroom Accessories	Per Plan	\$10,000.00
10-015	Shower Enclosure, Mirrors, Glass	Per Plan	\$20,000.00
12-000	MECH / PLUMBING		
12-005	HVAC	Per Plan	\$60,000.00
12-015	Exhaust Systems	Per Plan	\$4,000.00
12-025	Plumbing	Per Plan	\$125,000.00
12-055	Water Heater	Per Plan	\$7,000.00
12-060	Plumbing Fixtures	Per Plan	\$80,000.00
13-000	ELECTRICAL		
13-005	Electrical Wiring	Per Plan	\$85,000.00
13-070	Low Voltage	Per Plan	\$60,000.00
14-000	MISCELLANEOUS		
14-002	Fireplace	Per Plan	\$20,000.00
14-003	Fire Sprinklers	Per Plan	\$18,000.00
14-003	Appliances	Per Plan	\$75,000.00
14-003	Outdoor appliances	Per Plan	\$5,000.00
15-000	HARDSCAPE / LANDSCAPE		
15-005	Hardscape / Drainage	Per Plan	\$120,000.00
15-010	Pool	Per Plan	\$100,000.00

15-020	Landscape	Per Plan	\$120,000.00
15-030	Landscape Lighting	Per Plan	\$20,000.00
Sub-total			\$3,271,500.00
Insurance		1%	\$32,715.00
Overhead		3%	\$98,145.00
Contractors Fee		16%	\$523,440.00
GRAND TOTAL		Price Per Square Foot Total Build 6,603 SF x \$594	\$3,925,800.00

Exclusions

- * Asbestos Report / Abatement
- * Permit Fees
- * Surveying (Consider 3-4 Field Trips)
- * Engineering, Architectural, Mechanical related expenses & Fees
- * Deputy Inspections (Concrete, Steel, Epoxy, Methane etc...)
- * Light Fixtures
- * Smart Home
- * Utility Hookup Fees
- * Street Curbs / Apron / Sidewalks (Extent of work to be decided by Public Works Inspector)

Exhibit F

NOTICE OF EXEMPTION

To: Los Angeles Clerk/Recorder
12400 Imperial Highway
Norwalk, CA 90650

From: Elliot Liebhard
252 S. June Street
Los Angeles, CA 90004

Project Title:

252 S. June Street Project

Project Location:

252 S. June Street, Los Angeles, California 90004 (APN 5515-001-007)

Description of Nature, Purpose, and Beneficiaries of Project:

Demolition:

- *Remove the existing two-story 3,454-square-foot (sf) single family residence and associated garage*
- *Remove the existing pool*

See the Attachment to this Notice of Exemption for further details.

Public Agency Approving Project:

City of Los Angeles Planning Department

Entity Carrying Out Project:

Elliot Liebhard

Exempt Status (check one):

☐ Ministerial (Public Resources Code [PRC] Section 21080(b)(1); State CEQA Guidelines [Guidelines] Section 15268)

☐ Declared Emergency (PRC Section 21080(b)(3); Guidelines Section 15269(a))

☐ Emergency Project (PRC Section 21080(b)(4); Guidelines Section 15269(b)(c))

☒ X Categorical Exemption. Type and Section number: *Class 2, Guidelines Section 15302, Replacement or Reconstruction*

☐ Statutory Exemptions, Code number:

Reasons why project is exempt:

Guidelines Section 15302 (Class 2) permits the “replacement or reconstruction of existing structures and facilities where the new structure would be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.” The Project has been examined in the context of Section 15302 and has been found consistent with these criteria. Further, the application of Section 15302 of the Guidelines is not barred by any exceptions set forth in Section 15300.2. Attachments to this Notice of Exemption provide additional detail in support of this finding.

In addition, Section 15061(b) provides further guidance in the determination of whether an action is exempt from CEQA stating, “CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect the environment, the activity is not subject to CEQA.”

The Project is minor in scope and involves the demolition of a single-family residence and associated garage, and pool. Construction of the Project would comply with all applicable City of Los Angeles code requirements. Therefore, the Project would not result in a significant effect on the environment. Attachments to this Notice of Exemption provide additional detail in support of this finding.

CEQA Contact Person:

Telephone:

David Crook, ESA

949-870-1525

If filed by applicant:

1. Attach certified document of exemption findings.
 2. Has a Notice of Exemption been filed by the public agency approving the project? ☐ Yes ☐ No
-

Date Received for Filing_____

Signature_____

Title_____

**ATTACHMENT TO NOTICE OF EXEMPTION
252 S. JUNE STREET PROJECT
LOS ANGELES, CALIFORNIA
SUPPLEMENTAL INFORMATION**

- 1. Description of the Existing Setting of the Site and Adjacent Areas:** The 252 S. June Street Project (Proposed Project) is located at 252 S. June Street within the neighborhood of Hancock Park in the City of Los Angeles, California, assessor parcel number (APN) 5515-001-007 (Project Site). The Project Site is surrounded by single-family homes to the north, east, and south, with S. June Street and the Third Street Elementary School located to the west of the Project Site. The Project Site currently consists of a two-story 3,454 sf single-family residence and driveway on the western portion of the property with a garage and pool located on the eastern portion of the property.

Originally constructed in 1933, the residence was identified as an “altered contributor” to the Hancock Park Historic Preservation Overlay Zone (HPOZ) in 2008.¹ The Project Site was severely damaged in a fire in 2018. A structural assessment was prepared by Mercado Associates, Inc., Structural Engineers in 2023 that deemed the residence to be structurally unsafe and beyond repair.² The Proposed Project would demolish the existing residence, garage, and pool. The existing large tree in the southwest corner of the property would be retained as well as two trees near the sidewalk in front of the property.

- 2. Qualification Criteria:** Class 2 Categorical Exemption, Replacement or Reconstruction (Guidelines Section 15302), is limited to the replacement or reconstruction of existing structures and facilities where the new structure would be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

The Project involves the replacement of an existing residence with similar structures within generally the same building footprint area of the existing buildings. Therefore, the Project would meet the criteria in the Guidelines to qualify for a Class 2 exemption.

- 3. Review of Possible Exceptions to the Categorical Exemption:** The Project has been reviewed under Guidelines Section 15300.2 for any characteristics or circumstances that might invalidate findings that the Project is exempt from CEQA as follows:

- a. Cumulative Impacts:** The Project is not related to any other "successive projects of the same kind in the same place over time," thus, no significant cumulative impacts would occur.
- b. Significant Effects:** As stated above, the Project Site is located in an urbanized residential area. There are no sensitive natural resources of any kind on the Project Site or in the surrounding area, as the Project Site and surrounding area are fully developed with residential and institutional buildings, and there are no "unusual circumstances" that would indicate a potential for any significant environmental effects. Construction of the Project would comply with all City of Los Angeles code requirements as applicable. Therefore, there is no reasonable possibility that the Project would have a significant effect on the environment due to unusual circumstances.
- c. Scenic Highways:** According to the City of Los Angeles Mobility Plan 2035 and California Department of Transportation (Caltrans) State Scenic Highway Map, there are no state scenic

¹ ESA, 2024. Hancock Park HPOZ Preservation Plan and Historical Resources CEQA Impacts Analysis, 252 S. June Street, Los Angeles CA.

² Mercado Associates, Inc. Structural Engineers, 2023. 252 South June Street, Los Angeles, Field Observation Report – Fire Damage. January 6, 2023.

highways in the vicinity of the Project Site.^{3, 4} Therefore, the Project would not damage any scenic resources.

- d. **Hazardous Waste Sites:** According to the Department of Toxic Substances Control EnviroStor database and the California State Water Resources Control Board Geotracker database, the Project Site is not on any list of hazardous waste sites.^{5, 6}
- e. **Historical Resources:** As detailed within the Hancock Park HPOZ Preservation Plan and Historical Resources CEQA Impacts Analysis, bound under separate cover, the Project is located within the designated Hancock Park HPOZ in the Wilshire Community Plan Area (CPA).⁷ The lot is improved with a two-story single-family residence constructed in 1933 in the Monterey Revival style by architect Earl T. Heitschmidt. In 2008, SurveyLA originally identified the Property as an “altered contributor” to the Hancock Park HPOZ. It was constructed within the HPOZ’s period of significance, “and the nature and extent of alterations are determined to be reversible by the Historic Resources Survey.” The Property was altered in the early 1960s in an “incompatible Mid-Century Modern style” including jalousie windows, stone veneer, a porte-cochere in the Mid-Century Modern style, an entrance porch with metal trellis supports and a balustrade added to the cantilevered front balcony. The Property was severely damaged by a fire on October 14, 2018, and has remained vacant since.

In 2022, Historic Resources Group (HRG) authored a Historical Resource Assessment Report (HRAR) to determine if the property at 252 S. June Street retained sufficient historic integrity for continued listing as an “altered contributor” to the Hancock Park HPOZ. The HRAR concluded that the Property was found to be structurally unsafe for occupancy due to the 2018 fire and “does not retain sufficient historic integrity for continued listing as a Contributor to the Hancock Park HPOZ.” Incompatible changes to the 1930s Period Revival home in the 1960s and the fire damage have caused the Property to lose integrity of design, materials, workmanship, feeling, and association. As a result, it no longer conveys its association with the development of Hancock Park and cannot be considered an “altered contributor.”

As detailed within the Hancock Park HPOZ Preservation Plan and Historical Resources CEQA Impacts Analysis, ESA assessed potential impacts on historical resources in the HPOZ that may be caused by the demolition of the residence at the Project Site. ESA’s conclusions agree with the HRAR, that the impact of the demolition would not result in a significant adverse change to a historical resource as defined by CEQA. In relation to the larger district, the HRAR details there is an “exceptionally high percentage of contributors in the Hancock Park HPOZ” and “the demolition of 252 South June Street would not substantially alter the ratio of contributors to

³ Los Angeles Department of City Planning, Mobility Plan 2035, 2016. Available at https://planning.lacity.gov/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf. Accessed May 7, 2024.

⁴ California Department of Transportation (Caltrans), California State Scenic Highway System Map. Available at <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed May 7, 2024.

⁵ Department of Toxic Substances Control (DTSC), EnviroStor. Available at <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=252+June+Street%2C+Los+Angeles+CA>. Accessed May 7, 2024.

⁶ State Water Resources Control Board, Geotracker. Available at <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=252+June+Street%2C+Los+Angeles+CA>. Accessed May 7, 2024.

⁷ ESA, 2024. Hancock Park HPOZ Preservation Plan and Historical Resources CEQA Impacts Analysis, 252 S. June Street, Los Angeles CA.

noncontributors and would have no impact on the district's historic integrity and significance.” The HPOZ includes 1,282 structures and sites, of which 1,113 (86.8%) were identified as Contributing resources. A loss of one altered contributor to the HPOZ, 252 S. June Street, would result in a change of one-tenth of one percent, with 1,112 remaining contributors (86.7%) in the HPOZ.

The CEQA Thresholds Guide from the City of Los Angeles states that a project would normally have an impact on a significant resource if it would cause a substantial adverse change in the significance of a historical resource. As the significant resource located at 252 S. June Street has already been damaged by the fire, the construction of a new residence does not cause a substantial adverse change to the status of the existing home. Therefore, pursuant to CEQA, the Project would have a less than significant impact on historical resources for the reasons detailed above.

Exhibits:

Figure 1, Site Plan

Exhibit G

Historical Preservation Overlay Zone

252 S JUNE ST

HPOZ Name:

Hancock Park

Historic Designation:

Contributing Feature (Altered)

Historic Name:

Residence of Carrye M. Hewitt

Common Name:

None

Year Built:

1933

Architecture:

Monterrey

Architect:

Heitschmidt, Earl T.

Builder:

Not Available

Survey Notes:

Altered structure, but it is a contributor to the HPOZ because it was built within the HPOZ's period of significance and the nature and extent of alterations are determined to be reversible by the Historic Resources Survey.

Structural Alterations:

Re-stucco, stone added, windows replaced.

Landscaping:

Sycamore trees and replica streetlight in parkway; slightly raised yard; NC-circular driveway; stucco and iron fence.

Survey Date:

October 2001

Mills Act:

Contract Number: None

Case Number: None



Other Historical Designation

252 S JUNE ST

This property is located within a City Historic Preservation Overlay Zone (HPOZ) but does not have any other designations. Click the tab above to view "Historic Preservation Overlay Zone" information.

Mills Act

252 S JUNE ST

This property does not have a Mills Act Contract.

Exhibit H

SEC. 13B.8.6. CERTIFICATE OF APPROPRIATENESS (DEMOLITION, REMOVAL, OR RELOCATION)

A. Applicability

1. General

This Section requires the issuance of a Certificate of Appropriateness (Demolition, Removal, or Relocation) for:

- a. The Demolition, relocation or removal of any contributing building, structure, Landscaping, or Natural Feature, except as set forth in Subdivision 3. (Conforming Work) below; or
- b. Any combination of the above designated as Contributing in the Historic Resources Survey for an HPOZ.

2. Prohibition

- a. No person shall cause the Demolition, relocation or removal of any building, structure, Landscaping, or Natural Feature designated as contributing in the Historic Resources Survey for an HPOZ unless a Certificate of Appropriateness (Demolition, Removal, or Relocation) is approved for that action pursuant to this Section, with the exception of Conforming Work on Contributing Elements (which shall not require a Certificate of Appropriateness).
- b. If the event that Demolition, removal, or relocation occurs without a Certificate of Appropriateness (Demolition, Removal, or Relocation) having been approved for that action pursuant to this Section, a Certificate of Appropriateness shall be based on the existing conditions of the Historic Resource prior to the Demolition, removal, or relocation.
- c. No Certificate of Appropriateness (Demolition, Removal, or Relocation) shall be approved unless the plans for the Demolition, relocation, or removal conform to the provisions of this Section.

3. Conforming Work

- a. This Section does not require a Certificate of Appropriateness (Demolition, Removal, or Relocation) for the ordinary Maintenance and repair of any exterior architectural feature of a property within an HPOZ, which does not involve a change in design, material, color, or outward appearance.

Sec. 13B.8.6. Certificate of Appropriateness (Demolition)

1 Initiation

APPLICANT

2 Submittal

COMPLETENESS REVIEW

NOTICE

3 Review

CULTURAL HERITAGE COMMISSION REVIEW HISTORIC PRESERVATION BOARD HEARING

CULTURAL HERITAGE COMMISSION REPORT & RECOMMENDATION HISTORIC PRESERVATION REPORT & RECOMMENDATION

4 Decision

AREA PLANNING COMMISSION HEARING

APPROVE OR DENY

APPEAL AVAILABLE

- b. Work meeting the criteria for Conforming Work on Contributing Elements does not require a Certificate of Appropriateness.

4. Other City Approvals

The activities listed in Subdivision 1. (General) above require a Certificate of Appropriateness (Demolition, Removal, or Relocation) in addition to other City approvals (building permits, variances, etc.) or other legal requirements, such as *Sec. 5028 of the California Public Resources Code*, which may be required.

B. Initiation

1. The applicant shall submit:
 - a. Any plan for the Demolition, removal, or relocation of a building, structure, Landscaping, or Natural Feature; or
 - b. Any combination of the above designated as Contributing in the Historic Resources Survey for an HPOZ.
2. The plans shall be submitted to the Department of City Planning in conjunction with an application, on a form provided for that purpose.
3. The application fees for a Certificate of Appropriateness (Demolition, Removal, or Relocation) shall be as set forth in *Article 9 (Fees) of Chapter 1 (General Provisions and Zoning)* of this Code.

C. Notice

1. Notice of Public Hearing

The following notice is required for the public hearing held prior to a recommendation:

Type of Notice	When	Where / To Whom / Additional Requirements
Mail	10 days	<ul style="list-style-type: none"> • Owners and occupants of all properties abutting, across the street or alley from, or having a common corner with the subject property; and • The Certified Neighborhood Council representing the area in which the property is located
Posting	10 days	<ul style="list-style-type: none"> • The applicant will post notice in a conspicuous place on the property

2. Notice of Public Hearing on Appeal

The following notice is required for the public hearing on the appeal:

Type of Notice	When	Where / To Whom / Additional Requirements
Mail	24 days	<ul style="list-style-type: none"> • Applicant; • Appellant; • Cultural Heritage Commission; • The relevant Board; • The Certified Neighborhood Council representing the area in which the property is located; and • Any other interested parties of record

D. Decision

1. General Procedures

See Sec. 13A.2.5. (Decisions).

2. Decision Maker

The Area Planning Commission is the initial decision maker.

3. Referral

Upon an application being deemed complete by the Director, one copy each of the application and relevant documents shall be mailed by the Department of City Planning to both the Cultural Heritage Commission and to each Board Member for the HPOZ for evaluation.

4. Public Hearing

Before making its recommendation to approve, conditionally approve, or disapprove an application pursuant to this Section for a Certificate of Appropriateness (Demolition, Removal, or Relocation), the Board shall hold a public hearing on the matter, giving notice in the manner specified in Subsection C. (Notice) of this Section.

5. Cultural Heritage Commission and Board Recommendations

- a. The Cultural Heritage Commission (or its designee) and the Board shall submit their recommendations to the Area Planning Commission as to whether the Certificate should be approved, conditionally approved, or disapproved.
- b. In the event that the Cultural Heritage Commission or Board does not submit their recommendations within 30 days of the postmarked date of the mailing from the City Planning Department, the Cultural Heritage Commission or Board shall be deemed to have forfeited all jurisdiction in the matter and the Certificate may be approved, conditionally approved, or disapproved as filed. The applicant and the Director may mutually agree in writing to a longer period of time for the Board to act.

6. Decision

- a.** The Area Planning Commission shall approve, conditionally approve, or disapprove a Certificate of Appropriateness (Demolition, Removal, or Reconstruction).
- b.** Any approval, conditional approval, or denial shall include written findings in support.

7. Time to Act

The Area Planning Commission shall render a determination on any Certificate of Appropriateness (Demolition, Removal, or Relocation) within 75 days after the application is deemed complete, unless the applicant and the Director mutually consent in writing to a longer period.

8. Transmittal

A copy of the determination shall be mailed to the applicant, the Board, the Cultural Heritage Commission, and any other interested parties. No Certificate of Appropriateness (Demolition, Removal, or relocation) shall be deemed approved or issued until the appeal period has expired or until any appeal has been resolved.

E. Standards for Review and Required Findings

- 1.** No Certificate of Appropriateness (Demolition, Removal, or Relocation) shall be issued for Demolition, removal, or relocation of any contributing building, structure, Landscaping, Natural Feature or Lot within an HPOZ that is designated as a Contributing Element unless the Owner can demonstrate to the Area Planning Commission that the Owner would be deprived of all economically viable use of the property.
- 2.** In making a determination on a Certificate of Appropriateness (Demolition, Removal, or Relocation), the Area Planning Commission or City Council (on appeal) shall consider any evidence presented concerning the following:
 - a.** An opinion regarding the structural soundness of the structure and its suitability for continued use, renovation, Restoration, or Rehabilitation from a licensed engineer or architect who meets the Secretary of the interior's Professional Qualification Standards as established by the Code of Federal Regulation, 36 CFR Part 61. This opinion shall be based on the Secretary of the interior's Standards for Architectural and Engineering Documentation with Guidelines;
 - b.** An estimate of the cost of the proposed Alteration, construction, Demolition, or removal and an estimate of any additional cost that would be incurred to comply with the recommendation of the Board for changes necessary for it to be approved;

- c. An estimate of the market value of the property in its current condition; after completion of the proposed Alteration, construction, Demolition, or removal; after any expenditure necessary to comply with the recommendation of the Board for changes necessary to approve a Certificate of Appropriateness; and, in the case of a proposed Demolition, after renovation of the existing structure for continued use; and
 - d. In the case of a proposed Demolition, an estimate from architects, developers, real estate consultants, appraisers, or other real estate professionals experienced in Rehabilitation as to the economic feasibility of Restoration, renovation, or Rehabilitation of any existing structure or objects. This includes tax incentives and any special funding sources, or government incentives, which may be available.
3. In a case where Demolition, removal, or relocation of any Contributing Element, without a Certificate of Appropriateness (Demolition, Removal, or Relocation) has occurred, this Subsection does not apply. Procedures in *Sec. 13B.8.5. (Certificate of Appropriateness (Construction, Addition, Alteration, or Reconstruction))* and/or *Sec. 13B.8.1.E. (General Provisions; Enforcement)* apply.

F. Scope of Decision

See *Sec. 13A.2.7. (Scope of Decisions)*.

G. Appeals

1. General Procedures

See *Sec. 13A.2.8. (Appeals)*.

2. Decision Maker

The City Council is the appellate decision maker.

3. Filing

- a. An appeal may be filed by the applicant, any aggrieved party, the Mayor, or a member of the City Council. Unless a Board member is an applicant, he or she may not appeal any initial decision of the Director as it pertains to this Section.
- b. An appeal shall be filed in triplicate, and the Planning Department shall forward a copy of the appeal to the Board and the Cultural Heritage Commission.

4. Public Hearing

Before acting on any appeal, the City Council shall set the matter for hearing, giving notice in the manner specified in Subsection C. (Notice) of this Section.

5. Appellate Decision

- a. The City Council may grant, conditionally grant, or deny the appeal.

- b.** The City Council shall render its decision within 75 days after the expiration of the appeal period or within an additional period as may be agreed upon by the applicant and the appellate body.
- c.** The failure of the City Council to submit a timely decision shall be deemed a denial of the appeal, and the original action on the matter shall become final.

H. Modification of Entitlement

1. Modification of an Approved Certificate of Appropriateness

Once a Certificate of Appropriateness becomes effective, the Director shall review any subsequent proposed modification to the project. The Director shall approve the modification if he or she finds the modification to be substantially in conformance to the original approved project. If the Director finds that the proposed modification does not substantially conform to the original approved project, then the applicant shall resubmit the project for a new Certificate of Appropriateness.

2. Modification Procedure

To modify an approved Certificate of Appropriateness, an applicant shall submit to the Department of City Planning plans, elevations, or details of the proposed modification and any additional information determined necessary for conformance review. The Director may forward proposed modifications to the Board and/or the Cultural Heritage Commission's designee for consultation.