

June 11, 2014

Luciralia Ibarra City Planner – Major Projects Department of City Planning 200 N. Spring Street, Rm 750 Los Angeles, CA 90012

RE: 332-336 North Oakhurst Drive (Case No. VTT-70499-CN and CEQA No. EVN-2001-3325-MND)

Dear Ms. Ibarra,

As you are aware, the City of Beverly Hills serves as a responsible agency pursuant to the California Environmental Quality Act for the purposes of processing the subject project, while the City of Los Angeles serves as the lead agency. Previously, the City of Beverly Hills requested that additional analysis of potential impacts to historic resources be undertaken as part of the proposed mitigated negative declaration (MND). In response to this request, the project applicant engaged Kaplan Chen Kaplan to further assess potential impacts. The City is aware that the applicant-prepared Historic Resource Evaluation concludes that the subject properties are not potentially historic, and the City further understands that the City of Los Angeles intends to support this conclusion. The purpose of this letter is to notify the City of Los Angeles that the City of Beverly Hills has engaged its own historic consultant, Historic Resources Group, to study the subject properties. Contrary to the conclusions of the applicant-prepared assessment, the assessment prepared by Historic Resources Group concludes that the subject properties are located within a potential historic district, which is eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Beverly Hills historic district due to the notable concentration of Period Revival style multi-family residences from the The assessment prepared by Historic Resources Group is attached for your 1930s. information.

Because the attached assessment concludes that 100% of the buildings located along the east side of North Oakhurst Drive between Alden Drive and West 3rd Street contribute to the potential historic district, demolition of the structures to make way for the proposed project would result in impacts to the potential district.

332-336 North Oakhurst Drive Historic Analysis June 11, 2014

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 21080(d), if there is substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. For the purposes of CEQA, substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact. Historic Resources Group is recognized as an expert in the field of historic preservation, and their expert opinion (based on facts developed through intensive fieldwork and investigations) that the subject properties contribute to a potential historic district qualifies as substantial evidence. Because there is conflicting expert opinion regarding the potential historic district, the City of Beverly Hills respectfully requests that an EIR be prepared for the project to fully assess and disclose the project's impacts, and to identify any mitigations or project alternatives that can eliminate or reduce the project impacts. In preparing the EIR required for the project, the appropriate public review and evaluation guidelines for EIRs must be met pursuant to CEQA statutes and Guidelines.

The City of Beverly Hills remains committed to processing the subject project in a cooperative manner with the City of Los Angeles, and is available to meet with the City of Los Angeles and the project applicant to explore possible mitigation measures and/or project alternatives. Thank you for your attention to this important matter, and please feel free to contact me directly to discuss the information provided in this letter. I can be reached at 310-285-1192 or via email at <a href="mailto:srojemann@beverlyhills.org">srojemann@beverlyhills.org</a>.

Sincerely,

Shena Rojemann, Associate Planner

Attachment: City of Beverly Hills - Historic Memo (prepared by Historic Resources Group)

## To: Reina Kapadia, Shena Rojemann

## City of Beverly Hills

From: Christine Lazzaretto

Date: May 29, 2014

Per your request, the survey team for the 2014 Beverly Hills Citywide Survey Update has reviewed the potential historic district along North Oakhurst Drive for potential historic significance. North Oakhurst Drive was identified as a potential historic district during the preliminary reconnaissance for the survey update, and that finding has been confirmed following completion of an intensive level survey of the area.¹ The team has determined that North Oakhurst Drive is eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Beverly Hills historic district. The district overall, as well as the individual buildings, retain an unusually high level of historic integrity.

### DESCRIPTION

The Oakhurst Drive Residential Historic District is a multi-family historic district located along the eastern edge of Beverly Hills at the city's boundary with Los Angeles. The district is one block in size and comprised of nine multi-family residences on the east side of North Oakhurst Drive between Alden Drive and West 3rd Street. The topography of the district is flat and the lots are uniform, with a rectangular form, modest size, and consistent setback. The residences are two-story duplexes, four-plexes, and small-scale apartment houses predominantly in the Spanish Colonial Revival or Minimal Traditional styles with Monterey Revival and American Colonial Revival features. They have concrete walkways and rear, detached garages accessible via a rear alley. Significant district features include a concrete sidewalk and parkway, with mature Jacaranda trees lining both sides of the street. All nine properties contribute to the district. Common alterations include window replacements and the addition of window security bars.

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# City of Beverly Hills North Oakhurst Drive

#### HISTORIC RESOURCES GROUP

12 S. Fair Oaks Avenue, Suite 200, Pasadena, CA 91105-1915 Telephone 626 793 2400, Facsimile 626 793 2401 historicla.com

<sup>&</sup>lt;sup>1</sup> Per the identified fieldwork methodology for the project, the reconnaissance survey was undertaken by the entire project team; intensive level fieldwork was conducted by Architectural Resources Group.

SIGNIFICANCE 2

The North Oakhurst Residential Historic District is significant as a notable concentration of Period Revival style multi-family residences from the 1930s. Its period of significance has been defined as 1930 to 1939, which encompasses the earliest and latest residences constructed during the district's development. The historic district is part of a tract that was originally subdivided in 1922 by the Rodeo Land and Water Company and the residences were constructed in the subsequent decade by individual property owners. Various architects and builders contributed to the district with notable local architect, S. Charles Lee, designing the building at 344 North Oakhurst Drive. One hundred percent of the residences contribute to the district's significance, making the North Oakhurst Residential Historic District a cohesive representation of Period Revival style multi-family residences.

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#### North Oakhurst Drive Potential Historic District

APN	No	Street	Suffix	c Dir	Architectural Style	Year Built	Architect	Builder	BH Master List [Y/N]	Property Type			2014 Survey Evaluation CR STATUS CODE	Evaluation	District Name	District [C/NG/Not Visible]
4335007005	332	Oakhurst	Dr	N	Spanish Colonial Revival	1931	Neddham; Paul	Illegible	No	MFR	some windows replaced	5D3	3CD	3D	North Oakhurst Historic District	Contributor
4335007007	334	Oakhurst	Dr	N	Spanish Colonial Revival; Monterey Revival	1930	Northman; E.	Northman; E.	No	MFR	security bars at windows added	5D3	3CD	3D	North Oakhurst Historic District	Contributor
4335007009	336	Oakhurst	Dr	N	Spanish Colonial Revival; Monterey Revival	1930	permit not available online, presumably work of E. Northman	permit not available online, presumably work of E. Northman	No	MFR	security bars at windows added	5D3	3CD	3D	North Oakhurst Historic District	Contributor
4335007011	338	Oakhurst	Dr	N	Minimal Traditional; American Colonial Revival	1939	Unknown: permit not available electronically	Unknown: permit not available electronically	Unknown: permit not available	MFR	security bars at windows added	5D3	3CD	3D	North Oakhurst Historic District	Contributor
4335007103	340	Oakhurst	Dr	N	Spanish Colonial Revival	1930	Unknown: permit not available electronically	Unknown: permit not available electronically	Unknown: permit not available	MFR	cladding altered	5D3	3CD	3D	North Oakhurst Historic District	Contributor
4335007015	342	Oakhurst	Dr	N	Minimal Traditional; American Colonial Revival	1939	None listed on permit	Rees, J.J.	electronically No	MFR	security bars at windows added; some windows replaced	5D3	3CD	3D	North Oakhurst Historic District	Contributor
4335007017	344	Oakhurst	Dr	N	Minimal Traditional; American Colonial Revival	1937	Lee; S. Charles	Associates Inc.	Yes	MFR	security bars at windows added	5D3	3CD	3D	North Oakhurst Historic District	Contributor
4335007019	346	Oakhurst	Dr	N	Minimal Traditional; American Colonial Revival	1936	Scherer; L. G.	California Engineering and Construction Co.	No	MFR	some windows replaced	5D3	3CD	3D	North Oakhurst Historic District	Contributor
4335007021	348	Oakhurst	Dr	N	Minimal Traditional; American Colonial Revival	1936	Scherer; L. G.	California Engineering and Construction Co.	No	MFR	none visible	5D3	3CD	3D	North Oakhurst Historic District	Contributor