

## Communication from Public

**Name:** Heather McPherson  
**Date Submitted:** 04/16/2026 10:54 PM  
**Council File No:** 25-0690  
**Comments for Public Posting:** As Executive Director of the Silver Lake Independent Jewish Community Center, I submit the attached letter requesting review of the Arbitrary Threshold Disqualification of SIJCC Application.

April 16, 2026

VIA EMAIL

Councilmember Ysabel Jurado, Chair  
Councilmember John Lee  
Councilmember Imelda Padilla  
Ad Hoc Committee on Measure United to House Los Angeles (ULA)  
Los Angeles City Council  
200 N. Spring Street, Room 340  
Los Angeles, CA 90012

**Re: SIJCC Housing + Campus – 1110 N. Bates Ave., Los Angeles, CA 90029  
Arbitrary Threshold Disqualification Under the 2025–2026 Homes for LA NOFA  
Request for ULA Committee Oversight and Intervention**

Dear Chair Jurado and Members of the Ad Hoc Committee on Measure United to House Los Angeles (ULA):

I write on behalf of Silver Lake Independent Jewish Community Center (“SIJCC”) Housing + Campus and Elysian Housing, LLC regarding the arbitrary disqualification of SIJCC’s application from the 2025–2026 Homes for LA NOFA — and to request this Committee’s intervention.

I bring this matter to the Committee not to re-litigate the merits of the application, but because these administrative failures raise serious questions about LAHD’s threshold review process that bear directly on the Committee’s oversight of Measure ULA — and on the fairness of Round 2 for all applicants.

I respectfully request that the Committee direct LAHD to reconsider the disqualification and allow the Application to proceed to scoring. Supporting detail for each of the five points above follows.

### **I. THE SCALE OF THE PROBLEM: LAHD’S OWN TRANSMITTAL LETTER**

**47% of all applicants filed appeals — and LAHD approved half of them. This is not an isolated error.**

The issues raised in this letter are not isolated to a single project. LAHD’s own transmittal letter to the Council reporting on the results of the 2025–2026 Homes for LA NOFA reveals the scale of the problem:

*“In total, 82 of the 174 projects submitted an appeal. Of the 82 projects that appealed, the Department denied 41 of the appeals and approved or partially approved 41 of the appeals.”*

Nearly half of all projects submitted — 82 out of 174, or 47% — filed appeals. That is not a sign of a well-administered threshold review process. It is a sign that applicants across the board had serious concerns about the fairness and accuracy of LAHD’s determinations. The fact that LAHD itself approved or partially approved 41 of those 82 appeals confirms that a significant number of disqualifications were incorrect on their face, while also providing complete discretion to the Department to determine who could proceed and who could not.

For the projects that did not prevail on appeal — including SIJCC — this context matters. When nearly half of all applicants are challenging threshold determinations, and when LAHD is correcting nearly half of those challenges internally, the question is not whether errors occurred: LAHD has already acknowledged that they did, at scale. The question is whether the appeal process was administered fairly enough to catch all of them. In SIJCC’s case, as detailed below, the answer is no — both because the regulatory basis for the disqualification does not exist in the published rules, and because the appeal was mishandled in ways that denied the Applicant a genuine opportunity to be heard.

With this number of disqualifications, the threshold process is functioning as an arbitrary filter, with no consistency and the opportunity for selective consideration for certain organizations. That is not how a \$400 million publicly-funded competitive grant program should work, especially one as scrutinized as Measure ULA. The Committee has every reason to examine this pattern before Round 2 opens.

## **II. THE PROJECT AND ITS APPLICATIONS**

The Silverlake Independent Jewish Community Center, in partnership with Elysian Housing, LLC, Las Palmas Foundation, and Atlantic-Pacific Companies, proposed to redevelop its existing campus at 1110 N. Bates Ave. into a 99-unit, 100% affordable mixed-use development that would also include a reimagined Jewish community center, preschool, fitness center, community pool, and public event space. The project is by-right under existing zoning, is organized as a Community Land Trust (“CLT”), and was designed to meet and exceed the NOFA’s program goals.

SIJCC submitted two applications: one under the ULA Multifamily New Construction Program and one under the ULA Alternative Models New Construction Program. The Alternative Models program gives first priority to CLT-partnered applications — a designation SIJCC holds. Both applications were materially identical in content.

### **III. PROCEDURAL HISTORY AND LAHD'S FAILURES**

**LAHD sent the appeal denial to the wrong address, never notified the attorneys who filed the appeal, and missed its own regulatory deadline by 48 days. The Applicant only found out the denial existed by chance.**

The following timeline documents the administrative failures that compounded the underlying regulatory error:

- October 20, 2025: Both applications submitted by the deadline.
- Early November: Self-scores were published online, and SIJCC Housing + Campus showed as the top score within the entire Alternative Models category and within the ULA Multifamily New Construction category.
- November 25, 2025: LAHD published scores. The Alternative Models application received a score of 0, indicating threshold failure. In an anomaly reflecting disordered review, LAHD sent a score sheet for the Multifamily application but no pass/fail sheet, and a pass/fail sheet for the Alternative Models application but no score sheet — despite the applications being materially identical.
- January 28, 2026: LAHD transmitted threshold disqualification notices to greg@elysian.la, the contact address on the applications.
- February 4, 2026: The Applicant, represented by Victor de la Cruz of Manatt, Phelps & Phillips, LLP (“Manatt”), submitted a timely written appeal to LAHD.H4LANOFA@LACITY.ORG, the address specified in the NOFA.
- February 18, 2026 (approx.): Deadline by which LAHD was required to respond under Section 6.3 of the NOFA Regulations, which mandates a written response within 14 calendar days.
- March 5, 2026: LAHD issued an appeal denial — already 15 days past the regulatory deadline — but did not transmit it to Victor de la Cruz or anyone at Manatt. Instead, LAHD sent the denial only to gregcomanor@elysian.la, an email address not associated with the appeal submission. Manatt was not copied or notified in any form.
- March 5 – April 7, 2026: Neither the Applicant nor Manatt received the appeal denial letter. Manatt continued to operate without knowledge that a denial had been issued, unable to evaluate legal options or protect the Applicant’s financing timeline.
- April 7, 2026: The existence of the denial came to light only when it was mentioned incidentally in an unrelated meeting. LAHD then transmitted it to the correct parties — 48 days after the regulatory deadline, and 33 days after the letter was dated.

LAHD missed the regulatory response deadline, sent the denial to the wrong address, failed to notify counsel of record, and the Applicant only discovered the denial had been issued by chance. These are not minor procedural irregularities — they effectively denied the Applicant and its counsel the ability to respond, escalate, or protect their legal rights for over five weeks.

#### **IV. LAHD'S INTERNAL RECORDS ARE CONTRADICTORY**

**LAHD produced two internal checklists for the same application. One says it passed threshold review. The other says it failed. No explanation was ever provided.**

The Applicant has obtained LAHD's Threshold Review Checklist for the SIJCC Alternative Models application. The checklist exists in two irreconcilable versions:

**Version 1 (marked "Threshold Review: Pass"):**

- Document 7 (Soils Report): Fail
- Document 10 (Self-Score Form): Pass
- Document 13 (Accessibility Standards): Pass
- Overall Determination: Pass

**Version 2 (marked "Threshold Review: Fail"):**

- Document 9 (Architectural Plans): Pass
- Document 10 (Self-Score Form): Fail
- Document 13 (Accessibility Standards): Fail
- Overall Determination: Fail

Under Version 1, the only deficiency is the Soils Report — which LAHD's own appeal denial acknowledged was resolved by the affidavit submitted in lieu, and which was expressly sanctioned as sufficient in LAHD's published Q&A guidance to all applicants. Under Version 1, the application passed threshold and should have been scored.

The self-score form (Document 10) was submitted. It is confirmed as passing on Version 1, and in the very same email in which LAHD notified SIJCC of its disqualification, LAHD attached a List of Applications showing SIJCC's Base Self-Score of 100 — demonstrating that LAHD's own systems received and processed the self-score. The failure marking on Version 2 was never disclosed to the Applicant and was never cited in any LAHD communication. The appeal denial addressed only Document 13 (accessibility).

The existence of two contradictory internal checklists for the same application — one showing a pass, one showing a fail, with no explanation provided — is itself a matter warranting the Committee's attention.

#### **V. THE ENHANCED ACCESSIBILITY PROGRAM CONTRADICTION**

**LAHD disqualified SIJCC for failing accessibility standards and simultaneously awarded it bonus points for exceeding those same standards. Both cannot be true.**

SIJCC not only submitted the required Accessibility Self-Certification Form — it also elected to participate in LAHD's Enhanced Accessibility Program ("EAP"), a voluntary program awarding 10 bonus scoring points to applicants who commit to accessibility features exceeding the NOFA's minimum requirements. SIJCC submitted a signed EAP form with the required features checked and executed by SIJCC's Executive Director.

It is logically impossible for LAHD to simultaneously disqualify an application for failing to meet accessibility standards while that same application qualifies for bonus points for exceeding those

standards. One determination directly negates the other. This contradiction was raised in the appeal and was never addressed in LAHD's denial.

## **VI. LAHD CITED THE WRONG SECTION OF DOCUMENT 13A — AND IT WAS THEIR ONLY JUSTIFICATION**

**LAHD's entire basis for disqualification was a single quoted passage from the Plan Check section of Document 13a — not the Application section. The Application section requires only a signed certification. SIJCC submitted it.**

The appeal denial letter, signed by Assistant General Manager Craig Arceneaux on March 5, 2026, provides the following as its sole regulatory basis for the accessibility disqualification:

*“Page 2 of Document 13a includes the following information: ‘The Cover Sheet of plans shall list all applicable accessibility codes and standards for the project, including the list of funding sources with related architectural/accessibility requirements, matrices of units and matrices of parking spaces. This must include all federal, state and local accessibility codes and standards, including the designated FHA Safe Harbor.’ The application did not pass threshold review because the required accessibility information was not included.”*

This is the entirety of LAHD's regulatory justification — a single quoted passage, and nothing else. No other provision is cited. No other analysis is offered. The disqualification of a 99-unit affordable housing project, the denial of a formal legal appeal, and the expenditure of LAHD staff resources were all predicated solely on this one passage.

The passage LAHD quoted comes from Section 2.B of Document 13a, which sits within Section 2, titled “Plan Check Submittal.” It is not from the Application phase (Section 1) of Document 13a.

Document 13a expressly organizes its requirements into three phases: (1) Project Application, (2) Plan Check Submittal, and (3) Construction. Section 2 — and all of its subsections, including Section 2.B and the “Required Information in Reviews and Reports” items that follow it — govern the submission of construction documents and CASp Accessibility Design Review Reports to LAHD prior to LADBS plan check, which occurs after a funding award. The unit and parking matrices LAHD required (items 10 and 11 of Document 13a) are subordinate details within Section 2, specifying what the CASp must include in those post-award Plan Check reports. None of this has any application to pre-award NOFA submissions.

The application-phase requirement is in Section 1.A of Document 13a, which requires one thing only: a signed Access Compliance Certification emailed to [lahd.retrofit@lacity.org](mailto:lahd.retrofit@lacity.org). SIJCC submitted that certification, signed by its Executive Director, on October 10, 2025. LAHD did not dispute this in the appeal denial. LAHD's sole stated justification for disqualification was a Plan Check requirement that does not apply at the application stage. That is the entirety of the record.

## **VII. SECTION 9.4 IS NOT A THRESHOLD DOCUMENT AND CANNOT SUPPORT DISQUALIFICATION**

**After declaring the appeal “final and not subject to appeal,” LAHD raised a new justification it had never previously cited — Section 9.4, a Construction Standards provision that is not a threshold document and has no role in application review.**

Following the appeal denial, LAHD indicated reliance on Section 9.4 of the NOFA Regulations (“Accessibility Certification Requirements”) as additional justification for the disqualification. This argument fails for three independent reasons.

### **A. Section 9.4 Does Not Appear in the NOFA’s Threshold Documents**

The NOFA Regulations establish a precise and exhaustive list of threshold documents in Section 5 and Appendix I. The threshold requirement for accessibility is Document 13, defined as the Accessibility Self-Certification Form. The governing implementation document for Document 13 is the August 14, 2025 Accessibility Report Requirements and Procedures memo (“Document 13a”), which is posted on LAHD’s Homes for LA NOFA webpage as the sole threshold reference document for accessibility compliance.

Section 9.4 appears nowhere in Section 5, Appendix I, or any threshold checklist. It is not listed as a threshold document. It is not referenced in the definition of Document 13. It does not appear among the required materials checklist. Under the NOFA’s own published framework, it has no role in the threshold review of applications.

### **B. Section 9.4 Is Located in the Construction Standards Section**

Section 9.4 is found within Section 9 of the NOFA Regulations, titled “Construction Standards.” Section 9 governs what funded projects must build — not what applicants must submit to qualify for funding. Section 9.4 specifically addresses what accessibility standards a funded project’s construction must meet. Its operative language — “the development must construct at least...” — is the language of a construction obligation, not an application submission requirement.

### **C. Section 9.4 Contains No Application-Phase Documentation Requirement**

Nothing in the text of Section 9.4 requires applicants to submit a unit accessibility matrix, a parking matrix, or any other specific document as part of a NOFA application. Furthermore, Section 9.6 of the same Construction Standards section — immediately following Section 9.4 — directly addresses what is required at application time:

*“At the time of application, an Accessibility Compliance Certification must be completed and signed by the applicant... certifying that the development is compliant with applicable accessibility standards.”*

The NOFA Regulations answer the question internally, within the same section LAHD now cites: the certification is what is required at application. LAHD cannot invoke a Construction Standards provision to impose an application-phase documentation requirement that the Construction Standards section itself confirms does not exist.

Finally, Section 9.4 was not cited in the original disqualification notice and was not cited in the appeal denial. It emerged only after the appeal was denied and the matter declared “final and not subject to appeal.” An agency cannot introduce a new regulatory basis for a final decision after that decision has been made.

### **VIII. THE NOFA ONLY AUTHORIZES DISQUALIFICATION FOR THRESHOLD FAILURES — AND SIJCC MET THE ONLY THRESHOLD REQUIREMENT DOCUMENT 13a IMPOSES AT APPLICATION**

**Under the NOFA’s own rules, LAHD can only disqualify for threshold failures. The provisions LAHD cited are not threshold requirements. Even if they were correctly interpreted, LAHD had no authority to disqualify on these grounds.**

The foregoing analysis is reinforced by a broader and fundamental point: under the NOFA’s own published rules, disqualification is only permitted for failure to meet threshold requirements. LAHD has no regulatory authority to disqualify applications on any other basis.

Section 5 of the NOFA Regulations states explicitly:

*“If an application does not meet these threshold requirements, it will not be considered for the Homes for LA NOFA.”*

The word “these” refers specifically and exclusively to the threshold requirements defined in Section 5 and listed in Appendix I. Section 5 further provides:

*“Determination of completeness and compliance with thresholds and scoring of the application shall be based entirely on the application and all documents submitted therewith as of the filing deadline.”*

These two sentences together establish a closed, exhaustive system. Disqualification authority is limited to threshold failures. There is no catch-all discretionary authority to disqualify based on plan check requirements, construction standards, or any provision outside the threshold framework defined in Section 5 and Appendix I.

Document 13a — the August 14, 2025 Accessibility Report Requirements and Procedures memo — is correctly understood as the threshold document implementing Document 13. But Document 13a does not impose the unit matrix as an application-phase threshold requirement. Document 13a’s application-phase requirement is found in Section 1.A, which requires only a signed Access Compliance Certification. The unit and parking matrix requirements — items 10 and 11 — are subordinate details within Section 2 (“Plan Check Submittal”), specifying what the CASp consultant must include in the Accessibility Design Review Report submitted to LAHD prior to LADBS plan check. Section 2.B — the provision LAHD quoted verbatim as its only justification — is the governing Plan Check cover sheet requirement from which those matrix details flow. The entire Section 2 framework, including items 10 and 11, applies after a funding award. It has no application to pre-award NOFA submissions. SIJCC submitted the signed certification required by Section 1.A. It met the threshold.

Section 9.4, by contrast, is not a threshold document at all. It does not appear in Section 5, Appendix I, or any threshold checklist. It is a Construction Standards provision governing what funded projects must build. Even setting aside that it was never cited until after the final denial, it has no place in threshold review under any reading of the NOFA.

Put simply: the NOFA creates one and only one basis for disqualification — failure to meet the threshold requirements listed in Section 5 and Appendix I. The threshold accessibility requirement is Document 13, implemented by Document 13a. Document 13a required a signed certification at application phase. SIJCC submitted it. SIJCC met the threshold. The plan check language LAHD quoted in its denial, and the Construction Standards provision LAHD raised afterward, are not threshold requirements and cannot support disqualification under the NOFA’s own rules.

## **IX. THE ACCESSIBILITY DISQUALIFICATION HAS NO BASIS IN THE PUBLISHED REGULATIONS**

In sum, the unit matrix LAHD required does not appear as an application-phase threshold requirement anywhere in the published NOFA Regulations:

- Appendix I — the official published Threshold Checklist — lists Document 13 as: “Accessibility Self-Certification Form and Enhanced Accessibility Program Checklist.” No unit matrix is listed.
- Section 5 of the NOFA Regulations defines Document 13 as a signed certification that the project “shall be designed, constructed, and thereafter maintained in compliance” with applicable accessibility standards. It is a certification of future intent, not a construction-level documentation requirement.
- Document 13a — the threshold document for accessibility, available on LAHD’s NOFA webpage — requires only a signed Access Compliance Certification at the application phase (Section 1.A). The unit and parking matrix requirements appear within Section 2 “Plan Check Submittal” as details of what the CASp Accessibility Design Review Report must contain when submitted to LAHD prior to LADBS plan check — a post-award obligation. Items 10 and 11 of Document 13a (“Required Information in Reviews and Reports”) are subordinate requirements within the Plan Check phase, specifying the contents of CASp reports. LAHD’s appeal denial quoted Section 2.B of Document 13a verbatim as its only justification — that is a Plan Check provision, not an application-phase threshold requirement.
- Section 9.4 of the NOFA Regulations is a Construction Standards provision — not a threshold document. It does not appear in Appendix I or Section 5, contains no application-phase documentation requirement, and was cited by LAHD for the first time only after declaring the appeal denial final. It has no role in threshold review under the NOFA.
- Section 9.6 of the NOFA Regulations — in the same Construction Standards section as Section 9.4 — confirms that the certification is the application-phase accessibility requirement.
- Section 5 of the NOFA Regulations limits disqualification authority exclusively to threshold failures as defined in Section 5 and Appendix I. No provision authorizes disqualification based on plan check or construction standards provisions.

There is no definition of “Conceptual Drawings” as a requirement of the application. Since SIJCC Housing + Campus is a by-right project, the design drawings, as allowed by the NOFA, were conceptual in nature and did not require construction-level plan details.

## **X. SUMMARY OF CONCERNS AND REQUESTED RELIEF**

The Committee may wish to consider the following questions in connection with its oversight of Measure ULA:

- Why did 82 of 174 applicants — 47% — file threshold appeals, and what does that rate indicate about the consistency and accuracy of LAHD's threshold review process?
- Why did LAHD produce two contradictory threshold checklists for the SIJCC application, and which one reflects the actual basis for the disqualification?
- How could one page of an internal checklist state that an application passed a threshold category, while the second page showed the opposite result?
- Why was the appeal denial sent to the wrong address and not transmitted to the attorneys of record who filed the appeal, resulting in a 48-day gap before the Applicant learned the denial had been issued?
- How can an application be simultaneously disqualified for failing accessibility standards and eligible for bonus points for exceeding those same standards?
- What provision of the published NOFA Regulations — by section and page number — imposes the unit accessibility matrix as a threshold document required at the application phase, given that the NOFA only authorizes disqualification for threshold failures listed in Section 5 and Appendix I, and given that LAHD's own appeal denial cited only a Plan Check provision?
- Why did LAHD introduce Section 9.4 — a Construction Standards provision not listed as a threshold document — as a new justification only after declaring the appeal denial final?

The Applicant respectfully requests that the Committee:

- Direct LAHD to reconsider the SIJCC Housing + Campus threshold determination, consistent with the regulatory analysis set forth herein, and allow the Application to proceed to scoring consistent with its CLT priority status;
- Direct LAHD to provide a written explanation of the two contradictory threshold checklists and the basis for the disqualification;
- Direct LAHD to confirm whether any other applications were disqualified on Document 13 or Document 10 grounds, and whether any applicants were permitted to cure or supplement documentation after the deadline; and
- Consider whether LAHD's threshold review procedures, record-keeping, legal notice practices, and appeal process warrant procedural reforms before Round 2 opens — for the benefit of all future applicants.

I am available to present this matter to the Committee at its convenience. Attached to this letter are the two contradictory threshold checklists, LAHD's Appeal denial letter and the August 14, 2025 Accessibility Report Requirements and Procedures, the sole Threshold Document for Document 13a that is available on LAHD's NOFA website.

Thank you for your attention to this matter and for the Committee's ongoing stewardship of Measure ULA.

Respectfully submitted,

Heather McPherson

Executive Director, Silver Lake Independent Jewish Community Center

cc: Councilmember Hugo Soto-Martinez, Council District 13

**THRESHOLD REVIEW CHECKLIST**  
**ULA - ALTERNATIVE MODELS: NEW CONSTRUCTION PROGRAM**

**PROJECT NAME:** SIJCC Housing + Campus  
**SPONSOR NAME:** Silverlake Independent Jewish Community Center  
**TAX CREDITS INCLUDE:** Yes  
**PSH PROJECT:** No  
**NUMBER OF UNITS:** 99

**THRESHOLD REVIEW:** Pass

	THRESHOLD ITEM	DOCUMENT	STATUS
1	Project Demonstrates Financial Feasibility	Document 1	Pass
2	Project Sponsor must disclose potential conflicts of interest and legal/findings liabilities	Document 2	Pass
3	Project must have Site Control and Clear Title	Document 3	Pass
4	Project Sponsor must pass Sponsor Portfolio Underwriting	Document 4	Pass
5	Project site valuation must be supported by an appraisal.	Document 5	Pass
6	Project Sponsor must commission ESA and remediate hazards	Document 6	Pass
7	Projects must undergo evaluation of geo-technical engineering of subsurface soils.	Document 7	Fail
9	Projects must comply with LAHD architectural standards; ULA NC projects must meet a 40 unit count minimum	Document 9	Pass
10	Sponsor must provide a self-score for NOFA funding program for which it is applying	Document 10	Pass
11	Sponsor must provide relocation assistance to projects involving displacement of qualified households	Document 11	Pass
13	Projects must comply with Accessibility Standards	Document 13	Pass
14	Sponsor must commit to timely completion of work	Document 14	Pass
15	Sponsor must certify compliance with LAHD business policy and general City requirements	Document 15	Pass
16	Construction must comply with a PLA (all ULA projects with at least 40 units)	Document 21	Pass
17	Project must address neighborhood level needs	Document 22	Pass
18	Project must address racial disparities	Document 23	Pass
19	Project incorporates tenant governance and development team has tenant governance experience	Document 24	Pass
20	Sponsor must engage community to identify environmental hazards beyond baseline ESA	Document 25	Pass
21	List of Entities and Names of Partners	Document 27	Pass

**THRESHOLD REVIEW CHECKLIST**  
**ULA - ALTERNATIVE MODELS: NEW CONSTRUCTION PROGRAM**

**PROJECT NAME:** SIJCC Housing + Campus  
**SPONSOR NAME:** Silverlake Independent Jewish Community Center  
**TAX CREDITS INCLUDED:** Yes  
**PSH PROJECT:** No  
**NUMBER OF UNITS:** 99

**THRESHOLD REVIEW:** Fail

	THRESHOLD ITEM	DOCUMENT	STATUS
9	Projects must comply with LAHD architectural standards;	Document 9	Pass
10	Sponsor must provide a self-score for NOFA funding	Document 10	Fail
13	Projects must comply with Accessibility Standards	Document 13	Fail

City of Los Angeles

Tiena Johnson Hall, General Manager  
Luz C. Santiago, Acting Executive Officer



LOS ANGELES HOUSING DEPARTMENT  
1910 Sunset Blvd, Ste 300  
Los Angeles, CA 90026  
Tel: 213.808.8808

Anna E. Ortega, Assistant General Manager  
Luz C. Santiago, Assistant General Manager  
Craig Arceneaux, Assistant General Manager

housing.lacity.gov

Karen Bass, Mayor

VIA EMAIL

January 28, 2026

SIJCC Housing + Campus  
c/o Elysian Housing, LLC  
584 1/2 N Larchmont Blvd  
Los Angeles, CA 90004, USA,  
Attn: Greg Comanor, Director of Housing Development  
Email: gregcomanor@elysian.la

Re: **SIJCC Housing + Campus**  
**1110 N BATES AVE Los Angeles CA 90029**

Dear Greg Comanor:

In September of 2025, the Los Angeles Housing Department (LAHD) launched its inaugural Homes For LA (H4LA) Funding Program, which integrates United To House LA (ULA) resources with federal, state, and local sources. With the approval of the City Council, this unified financing strategy to deploy capital and operating subsidies will increase the construction and preservation of affordable housing across the City of Los Angeles.

LAHD received an application for the site located at 1110 N BATES AVE Los Angeles CA 90029 (“Project”) in response to the 2025-2026 H4LA Notice of Funding Availability (NOFA). The Department received a total of 176 applications requesting \$1,926,060,941 in LAHD funding across all programs.

As part of the NOFA selection process, LAHD staff reviewed your application to determine a total point score of 0 out of a total possible 130 points. Please find the attached LAHD Project Score for the above-referenced Project. Unfortunately, the application for the above-referenced Project did not meet LAHD’s threshold requirements and will not be considered for a funding award in round 1 of the H4LA NOFA.

If you would like to appeal LAHD’s determination, please submit your request in writing. The appeal must be sent to lahd.H4LANOFA@lacity.org, no later than 5:00 p.m. on February 04, 2026 and must specifically identify the justification for the appeal based upon previously submitted application materials. LAHD’s review of the appeal will be based upon the existing documentation you submitted with the original application. You may not appeal any other applicant’s score.

We acknowledge the substantial amount of time and effort involved in preparing this application and encourage you to consider reapplying in the next NOFA which is tentatively scheduled for Spring 2026.

Sincerely,

Craig Arceneaux  
Assistant General Manager

City of Los Angeles

Tiena Johnson Hall, General Manager  
Luz C. Santiago, Acting Executive Officer

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Luz C. Santiago, Assistant General Manager  
Craig Arceneaux, Assistant General Manager

housing.lacity.gov

Karen Bass, Mayor

VIA EMAIL

March 5, 2026

SIJCC Housing + Campus  
c/o Elysian Housing, LLC  
584 1/2 N Larchmont Blvd  
Los Angeles, CA 90004, USA,  
Attn: Greg Comanor, Director of Housing Development  
Email: gregcomanor@elysian.la

Re: SIJCC Housing + Campus  
1110 N BATES AVE., Los Angeles CA 90029

Dear Greg Comanor:

This letter is in response to the appeal letter submitted on February 4, 2026 regarding the scoring of the application for the SIJCC Housing + Campus project that submitted an application to the 2025-2026 Homes For LA Notice of Funding Availability (NOFA). The project earned an initial score of 0 out of 130 for the ULA Alternative Models New Construction Program.

After reviewing and considering your appeal, the Los Angeles Housing Department (LAHD) has determined the project's final score is 0 points because the project did not pass Threshold Review. Below, LAHD staff outlined the response(s) to your appeal in accordance with the Homes For LA NOFA Regulations and LAHD underwriting standards. The specific results are as follows:

- Document 7 (Soils Report): The application failed to provide the required documentation. According to page 34 of the Homes for LA Regulations, "All new construction projects must submit a Soils Report completed within the past 24 months of the Notice of Funding Availability application deadline, for the purposes of evaluating the geo-technical engineering characteristics of the on-site subsurface soils relative to the anticipated development." However, an affidavit was submitted in-lieu and will be accepted.
- Document 13a (Accessibility Requirements): The plans submitted in the application do not include the required unit matrix of the 15% mobility units and 10% communication units. This is a required information for Department staff to ensure that the project adheres to the Accessibility requirements in the regulations. This is a threshold requirement for applications to be reviewed further for scoring. Page 2 of Document 13a includes the following information: "The Cover Sheet of plans shall list all applicable accessibility codes and standards for the project, including the list

of funding sources with related architectural/accessibility requirements, matrices of units and matrices of parking spaces. This must include all federal, state and local accessibility codes and standards, including the designated FHA Safe Harbor.” The application did not pass threshold review because the required accessibility information was not included.

Unfortunately, the above-referenced project will not be recommended for funding in the Homes For LA NOFA this round because a sufficient number of higher-scoring applications were received to use all of the H4LA NOFA funding. This decision is final and not subject to appeal.

We acknowledge the substantial amount of time and effort involved in preparing this application and encourage you to consider reapplying in the next NOFA which is tentatively scheduled for Summer 2026.

Sincerely,

Craig Arceneaux  
Assistant General Manager

Tiena Johnson Hall, General Manager  
Tricia Keane, Executive Officer

Anna E. Ortega, Assistant General Manager  
Luz C. Santiago, Assistant General Manager  
Craig Arceneaux, Acting Assistant General Manager



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Karen Bass, Mayor

August 14, 2025

## ACCESSIBILITY REPORT REQUIREMENTS & PROCEDURES

### Certified Accessibility Specialist (CASp) Program Consultant Requirements:

1. A State of California licensed design professional (i.e. Architect or Engineer) who is also a State of California Certified Accessibility Specialist (CASp) Program consultant shall be hired by the developer and identified as a part of the development team.
2. The CASp consultant must be an independent, 3<sup>rd</sup> party consultant hired directly by the developer, and independent of the architect-of-record. The architect-of-record, who may also possess CASp credentials (as an individual or within the firm), cannot serve as a CASp consultant on their own projects.

### Access Compliance Requirements During Project Phases:

#### **1. Project Application**

The CASp consultant must be identified as part of the development team within the project application.

#### **A. Project Application (Conceptual Phase)**

The developer shall submit a signed copy of the Access Compliance Certification during the application period:

<b><u>Access Compliance Certification</u></b>	
I, _____ ( <i>print name &amp; title</i> ), Certify that this project shall be designed, constructed, and thereafter maintained in compliance with the applicable accessibility standards in respect to the given funding source(s), Federal, State and local government provided services, programs, and activities requirements.	
_____ Developer's Signature	_____ Date

**Email the signed document to [lahd.retrofit@lacity.org](mailto:lahd.retrofit@lacity.org)**

## 2. Plan Check Submittal

- A. The developer shall provide LAHD's Accessible Housing Program (AcHP) with an Accessibility Design Review Report by a CASp consultant of the construction documents at the time or prior to submission of plans to the Los Angeles Department of Building & Safety (LADBS). The submittal is electronic to [lahd.retrofit@lacity.org](mailto:lahd.retrofit@lacity.org) and must include PDF files of the Accessibility Design Review Report by the CASp consultant, a PDF file of the complete set of construction documents as being submitted to LADBS, and a Technical Services Request (TSR) form. AcHP may return the submittal to the developer if it does not meet the submittal requirements herein stated. AcHP will complete a review of the plans and Accessibility Design Review Report from CASp consultant within 38 days or less from the submittal date.
- a. AcHP will assign a lead staff person to conduct a screening review of the materials within 8 business days of the initial submittal and will contact the developer if any required documents are missing. The assigned AcHP staff will then conduct the design review within 25 business days and send the corrections to an AcHP supervisor for review. The AcHP supervisor will review the materials and provide corrections to the developer within 5 business days.
- B. The Cover Sheet of plans shall list all applicable accessibility codes and standards for the project, including the list of funding sources with related architectural/accessibility requirements, matrices of units and matrices of parking spaces. This must include all federal, state and local accessibility codes and standards, including the designated FHA Safe Harbor.
- a. Plans must include this note on the cover sheet: *"This is a publicly funded housing project and must comply with federal accessibility standards, California Building Code Chapter 11B, and local accessibility requirements by funding source."*
- b. Documents relating to additional accessibility or architectural requirements by funding source must be submitted, including: TCAC scoring sheet, universal design requirements, enhanced accessibility program sheet, and/or other relevant documents.
- c. FHA Safe Harbor: The requirements in 24 CFR Part 100.205, including ANSI A117.1-1986; the Fair Housing Accessibility Guidelines, including the Supplement to Notice of FHA Guidelines - Questions and Answers about the Guidelines, June 28, 1994.
- C. If there are substantial accessibility changes to the construction documents upon the plan check approval, a revised electronic set of plans must be provided to LAHD's Accessible Housing Program Retrofit Unit ([lahd.retrofit@lacity.org](mailto:lahd.retrofit@lacity.org))
- D. Plans shall include a page that is titled Accessible Means of Egress, with calculations and diagrams. Plan page shall clearly indicate the required methods for Accessible Means of Egress for the project per CBC 1009.
- E. Senior projects shall include a plan page that provides details for handrails and backing, in compliance with CIV 51.2. (2)
- F. Senior projects shall include a plan page that provides lighting plans and calculations in order to provide evidence of compliance with CIV 51.2. (3)

### 3. Construction Phase

A. The developer, during construction, shall provide LAHD with written Accessibility Reports from a CASp consultant at a minimum of two stages, as listed below. The need for additional inspections or reports may rise depending on the phases of the project and/or on the occupation status. The developer shall also request the CASp consultant's field inspection and send the CASp's inspection report prior to scheduling the LAHD inspection.

**a. Rough Inspection Reports for New Construction/Substantial Alteration Projects and Progress Accessibility Reports for phased Substantial Alteration Projects**

Post-framing inspection items to be reviewed include, but are not limited to, wall reinforcement for future grab bar installation, switches, outlets and environmental control placement, framed passage door openings, kitchen and bathroom layouts in each type of unit type.

The project CASp must review all public and common use areas completed to date. Issue field review report to LAHD within 10 business days of inspection. [*Rough/Progress Inspection Report*]

LAHD's Accessible Housing Unit staff will conduct a site inspection after receiving the Rough/Progress Inspection Report to confirm compliance at the rough framing stage of the project

**b. Final Inspection Reports for all types of projects**

Final construction completion inspection, reviewing finished units. Items to be reviewed include, but are not limited to, thresholds, cabinet installation for clearance, switches, outlets, and environmental controls, clear floor space at fixtures and appliances, kitchen and bathroom layouts. Accessible pedestrian routes as well as public areas including the leasing office, common use areas and amenities, and accessible resident and public area parking will also be reviewed. CASp to issue a field review full report to LAHD within 10 business days of inspection. [*Final Accessibility Report*]

LAHD's Accessible Housing Unit staff will conduct a Final Accessibility Site Inspection after receiving the Final Accessibility Report to confirm compliance at project completion. If non-compliant items are found, an updated Final Accessibility Report will be required.

### 4. Notes on Certificates

A. Temporary Certificate of Occupancy: LAHD will not issue a clearance for issuing a Temporary Certificate of Occupancy unless all non-compliant items in the units are corrected and an accessible route from the public right of way and the development's parking to each of the units exist.

a. AcHP staff will issue a TCO clearance within five business days of receiving a complete request for a TCO from an ED1 applicant, provided the requirements above are met.

- B.** Certificate of Occupancy: LAHD will not issue a clearance for issuance of a Certificate of Occupancy or final building permit signed off by LADBS and release of a final retention payment unless all of the following are met:
- a.** Corrections issued by LAHD are completed and approved.
  - b.** LAHD approves the final Accessibility Report from the project's CASp consultant.
  - c.** Expert Recommendations and City Certification of Compliance with ACSA are issued.
  - d.** Neutral Accessibility Consultant (NAC) Verification and City Certification of Compliance with Accessibility Standard with VCA are issued.
- C.** AcHP staff will schedule a NAC re-inspection for any correction requiring NAC verification within 5 business days of a request by an ED1 applicant. If there are no further corrections as a result of the reinspection, the NAC will issue a report within 5 business days of the re-inspection indicating there are no further deficiencies. AcHP will then issue the clearance for the Certificate of Occupancy.

## **Required Information in Reviews and Reports**

The following information is to be provided within all Accessible Design Reviews and Accessibility Reports.

1. Name and address of property;
2. Include if applicable:
  - Dates of Plan Review
  - Date of Site Inspection
  - Date Report was completed;
3. List all applicable accessibility Codes and Standards (Federal, State, and local);
4. Developer Information:
  - Name
  - Address
  - Contact Person
  - Phone Number
  - Email Address;
5. CASp Consultant Information:
  - Name
  - Address
  - Phone Number
  - Email Address
  - CASp Number
  - CASp Certification Expiration Date
  - CASp Signature and Date (Wet Signature and Date);
6. Architect of Record:
  - Name
  - Address
  - Contact Person
  - Phone Number
  - Email Address;
7. List the Types of Funding that will be used for this project (to be provided by the developer) Provide copies of funding agreements with Los Angeles County and California Tax Credit Allocation Committee;
8. Provide a detailed Scope of Work for the project and project type (New Construction, Rehabilitation, Acquisition, New Construction and Rehabilitation). For rehabilitation projects please provide a spreadsheet that details the scope of work in each unit, all common areas, and parking;
9. List any request made for Technical Infeasibilities to **LADBS**;
10. CASp consultant must provide within their Accessibility Reports an “Accessible Units Matrix” indicating; *(See Attached **Unit Count, Distribution and Designation** table example on page 7)*
  - a. The total number of units in the development
  - b. All unit types by size, number of bedrooms, number of bathrooms, and floor plan types
  - c. Accessible unit distribution in respect to the types of units provided

- d. The actual unit numbers for units designated as Mobility, Hearing/Vision, Universal Design, Enhanced Accessibility, and Adaptable Units are the following:
  - i. **Fifteen percent (15%) of the units in the development must have Mobility Features, and ten percent (10%) of units must have Hearing/Vision features. For projects that provide more than the minimum number of units required, please have your CASp consultant designate which units will be used to meet the maximum allowable for both the ACSA and the VCA. The maximum allowed per ACSA is 15% Mobility Units and 10% Hearing/Vision Units, and the maximum allowed for the VCA is 11% Mobility and 4% Hearing/Vision Units.**
  - ii. **For Rehabilitation projects under the ACSA, the minimum is 11% Mobility Units and 4% Hearing/Vision Units. For the VCA Rehabilitation projects, the minimum is 5% Mobility Units and 2% Hearing/Vision Units.**
11. CASp consultant must provide within their Accessibility Reports a “Parking Space Matrix” (*See Attached **Parking Table** example on page 8*) indicating:
  - a. CASp consultant must provide within their Accessibility Reports a “Parking Space Matrix” indicating; Indicate if each residential unit has its own parking space
  - b. Total number of parking space for the development
  - c. Total number of van accessible parking spaces
  - d. Total number of standard parking spaces
  - e. Total number of Electric Vehicle Charging Stations
  - f. Total number of Van Accessible Electric Vehicle Charging Stations
  - g. Total number of Standard Accessible Electric Vehicle Charging Stations
  - h. Total number of Ambulatory Electric Vehicle Charging Stations
12. Number all pages of Accessibility Reports with X of Y format;
13. **All CASp reports must be submitted with Wet Signature and Date.**

Services provided by CASp consultants are to be performed in accordance with the latest DSA, Certified Access Specialist Program “Practice Standards and Best Practices Handbook” as applicable to Affordable Housing program requirements. See the link below to download.

[https://www.dgs.ca.gov/-/media/Divisions/DSA/Publications/casp/CASp1\\_Manual2024.pdf](https://www.dgs.ca.gov/-/media/Divisions/DSA/Publications/casp/CASp1_Manual2024.pdf)

Should you have any questions, please email us at [lahd.retrofit@lacity.org](mailto:lahd.retrofit@lacity.org).

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**Tricia Keane**  
*Executive Officer*

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**Jorge Alcantar**  
*RCS III Accessible Housing Program*

## Unit Count, Distribution and Designation table

**Please Note:** The manager's units must be included in the Total Number of units when calculating the minimum required number of Mobility Units and Hearing/Vision units for a project.

Distribution & Designation By Unit Type, Floor Plan Type, Accessible Unit Type										
Number of Units	AchP #	Bldg	Unit #	Managers Unit (Mark with "x")	Unit Type: Studio, Efficiency, 1 Bedroom, 2 Bedroom, 3 Bedroom, 4 Bedroom, 5 Bedroom	Floor Plan Type	Unit Designation: Mobility, Communication, FHA/11A/11B	Additional Accessibility Requirements: Universal Design, EAP, Unruh, TCAC Mobility Units, TCAC Communication U	Unit Designated for Compliance with CSA	Unit Designated for Compliance with VCA
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										
19										
20										
21										
22										
23										
24										
25										
26										
27										
<b>Total # Units for VCA &amp; CSA:</b>										0
<b>Total Number of Units</b>										0
Studio										0
Efficiency										0
1 Bedroom										0
2 Bedroom										0
3 Bedroom										0
4 Bedroom										0
5 Bedroom										0
Manager Unit										0
Grand Total										0
<b>Floor Plans</b>										0
Floor Plan Type 1										0
Floor Plan Type 2										0
Floor Plan Type 3										0
Floor Plan Type 4										0
Floor Plan Type 5										0
Floor Plan Type 6										0
Floor Plan Type 7										0
Floor Plan Type 8										0
Floor Plan Type 9										0
Floor Plan Type 10										0
Floor Plan Type 11										0
Floor Plan Type 12										0
Floor Plan Type 13										0
Floor Plan Type 14										0
Floor Plan Type 15										0
Different Floor Plans										0
<b>Project Type</b>										0
Senior Project										0

# Parking Table

<b>Project Name:</b>									
<b>Site Name and Address:</b>									
<b>Building Name and Address:</b>									
<b>Parking Table</b>									
<b>Residential Parking</b>									
(Mark "Yes"/"No")									
Will Parking be provided for Each Residential Dwelling Unit?									
Residential Parking	0								0
Accessible Parking	0								0
Van Accessible Parking	0								0
<b>Total Residential Parking Spaces</b>	<b>0</b>								<b>0</b>
Residential Electric Vehicle Charging Stations	0								0
Electric Vehicle Charging Station	0								0
Van Accessible Charging Station	0								0
Standard Accessible Charging Station	0								0
Ambulatory Charging Station	0								0
<b>Total Number of Electric Vehicle Charging Stations</b>	<b>0</b>								<b>0</b>
<b>Commercial Parking</b>									
Commercial Parking Spaces									0
Commercial Accessible Parking Spaces									0
Commercial Van Accessible Parking Spaces									0
<b>Total Commercial Parking Spaces</b>	<b>0</b>								<b>0</b>
Commercial Electric Vehicle Charging Stations									0
Commercial Vehicle Charging Stations									0
Commercial Van Accessible Charging Stations									0
Commercial Standard Accessible Charging Stations									0
Commercial Ambulatory Charging Stations									0
<b>Total Number of Commercial Charging Stations</b>	<b>0</b>								<b>0</b>

## Communication from Public

**Name:** Heather McPherson

**Date Submitted:** 04/16/2026 11:00 PM

**Council File No:** 25-0690

**Comments for Public Posting:** As Executive Director of the Silver Lake Independent Jewish Community Center, I submit the attached letter requesting review of the Arbitrary Threshold Disqualification of SIJCC Application.

April 16, 2026

VIA EMAIL

Councilmember Ysabel Jurado, Chair  
Councilmember John Lee  
Councilmember Imelda Padilla  
Ad Hoc Committee on Measure United to House Los Angeles (ULA)  
Los Angeles City Council  
200 N. Spring Street, Room 340  
Los Angeles, CA 90012

**Re: SIJCC Housing + Campus – 1110 N. Bates Ave., Los Angeles, CA 90029  
Arbitrary Threshold Disqualification Under the 2025–2026 Homes for LA NOFA  
Request for ULA Committee Oversight and Intervention**

Dear Chair Jurado and Members of the Ad Hoc Committee on Measure United to House Los Angeles (ULA):

I write on behalf of Silver Lake Independent Jewish Community Center (“SIJCC”) Housing + Campus and Elysian Housing, LLC regarding the arbitrary disqualification of SIJCC’s application from the 2025–2026 Homes for LA NOFA — and to request this Committee’s intervention.

I bring this matter to the Committee not to re-litigate the merits of the application, but because these administrative failures raise serious questions about LAHD’s threshold review process that bear directly on the Committee’s oversight of Measure ULA — and on the fairness of Round 2 for all applicants.

I respectfully request that the Committee direct LAHD to reconsider the disqualification and allow the Application to proceed to scoring. Supporting detail for each of the five points above follows.

### **I. THE SCALE OF THE PROBLEM: LAHD’S OWN TRANSMITTAL LETTER**

**47% of all applicants filed appeals — and LAHD approved half of them. This is not an isolated error.**

The issues raised in this letter are not isolated to a single project. LAHD’s own transmittal letter to the Council reporting on the results of the 2025–2026 Homes for LA NOFA reveals the scale of the problem:

*“In total, 82 of the 174 projects submitted an appeal. Of the 82 projects that appealed, the Department denied 41 of the appeals and approved or partially approved 41 of the appeals.”*

Nearly half of all projects submitted — 82 out of 174, or 47% — filed appeals. That is not a sign of a well-administered threshold review process. It is a sign that applicants across the board had serious concerns about the fairness and accuracy of LAHD’s determinations. The fact that LAHD itself approved or partially approved 41 of those 82 appeals confirms that a significant number of disqualifications were incorrect on their face, while also providing complete discretion to the Department to determine who could proceed and who could not.

For the projects that did not prevail on appeal — including SIJCC — this context matters. When nearly half of all applicants are challenging threshold determinations, and when LAHD is correcting nearly half of those challenges internally, the question is not whether errors occurred: LAHD has already acknowledged that they did, at scale. The question is whether the appeal process was administered fairly enough to catch all of them. In SIJCC’s case, as detailed below, the answer is no — both because the regulatory basis for the disqualification does not exist in the published rules, and because the appeal was mishandled in ways that denied the Applicant a genuine opportunity to be heard.

With this number of disqualifications, the threshold process is functioning as an arbitrary filter, with no consistency and the opportunity for selective consideration for certain organizations. That is not how a \$400 million publicly-funded competitive grant program should work, especially one as scrutinized as Measure ULA. The Committee has every reason to examine this pattern before Round 2 opens.

## **II. THE PROJECT AND ITS APPLICATIONS**

The Silverlake Independent Jewish Community Center, in partnership with Elysian Housing, LLC, Las Palmas Foundation, and Atlantic-Pacific Companies, proposed to redevelop its existing campus at 1110 N. Bates Ave. into a 99-unit, 100% affordable mixed-use development that would also include a reimagined Jewish community center, preschool, fitness center, community pool, and public event space. The project is by-right under existing zoning, is organized as a Community Land Trust (“CLT”), and was designed to meet and exceed the NOFA’s program goals.

SIJCC submitted two applications: one under the ULA Multifamily New Construction Program and one under the ULA Alternative Models New Construction Program. The Alternative Models program gives first priority to CLT-partnered applications — a designation SIJCC holds. Both applications were materially identical in content.

### **III. PROCEDURAL HISTORY AND LAHD'S FAILURES**

**LAHD sent the appeal denial to the wrong address, never notified the attorneys who filed the appeal, and missed its own regulatory deadline by 48 days. The Applicant only found out the denial existed by chance.**

The following timeline documents the administrative failures that compounded the underlying regulatory error:

- October 20, 2025: Both applications submitted by the deadline.
- Early November: Self-scores were published online, and SIJCC Housing + Campus showed as the top score within the entire Alternative Models category and within the ULA Multifamily New Construction category.
- November 25, 2025: LAHD published scores. The Alternative Models application received a score of 0, indicating threshold failure. In an anomaly reflecting disordered review, LAHD sent a score sheet for the Multifamily application but no pass/fail sheet, and a pass/fail sheet for the Alternative Models application but no score sheet — despite the applications being materially identical.
- January 28, 2026: LAHD transmitted threshold disqualification notices to greg@elysian.la, the contact address on the applications.
- February 4, 2026: The Applicant, represented by Victor de la Cruz of Manatt, Phelps & Phillips, LLP (“Manatt”), submitted a timely written appeal to LAHD.H4LANOFA@LACITY.ORG, the address specified in the NOFA.
- February 18, 2026 (approx.): Deadline by which LAHD was required to respond under Section 6.3 of the NOFA Regulations, which mandates a written response within 14 calendar days.
- March 5, 2026: LAHD issued an appeal denial — already 15 days past the regulatory deadline — but did not transmit it to Victor de la Cruz or anyone at Manatt. Instead, LAHD sent the denial only to gregcomanor@elysian.la, an email address not associated with the appeal submission. Manatt was not copied or notified in any form.
- March 5 – April 7, 2026: Neither the Applicant nor Manatt received the appeal denial letter. Manatt continued to operate without knowledge that a denial had been issued, unable to evaluate legal options or protect the Applicant’s financing timeline.
- April 7, 2026: The existence of the denial came to light only when it was mentioned incidentally in an unrelated meeting. LAHD then transmitted it to the correct parties — 48 days after the regulatory deadline, and 33 days after the letter was dated.

LAHD missed the regulatory response deadline, sent the denial to the wrong address, failed to notify counsel of record, and the Applicant only discovered the denial had been issued by chance. These are not minor procedural irregularities — they effectively denied the Applicant and its counsel the ability to respond, escalate, or protect their legal rights for over five weeks.

#### **IV. LAHD'S INTERNAL RECORDS ARE CONTRADICTORY**

**LAHD produced two internal checklists for the same application. One says it passed threshold review. The other says it failed. No explanation was ever provided.**

The Applicant has obtained LAHD's Threshold Review Checklist for the SIJCC Alternative Models application. The checklist exists in two irreconcilable versions:

**Version 1 (marked "Threshold Review: Pass"):**

- Document 7 (Soils Report): Fail
- Document 10 (Self-Score Form): Pass
- Document 13 (Accessibility Standards): Pass
- Overall Determination: Pass

**Version 2 (marked "Threshold Review: Fail"):**

- Document 9 (Architectural Plans): Pass
- Document 10 (Self-Score Form): Fail
- Document 13 (Accessibility Standards): Fail
- Overall Determination: Fail

Under Version 1, the only deficiency is the Soils Report — which LAHD's own appeal denial acknowledged was resolved by the affidavit submitted in lieu, and which was expressly sanctioned as sufficient in LAHD's published Q&A guidance to all applicants. Under Version 1, the application passed threshold and should have been scored.

The self-score form (Document 10) was submitted. It is confirmed as passing on Version 1, and in the very same email in which LAHD notified SIJCC of its disqualification, LAHD attached a List of Applications showing SIJCC's Base Self-Score of 100 — demonstrating that LAHD's own systems received and processed the self-score. The failure marking on Version 2 was never disclosed to the Applicant and was never cited in any LAHD communication. The appeal denial addressed only Document 13 (accessibility).

The existence of two contradictory internal checklists for the same application — one showing a pass, one showing a fail, with no explanation provided — is itself a matter warranting the Committee's attention.

#### **V. THE ENHANCED ACCESSIBILITY PROGRAM CONTRADICTION**

**LAHD disqualified SIJCC for failing accessibility standards and simultaneously awarded it bonus points for exceeding those same standards. Both cannot be true.**

SIJCC not only submitted the required Accessibility Self-Certification Form — it also elected to participate in LAHD's Enhanced Accessibility Program ("EAP"), a voluntary program awarding 10 bonus scoring points to applicants who commit to accessibility features exceeding the NOFA's minimum requirements. SIJCC submitted a signed EAP form with the required features checked and executed by SIJCC's Executive Director.

It is logically impossible for LAHD to simultaneously disqualify an application for failing to meet accessibility standards while that same application qualifies for bonus points for exceeding those

standards. One determination directly negates the other. This contradiction was raised in the appeal and was never addressed in LAHD's denial.

## **VI. LAHD CITED THE WRONG SECTION OF DOCUMENT 13A — AND IT WAS THEIR ONLY JUSTIFICATION**

**LAHD's entire basis for disqualification was a single quoted passage from the Plan Check section of Document 13a — not the Application section. The Application section requires only a signed certification. SIJCC submitted it.**

The appeal denial letter, signed by Assistant General Manager Craig Arceneaux on March 5, 2026, provides the following as its sole regulatory basis for the accessibility disqualification:

*“Page 2 of Document 13a includes the following information: ‘The Cover Sheet of plans shall list all applicable accessibility codes and standards for the project, including the list of funding sources with related architectural/accessibility requirements, matrices of units and matrices of parking spaces. This must include all federal, state and local accessibility codes and standards, including the designated FHA Safe Harbor.’ The application did not pass threshold review because the required accessibility information was not included.”*

This is the entirety of LAHD's regulatory justification — a single quoted passage, and nothing else. No other provision is cited. No other analysis is offered. The disqualification of a 99-unit affordable housing project, the denial of a formal legal appeal, and the expenditure of LAHD staff resources were all predicated solely on this one passage.

The passage LAHD quoted comes from Section 2.B of Document 13a, which sits within Section 2, titled “Plan Check Submittal.” It is not from the Application phase (Section 1) of Document 13a.

Document 13a expressly organizes its requirements into three phases: (1) Project Application, (2) Plan Check Submittal, and (3) Construction. Section 2 — and all of its subsections, including Section 2.B and the “Required Information in Reviews and Reports” items that follow it — govern the submission of construction documents and CASp Accessibility Design Review Reports to LAHD prior to LADBS plan check, which occurs after a funding award. The unit and parking matrices LAHD required (items 10 and 11 of Document 13a) are subordinate details within Section 2, specifying what the CASp must include in those post-award Plan Check reports. None of this has any application to pre-award NOFA submissions.

The application-phase requirement is in Section 1.A of Document 13a, which requires one thing only: a signed Access Compliance Certification emailed to [lahd.retrofit@lacity.org](mailto:lahd.retrofit@lacity.org). SIJCC submitted that certification, signed by its Executive Director, on October 10, 2025. LAHD did not dispute this in the appeal denial. LAHD's sole stated justification for disqualification was a Plan Check requirement that does not apply at the application stage. That is the entirety of the record.

## **VII. SECTION 9.4 IS NOT A THRESHOLD DOCUMENT AND CANNOT SUPPORT DISQUALIFICATION**

**After declaring the appeal “final and not subject to appeal,” LAHD raised a new justification it had never previously cited — Section 9.4, a Construction Standards provision that is not a threshold document and has no role in application review.**

Following the appeal denial, LAHD indicated reliance on Section 9.4 of the NOFA Regulations (“Accessibility Certification Requirements”) as additional justification for the disqualification. This argument fails for three independent reasons.

### **A. Section 9.4 Does Not Appear in the NOFA’s Threshold Documents**

The NOFA Regulations establish a precise and exhaustive list of threshold documents in Section 5 and Appendix I. The threshold requirement for accessibility is Document 13, defined as the Accessibility Self-Certification Form. The governing implementation document for Document 13 is the August 14, 2025 Accessibility Report Requirements and Procedures memo (“Document 13a”), which is posted on LAHD’s Homes for LA NOFA webpage as the sole threshold reference document for accessibility compliance.

Section 9.4 appears nowhere in Section 5, Appendix I, or any threshold checklist. It is not listed as a threshold document. It is not referenced in the definition of Document 13. It does not appear among the required materials checklist. Under the NOFA’s own published framework, it has no role in the threshold review of applications.

### **B. Section 9.4 Is Located in the Construction Standards Section**

Section 9.4 is found within Section 9 of the NOFA Regulations, titled “Construction Standards.” Section 9 governs what funded projects must build — not what applicants must submit to qualify for funding. Section 9.4 specifically addresses what accessibility standards a funded project’s construction must meet. Its operative language — “the development must construct at least...” — is the language of a construction obligation, not an application submission requirement.

### **C. Section 9.4 Contains No Application-Phase Documentation Requirement**

Nothing in the text of Section 9.4 requires applicants to submit a unit accessibility matrix, a parking matrix, or any other specific document as part of a NOFA application. Furthermore, Section 9.6 of the same Construction Standards section — immediately following Section 9.4 — directly addresses what is required at application time:

*“At the time of application, an Accessibility Compliance Certification must be completed and signed by the applicant... certifying that the development is compliant with applicable accessibility standards.”*

The NOFA Regulations answer the question internally, within the same section LAHD now cites: the certification is what is required at application. LAHD cannot invoke a Construction Standards provision to impose an application-phase documentation requirement that the Construction Standards section itself confirms does not exist.

Finally, Section 9.4 was not cited in the original disqualification notice and was not cited in the appeal denial. It emerged only after the appeal was denied and the matter declared “final and not subject to appeal.” An agency cannot introduce a new regulatory basis for a final decision after that decision has been made.

### **VIII. THE NOFA ONLY AUTHORIZES DISQUALIFICATION FOR THRESHOLD FAILURES — AND SIJCC MET THE ONLY THRESHOLD REQUIREMENT DOCUMENT 13a IMPOSES AT APPLICATION**

**Under the NOFA’s own rules, LAHD can only disqualify for threshold failures. The provisions LAHD cited are not threshold requirements. Even if they were correctly interpreted, LAHD had no authority to disqualify on these grounds.**

The foregoing analysis is reinforced by a broader and fundamental point: under the NOFA’s own published rules, disqualification is only permitted for failure to meet threshold requirements. LAHD has no regulatory authority to disqualify applications on any other basis.

Section 5 of the NOFA Regulations states explicitly:

*“If an application does not meet these threshold requirements, it will not be considered for the Homes for LA NOFA.”*

The word “these” refers specifically and exclusively to the threshold requirements defined in Section 5 and listed in Appendix I. Section 5 further provides:

*“Determination of completeness and compliance with thresholds and scoring of the application shall be based entirely on the application and all documents submitted therewith as of the filing deadline.”*

These two sentences together establish a closed, exhaustive system. Disqualification authority is limited to threshold failures. There is no catch-all discretionary authority to disqualify based on plan check requirements, construction standards, or any provision outside the threshold framework defined in Section 5 and Appendix I.

Document 13a — the August 14, 2025 Accessibility Report Requirements and Procedures memo — is correctly understood as the threshold document implementing Document 13. But Document 13a does not impose the unit matrix as an application-phase threshold requirement. Document 13a’s application-phase requirement is found in Section 1.A, which requires only a signed Access Compliance Certification. The unit and parking matrix requirements — items 10 and 11 — are subordinate details within Section 2 (“Plan Check Submittal”), specifying what the CASp consultant must include in the Accessibility Design Review Report submitted to LAHD prior to LADBS plan check. Section 2.B — the provision LAHD quoted verbatim as its only justification — is the governing Plan Check cover sheet requirement from which those matrix details flow. The entire Section 2 framework, including items 10 and 11, applies after a funding award. It has no application to pre-award NOFA submissions. SIJCC submitted the signed certification required by Section 1.A. It met the threshold.

Section 9.4, by contrast, is not a threshold document at all. It does not appear in Section 5, Appendix I, or any threshold checklist. It is a Construction Standards provision governing what funded projects must build. Even setting aside that it was never cited until after the final denial, it has no place in threshold review under any reading of the NOFA.

Put simply: the NOFA creates one and only one basis for disqualification — failure to meet the threshold requirements listed in Section 5 and Appendix I. The threshold accessibility requirement is Document 13, implemented by Document 13a. Document 13a required a signed certification at application phase. SIJCC submitted it. SIJCC met the threshold. The plan check language LAHD quoted in its denial, and the Construction Standards provision LAHD raised afterward, are not threshold requirements and cannot support disqualification under the NOFA’s own rules.

## **IX. THE ACCESSIBILITY DISQUALIFICATION HAS NO BASIS IN THE PUBLISHED REGULATIONS**

In sum, the unit matrix LAHD required does not appear as an application-phase threshold requirement anywhere in the published NOFA Regulations:

- Appendix I — the official published Threshold Checklist — lists Document 13 as: “Accessibility Self-Certification Form and Enhanced Accessibility Program Checklist.” No unit matrix is listed.
- Section 5 of the NOFA Regulations defines Document 13 as a signed certification that the project “shall be designed, constructed, and thereafter maintained in compliance” with applicable accessibility standards. It is a certification of future intent, not a construction-level documentation requirement.
- Document 13a — the threshold document for accessibility, available on LAHD’s NOFA webpage — requires only a signed Access Compliance Certification at the application phase (Section 1.A). The unit and parking matrix requirements appear within Section 2 “Plan Check Submittal” as details of what the CASp Accessibility Design Review Report must contain when submitted to LAHD prior to LADBS plan check — a post-award obligation. Items 10 and 11 of Document 13a (“Required Information in Reviews and Reports”) are subordinate requirements within the Plan Check phase, specifying the contents of CASp reports. LAHD’s appeal denial quoted Section 2.B of Document 13a verbatim as its only justification — that is a Plan Check provision, not an application-phase threshold requirement.
- Section 9.4 of the NOFA Regulations is a Construction Standards provision — not a threshold document. It does not appear in Appendix I or Section 5, contains no application-phase documentation requirement, and was cited by LAHD for the first time only after declaring the appeal denial final. It has no role in threshold review under the NOFA.
- Section 9.6 of the NOFA Regulations — in the same Construction Standards section as Section 9.4 — confirms that the certification is the application-phase accessibility requirement.
- Section 5 of the NOFA Regulations limits disqualification authority exclusively to threshold failures as defined in Section 5 and Appendix I. No provision authorizes disqualification based on plan check or construction standards provisions.

There is no definition of “Conceptual Drawings” as a requirement of the application. Since SIJCC Housing + Campus is a by-right project, the design drawings, as allowed by the NOFA, were conceptual in nature and did not require construction-level plan details.

## **X. SUMMARY OF CONCERNS AND REQUESTED RELIEF**

The Committee may wish to consider the following questions in connection with its oversight of Measure ULA:

- Why did 82 of 174 applicants — 47% — file threshold appeals, and what does that rate indicate about the consistency and accuracy of LAHD's threshold review process?
- Why did LAHD produce two contradictory threshold checklists for the SIJCC application, and which one reflects the actual basis for the disqualification?
- How could one page of an internal checklist state that an application passed a threshold category, while the second page showed the opposite result?
- Why was the appeal denial sent to the wrong address and not transmitted to the attorneys of record who filed the appeal, resulting in a 48-day gap before the Applicant learned the denial had been issued?
- How can an application be simultaneously disqualified for failing accessibility standards and eligible for bonus points for exceeding those same standards?
- What provision of the published NOFA Regulations — by section and page number — imposes the unit accessibility matrix as a threshold document required at the application phase, given that the NOFA only authorizes disqualification for threshold failures listed in Section 5 and Appendix I, and given that LAHD's own appeal denial cited only a Plan Check provision?
- Why did LAHD introduce Section 9.4 — a Construction Standards provision not listed as a threshold document — as a new justification only after declaring the appeal denial final?

The Applicant respectfully requests that the Committee:

- Direct LAHD to reconsider the SIJCC Housing + Campus threshold determination, consistent with the regulatory analysis set forth herein, and allow the Application to proceed to scoring consistent with its CLT priority status;
- Direct LAHD to provide a written explanation of the two contradictory threshold checklists and the basis for the disqualification;
- Direct LAHD to confirm whether any other applications were disqualified on Document 13 or Document 10 grounds, and whether any applicants were permitted to cure or supplement documentation after the deadline; and
- Consider whether LAHD's threshold review procedures, record-keeping, legal notice practices, and appeal process warrant procedural reforms before Round 2 opens — for the benefit of all future applicants.

I am available to present this matter to the Committee at its convenience. Attached to this letter are the two contradictory threshold checklists, LAHD's Appeal denial letter and the August 14, 2025 Accessibility Report Requirements and Procedures, the sole Threshold Document for Document 13a that is available on LAHD's NOFA website.

Thank you for your attention to this matter and for the Committee's ongoing stewardship of Measure ULA.

Respectfully submitted,

Heather McPherson

Executive Director, Silver Lake Independent Jewish Community Center

cc: Councilmember Hugo Soto-Martinez, Council District 13

**THRESHOLD REVIEW CHECKLIST**  
**ULA - ALTERNATIVE MODELS: NEW CONSTRUCTION PROGRAM**

**PROJECT NAME:** SIJCC Housing + Campus  
**SPONSOR NAME:** Silverlake Independent Jewish Community Center  
**TAX CREDITS INCLUDED:** Yes  
**PSH PROJECT:** No  
**NUMBER OF UNITS:** 99

**THRESHOLD REVIEW:** Pass

	THRESHOLD ITEM	DOCUMENT	STATUS
1	Project Demonstrates Financial Feasibility	Document 1	Pass
2	Project Sponsor must disclose potential conflicts of interest and legal/findings liabilities	Document 2	Pass
3	Project must have Site Control and Clear Title	Document 3	Pass
4	Project Sponsor must pass Sponsor Portfolio Underwriting	Document 4	Pass
5	Project site valuation must be supported by an appraisal.	Document 5	Pass
6	Project Sponsor must commission ESA and remediate hazards	Document 6	Pass
7	Projects must undergo evaluation of geo-technical engineering of subsurface soils.	Document 7	Fail
9	Projects must comply with LAHD architectural standards; ULA NC projects must meet a 40 unit count minimum	Document 9	Pass
10	Sponsor must provide a self-score for NOFA funding program for which it is applying	Document 10	Pass
11	Sponsor must provide relocation assistance to projects involving displacement of qualified households	Document 11	Pass
13	Projects must comply with Accessibility Standards	Document 13	Pass
14	Sponsor must commit to timely completion of work	Document 14	Pass
15	Sponsor must certify compliance with LAHD business policy and general City requirements	Document 15	Pass
16	Construction must comply with a PLA (all ULA projects with at least 40 units)	Document 21	Pass
17	Project must address neighborhood level needs	Document 22	Pass
18	Project must address racial disparities	Document 23	Pass
19	Project incorporates tenant governance and development team has tenant governance experience	Document 24	Pass
20	Sponsor must engage community to identify environmental hazards beyond baseline ESA	Document 25	Pass
21	List of Entities and Names of Partners	Document 27	Pass

**THRESHOLD REVIEW CHECKLIST**  
**ULA - ALTERNATIVE MODELS: NEW CONSTRUCTION PROGRAM**

**PROJECT NAME:** SIJCC Housing + Campus  
**SPONSOR NAME:** Silverlake Independent Jewish Community Center  
**TAX CREDITS INCLUDED:** Yes  
**PSH PROJECT:** No  
**NUMBER OF UNITS:** 99

**THRESHOLD REVIEW:** Fail

	THRESHOLD ITEM	DOCUMENT	STATUS
9	Projects must comply with LAHD architectural standards;	Document 9	Pass
10	Sponsor must provide a self-score for NOFA funding	Document 10	Fail
13	Projects must comply with Accessibility Standards	Document 13	Fail

City of Los Angeles

Tiena Johnson Hall, General Manager  
Luz C. Santiago, Acting Executive Officer



LOS ANGELES HOUSING DEPARTMENT  
1910 Sunset Blvd, Ste 300  
Los Angeles, CA 90026  
Tel: 213.808.8808

Anna E. Ortega, Assistant General Manager  
Luz C. Santiago, Assistant General Manager  
Craig Arceneaux, Assistant General Manager

housing.lacity.gov

Karen Bass, Mayor

VIA EMAIL

January 28, 2026

SIJCC Housing + Campus  
c/o Elysian Housing, LLC  
584 1/2 N Larchmont Blvd  
Los Angeles, CA 90004, USA,  
Attn: Greg Comanor, Director of Housing Development  
Email: gregcomanor@elysian.la

Re: **SIJCC Housing + Campus**  
**1110 N BATES AVE Los Angeles CA 90029**

Dear Greg Comanor:

In September of 2025, the Los Angeles Housing Department (LAHD) launched its inaugural Homes For LA (H4LA) Funding Program, which integrates United To House LA (ULA) resources with federal, state, and local sources. With the approval of the City Council, this unified financing strategy to deploy capital and operating subsidies will increase the construction and preservation of affordable housing across the City of Los Angeles.

LAHD received an application for the site located at 1110 N BATES AVE Los Angeles CA 90029 (“Project”) in response to the 2025-2026 H4LA Notice of Funding Availability (NOFA). The Department received a total of 176 applications requesting \$1,926,060,941 in LAHD funding across all programs.

As part of the NOFA selection process, LAHD staff reviewed your application to determine a total point score of 0 out of a total possible 130 points. Please find the attached LAHD Project Score for the above-referenced Project. Unfortunately, the application for the above-referenced Project did not meet LAHD’s threshold requirements and will not be considered for a funding award in round 1 of the H4LA NOFA.

If you would like to appeal LAHD’s determination, please submit your request in writing. The appeal must be sent to lahd.H4LANOFA@lacity.org, no later than 5:00 p.m. on February 04, 2026 and must specifically identify the justification for the appeal based upon previously submitted application materials. LAHD’s review of the appeal will be based upon the existing documentation you submitted with the original application. You may not appeal any other applicant’s score.

We acknowledge the substantial amount of time and effort involved in preparing this application and encourage you to consider reapplying in the next NOFA which is tentatively scheduled for Spring 2026.

An Equal Opportunity Employer

Sincerely,

Craig Arceneaux  
Assistant General Manager

City of Los Angeles

Tiena Johnson Hall, General Manager  
Luz C. Santiago, Acting Executive Officer

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LOS ANGELES HOUSING DEPARTMENT  
1910 Sunset Blvd, Ste 300  
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Anna E. Ortega, Assistant General Manager  
Luz C. Santiago, Assistant General Manager  
Craig Arceneaux, Assistant General Manager

housing.lacity.gov

Karen Bass, Mayor

VIA EMAIL

March 5, 2026

SIJCC Housing + Campus  
c/o Elysian Housing, LLC  
584 1/2 N Larchmont Blvd  
Los Angeles, CA 90004, USA,  
Attn: Greg Comanor, Director of Housing Development  
Email: gregcomanor@elysian.la

Re: SIJCC Housing + Campus  
1110 N BATES AVE., Los Angeles CA 90029

Dear Greg Comanor:

This letter is in response to the appeal letter submitted on February 4, 2026 regarding the scoring of the application for the SIJCC Housing + Campus project that submitted an application to the 2025-2026 Homes For LA Notice of Funding Availability (NOFA). The project earned an initial score of 0 out of 130 for the ULA Alternative Models New Construction Program.

After reviewing and considering your appeal, the Los Angeles Housing Department (LAHD) has determined the project's final score is 0 points because the project did not pass Threshold Review. Below, LAHD staff outlined the response(s) to your appeal in accordance with the Homes For LA NOFA Regulations and LAHD underwriting standards. The specific results are as follows:

- Document 7 (Soils Report): The application failed to provide the required documentation. According to page 34 of the Homes for LA Regulations, "All new construction projects must submit a Soils Report completed within the past 24 months of the Notice of Funding Availability application deadline, for the purposes of evaluating the geo-technical engineering characteristics of the on-site subsurface soils relative to the anticipated development." However, an affidavit was submitted in-lieu and will be accepted.
- Document 13a (Accessibility Requirements): The plans submitted in the application do not include the required unit matrix of the 15% mobility units and 10% communication units. This is a required information for Department staff to ensure that the project adheres to the Accessibility requirements in the regulations. This is a threshold requirement for applications to be reviewed further for scoring. Page 2 of Document 13a includes the following information: "The Cover Sheet of plans shall list all applicable accessibility codes and standards for the project, including the list

of funding sources with related architectural/accessibility requirements, matrices of units and matrices of parking spaces. This must include all federal, state and local accessibility codes and standards, including the designated FHA Safe Harbor.” The application did not pass threshold review because the required accessibility information was not included.

Unfortunately, the above-referenced project will not be recommended for funding in the Homes For LA NOFA this round because a sufficient number of higher-scoring applications were received to use all of the H4LA NOFA funding. This decision is final and not subject to appeal.

We acknowledge the substantial amount of time and effort involved in preparing this application and encourage you to consider reapplying in the next NOFA which is tentatively scheduled for Summer 2026.

Sincerely,

Craig Arceneaux  
Assistant General Manager

Tiena Johnson Hall, General Manager  
Tricia Keane, Executive Officer

Anna E. Ortega, Assistant General Manager  
Luz C. Santiago, Assistant General Manager  
Craig Arceneaux, Acting Assistant General Manager



LOS ANGELES HOUSING DEPARTMENT  
1910 Sunset Blvd, Ste 300  
Los Angeles, CA 90026  
Tel: 213.808.8808

housing.lacity.gov

Karen Bass, Mayor

August 14, 2025

## **ACCESSIBILITY REPORT REQUIREMENTS & PROCEDURES**

### **Certified Accessibility Specialist (CASp) Program Consultant Requirements:**

1. A State of California licensed design professional (i.e. Architect or Engineer) who is also a State of California Certified Accessibility Specialist (CASp) Program consultant shall be hired by the developer and identified as a part of the development team.
2. The CASp consultant must be an independent, 3<sup>rd</sup> party consultant hired directly by the developer, and independent of the architect-of-record. The architect-of-record, who may also possess CASp credentials (as an individual or within the firm), cannot serve as a CASp consultant on their own projects.

### **Access Compliance Requirements During Project Phases:**

#### **1. Project Application**

The CASp consultant must be identified as part of the development team within the project application.

#### **A. Project Application (Conceptual Phase)**

The developer shall submit a signed copy of the Access Compliance Certification during the application period:

<b><u>Access Compliance Certification</u></b>	
I, _____ ( <i>print name &amp; title</i> ), Certify that this project shall be designed, constructed, and thereafter maintained in compliance with the applicable accessibility standards in respect to the given funding source(s), Federal, State and local government provided services, programs, and activities requirements.	
_____ Developer's Signature	_____ Date

**Email the signed document to [lahd.retrofit@lacity.org](mailto:lahd.retrofit@lacity.org)**

## 2. Plan Check Submittal

- A. The developer shall provide LAHD's Accessible Housing Program (AcHP) with an Accessibility Design Review Report by a CASp consultant of the construction documents at the time or prior to submission of plans to the Los Angeles Department of Building & Safety (LADBS). The submittal is electronic to [lahd.retrofit@lacity.org](mailto:lahd.retrofit@lacity.org) and must include PDF files of the Accessibility Design Review Report by the CASp consultant, a PDF file of the complete set of construction documents as being submitted to LADBS, and a Technical Services Request (TSR) form. AcHP may return the submittal to the developer if it does not meet the submittal requirements herein stated. AcHP will complete a review of the plans and Accessibility Design Review Report from CASp consultant within 38 days or less from the submittal date.
- a. AcHP will assign a lead staff person to conduct a screening review of the materials within 8 business days of the initial submittal and will contact the developer if any required documents are missing. The assigned AcHP staff will then conduct the design review within 25 business days and send the corrections to an AcHP supervisor for review. The AcHP supervisor will review the materials and provide corrections to the developer within 5 business days.
- B. The Cover Sheet of plans shall list all applicable accessibility codes and standards for the project, including the list of funding sources with related architectural/accessibility requirements, matrices of units and matrices of parking spaces. This must include all federal, state and local accessibility codes and standards, including the designated FHA Safe Harbor.
- a. Plans must include this note on the cover sheet: *"This is a publicly funded housing project and must comply with federal accessibility standards, California Building Code Chapter 11B, and local accessibility requirements by funding source."*
- b. Documents relating to additional accessibility or architectural requirements by funding source must be submitted, including: TCAC scoring sheet, universal design requirements, enhanced accessibility program sheet, and/or other relevant documents.
- c. FHA Safe Harbor: The requirements in 24 CFR Part 100.205, including ANSI A117.1-1986; the Fair Housing Accessibility Guidelines, including the Supplement to Notice of FHA Guidelines - Questions and Answers about the Guidelines, June 28, 1994.
- C. If there are substantial accessibility changes to the construction documents upon the plan check approval, a revised electronic set of plans must be provided to LAHD's Accessible Housing Program Retrofit Unit ([lahd.retrofit@lacity.org](mailto:lahd.retrofit@lacity.org))
- D. Plans shall include a page that is titled Accessible Means of Egress, with calculations and diagrams. Plan page shall clearly indicate the required methods for Accessible Means of Egress for the project per CBC 1009.
- E. Senior projects shall include a plan page that provides details for handrails and backing, in compliance with CIV 51.2. (2)
- F. Senior projects shall include a plan page that provides lighting plans and calculations in order to provide evidence of compliance with CIV 51.2. (3)

### 3. Construction Phase

A. The developer, during construction, shall provide LAHD with written Accessibility Reports from a CASp consultant at a minimum of two stages, as listed below. The need for additional inspections or reports may rise depending on the phases of the project and/or on the occupation status. The developer shall also request the CASp consultant's field inspection and send the CASp's inspection report prior to scheduling the LAHD inspection.

**a. Rough Inspection Reports for New Construction/Substantial Alteration Projects and Progress Accessibility Reports for phased Substantial Alteration Projects**

Post-framing inspection items to be reviewed include, but are not limited to, wall reinforcement for future grab bar installation, switches, outlets and environmental control placement, framed passage door openings, kitchen and bathroom layouts in each type of unit type.

The project CASp must review all public and common use areas completed to date. Issue field review report to LAHD within 10 business days of inspection. [*Rough/Progress Inspection Report*]

LAHD's Accessible Housing Unit staff will conduct a site inspection after receiving the Rough/Progress Inspection Report to confirm compliance at the rough framing stage of the project

**b. Final Inspection Reports for all types of projects**

Final construction completion inspection, reviewing finished units. Items to be reviewed include, but are not limited to, thresholds, cabinet installation for clearance, switches, outlets, and environmental controls, clear floor space at fixtures and appliances, kitchen and bathroom layouts. Accessible pedestrian routes as well as public areas including the leasing office, common use areas and amenities, and accessible resident and public area parking will also be reviewed. CASp to issue a field review full report to LAHD within 10 business days of inspection. [*Final Accessibility Report*]

LAHD's Accessible Housing Unit staff will conduct a Final Accessibility Site Inspection after receiving the Final Accessibility Report to confirm compliance at project completion. If non-compliant items are found, an updated Final Accessibility Report will be required.

### 4. Notes on Certificates

A. Temporary Certificate of Occupancy: LAHD will not issue a clearance for issuing a Temporary Certificate of Occupancy unless all non-compliant items in the units are corrected and an accessible route from the public right of way and the development's parking to each of the units exist.

a. AcHP staff will issue a TCO clearance within five business days of receiving a complete request for a TCO from an ED1 applicant, provided the requirements above are met.

- B.** Certificate of Occupancy: LAHD will not issue a clearance for issuance of a Certificate of Occupancy or final building permit signed off by LADBS and release of a final retention payment unless all of the following are met:
- a.** Corrections issued by LAHD are completed and approved.
  - b.** LAHD approves the final Accessibility Report from the project's CASp consultant.
  - c.** Expert Recommendations and City Certification of Compliance with ACSA are issued.
  - d.** Neutral Accessibility Consultant (NAC) Verification and City Certification of Compliance with Accessibility Standard with VCA are issued.
- C.** AcHP staff will schedule a NAC re-inspection for any correction requiring NAC verification within 5 business days of a request by an ED1 applicant. If there are no further corrections as a result of the reinspection, the NAC will issue a report within 5 business days of the re-inspection indicating there are no further deficiencies. AcHP will then issue the clearance for the Certificate of Occupancy.

## **Required Information in Reviews and Reports**

The following information is to be provided within all Accessible Design Reviews and Accessibility Reports.

1. Name and address of property;
2. Include if applicable:
  - Dates of Plan Review
  - Date of Site Inspection
  - Date Report was completed;
3. List all applicable accessibility Codes and Standards (Federal, State, and local);
4. Developer Information:
  - Name
  - Address
  - Contact Person
  - Phone Number
  - Email Address;
5. CASp Consultant Information:
  - Name
  - Address
  - Phone Number
  - Email Address
  - CASp Number
  - CASp Certification Expiration Date
  - CASp Signature and Date (Wet Signature and Date);
6. Architect of Record:
  - Name
  - Address
  - Contact Person
  - Phone Number
  - Email Address;
7. List the Types of Funding that will be used for this project (to be provided by the developer) Provide copies of funding agreements with Los Angeles County and California Tax Credit Allocation Committee;
8. Provide a detailed Scope of Work for the project and project type (New Construction, Rehabilitation, Acquisition, New Construction and Rehabilitation). For rehabilitation projects please provide a spreadsheet that details the scope of work in each unit, all common areas, and parking;
9. List any request made for Technical Infeasibilities to **LADBS**;
10. CASp consultant must provide within their Accessibility Reports an “Accessible Units Matrix” indicating; *(See Attached Unit Count, Distribution and Designation table example on page 7)*
  - a. The total number of units in the development
  - b. All unit types by size, number of bedrooms, number of bathrooms, and floor plan types
  - c. Accessible unit distribution in respect to the types of units provided

- d. The actual unit numbers for units designated as Mobility, Hearing/Vision, Universal Design, Enhanced Accessibility, and Adaptable Units are the following:
- i. **Fifteen percent (15%) of the units in the development must have Mobility Features, and ten percent (10%) of units must have Hearing/Vision features. For projects that provide more than the minimum number of units required, please have your CASp consultant designate which units will be used to meet the maximum allowable for both the ACSA and the VCA. The maximum allowed per ACSA is 15% Mobility Units and 10% Hearing/Vision Units, and the maximum allowed for the VCA is 11% Mobility and 4% Hearing/Vision Units.**
  - ii. **For Rehabilitation projects under the ACSA, the minimum is 11% Mobility Units and 4% Hearing/Vision Units. For the VCA Rehabilitation projects, the minimum is 5% Mobility Units and 2% Hearing/Vision Units.**
11. CASp consultant must provide within their Accessibility Reports a “Parking Space Matrix” (*See Attached **Parking Table** example on page 8*) indicating:
- a. CASp consultant must provide within their Accessibility Reports a “Parking Space Matrix” indicating; Indicate if each residential unit has its own parking space
  - b. Total number of parking space for the development
  - c. Total number of van accessible parking spaces
  - d. Total number of standard parking spaces
  - e. Total number of Electric Vehicle Charging Stations
  - f. Total number of Van Accessible Electric Vehicle Charging Stations
  - g. Total number of Standard Accessible Electric Vehicle Charging Stations
  - h. Total number of Ambulatory Electric Vehicle Charging Stations
12. Number all pages of Accessibility Reports with X of Y format;
13. **All CASp reports must be submitted with Wet Signature and Date.**

Services provided by CASp consultants are to be performed in accordance with the latest DSA, Certified Access Specialist Program “Practice Standards and Best Practices Handbook” as applicable to Affordable Housing program requirements. See the link below to download.

[https://www.dgs.ca.gov/-/media/Divisions/DSA/Publications/casp/CASp1\\_Manual2024.pdf](https://www.dgs.ca.gov/-/media/Divisions/DSA/Publications/casp/CASp1_Manual2024.pdf)

Should you have any questions, please email us at [lahd.retrofit@lacity.org](mailto:lahd.retrofit@lacity.org).

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**Tricia Keane**  
*Executive Officer*

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**Jorge Alcantar**  
*RCS III Accessible Housing Program*

## Unit Count, Distribution and Designation table

**Please Note:** The manager's units must be included in the Total Number of units when calculating the minimum required number of Mobility Units and Hearing/Vision units for a project.

Distribution & Designation By Unit Type, Floor Plan Type, Accessible Unit Type										
Number of Units	AchP #	Bldg	Unit #	Managers Unit (Mark with "x")	Unit Type: Studio, Efficiency, 1 Bedroom, 2 Bedroom, 3 Bedroom, 4 Bedroom, 5 Bedroom	Floor Plan Type	Unit Designation: Mobility, Communication, FHA/11A/11B	Additional Accessibility Requirements: Universal Design, EAP, Unruh, TCAC Mobility Units, TCAC Communication U	Unit Designated for Compliance with CSA	Unit Designated for Compliance with VCA
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
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21										
22										
23										
24										
25										
26										
27										
<b>Total # Units for VCA &amp; CSA:</b>										0
<b>Total Number of Units</b>										0
Studio										0
Efficiency										0
1 Bedroom										0
2 Bedroom										0
3 Bedroom										0
4 Bedroom										0
5 Bedroom										0
Manager Unit										0
Grand Total										0
<b>Floor Plans</b>										0
Floor Plan Type 1										0
Floor Plan Type 2										0
Floor Plan Type 3										0
Floor Plan Type 4										0
Floor Plan Type 5										0
Floor Plan Type 6										0
Floor Plan Type 7										0
Floor Plan Type 8										0
Floor Plan Type 9										0
Floor Plan Type 10										0
Floor Plan Type 11										0
Floor Plan Type 12										0
Floor Plan Type 13										0
Floor Plan Type 14										0
Floor Plan Type 15										0
Different Floor Plans										0
<b>Project Type</b>										0
Senior Project										0

# Parking Table

<b>Project Name:</b>										
<b>Site Name and Address:</b>										
<b>Building Name and Address:</b>										
<b>Parking Table</b>										
<b>Residential Parking</b>										
Will Parking be provided for Each Residential Dwelling Unit?										
Residential Parking					0	(Mark "Yes"/"No")				0
Accessible Parking					0					0
Van Accessible Parking					0					0
<b>Total Residential Parking Spaces</b>					<b>0</b>					<b>0</b>
Residential Electric Vehicle Charging Stations										
Electric Vehicle Charging Station					0					0
Van Accessible Charging Station					0					0
Standard Accessible Charging Station										
Ambulatory Charging Station					0					0
<b>Total Number of Electric Vehicle Charging Stations</b>					<b>0</b>					<b>0</b>
<b>Commercial Parking</b>										
Commercial Parking Spaces										
Commercial Accessible Parking Spaces					0					0
Commercial Van Accessible Parking Spaces					0					0
<b>Total Commercial Parking Spaces</b>					<b>0</b>					<b>0</b>
Commercial Electric Vehicle Charging Stations										
Commercial Vehicle Charging Stations					0					0
Commercial Van Accessible Charging Stations					0					0
Commercial Standard Accessible Charging Stations										
Commercial Ambulatory Charging Stations					0					0
<b>Total Number of Commercial Charging Stations</b>					<b>0</b>					<b>0</b>