

THE LAW OFFICE  
OF  
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VIA U.S. MAIL AND E-MAIL

August 19, 2013

Los Angeles City Council and the Planning and Land Use (PLUM) Committee  
C/O City Clerk (Sharon Gin, [sharon.gin@lacity.org](mailto:sharon.gin@lacity.org))  
200 North Spring Street, Room 395  
Los Angeles, CA 90012

RE: 1342 West Adams Blvd., Los Angeles CA 90007  
Case No. DIR-2012-3128-COA-SPP-1A; Council File No. 13-0903

Dear Honorable Council Members:

I am writing you today to express my SUPPORT for West Adams Heritage Association's Appeal in the above referenced matter. I am now, and have been for the last eight years, a member of the Board of West Adams Heritage Association. I moved to the Historic West Adam's district in 2004 because I wanted to live in a neighborhood with historic structures and enjoy the community that those historic structures provide.

The case involves a highly visible, historical Adams Boulevard mansion and church on a scenic highway in a historic district and which together serve as a gateway to North University Park. The project and its environmental clearance should not be approved without a true, full evaluation.

It is imperative that you be aware that this project is NOT "categorically exempt." Categorical exemptions should never be used when there is a historic property involved, and particularly one whose use is being changed. In this case, the development plans also have significant impacts on the historic resources. Under state law, categorical exemptions are reserved for use in small projects, such as the removal of a shed, the change of a fence, or in some instances, the construction of a single family home (but not one involving historic resources.)

In any case, this project involves multiple historic structures which apparently are being redeveloped over time; changes that are not compliant with Secretary of Interior Standards; and a significant change of use that may permanently change the historic nature of at least one of the structures on the property, that is, the Bishop Mansion. Therefore, it is not legally exempt from review.

WAHA has explained that, when there is a dispute among experts, the California Environmental

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Page 2 of 2

Quality Act (CEQA) requires a cautious path to be followed. The Planning Department needs to do an Initial Study, which then determines if an ND, MND or an EIR would be required. I agree with this position.


The whole of the project needs to be reviewed, not just the housing portion. In this case we don't even know for sure what the owner is planning to do with 17,000 square feet of existing other buildings on the same property.)

I was frankly surprised that the planning department did not take unilateral, and immediate action in response to the unpermitted demolition of the interior of this national monument property. In particular, it was tragic to lose the grand two-story entry/reception area.

I urge the PLUM Committee to support WAHA's Appeal, not certify the environmental clearance and, rather, rescind the categorical exemption, and further, direct the Planning Department to initiate legally-sufficient environmental review that includes the Applicant's full description of their plans for the entire seven-parcel property, including the historic Roger Williams Baptist Church and the Bekins Hall structures.

Thank you for considering my input.

Respectfully,



Lore Hilburg, Esq.

cc: Gil Cedillo, CD1 and member of PLUM Committee: [councilmember.cedillo@lacity.org](mailto:councilmember.cedillo@lacity.org)  
Jose Huizar, chair of PLUM: [councilmember.huizar@lacity.org](mailto:councilmember.huizar@lacity.org)  
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Bernard Parks, CD8 (property is within his district): [councilmember.parks@lacity.org](mailto:councilmember.parks@lacity.org)  
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