

Preservation VIDEO

HISTORIC PRESERVATION: RESEARCH / CONSULTING / ADVOCACY

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Honorable Bernard Parks
Councilmember, Council District 8
Honorable Herb Wesson
President, Los Angeles City Council
Honorable Members of the Los Angeles City Council
Los Angeles City Council
C/O City Clerk (Sharon.Gin@lacity.org)
200 North Spring Street, Room 395
Los Angeles, CA 90012

September 16, 2013 / via Email

RE: 1342 West Adams Blvd., Los Angeles CA 90007
Council File No. 13-0903, Case No. DIR-2012-3128-COA-SPP-1A; ENV-2012-3129-CE

Honorable Members

It is my professional opinion that the above referenced Project is not Categorically Exempt for purposes of CEQA as has been asserted by the Los Angeles Department of City Planning staff. I have made both written and oral statements as part of the public record to this position as Chair of the Adams Dockweiler Heritage Organizing Committee (A.D.H.O.C.). I fully support the appeal made by the West Adams Heritage Association (W.A.H.A.) and urge you to join with me and reject the City's issued Categorical Exemption (CE) and require that an Initial Study and Checklist be prepared.

It has been the historic preservation community's goal throughout this appeal process to simply have the appropriate level of review as required by the California Environmental Quality Act applied to the Project. In the public record for this Case I have joined with other historic preservation professionals it stating that this Project does not meet the required Secretary of the Interior's Standards (SIS). Both as a retained consultant, and as the City's Cultural Heritage Commission's appointed University Park Historic Preservation Overlay Zone Board's authority for eight years I have had lengthy experience in the appropriate application of the SIS for historic structures' interiors and exteriors.

The CEQA threshold for the use of a CE is very restrictive. The Planning Department

grossly erred when they initially issued the CE, which at that time included the demolition of the identified National Register eligible "Cloisters" component of the historic resource: the "Roger Williams Baptist Church" complex. They have repeatedly abused their discretion since acknowledging that blunder. Behaving as stereotypical bureaucrats they have only reacted to the issues brought to light by the appeals of WAHA with denials, obfuscations, fabrications, and contrived misinterpretations of the application of the SIS.

The historic National Register eligible Roger Williams Baptist Church complex: the Church Sanctuary, the Cloister and the William T. Bishop Residence form a collective entity. This triptych architectural icon forms a prominent façade along Adams Boulevard, a scenic highway. Their triplet facades have been a visual-cultural landmark for nine decades. They are an integral part of the evolutionary historic narrative that speaks to the development pattern of our City's westward growth.

Their conjoined identity has been bifurcated by the malfeasance of our empowered administrators. Planning staff was negligent when they issued the CE for a separate William T. Bishop Residence Project. StuHo, the developers of the proposed adaptive reuse for USC student housing of the Bishop structure, are usurping all of the complex's available parking for their tenants. What is to be the fate of the Roger Williams Baptist Church? The Planning Department has no answer, they refuse to ask the question. The developer's offer vague oral projections.

Without a disclosed plan for the whole of the complex the issuance of the CE instead of an Initial Study & Checklist goes far beyond incompetence. It is more than a failing to see the context of the subject property but illustrates a bureaucratic culture that itself is blind, deaf, and dumb.

Without the intervention of WAHA the Department's approval for the demolition of part of the Cloister and the demolition of the Bishop's historic stucco façade would now have been completed. The integrity of the historic asset would have been lost.

I understand that WAHA has retained legal counsel and is prepared to challenge the certification of the Project's CE should you our City's leaders deny their appeal. I wholeheartedly support that action. The community does not have to accept the abuse or be dismissed by callous decision-makers who all too often fail to appreciate the historic-cultural resources of our ethnically diverse neighborhoods.

Respectively yours

Jim Childs