

James Oviatt Building
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May 13, 2014



Hon. Councilmember Jose Huizar, Chair
Hon. Councilmember Gilbert A. Cedillo
Hon. Councilmember Mitchell Englander
Planning and Land Use Management Committee

c/o Sharon.Gin@lacity.org

RE: Item 8 (14-0232) and 9(14-0232-S1), PLUM, May 13, 2014
Oak/Norwood Project, 2003-2023 Oak Street (904 W. 20th Street, 2009, 2015, 2021, 2023-2025 Oak Street, 903-909 W. 21st Street)
ENV-2012-83 MND REC 1, CASE NO. ZA-2012-1216 (ZAA) SPR / DIR
2012-1217-CCMP/ UNIVERSITY PARK HPOZ

Dear Council members,

I am writing about this development case before you regarding the proposed infill by the developer on this property located in the University Park HPOZ and adjacent to the 20ST Street National Historic District. As an Architect with over 40 years of preservation experience; as a former Board member on two HPOZ districts (University park HPOZ 2003 through 2005 and the Miracle Mile HPOZ from 1992-1997) ; and as the co-author of the University Park HPOZ Preservation Plan, I would like to ask that you **reject** this determination for issuing a Certificate of Appropriateness by the planning department for this project.

The proposed project is entirely against what the Los Angeles HPOZ ordinance and HPOZ neighborhood zones were created by Los Angeles City Council to prevent. Currently 27 neighborhood groups throughout Los Angeles and Nationwide preservation groups have created these districts by a majority vote to control the physical, economic and environmental impacts that will occur when inappropriate development is forced onto these specific historic neighborhoods.

Each Preservation Plan was adopted by planning staff and neighborhoods to standardize City wide enforcement and to set of measureable values about what constitutes “appropriate development and change” within each of the HPOZ districts.

This development has a number of problems within its design as presented. It tries to put an appropriate “historical” façade on a non-conforming project while not meeting the underlying goals and philosophy of the HPOZ Ordinance.



1. This project is adjacent to a **National Register District** as well as within the boundaries of the HPOZ. This should be treated as even more stringent in its required conformance with the national Secretary of Interiors Standards and should comply completely with the guidelines of this local UP Preservation Plan. The project as presented has too many variances from the Plan, which they try to justify because of the multi-family project type and current zoning standards. The Plan applies to all infill residential and commercial projects and supersedes zoning standards where it is more restrictive.
2. This project does not meet the important **massing** standards of the plan by having two and three story high units in the rear yards, which are traditionally throughout the city and specifically in this historic district reserved for one story structures or stepped two story structures with adequate rear setbacks and open space. This project proposed 5' setbacks that now extends across the rear portion of the site for both the two story Units 2 and 6 and the three stories double Unit 3 and 4 structures. The developer has placed the highest development to the rear to disguise the project as being "two stories" on the street. This project actually has a center portion with three stories that is two lots wide if the development is placed in the front half where it belongs, which would then not meet the standards.
3. The proposed of 59% **Lot coverage** is above the 35% allowed for all types of new development in the Preservation plan. This is a critical element in any historic neighborhood. The developer is trying to cherry pick historic structures that show lot coverage above the Plans but these were known at the time of the original district boundaries and accepted as part of the district. The Plan addresses any new development standards for this specific district to enable limitations about maximum allowable lot coverage that are deliberately more restrictive than the current zoning code.
4. The project does not respect the **historic lot setback pattern** of the neighborhood. Units 3 and 4 actually extend over the historic lot lines and all "six" of the buildings are tied together into one building by the second floor corridor. The project places 12 of the 29 units in the rear yard which is also nonconforming and inappropriate result of their failure to respect the required lot coverage. All new construction is required by the Plan to respect the historic development pattern that makes this district special and unique.

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In summary, I am asking that the Council not approve this **inappropriate** development. Your final approval will weaken the current law by skirting the HPOZ clearly stated development standards and therefore also reducing the effectiveness of the local HPOZ Boards with their great depth of experience in these approvals. This create a loophole that can be used against all HPOZ developments throughout the City where this kind of project could now occur.

Sincerely,

Thomas Michali,
Partner
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