

Date:

DEPARTMENT OF CITY PLANNING RECOMMENDATION REPORT



South Area City Planning Commission

January 21, 2014

Time: after 4:30 p.m.*

Place: Constituent Service Center

8475 S. Vermont Avenue Los Angeles, CA 90044

Public Hearing:

Not Required

Appeal Status:

CCMP - Not Further Appealable

MND - Further Appealable to

City Council

Expiration Date:

January 29, 2014

Case No.:

DIR-2012-1217-CCMP-1A

APPEAL OF DIRECTOR

OF PLANNING'S DETERMINATION (CERTIFICATE OF

COMPATIBILITY) AND MITIGATED NEGATIVE

DECLARATION

CEQA No.:

ENV-2012-83-MND

Related Cases:

ZA-2012-1216-ZAA-SPR

Council No.:

1 – Cedillo

Plan Area: Certified NC: South Los Angeles

ried NC: Emp

Empowerment Congress -

North Area

GPLU:

Public Facilities

Zone:

PF-1-O-HPOZ

PROJECT

2003 S. Oak Street

LOCATION:

PROPOSED PROJECT:

Pursuant to LAMC Section 12.20.3.L, a Certificate of Compatibility (CCMP) for the construction of a new 29-unit multi-family affordable housing development with underground

parking in the University Park Historic Preservation Overlay Zone (HPOZ). The subject

property is currently used as a surface parking lot for the Norwood Elementary School.

APPLICANT:

Thomas Safran & Associates

Representative: Tyler Monroe

APPELLANT:

Adams-Dockweiler Heritage Organizing Committee

Representative: Jim Childs

REQUESTED ACTIONS: Appeal of the Director of Planning's decision to approve, pursuant to Los Angeles Municipal Code Section 12.20.3.L, a Certificate of Compatibility for the following project in the PF-1-O-HPOZ Zone within the University Park HPOZ: Construction of a new 29-unit multi-family affordable housing development with underground parking; and the Director of Planning's decision to adopt the recommendation of the lead agency by adopting a Mitigated Negative Declaration (ENV-2012-83-MND) as the environmental clearance for this action.

RECOMMENDED ACTIONS:

1. Deny the appeal and sustain the Director of Planning's Determination to approve the CCMP.

2. Deny the appeal of the Mitigated Negative Declaration and adopt the MND as adequate environmental clearance for this action.

MICHAEL J. LOGRANDE Director of Planning

Director of Flaming

Ken Bernstein, AICP, Principal City Planner

Michelle Levy, City Planner

Steven Wechsler, AICP, Planning Assistant

(213) 978-1391

TABLE OF CONTENTS

roject Analysis	2
Background and Project Description	
Appeal Points/Staff Response to Appeal Points	
xhibits	.6
Exhibit A: Approved Project plans (Exhibit A of DIR-2012-1217-CCMP)	
Exhibit B: Lot coverage and setback analysis (Exhibit B of DIR-2012-1217-CCMP)	
Exhibit C: Director's Determination DIR-2012-1217-CCMP	
Exhibit D: Appeal of DIR-2012-1217-CCMP/ENV-2012-83-MND	
Exhibit E: Mitigated Negative Declaration DIR-2012-83-MND	

ADVICE TO PUBLIC:* The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the Commission Secretariat, Room 272, City Hall, 200 North Spring Street, Los Angeles, CA 90012 (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the Commission's Office a week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to the agency at or prior to the public hearing. As a covered entity under Title II of the American Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat (213) 978-1300.

PROJECT ANALYSIS

Background

The University Park Historic Preservation Overlay Zone (HPOZ) was adopted in March 2000 and covers a neighborhood roughly bounded by the I-10 Freeway to the north, the 110 Freeway to the east, and Vermont Avenue to the west. The southern boundary of the district runs roughly along West Adams Boulevard to Hoover Street, north on Hoover to 24th Street, and then west along 24th Street to Vermont Ave. The National Register 20th Street District is located immediately west of the subject property. In this HPOZ area, physical changes to the exterior of a property are required to be reviewed by the appointed University Park HPOZ Board and/or Department of City Planning Staff, pursuant to the provisions of Los Angeles Municipal Code Section 12.20.3.

Project Description

The project consists of a 31,571 square-foot, six-building, 29-unit new development with a subterranean parking garage. The new development is proposed across six lots along the west side of Oak Street, between 20th Street and 21st Street. The approximately 31,851 square-foot site is currently developed as an asphalt parking lot for the Norwood Elementary School, to the east across Oak Street. At the time of the January 1999 Historic Resources Survey the site was designated as a Non-Contributing Feature in the University Park HPOZ. Vehicular access to the subterranean parking garage will be provided via an existing concrete curb cut/driveway entry located along 21st Street. Building 1, located at the corner of Oak Street and 21st Street will have four units; Building 3, located in the middle along Oak Street will have 13 units, designated community space, and a central elevator; Building 4, located to the north of Building 3 will have two units; Building 5, located at the corner of Oak Street and 20th Street will have four units; and Building 6, located along 20th Street will have two units.

Buildings 1, 2, 5, and 6 will be two-story buildings built in the Craftsman Style. Buildings 3 (a three-story building) and 4 (a two-story building) will be built in the Dutch Colonial Style. All six buildings will utilize asphalt roof shingles, wood frame and sash windows, a fiber cement material in a cedar lap style, brick/masonry, and will be painted in a historic color palette compatible with the surrounding Contributing structures in the University Park HPOZ. Additionally, all six buildings will use simplified architectural details to differentiate them as new construction from the surrounding historic structures. All of the six existing mature street trees along Oak Street will be maintained.

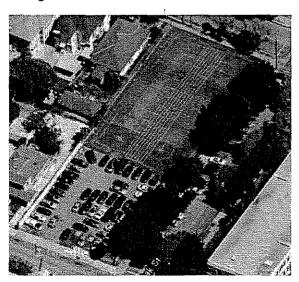


Figure 1: Image of 2003 S Oak Street taken from Google Maps, 2013

APPEAL POINTS AND STAFF RESPONSE

The Appellant raised several issues in the Appeal. In summation, the major concerns raised include: that the project is in non-compliance with multiple guidelines of the University Park Preservation Plan (UPPP) dealing with prevailing conditions, that the project is out-of-scale and inadequately designed to be compatible with the neighborhood character, and that additional CEQA review should have been undertaken due to the HPOZ Board's recommendation of project denial. This section responds to the main points raised in the appeal.

1. The Project failed to conform with many substantive elements of the University Park Preservation Plan's (UPPP) "prevailing" requirements including: massing, lot coverage, historic setbacks, and historic patterns of development.

Extensive findings were included in the Certificate of Compatibility (CCMP) Decision which analyzed in exacting detail the project design and how it substantially conforms to all applicable elements of the Plan. The Appellant's Appeal Request characterizes this analysis as:

"(The CCMP) Determination commits a total 13 of its 19 pages to a bureaucratic listing of some 72 Guideline requirements from the (UPPP) for compliance, coupled with an official response that the Project's design is in conformance with all of those Guidelines." (Appeal Request, Page 2, Paragraph 3)

However, instead of a rote "bureaucratic listing" of the 72 guidelines, the Director's Decision provides legally mandated Findings which outline a detailed, exhaustive analysis of the elements of the project that allowed the Director to reach the conclusion that the development complies with the overwhelming majority of both the quantitative, numerical guidelines of the UPPP and with all of the qualitative, interpretive guidelines. In those infrequent instances where the project varies from the precise guidelines, the Findings provide an analysis of the project elements and evidence that supports allowing the project as proposed, or requires compliance with Conditions of Approval to meet the guidelines.

The 13 pages of Findings analysis are not repeated here, but are attached to this report in the original CCMP Director's Decision. The Appellant's concern that the central Building 3 is a three-story structure out of character with the community is not supported by the data in the Findings regarding multiple other properties in the area and an examination of the design of the building, which minimizes the massing by placing only four units on the third floor, and uses sloping roof forms in a Dutch Colonial architecture style. The lot coverage guideline of 35 percent or less in the UPPP, that is designed to assure adequate open space and recreation areas on a site, is addressed with the final project design's use of common open space areas. To minimize changes to the historic character of the neighborhood, the project Applicant has voluntarily relocated 100 percent of the parking to an underground garage to further maximize opportunities for open space. The project Applicant's survey of prevailing setbacks on Oak Street and the neighboring streets including the 20th Street National Register District provides extensive evidence of the varied street setbacks found throughout the area (Exhibit B, attached). The Findings detail how the proposed design is an appropriate response by the project to adapt a multi-family multi-lot development to conform to the historic character of the area.

2. There is no forgiveness or allowance for exceptions to the requirements of the University Park Preservation Plan.

This concept is reiterated in several instances in the Appeal Request and forms the main thesis of the appeal. The Guidelines, however, are just that: Guidelines, and not standards which have the enforceability of an ordinance. Although repeatedly referred to by the Appellant as "requirements", they are in fact <u>advisory</u> guidelines. The Guidelines of the University Park Preservation Plan (UPPP) serve as an interpretation of the Secretary of the Interior's Standards for the Treatment of Historic Properties as <u>guidelines</u> to provide design recommendations on rehabilitation work on historic structures and the design of new projects. The central contention of the Appellant's Appeal Request is that the Guidelines are immutable mandatory standards that require full adherence in all situations. The UPPP Guidelines have been adopted by the City Planning Commission to provide general direction and guidance to project applicants, the HPOZ Board, and City Staff. They have not been adopted as an Ordinance by the City Council requiring Variance or Minor Exception findings for all deviations from written text.

HPOZ Ordinance Section 12.20.3.L defines the purpose of the Certificate of Compatibility (CCMP) for new development as a process "to assure that the construction work is undertaken in a manner that does not impair the essential form and integrity of the Historic character of its environment." Although the UPPP provides multiple instances of specific quantitative guidelines, interpreting whether the built form of a new development will "not impair the essential form and integrity of the Historic character" of a neighborhood also inherently involves qualitative analysis. The CCMP process is more than just a staff review to determine that a project meets all mathematical Zoning requirements. The CCMP process requires the consideration of qualitative, interpretive input through a public hearing process from the HPOZ Board, the Cultural Heritage Commission (CHC) staff architect, and any opinions and evidence provided by the public and the applicant. The extensive Findings included in the Director's Decision provide a detailed analysis of those factors and how, both for the specific guidelines and the Preservation Plan as a whole, the project meets the purpose of the CCMP process.

3. The application of the UPPP with respect to new infill development does not permit consideration of "the broader neighborhood context". The Plan requires in this case compatibility and conformance with the specific historic setting, and not out-of-scale extraneous developments that are far greater than the prevailing.

The UPPP was not created to address every potential land use possible within the Plan area. The Plan generally envisions small-scale development on a single lot or a small consolidation of lots. The Norwood project is the redevelopment of six lots that had been previously consolidated to one large .73 acre surface parking lot. The multi-family typology of the Norwood project is not one contemplated by the UPPP. The plan provides guidance on new, small-scale multi-family projects, but is inadequate in addressing unanticipated forms such as the Norwood project. The extensive multi-year consultation and review process for the CCMP resulted in the project Applicant progressively modifying the originally proposed three-building 3-story 40-unit project into the current project design consisting of 29-units, in a 2- and 3-story development divided into six buildings, and which locates all onsite parking in an underground parking garage. The Applicant's survey of 59 neighborhood properties, primarily Contributing structures, was utilized to inform and guide the design of the project. The final design of the project is therefore one which applies the forms and architecture of the surrounding community and minimizes project impacts to prevent it from being an "out-of-scale extraneous development" but instead one which is designed and

conditioned for compatibility and conformance with the specific historic setting of the University Park neighborhood.

4. The project requires additional environmental review due to the Director's Decision of approval differing from the denial recommendation of a majority of the University Park HPOZ Board. For purposes of CEQA, when there is a disagreement between experts, the more stringent level of environmental review is required.

The Appellant's claim that the project requires additional environmental review is flawed because it is not based on substantial evidence that the project, as proposed, would have a significant impact on a historic resource.

CEQA requires an analysis of baseline conditions. To determine whether a potential impact is significant or not the lead agency must compare that impact to a baseline condition. CEQA Guidelines Section 15125 specifies that a project's environmental setting normally is the "baseline" for environmental analysis. The CEQA Guidelines defines the "environmental setting" as being the physical conditions in the vicinity of a project as they exist at the time the time the environmental analysis is commenced.¹

As part of the review process, the applicant prepared an exhaustive review of baseline conditions within the existing historic setting, noting building heights, architectural styles, massing, etc. in the surrounding community. The existing site has been in use as a parking lot for decades, predating the establishment of the HPOZ. The existing parking lot on which the project is proposed is the environmental setting and the baseline condition – not the 1922 Sanborn footprints referenced in the appeal. The Appellant has taken a narrow interpretation of the UPPP guidelines to argue that the project, as a whole, does not meet the Preservation Plan because individual components of the project's design deviate from the letter of the UPPP design guidelines.

Many alternative designs (half dozen) were reviewed as part of the HPOZ process under LAMC Section 12.20.3.M; on balance, the design approved by the Director as Exhibit A, attached, was the best viable alternative because it substantially conforms to the UPPP as a whole, meets the Secretary of the Interior's Standards, and meets the spirit and intent of the guidelines for design of a new project within a historic district.

CONCLUSION

Staff recommends that the Commission deny the appeal and sustain the Director's Determination to approve the project.

APPELLATE DECISION

Per section 12.20.3.N of the LAMC, appeals of Certificate of Compatibility cases are heard by the subject Area Planning Commission. Decisions from the Area Planning Commission on Certificates of Compatibility are not further appealable.

¹ CEQA Deskbook, Third Edition, Ronald E. Bass, Solano Press Books, 2012 DIR-2012-1217-CCMP-1A Appeal of Director's Determination

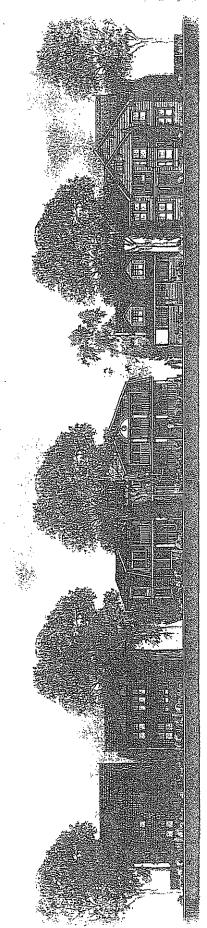
Exhibits A through E

MILATEL-SIDS- MICH

EXHIBIT A



EXHIBIT A



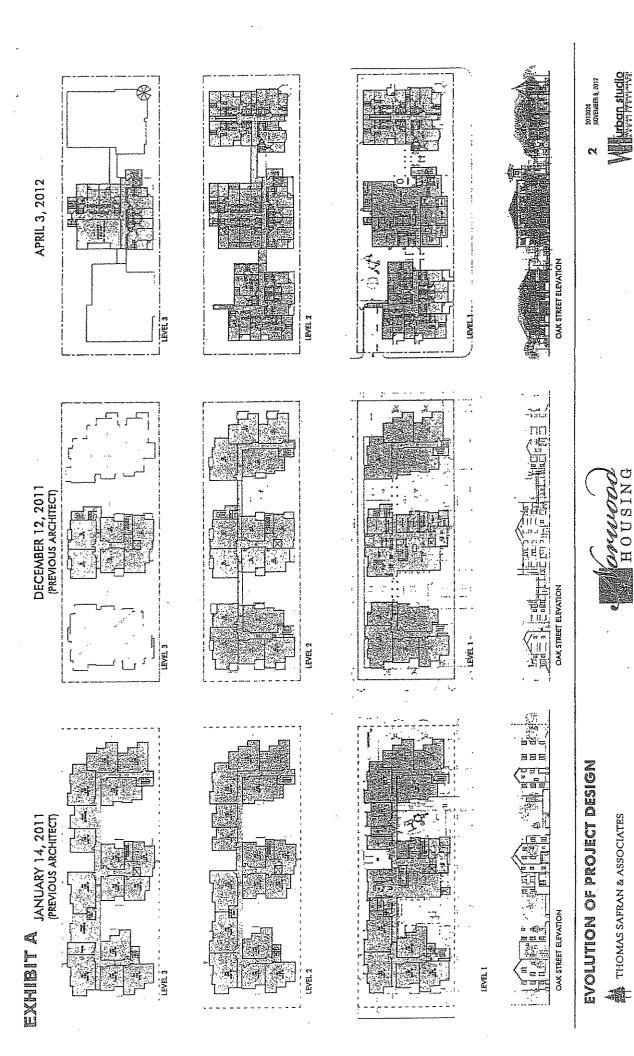


THOMAS SAFRAN & ASSOCIATES



UNIVERSITY PARK HPOZ SUBMITTAL CITY OF LOS ANGELES

NOVEMBER 9, 2012



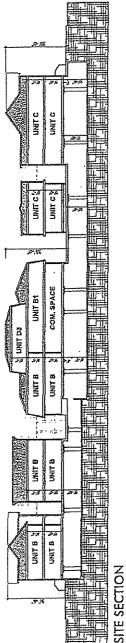
NOVEMBER 9, 2012 CURRENT OAK STREET ELEVATION LEVEL 2 LEVEL 1 SEPTEMBER 4, 2012 MALIAND HINDON OAK STREET ELEVATION AUGUST 7, 2012 OAK STREET ELEVATION EXHIBIT A

EXHIBIT A

HOUSING

EVOLUTION OF PROJECT DESIGN

THOMAS SAFRAN & ASSOCIATES



LOT AREA:

BUILDABLE AREA (- SETBACKS): 0.51 AC. (22,027 S.F.)

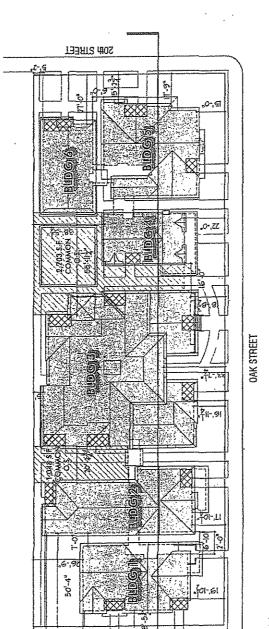
BUILDABLE AREA (- SETBACKS): 0.51 AC. (22,027 S.F.)

DWELLING UNITS:
29 DUs
29 DUs
10T COVERAGE:
49%
GROSS FLOOR AREA:
1,43:1 FA.R.

FLOOR AREA RATIO:
1,43:1 FA.R.

MAX. BUILDING HEIGHT: 33:-0*

PROJECT SUMMARY



S1st STREET

MAX. 20' 27' 50.3' 38.5'

MIN. 15,3' 8,5'

SETBACKS: FRONT - OAK STREET: SIDE - 20th STREET: SIDE - 21st STREET: REAR:

29 DUs

왕 역 %

PARKING PROVIDED: RESIDENT SPACES: TEACHER SPACES: TOTAL SPACES:

13 등

UNIT MIX:

UNIT A UNIT B UNIT C UNIT C

3,751 S.F. 1,450 S.E. 5,201 S.F.

USABLE OPEN SPACE:
COMMON (15' MIN, DIMENSIOM):
PRIVATE EG SE MIN DUD;
TOTAL, OPEN SPACE:

COMMON OPEN SPACE

XXX PRIVATE OPEN SPACE INDOOR FLOOR AREA

EXISTING TREE

SITE PLAN

SITE PLAN AND CROSS-SECTION



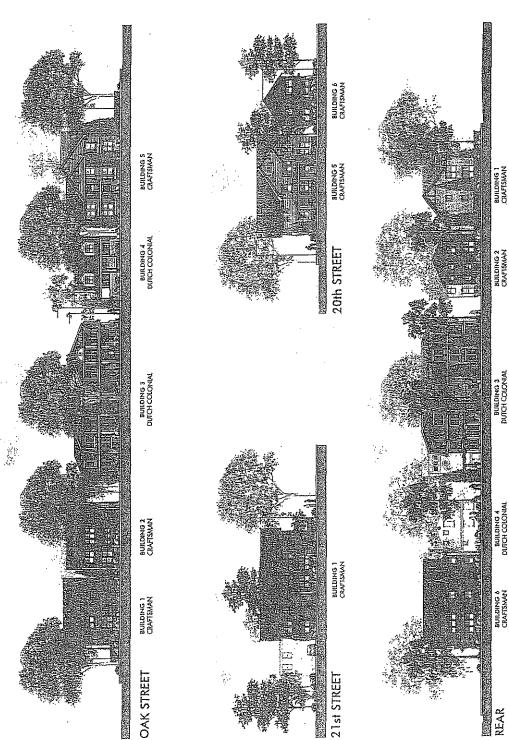
THOMAS SAFRAN & ASSOCIATES



EXHIBIT A



2012926 Noveniger 9, 2012



UNIVERSITY PARK HPOZ PRESERVATION PLAN CONSISTENCY

E. Roof Forms (8,12 pages 96-97)

- 1. Gabie, hip, and gambrel rool forms are consistent with those of surrounding historic structures.
- Dormers echo the size and placement of such features on historic structures.
- 3. Roots are afficulated with secondary elements to indicate locations of porches and entrances.

F. Openings (8.13 pages 98-100)

- 1. Windows are similar to shape and scale to surrounding 2. Primary entrances are from Oak Street, and Include historic structures,
 - stairs, stoops, overhangs, and porches.
- 3. Building entrances are consolidated to reflect the historic number of entrances on the block face.

G. Materials & Details (8.14 pages 101-103)

- i. Facades are articulated following patterns found on surrounding historic structures.
- 2. The number of steps to the first level is consistent with that of prevailing structures.
 - railings echo those of surrounding historic structures, 3. Architectural details such as posts, columns, and
- surrounding historic structures without replicating them. 4. Facades Incorporate a similar level of detail to
 - 5, Floor divisions are articulated with secondary roof elements, horizontal bands, and bay windows
 - prevailing block and give a sensa that the buildings belong to the neighborhood, 6. Architectural styles and omamentation reflect the

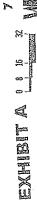
M. Public Realm (10.0 pages 135-137)

- Curb cuts across sidewalks are minimized to reduce pedestrian and vehicular conflicts,
- 2. Public walkway connections are maintained along the

STREETSCENE ELEVATIONS

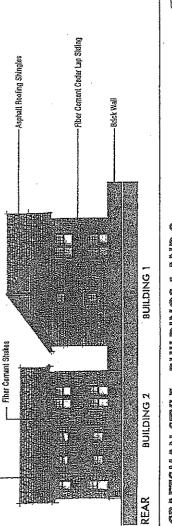








Fiber Cement Cedar Lap Siding Fiber Cement Cedar Lap Skilng -Asphall Roofing Shingles Asphall Rooling Shingles Asphall Roofing Shingles Fiber Cement Shakes Brick Pilasiers Brick Base BUILDING 2 BUILDING 1 --- Fiher Cerneni Shakes — Fiber Cement Shakes Aber Cemeni Cadar Lap Siding BUILDING 1 - Fiber Cement Shakes EXHIBITA OAK STREET 21st STREET



CRAFTSMAN STYLE - BUILDINGS 1 AND 2



THOMAS SAFRAN & ASSOCIATES



BUILDINGS 1 & 2 SCHEME

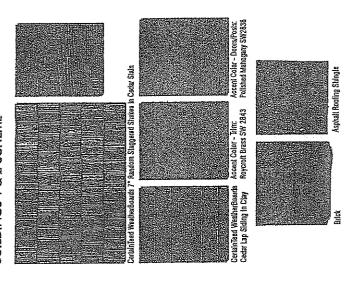
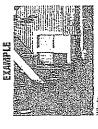


EXHIBIT A L-1

2012028 NOVEMBER 9, 2012

LAHIMII A

CRAFTSMAN ARCHITECTURAL STILE Character defining features



DETAILS

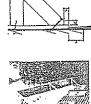


















CRAFTSMAN STYLE - BUILDINGS 1 AND 2

THOMAS SAFRAN & ASSOCIATES

#E













ELEVATION DETAIL - BLDG 2

UNIVERSITY PARK HPOZ PRESERVATION PLAN CONSISTENCY

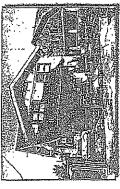
Graftsman Style Character Defining Features (7.3 page 38)

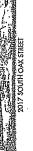
- Rustic aesthetic
- Low-pliched gable roots
 Exposed rafter fails and decorative brackets
 - 4. Oil-center porches
- 5. Square columns 6. Grouped, mulli-pane double-fung windows

 - 7. Glazed doors
 8. Earth-lone clapboard or shingle siding
 9. Brick base

HPOZ REFERENCES

ELEVATION DETAIL - BLDG 1





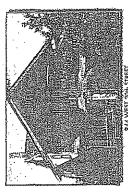
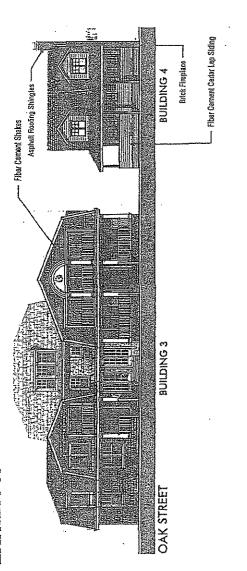
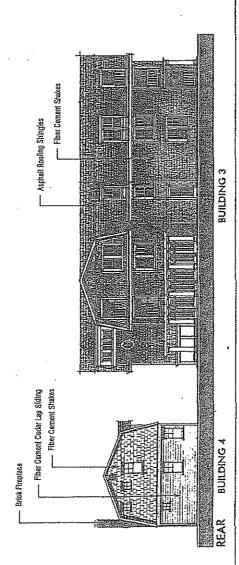




EXHIBIT A

EXHIBIT A





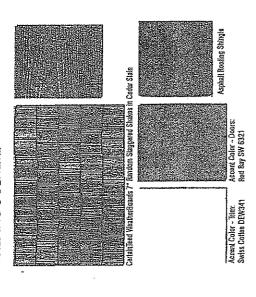
DUTCH COLONIAL STYLE - BUILDINGS 3 AND 4



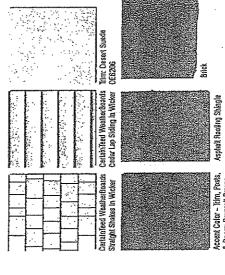
THOMAS SAFRAN & ASSOCIATES



BUILDING 3 SCHEME



BUILDING 4 SCHEME



Accent Calor – Tim, Posts, & Doors: Roycraft Bronza Green SW 2846

EXHIBIT A '

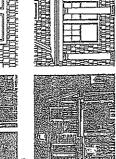
2012026 November 9, 2012

0

EXMINIT A

DUTCH COLONIAL ARCHITECTURAL STYLE CHARACTER DEFINING FEATURES

EXAMPLE



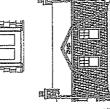


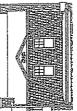




Hei.

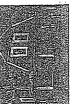
ELEVATION DETAIL - BLDG 3













DUTCH COLONIAL STYLE - BUILDINGS 3 AND 4

THOMAS SAFRAN & ASSOCIATES

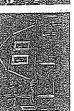


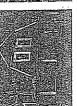


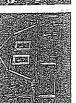














ELEVATION DETAIL - BLDG 4

UNIVERSITY PARK HPOZ PRESERVATION PLAN CONSISTENCY

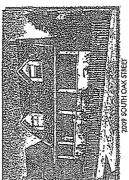
Character Defining Features (7.3 page 41) Dutch Colonial Revival Style

- 1. Gambrel roof 2. Side gables
 - 3. Shallow eaves
- 4. Recessed parches
- 5. Square or round columns
- Grouped, multi-pane double-hung windows
 Dulch doors
 Calphoard or shingle siding

HPOZ REFERENCES



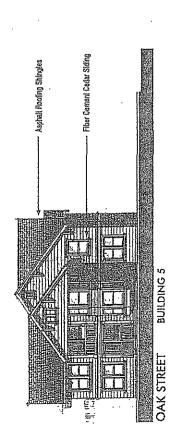


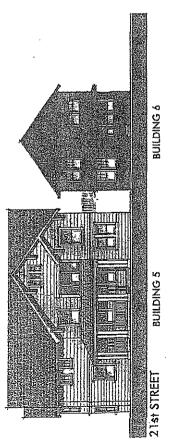


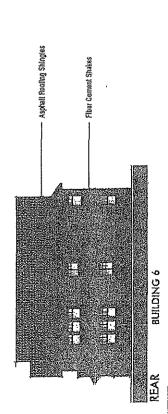
2012026 November 9, 2012

Manufacture studio EXMIBIT A

EXMIBIT A







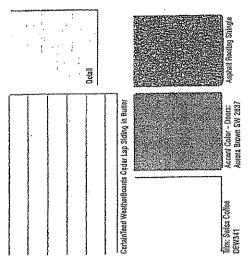
CRAFTSMAN STYLE - BUILDINGS 5 AND 6



THOMAS SAFRAN & ASSOCIATES



BUILDING 5 SCHEME



BUILDING 6 SCHEME



SeriainTeed WeatherBoards 7" Random Staggered Shakes in Mahagany Stain



Accent Color - Tilm & Doors: Studio Blus Green SW 0047

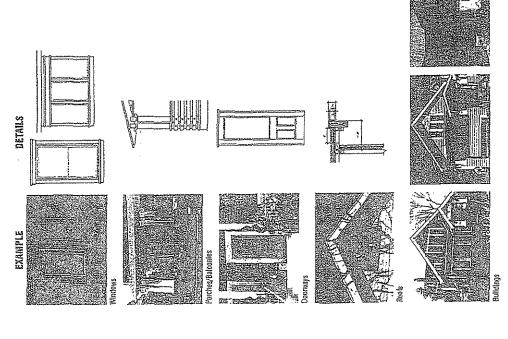
note. Palette based on skemmn waldans instoric collection affis a crafts palette Asphait RecingShingle

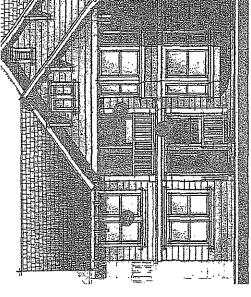


EXHIBIT A L

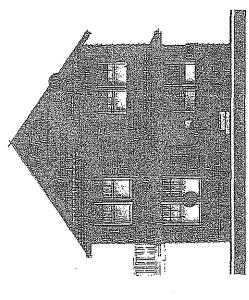
EXHIBIT A

CRAFTSMAN ARCHITECTURAL STYLE CHARACTER DEFINING FEATURES





ELEVATION DETAIL - BLDG 5



ELEVATION DETAIL - BLDG 6



CRAFTSMAN STYLE - BUILDINGS 5 AND 6

THOMAS SAFRAN & ASSOCIATES

UNIVERSITY PARK HPOZ PRESERVATION PLAN CONSISTENCY

Craftsman Style Character Defining Features (7.3 page 38)

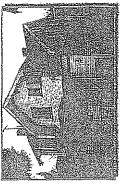
- 1. Simplified slyling
- 2. Low-pitched gable roofs
- 3. Exposed rafter tails and decorative brackets
 - 4. Oil-center porches
 - 5. Square columns

- 6. Grouped, double-hung windows 7. Glazed doors 8. Clapboard or shingle siding

HPOZ REFERENCES



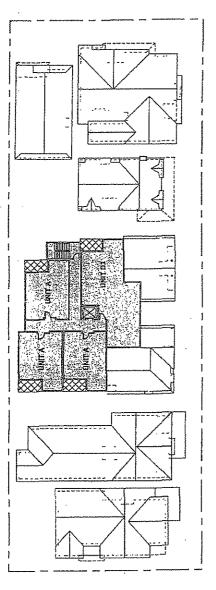




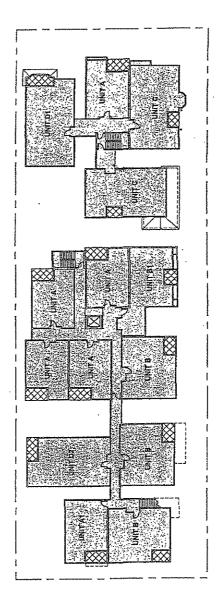
16 WEST 20th STREET

2012026 Noyember 9, 2012 ጀመብ ፈላጋ

Washingthallo EXHIBIT A



LEYEL 2



floor plans

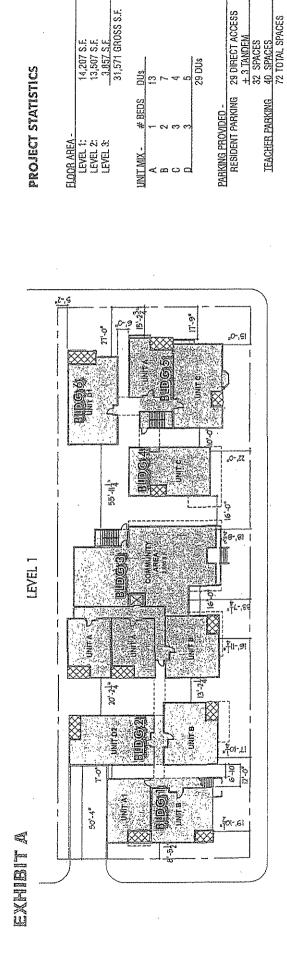


THOMAS SAFRAN & ASSOCIATES

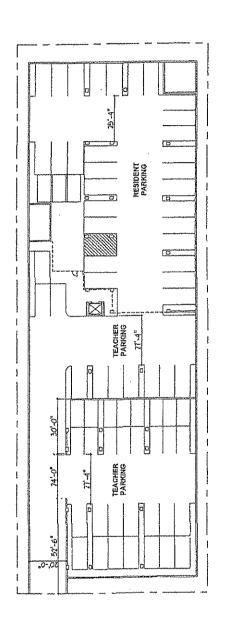


EXMIBIT A @





SUBTERRANEAN PARKING LEVEL



FLOOR PLANS

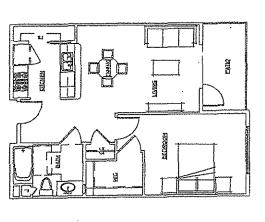
THOMAS SAFRAN & ASSOCIATES



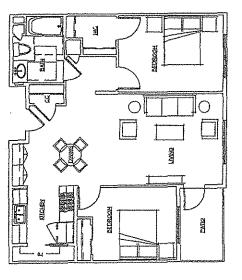
ovaropo HOUSING







PLAN A 1 BEDROOM 660 S.F. 70 S.F. PATIO



PLAN B 2 BEDROOM 890 S.F 60 S.F PATIO



EXHIBIT A



THOMAS SAFRAN & ASSOCIATES UNIT PLANS

REFEREN

MESON

BEDROOM



PLAN D 3 BEDROOM 1,200 S.E 80 S.E PATIO

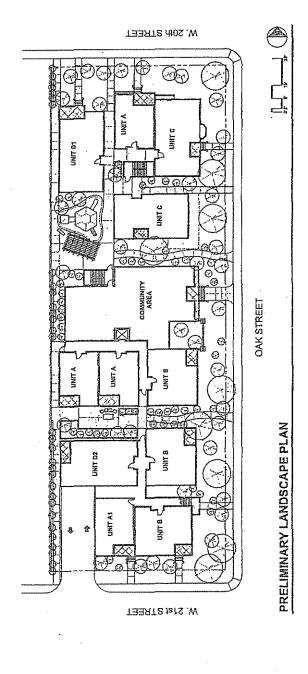


EXHIBIT A

Malurban studio 17 7012026 NOVEMBER 9, 2012

UNIT PLANS





Los Angeles, california NORWOOD HOUSING

EXHIBIT A