

Daniel Freedman  
Direct: 310-785-5391  
DFF@JMBM.COM

1900 Avenue of the Stars, 7th Floor  
Los Angeles, California 90067-4308  
(310) 203-8080 (310) 203-0567 Fax  
www.jmbm.com

September 17, 2018

**VIA E-MAIL AND HAND DELIVERY**

Chairman Jose Huizar and Hon. Members of the  
Planning & Land Use Management Committee  
City of Los Angeles, City Hall  
200 N. Spring Street  
Room 1010, City Hall  
Los Angeles, CA 90012

Re: **Council File: 18-0330**

1848 South Gramercy Place, Los Angeles  
Case No(s). CHC-2018-3217-HCM; ENV-2018-3218-CE  
Proposed Cultural Historic Monument Designation(s)  
**PLUM Hearing Date: September 18, 2018**

Dear Chairman Huizar and Honorable Members of the PLUM Committee:

Our office represents Janet and Akhilesh ("A.J.") Jha, the owners of 1848 S. Gramercy Place, Los Angeles, (the "Property"). We submit this letter in opposition to the City of Los Angeles's ("City") consideration of their Property as a potential Historic Cultural Monument ("HCM"), and to urge the City Council to adopt the Cultural Heritage Commission's ("Commission") *unanimous* recommendation against declaring the Property as an HCM. Attached as **Exhibit A** is the Commission's report on the nomination, concluding unequivocally that:

"[The Property] does not meet any of the three criteria in the Cultural Heritage Ordinance... [and is] ineligible for designation as an Historic Cultural Monument."  
(See Commission Findings, Pg. 1.)

The Commission's recommendation in this instance is consistent with the findings and analysis of the City's Office of Historic Resources and a detailed Historic Resources Assessment prepared by Environmental Science Associates ("ESA"), both of which found that the Property was not qualified for HCM designation under any standard. These conclusions are also consistent with the City's findings in SurveyLA - its recently completed inventory of potentially historic resources - which did not identify the Property as a potential historic resource or a contributor to a potential historic district. In this case, therefore, there is a clear consensus among all experts that this Property is not a historic resources or HCM under any applicable standard.

Additionally, strict consistency with these findings is even more important in this instance, given that the owners are currently in the process of developing a multi-family project - *with dedicated affordable units* - for the Property. An HCM designation for this dilapidated single-family home would (i) undermine the proposed project, (ii) threaten the development of much needed affordable housing, and would (iii) leave the owner with a building that cannot be economically repaired or rehabilitated. Accordingly, new and much needed affordable housing is at stake in this determination.

For these reasons, and others as set forth by ESA and the City's Office of Historic Resources, the City Council should adopt the Commission's recommendation against the designation of this Property as an HCM. Considering the consensus between the Commission, staff, ESA, and those who advised the City in the preparation of SurveyLA, it is clear the Property does not qualify as an HCM and does not meet the criteria set forth in LAAC Section 22.171.7 for HCM designation. Moreover, given the Property's poor condition, designation of the building as an HCM would make it impossible for the owner to economically maintain the structure while also bringing it to code. We urge the City Council deny this nomination consistent with the Commission's recommendation. Thank you for your consideration.

Sincerely,



DANIEL F. FREEDMAN of  
Jeffer Mangels Butler & Mitchell LLP

Enclosures

CC: Jordan Beroukhim, Planning Deputy, Los Angeles City Council District 10  
Azeen Khanmalek, Planning Deputy, Los Angeles City Council District 14

# EXHIBIT A

DEPARTMENT OF  
CITY PLANNING  
200 N. SPRING STREET, ROOM 532  
LOS ANGELES, CA 90012-4801

CITY OF LOS ANGELES  
CALIFORNIA

EXECUTIVE OFFICES

VINCENT P. BERTONI, AICP  
DIRECTOR  
(213) 978-1271  
KEVIN J. KELLER, AICP  
EXECUTIVE OFFICER  
(213) 978-1272  
LISA M. WEBBER, AICP  
DEPUTY DIRECTOR  
(213) 978-1274

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COMMISSION OFFICE MANAGER  
(213) 978-1300

<http://planning.lacity.org>

July 12, 2018

Los Angeles City Council  
c/o Office of City Clerk  
City Hall, Room 395  
200 North Spring Street  
Los Angeles, CA 90012

Attention: PLUM Committee

Dear Honorable Members:

**STOKES' ANGELUS VISTA TRACT RESIDENCE; 1848 SOUTH GRAMERCY PLACE; CHC-2018-3217-HCM; ENV-2018-3218-CE; COUNCIL FILE NO. 18-0330**

On May 1, 2018, the City Council instructed the Department of City Planning to initiate Historic-Cultural Monument designation proceedings for the Stokes' Angelus Vista Tract Residence (CF-18-0330). On May 24, 2018, a subcommittee of the Cultural Heritage Commission (CHC) visited the property, as required by Section 22.171.8 of the Los Angeles Administrative Code (LAAC). On July 5, 2018, after at the completion of a public hearing on the matter, the Commission, determined that this property does not conform with the definition of a Monument pursuant to LAAC Section 22.171.7 by a vote of 5-0. Therefore, the request for designation as a Historic-Cultural Monument has been declined.

The Commission vote was as follows:

Moved: Kennard  
Seconded: Kanner  
Ayes: Buelna, Milofsky  
Abstained: Barron

**Vote 5 – 0**

Etta Armstrong, Commission Executive Assistant I  
Cultural Heritage Commission

**Time for Council to Act:** The Commission action is hereby transmitted to the City Council for consideration. Pursuant to Section 22.171.10(f) of the Los Angeles Administrative Code, the Council may approve or disapprove in whole or in part an application or initiation for a proposed designation of a Monument. The Council shall act in 90-days of the public hearing held before the Commission on the proposed designation. The City Council may unilaterally extend the 90-day time limit to act for a maximum of 15 days for good cause. With written consent of the owner, the time for the City Council to act may be extended by up to an additional 60 days. If the Council does not act on the application or initiation within this specified time limit, the application or initiation to designate a Monument shall be deemed to have been denied. The Council may override a Commission recommendation of denial of Council initiated designation by a minimum of 10-votes.

Attachment: Findings

## STOKES' ANGELUS VISTA TRACT RESIDENCE

### FINDINGS

(Adopted by the Cultural Heritage Commission on July 5, 2018)

The Stokes' Angelus Vista Tract Residence does not meet any of the three criteria of the Cultural Heritage Ordinance and therefore is ineligible for designation as an Historic-Cultural Monument.

#### CRITERIA

The criterion is the Cultural Heritage Ordinance which defines a historical or cultural monument as any site (including significant trees or other plant life located thereon) building or structure of particular historic or cultural significance to the City of Los Angeles if it meets at least one of the following criteria:

1. Is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;
2. Is associated with the lives of historic personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

#### SUMMARY

The Stokes' Angelus Vista Tract Residence consists of a two-story single-family residence located on the east side of Gramercy Place between Washington Boulevard and 18th Street in the Arlington Heights neighborhood of Los Angeles. Built in 1907 by noted Los Angeles builder Naldo F. Stokes and his wife Minnie Stokes as part of the Angelus Vista Tract development, the residence exhibits qualities of Craftsman and Tudor Revival architectural styles. Over the years, a series of owners and renters occupied the residence, and currently it serves as a sober living facility.

Though promoted in 1902 as one of Los Angeles's elite residential neighborhoods, the Angelus Vista Tract was not an initial success, as most of the wealthy targeted by the developers were already living in grand houses in other new developments. Between 1908 and 1910 the city's population had more than doubled, leading to a building explosion. Most homes in Angelus Vista date from this period. Washington Boulevard, envisioned as the future grand boulevard from Los Angeles to the Pacific Ocean, played a key role in the development of the community. In September 1902 the Washington Boulevard rail line was extended through West Adams Heights, prompting developers to lay out residential tracts along the main thoroughfare to Santa Monica and the sea.

Irregular in plan, the subject property is of wood frame and concrete construction with wood shingle and stucco cladding. The steeply-pitched side-gabled roof has composition shingles, wide overhanging eaves, and exposed rafter tails. The primary, west-facing elevation features a large bay window on the lower level, a second story projecting front gable with decorative half-

timbering, and a small recessed balcony with lattice railing, also on the second floor. The entryway is off-centered and accessed via a protruding porch with a gabled roof and square columns. There is a porte-cochere of cross-truss construction attached to the south-facing elevation of the building and a one-story addition off the rear, east-facing elevation. Fenestration consists of double-hung wood windows, multi-lite wood fixed and casement windows, wood hopper windows, and aluminum windows. There is a small shed at the rear of the property. Interior features include wood floors, built-in wood benches, wood ceiling beams in the living room, a river rock fireplace surround, built-in china cabinets and bookcases, and reverse board and batten wainscoting.

Based on available permit records and visual observation during the Cultural Heritage Commission site inspection, there have been a number of alterations to the property over the years that include a 20-foot by 23-foot one-story rear addition in 1920, installation of a rear staircase in 1982, as well as kitchen and bathroom remodels, the enclosure of the porch on the primary elevation, re-stuccoing of the stucco cladding with course concrete plaster, replacement of some windows, addition of a porte-cochere, installation of partitions in many of the rooms, enclosure of the rear service porch, and a second-story addition to the 1920 rear addition, all at unknown dates.

The subject property was identified as eligible for historic designation under the local designation program as a Contributor to an identified historic district in the June 21, 1996 Historic Resources Final Report for the South Central Los Angeles District Plan Area prepared by Richard Starzak of Myra L. Frank & Associates, Incorporated. However, it was found to be ineligible for listing individually on the National Register of Historic Places in a 1987 Section 106 review survey and was also not identified as eligible individually or as part of a historic district for listing under the national, state, or local designation programs in the recent citywide historic resources survey, SurveyLA. Within the same neighborhood as the subject property, SurveyLA did identify a potential Angelus Vista Historic District, an important representative of a residential suburb with a significant concentration of Craftsman and Period Revival dwellings exhibiting quality of craftsmanship and distinctive features, and an excellent example of early 20th century streetcar suburbanization. The subject property was not included within the district boundary.

## **DISCUSSION**

The Stokes' Angelus Vista Tract Residence does not meet the criteria for designation under the Cultural Heritage Ordinance. The preparer argues that the property is eligible under two criteria of the Ordinance: that it "is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community" for its association with the early development of the Angelus Vista Tract and a California Supreme Court case involving restrictive use covenants, *Werner v. Graham*, and that it "embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age" as an unique example of Craftsman-style architecture and an exemplary work of noted builder Naldo F. Stokes.



The subject property is not associated with any significant historical events and does not exemplify any contributions to history. Even though the subject property does date from the early period of the neighborhood's development, it no longer retains sufficient integrity to individually convey its significance. The cumulative alterations, particularly on the primary, east-facing elevation, have substantially impacted the original design intent, materials, feeling, and association with the development of the Angelus Vista Tract. Further, the court case cited by the preparer may have had some impact on the development of Washington Boulevard as a commercial corridor; however, while the owner of the house was one of the named defendants, the case does not appear to have any direct association with the subject property.

Although the subject property retains original elements such as wood windows, decorative half-timbering, wide over-hanging eaves, exposed rafter tails, and built-in furniture typical of the style, staff does not find it to be a distinctive or outstanding example of Craftsman-style architecture. As noted above, the house has experienced a number of alterations, particularly to the primary façade, that compromise the integrity and original design of the house; therefore it is not a distinguished example of the style. More intact and exemplary Craftsman-style single-family residences that are already designated include the Kissam House, 2160 West 20th Street (1907, HCM #761), Perrine House, 2229 South Gramercy Place (1908, HCM #6662), and the Edward Alexander Kelley Hackett House, 1317 South Westlake Avenue (1910, HCM #719).

The property is also not a notable example of a master designer, builder, or architect. While Naldo Stokes built at least 50 single-family residences across Los Angeles, some of which were collaborations with master architect Frank M. Tyler, he is not recognized as a master builder or architect. The majority of Stokes' body of work consists of speculative ventures for himself and his wife.

The subject property was not identified by the citywide historic resources survey, SurveyLA, as eligible for designation under the national, state, or local designation programs and staff finds that it does not appear to rise to the level of historic significance to be individually eligible for designation as a Los Angeles City Historic-Cultural Monument.

### **BACKGROUND**

On May 1, 2018, the Los Angeles City Council, acting upon a motion introduced by Councilmember Herb Wesson, initiated consideration of the subject property as a potential Historic-Cultural Monument. On May 24, 2018, a subcommittee of the Cultural Heritage Commission consisting of Commissioners Barron and Kennard visited the property, accompanied by staff from the Office of Historic Resources.