

August 7, 2018

Sue Kaplan, Mary Jack and Shepard Stern, and our representative Amanda Seward in response to Appellants' interpretation of the Standards of Rehabilitation of Historic Resources.

Re: CEQA Appeal for 923-927 Marco Place, CE No. ENV-2015-3505-CE; DIR-2015-3504-CDP-SPP-MEL -1A et al.

Item 18-5074

To: Members of the Planning and Land Use Management Committee of the City Council of Los Angeles

By email to clerk.plumcommittee@lacity.org

Below are the interpretations of the Secretary of the Interior's standards for the Rehabilitation of Historic Resources. This is in response to the three Historic analysis that the Applicants commissioned and payed for.

While dismissed by the Applicants' representation as being lay people, and implying the public's voice has no place in land use issues, we have done our homework, studied the Standards in detail and read everything about their interpretations and implementation. In addition, Sue Kaplan, especially has knowledge of historic practices and process having been involved in two successful applications for Historic Cultural Monuments for Temple Mishkon Tephilo and recently the Irvin Tabor Westminster Family Residences.

For understanding of the different positions the analysis is represented below as follows: BOLD for the regulation; ITALIC the Appellants' interpretation; ROMAN is our response.

Thank you for your consideration of our appeal.

Sue Kaplan

Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

The Project would relocate the existing contributor, which currently occupies two lots (22 and 23) within Block 16 of the Venice Annex Tract. The Project would not result in demolishing any significant changes to distinctive materials or features. While the relocation of the Bungalow would alter its spatial relationship with its surroundings, its unusually large parcel consisting of two lots is not a distinctive feature of the district. Therefore, the Project would conform to Standard 1.

This is more than relocating. The original house on the property will be effectively be demolished and what's remaining will be moved. That is the whole point, the relocation will alter the property's relationship to the neighborhood. What was once a historic property, the equivalent of a double lot, with the distinct character of a single 100-year old house situated on it will no longer be the centerpiece of the block and neighborhood. It is hard to imagine that the Historian believes that putting half of the original house on a space half of its original space would not "alter its spatial relationship" adversely and destroy the specialness of this property as would dividing the lot and building two indistinct contemporary homes retains its historic use.

Relocating a historic resource is to be considered when all alternatives have been considered. The applicants have refused to consider keeping the house in situ because they felt it didn't fulfill their financial profit. The Appellants have offered a reasonable alternative that would retain the integrity of the historic resource with substantial evidence including real estate analysis.

By demolishing half of the original house, a significant amount of the features, materials, spaces, especially interior, will obviously be destroyed. This project does not meet the guidelines in Standard 1.

Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

The Project would retain the existing contributing Bungalow and would not result in the removal of any distinctive features. The Bungalow's spatial relationship will be altered but as stated under Standard 1, the unusually large parcel consisting of two lots is not a distinctive feature of the district. Furthermore, the Bungalow will remain in the District and thus remain in its historical setting. Therefore, the Project would conform to Standard 2.

The project will not retain its historic character. The historic character of this house on this property does not retain its character if half the house will be squeezed on half the lot. Its historic quality comes from its magisterial place on that lot in that way. The original house will be more than 50% demolished, consequently half of the defining features and distinctive materials will be lost as there will only be a façade remaining.

The original house situated on this property as it is not being preserved: "Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment;..." Thus this project does not meet the guidelines of Standard 2.

Standard 3: Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

There are no conjectural features as part of the Project, nor does the Project create a false sense of history. Therefore, the Project meets Standard 3.

This house was built in 1907. It was constructed as is, centered on the that lot. It has remained this way for over 100 years as a single-family home. It is one of the very few that one can say that is in its original state both in its structure and its siting. It serves as the record of the neighborhood when Abbot Kinney was developing his Venice of America. To continue to be recognized as a physical record of its time, place and use, an historical monument, its location on the property must be maintained. Anything otherwise does create a false perception of the neighborhood's historicism.

It is only logical to consider changes that destroy as well as an addition that only gives it a conjectural sense of the property and the demolition of 50% should not be undertaken. Destroying 50% of an historic property does not meet the requirements of Standard 3.

Standard 4: Changes to a property that have acquired historic significance in their own right will be retained and preserved.

The Project does not intend to physically alter the contributing Bungalow in any way. The only potential alteration identified was the enclosure of a portion of the front porch. Although it is not documented in building permits, the alteration appears to have occurred early in the Bungalow's history and within the District's period of significance (1904-1939). However, the Project does not propose to alter or remove this feature or any other features associated with the Bungalow, and therefore, conform to Standard 4.

This 100-year old craftsman bungalow is not just its front 20 ft. The sides from front to back also retain the typical profile with its jutting out sections. Demolishing the rear part of the house will destroy this characteristic feature. The modern addition does not offer a profile that would be compatible. Original clapboard and windows will be lost too. The interior is intact, including a few later but of the time features. The original interior will be lost

The project does not meet the requirements of Standard 4.

Standard 5: Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

The project will not remove or alter any distinctive materials, features, finishes, or examples of construction techniques or craftsmanship during the Bungalow's relocation. Therefore, the Project meets Standard 5.

The proposed project does nothing but remove the features that define this property and house as an original historic property and so this project does not meet the requirements of Standard 5.

Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

The Project does not seek to repair or replace any distinctive features. However, where the severity of deterioration requires replacement of a distinctive feature, the new feature would match the old in design, color, texture, and, where possible, materials. Therefore, the Project meets Standard 6.

Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The Project does not propose any chemical or physical treatments to the contributing Bungalow. Therefore, the Project would comply with Standard 7.

Standard 8: Archeological resources will be protected and preserved in place.

If such resources must be disturbed, mitigation measures will be undertaken. The potential to encounter archaeological or Native American resources is considered remote. Therefore, the Project meets Standard 8.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

In regards to the potential Milwood Walk Streets Historic District, the Project differentiates itself from the nearby early-twentieth century bungalows and the District's historic setting while at the same time relating to the overall Modern character of later infill development due to its contemporary design, including a flat roof profile and modern aesthetics. Conversely, the Project is compatible with the District contributors in massing, size, scale, and architectural features. The Project is modest in scale proposing two, two-story single-family residences that are compatible in scale with the District's contributors, which range between one- to two-stories in height. Table 5(Examples of Two-Story contributing residences in the Milwood Walk Streets Historic District, pp. 59-61, Historic Assessment Report) below shows contributing residences in the potential Milwood Walk Streets Historic District with similar scale and massing as the single family residences proposed by the Project. The Project will use natural materials for exterior cladding, such as wood siding, stone, and masonry, similar to the exterior features of the District's contributing residences. Additionally, the Project is set back fifteen feet from the front property line, the same set-back as the contributors, and will feature front yard walls and landscaped front lawns, which are character defining features of the District. Venice based architecture firm, Electric Bowery conducted a relative height study on the 900 block of Marco Place comparing the new construction proposed by

the Project with the existing residences along both sides of Marco Place (Figure 43). The study revealed that the new residences are similar in height and width as other residences along the walk street. The full relative height study diagram is included in this report in Appendix G. The new residences are not excessive in scale or massing and are therefore compatible with their surroundings. Furthermore, the front yard walls will obscure the public view of the new contemporary residences and therefore the new construction will not overshadow the surrounding historic setting. Therefore, the Project's proposed construction of two contemporary single-family residences conforms to Standard 9.

This is the heart of the issue that it is also required in our Land Use plan that it requires that mass, scale and compatibility with the existing neighborhood be supported in addition to the above prerequisites of height and setbacks. If you study the Renderings (the only documents shown to us at the Area Planning Commission) you will surely see how the addition overwhelms the original structure and draws the pedestrian visitors' eye away from the original structure and to the massiveness of the addition.

Thus, the project does not meet the requirements for Standard 9 as well the Venice Coastal Land Use Plan.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

If the contemporary residences proposed by the Project were removed in the future, the essential form and integrity of the District and its contributors in the Project vicinity would be unimpaired. The proposed project would conform to Standard 10.

By removing the rear part of the house now, the essential form and integrity of this historic property is lost. It is immaterial whether in the future its environment will be unimpaired. Its essential form and its integrity will already be compromised. This project will not conform to Standard 10.