

October 4, 2018

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REPORT

Los Angeles City Council  
200 N. Spring Street  
Los Angeles, CA 90012

**Re: 4321 Burns Ave. appeal; Council File 18-0659**

Case No.: VTT No. 73056-SL-1A; DIR-2014-4124-SPP-SPPA CEQA Case No.:  
ENV-2014-4125-CE; Project Addresses: 4321-4323 Burns Ave.

President Wesson and honorable council members:

**I. Additional Objections**

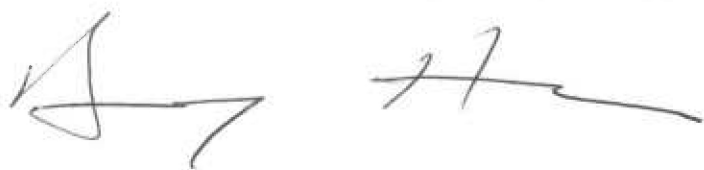
Please note the attached comments related to the historic merits of the 1914 duplex at 4321 Burns Ave. Note also comments by Historian Charlie Fisher<sup>2</sup> related to the Planning Department's biased approach regarding his qualifications, while at the same time ignoring the lack of qualifications of the historic consultant hired by the applicant, whose referenced degrees are in Planning and Technology Management, and Communications.

Note also for the record that the applicant did not attend the Planning and Land Use Management Committee hearing for our appeal, and has therefore waived his right to raise objections on these matters.

Furthermore, comments made during the PLUM Committee hearing by Planning Department staff misrepresented our appeal. Under questioning by Chair Jose Huizer, staff stated that the project is consistent with the specific plan now that the applicant has withdrawn his request for a height adjustment. This is incorrect. The project is inconsistent with multiple requirements of the specific plan's Development Standards and Design Guidelines, as noted in our appeal. Staff also stated that the applicant's two historic reports both concluded that the 4321 Burns Ave. duplex is not a historic resource, and therefore the site is unqualified -- as if two reports against one have merit under the California Environmental Quality Act. CEQA is not a numbers game. Both of the applicant's reports were biased and fatally flawed, and the planning department has no right to ignore an accurate report when presented for review.

The 4321 Burns Ave. project will significantly impact a historic resource, with no mitigation proposed to lessen that impact. A fair argument has been raised regarding the historic qualifications of the 1914 duplex on the project site. Under CEQA, an Environmental Impact Report is required.

Thank you,



Charles J. Fisher, Historian  
*140 S. Avenue 57*  
*Highland Park, CA 90042*  
*Phone: 323/256-3593 Fax: 323/255-0041*  
*Email: arroyoseco@hotmail.com*

September 23, 2018

Los Angeles City Council  
200 N Spring Street  
Los Angeles, CA 90012

RE: 4321 Burns Avenue, VTT 73056-SL

Dear Councilmembers,

I am writing this letter as a follow-up to my report of June 2018 in which I laid out the historic and architectural significance of the duplex at 4321-23 Burns Avenue and noting that the conclusions of two earlier reports were based on inadequate information.

The reports all note that the house was built in 1914 and moved to its current site in 1921, when a school was constructed at the original location on Vernon Avenue. The earlier reports noted that the house was removed from its original neighborhood and tried to assert that it was therefore out of its historic context. However, it was moved to the current location at the time that area was being developed and became a part of that development process.

My report includes an analysis of the various buildings in the 4300 block of Burns Avenue and shows that the subject duplex is a contributor on a street that could be a potential Historic Preservation Overlay Zone.

The duplex also fully retains its original design and materials. The earlier reports asserted that the house had various alterations, including replacement windows, an unpermitted rear addition and burglar bars. The report completed by Pam O'Connor of the firm Kaplan Chen Kaplan noted that the original building permit was for a structure of 1,620 square feet and it is now listed at 1,704 square feet by

the Los Angeles County Assessor, a difference of 84 square feet. That is equivalent of 2.8 feet being added to the depth of the house. The cross gabled section at the rear of the house is considerably larger than 84 square feet and the siding and other character defining features are identical throughout the entire structure. Sanborn maps in the report beginning in 1950 show no change in the footprint of the duplex. Earlier maps of the original site miss the duplex as only 1906, which was before it was built, and 1922, which was after it was removed from the original site are in the report. No extant Sanborn maps were found that displayed the duplex prior to 1950.

County appraisers normally measured buildings and noted square footage based on those measurements. It is entirely possible that the actual measurements of the original building were historically found it to be 1,704 square feet.

The Kaplan Chen Kaplan report also states in a DPR form that many of the side windows have been replaced by aluminum sliders, yet no photographic evidence was submitted to back up that claim. The form also notes the installation of burglar bars which can be easily reversed.

All photos in the Kaplan Chen Kaplan report appear to have been taken from the street view, outside of the property. No aluminum windows are visible from the street. It appears that no access to the property was given to Ms. O'Connor and there is no analysis done on the interior of either unit. Upon looking through the front window of the 4321 unit, the only side windows visible are original wood casements and seen in the photo accompanying this letter. My report also notes the existence of original trim and built-ins visible through that window.

Lastly, the city planners chose to ignore my report with an accretion that I am not qualified to write such a report. The only thing that I am lacking in the Secretary of the Interior's requirements is a Bachelor's degree in history or a related field. On the other hand, I have over thirty years of experience in historic preservation and was trained in the field through that experience and mentoring by other historic preservation professionals as well as attending numerous conferences by organizations, such as the Californian Preservation Foundation. It is a known fact that many years of experience in a field makes up for the lack of a degree.

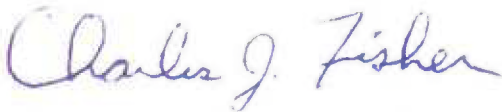
I have written many historic assessment reports in Los Angeles and other cities. These reports have been used by the various planning departments for years in doing review under the California Environmental Quality Act. It is only now that I have written this and another report in Venice that challenged the conclusions of earlier reports, that my qualifications have been questioned.

I include a short resume in all of my reports. I could not find one in the report written by Pam O'Connor. I do know that she has served on the Santa Monica City Council for many years and has twice served as the mayor of that city. I also know that she was mentored in historic preservation by the late David Cameron, who was for many years viewed as the "dean" of historic preservation in Los Angeles. I also worked with and learned from Mr. Cameron, who was a friend and mentor for many years prior to his death in 1997.

I am unaware of what formal training or degree that Ms. O'Connor has in the field of architecture or historic preservation, but as a historian, I am every bit as qualified as she is and take exception to accusations by a planner that I am not qualified, in an effort to "shoot the messenger" rather than to deal with the data in the report that I submitted.

My report stands for itself and should be addressed for the facts presented, which make a credible case that a categorical exemption under CEQA is an inappropriate action on the part of the City Planning Department concerning the demolition of the subject duplex at 4321-23 Burns Avenue.

Sincerely,



Charles J. Fisher,  
Historian