



FRANK LLOYD WRIGHT BUILDING CONSERVANCY

April 11, 2016

Mr. David Ambroz
President, City Planning Commission
200 North Spring Street
Los Angeles, CA 90012-2601

Date: 9/18/18
Submitted in PLUM Committee
Council File No: 18-0169
Item No.: 11
Communication from
Public

Re: Case No: CPC-2013-1595-DB-CUZAA-SPP-SPR (Edgemont Avenue and Hollywood Boulevard)

Dear President Ambroz:

The Frank Lloyd Wright Building Conservancy (FLWBC) is an interested party regarding the proposed project referenced above that is scheduled to come before your commission on 20 April 2016. The FLWBC is an international organization facilitating the preservation and maintenance of Frank Lloyd Wright's surviving structures. It is also the organizing agency coordinating with the National Park Service/U.S. Department of the Interior in the nomination of *Key Masterworks of Modern Architecture by Frank Lloyd Wright* for UNESCO's World Heritage List (WHL). The nomination was formalized by Secretary Jewell on 30 January 2015. This is a serial nomination comprising ten structures nationwide that includes Los Angeles' Hollyhock House. The inclusion of Hollyhock House in the nomination was approved by City Council in 2006 (CFN 06-0002-S32). The nomination will be considered by the World Heritage Committee (WHC) in July of this year.

In September of 2105 the official site evaluation of Hollyhock House was conducted by the International Council on Sites and Monuments (ICOMOS) which is the official site reviewer for the WHC. This site evaluation compliments multiple desk reviews and is done primarily to verify application data, ascertain the site's viability as a WHL site, and confirm the physical attributes of the site in the context of the site's "Outstanding Universal Value" – the most important criteria for inscription. One aspect of this is the view shed from the site. The ICOMOS reviewer noted that this has already been compromised by the early 21st century enlargement of Kaiser Permanente to the south. In Hollyhock House's favor were the uncompromised view sheds to the north, east and west.

The article regarding this proposed development in the *Los Feliz Ledger* brought this proposed project to our attention and causes concern. The considerable size and height of the structures will have a significant and compromising impact on the Hollyhock House view shed to the west. The FLWBC is also concerned in learning that granting the applicant's request for a Density Bonus and Conditional Use Approval allows the applicant to bypass city codes that would keep the building height within a limit that would not compromise the western view shed, thereby increasing the probability of a positive outcome for the WHL nomination for Hollyhock House.

We understand that the project has gone through a design revision after a public hearing to address issues raised by various entities however while curb aesthetics have been improved the height is unchanged. We feel that the World Heritage List nomination should be a major factor in determining the advisability of granting the Density Bonus and Conditional Use Approval. An inscription on the World

Heritage List is not just a prestigious honor that promotes preservation. The economic benefits from cultural tourism are very rewarding and enduring. A World Heritage site in the city would provide a significant additional boost for Los Angeles and its cultural attractions. The significance is compounded for California as the nomination also includes the Marin County Civic Center.

We encourage you to carefully consider the pros and cons of allowing this proposed project to be approved as revised after the public hearing. We are also available to consult or answer questions regarding the WHL nomination.

Sincerely,



Janet Halstead
Executive Director

cc: Renee Dake Wilson, Vice President, City Planning Commission
Robert L. Ahn, Member, City Planning Commission
Caroline Choe, Member, City Planning Commission
Richard Katz, Member, City Planning Commission
John W. Mack, Member, City Planning Commission
Samantha Millman, Member, City Planning Commission
Dana M. Perlman, Member, City Planning Commission
Veronica Padilla, Member, City Planning Commission



Blake Lamb <blake.lamb@lacity.org>

WHL FLW Decision

1 message

Jeffrey Herr <jeffrey.herr@lacity.org>

Mon, Jul 18, 2016 at 2:04 AM

To: Blake Lamb <blake.lamb@lacity.org>

Cc: Christine Peters <christine.peters@lacity.org>, Danielle Brazell <danielle.brazell@lacity.org>, Daniel Tarica <daniel.tarica@lacity.org>, "Thomas, Leslie" <Leslie.A.Thomas@lacity.org>, Mark Edwards <medwards@barnsdall.org>, Isabelle Lutterodt <isabelle.lutterodt@lacity.org>

Blake,

The following information is provided to assist you in determining the outcome of the upcoming Edgemont Development project.

The UNESCO WHC resumed it's work after a one-day hiatus due to the attempted coup. The result of a lively and evenly split committee was to "refer" the FLW nomination. At issue was whether the nomination as written adequately demonstrated the Outstanding Universal Value (OUV) of the 10 sites. A referral means the we have been given the opportunity to fix this problem and resubmit next year at the meeting in Poland. There was universal praise for the signifance of FLW. In fact, there was complete agreement that the WHL without FLW was unacceptable.

Observing the proceedings has been an education. Over several days the committee reviewed the State of Conservation of World Heritage Properties. These are sites already inscribed but in danger of being delisted unless the State Party corrects the problem. Three examples in particular are germane to Hollyhock House: Liverpool Docks, Vienna and Kiev. I will forward the relevant links to you for their complete details. To recap. Liverpool is contemplating permitting a 32-story, mixed use building that would impact the OUV of the site. The Committee will review this next year and if the building is permitted delisting is the likely outcome. In Vienna it is a similar situation with a proposed hotel and ice rink. Kiev, however, proceeded to build and is now being asked to raze the structure to retain the WHL designation for Saint Sophia's Church. It's clear this body takes their mandate seriously.

National Park Service and the FLW Building Conservancy have already begun internal discussions regarding next steps as it will take intense work to be ready for next year. The first step will be to revise our OUV. A reality is that the number of sites compromising the nomination may be reduced if the site does not clearly meet the revised OUV. HH could be eliminated vis a vis the Edgemont Development project. The question is does the City want a World Heritage site? If so, then a conservative approach to the project is required.

This nomination is important to the U.S. but even more so to the FLW universe and, having listened to the debate, by World Heritage. How important is it to the City?

Our site visit review by the ICOMOS reviewer already notes HHs lost view shed to the south. I feel confident in predicting that if our OUV is further compromised the U.S. will drop us from the nomination so that it will not be an impediment the submission next year. Even if we were retained in spite of approving an Edgemont Development that compromised our OUV the WHC would have the ability to remove HH before inscribing an FLW WHL nomination.

It is a complicated issue but I do think a solution can be found. My travel plans have me back in Los Angeles on Friday but that may not be possible. Hoping for the best. I am available by phone if you or anyone has questions. Forwards to follow. Thank you. Jeffrey