

February 3, 2020

City Clerk, Room 395
City Hall, 200 North Spring Street
Los Angeles, CA 90012

Re: DIR-2019-3828-COA-1A
ENV-2019-3829-CE
Council District 5/6500 W. Olympic Pl.

OPPOSITION

To Whom It May Concern:

In regard to the above captioned matter, I am **opposed** to the proposed second story development at 6500 W. Olympic Pl. (“**Project**”) for reasons detailed in my letter to the Planning Commission dated November 27, 2019, a copy of which is attached hereto.

If the city were to reverse the prior denial and proceed with the process of issuing a Certificate of Appropriateness, a full EIR would be required under the California Environmental Quality Act (“CEQA”). **A full EIR is required for this Project because there is substantial evidence it will have a significant effect on the environment.**¹

The following facts² show that the Project will have a significant effect on the environment:

1. **The Project will alter the architecture of a house that has been designated for preservation for its unique and architecture.**

The Project involves a home in the South Carthay Historic Zone (“**HPOZ**”), which was implemented by the City of Los Angeles to protect and preserve the Spanish colonial architecture of the neighborhood.³ “South Carthay is a positive historical asset to the City of Los Angeles as a result of its unique concentration of mid 1930’s residential housing, which is both **intact** and creates a powerful sense of time and place.”⁴ [emphasis added] Furthermore, and importantly, **this particular house is a contributing structure under the HPOZ** (i.e., it was one of the houses that qualified South Carthay for the HPOZ designation).

Adding a second story significantly modifies the original Spanish Colonial Revival style architecture of the house. **It is an indisputable fact that the house would no longer be an original, intact example of the architecture and style that the HPOZ was designed to preserve** (the HPOZ rules explicitly prohibit 2nd story additions). Even if the addition is done to mimic Spanish style architecture, it is still indisputable fact that

the house would no longer be an original, intact example of the architecture and style that the HPOZ was designed to preserve.

By effectively eliminating an intact example of Spanish revival architecture, the Project effectively **diminishes** this important historical architectural resource. The HPOZ was designed to protect the neighborhood's unique structures because their architectural significance was deemed extremely valuable. The Project diminishes this valuable resource, and therefore has a significant effect on the environment.

2. The experts from the HPOZ Board and the Central Los Angeles Planning Commission denied the Project because of its significant negative effects on the environment.

In the expert opinion of the HPOZ Board members (which include an architect) and the Planning Commission, the Project was denied because based on all the facts presented, the Project did not conform to the HPOZ prohibition against second story additions, impermissibly altered a historical home, and did not fit in with the historical architecture and character of the neighborhood.

For the reasons provided above, the City cannot issue a Negative Declaration (or Mitigated Negative Declaration) for the Project, and a full EIR is required.

Sincerely,



Aaron Friedland

Attachement

ENDNOTES

¹ “If there is substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment, an environmental impact report shall be prepared.”

Cal Public Resource Code, §21080(d)

² Substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact.

Cal Public Resource Code, §21080(e)

³ The important historic and architectural values which the South Carthay Historic Preservation Overlay Zone was intended to preserve and enhance are catalogued in a document prepared by the City of Los Angeles’ Bureau of Engineering and Roger G. Hathaway and Associates in January 1983 for the City’s Cultural Heritage Board and the City’s Planning Department, and entitled “Cultural Resource Documentation Report, Historic Preservation Overlay Zone, South Carthay.”

⁴ *Id.* at page 11.

November 27, 2019

VIA FED EX (7 copies) AND EMAIL (apccentral@lacity.org)

Central Los Angeles Area Planning Commission
c/o Etta Armstrong, Commission Executive Assistant
200 North Spring Street
Room 272, Los Angeles 90012

RE: Case #DIR-2019-3828-COA/6500 Olympic Pl.
Second Story Addition/South Carthay HPOZ
OPPOSED

I am a longtime owner of the duplex at 1031-1033 S. Alfred St. in South Carthay. I oppose the 2nd story addition proposed at 6500 Olympic Pl.

The South Carthay preservation plan calls for preserving **single story** Spanish colonial architecture. **The preservation plan specifically states that no second floor additions can be allowed.** The proposed second story is in direct conflict with the legally binding plan that applies to the homes in South Carthay.

Please enforce the HPOZ's very clear prohibition on 2nd story additions -- it does not matter how the 2nd story is designed or how many signatures the appellant gathers on a petition. The 2nd story is a clear, direct violation of the terms of the HPOZ plan.

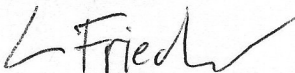
Furthermore, to allow the proposed second story at 6500 Olympic Pl. would surely mean that all future requests to add a second story would have to be approved. This would dramatically change the character of South Carthay.

I bought my home specifically because it is in an HPOZ protected area. Everyone in the HPOZ must live by its clear rules and general intent to preserve the architecture and feel of the neighborhood. Just because the appellant hires lawyers and consultants to try to evade the rules does not mean they should be exempt from the clear, legally binding rules of the neighborhood.

I have attached an October 5, 2016 letter from Michael Olecki, another South Carthay resident, written to the HPOZ board in opposition to this project. It eloquently and clearly lays out reasons no second story should be added, with specific citations to the South Carthay HPOZ preservation plan, and notes the fact that **this project has been repeatedly turned down by the HPOZ board.** I concur with all of Mr. Olecki's points. I provide his letter to the Commission to further explain the reasons this project should not be built.

Please do not allow the second floor to be constructed at 6500 Olympic Pl.

Sincerely,


Aaron Friedland
(415) 637-0704

Michael J. Olecki
1050 South La Jolla Ave.
South Carthay

October 5, 2016

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**Re: 6500 Olympic Place
Consultation
"Second-story addition to a one-story structure on a corner lot"**

Dear Members of the South Carthay HPOZ Board:

Because I will be out of state (and therefore unable to attend Thursday's meeting), I write to provide public comment on the consultation for a "second-story addition to a one-story structure on a corner lot" (6500 Olympic Place, the "Property"). As discussed in more detail below, I request that the Board dissuade the Property's owner, the "Quinn 2012 Irrevocable Trust for the benefit of Jennifer C. Quinn," from attempting to submit an application to add a second-story addition.

My wife (Karen Bodner) and I have lived in our home directly across the street from the Property since 1991. I am the former Chair of the South Carthay HPOZ Board. We bought our home specifically because of the HPOZ protections, particularly the prohibition on second-story additions to single-story structures. Indeed, before buying our home, we had lengthy discussions with then-Chair (and co-founder of the HPOZ) Fred Naiditch. It was very important to us – and to many others who bought here in reliance on the HPOZ status – that our new neighborhood not experience the type of second-story building that was happening in the neighborhood we were attempting to flee. We had seen first-hand how second-story additions and other overbuilding harm the livability, and architectural appeal, of a charming neighborhood.

The South Carthay HPOZ Preservation Plan addresses this issue head-on, leaving no room for guesswork on the issue of second-story additions to single-story structures:

3. Additions that comprise a new floor (for instance a new second floor on a single-story house) are not appropriate.

See South Carthay HPOZ Preservation Plan, Ch. 8, at p. 57 (emphasis supplied). Because the Board's mission is to determine whether proposed additions to structures are appropriate, the Preservation Plan provides the straightforward answer here: no, a second-story addition to a single-story structure IS NOT. See also Ch. 8 of Preservation Plan (descriptions of the types of additions that *are* appropriate).

Beyond that, this is the Property owner's second (or third) attempt to seek approval for such a second-story. In 2011, the Board sent a strong message that such a second-story would be inappropriate. Although the Board members have changed, in part, since 2011, the preservation plan has not. A change in Board members should not be a means to achieve a different result. If anything, HPOZ preservation is about consistency and continuity.

6500 Olympic Place is a stellar example of the architecture that makes South Carthay special. It is also a prominent corner property at the intersection of two streets of single-story homes. It is also *already* a large structure, being several hundred square feet larger than almost all the surrounding homes. A second-story would create a remarkably *inconsistent* exclamation point in a place where it does not belong (despite the applicant's apparent contention that a second-story would provide "consistency" on corner lot properties). There may be ways for the Property's owner to achieve greater living space, but a second-story is not an appropriate one.

Finally, we understand that the applicant has gone door-to-door with a petition regarding the issue. Although there are a number of reasons why such a petition is unpersuasive, the most pertinent are that those signing the petition may not be familiar with the express prohibitions in the Preservation Plan, may simply have been trying to be friendly during a neighbor's face-to-face request, or may have signed based on hearing information that is *inconsistent* with or irrelevant to the HPOZ requirements. The HPOZ process provides for public comment if an actual application were to be submitted, and I am confident that a large number of residents – including some who actually signed the petition – will express their opposition to any second story addition at that time.

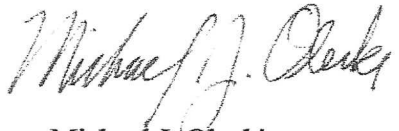
* * *

James Caccavo *et al.*
October 5, 2016
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In summary, we urge the Board to cite the Preservation Plan in encouraging the Property's owner to avoid pursuing a proposal that is *per se* inappropriate.

Thank you.

Respectfully submitted,



Michael J. Olecki

cc: Blair Smith
(By email)

BLAIR.SMITH@LACITY.ORG