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January 15, 2020

Re: 806 West Adams, ZA-2018-2453-CU-DB-SPR, ENV-2018-2454-CE  
Appeal of the CE to City Council

Via email and by hand

Los Angeles City Council and Planning & Land Use Management Committee  
c/o City Clerk Holly L. Wolcott, [CityClerk@lacity.org](mailto:CityClerk@lacity.org), [www.LACouncilComment.com](http://www.LACouncilComment.com)  
City Hall, Room 395  
200 N. Spring Street  
Los Angeles, CA 90012

Re: CF 19-1603  
Case No. ZA-2018-2463-CU-DB-SPR-1A  
Environmental No. ENV-2018-2454-CE, CD9

Honorable Members of the City Council PLUM Committee  
Marqueece Harris-Dawson, Chair  
Bob Blumenfield, Vice-Chair  
Members Gilbert A. Cedillo, Curren D. Price Jr., John S. Lee

Dear Commissioners:

I have been asked by the North University Park Community Association (NUPCA) and the Adams Severance Coalition (ASC) to address the issues regarding the project located at 806 W. Adams Boulevard and 2610 Severance Street. I am a Historic Preservation Consultant with more than 30 years in practice in Los Angeles.

The project has apparently been erroneously approved without understanding the impacts the project will have on the many historic resources surrounding the project location.

Two buildings have already been demolished in anticipation of approval of the project; one building remains, as well as a parking lot, both of which are part of the project site. Although the property is not located within an HPOZ and neither the remaining building or the parking lot are designated historic in any way, does not minimize the impact of the project as currently proposed on adjacent historic properties.

In the CPC Decision Site Plan Review Findings, #7, Pages 5-6 it is stated:

*The project is not within a Historic Preservation Overlay Zone. The subject property is comprised of four lots at 758 – 832 West Adams Boulevard and 2610 South Severance Street. The project site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping. The project site previously contained a separate two-story office, childcare, and classroom facility that was demolished in*

*2017 as a separate action that is not part of the currently proposed project. The existing building was constructed in 1971. None of the existing structures on the project site are designated as historic cultural monuments and the project site is not located within a Historic Preservation Overlay Zone.*

While the above description of the actual site is accurate, it fails to mention the proximity of a number of significant historic properties within close range and which would be substantially damaged in terms of their context, ambiance, environment (ie shade/shadow) and in some cases, quality of life.

When a project directly involves a listed historic property, certain regulations apply because of direct impact. In this case, even though the parcels for construction do not involve historic resources, those parcels are located in an area that is rich in historic resources. The secondary impacts to those resources have been completely ignored in examining the project. The City documents as well as the Historic Resources Report do not even acknowledge that these other historic properties exist. The City only looked at the parcels intended for construction, however they do not exist in a vacuum. A 4-story contemporary building looming over a 2-story historic building is a major impact. Issues of traffic, noise, and other human-induced actions and effects will alter the quality of life for those occupying the historic structures as well as the way that others will experience the historic resources.

One of the reasons that we (Society) have developed mechanisms for preserving, restoring, and maintaining properties which have been determined to have historic value is that we recognize that these properties enhance our built environment and contribute to our understanding of history and our appreciation of outstanding design. Part of protecting them is controlling the nearby environment, be it natural or man-made. The point is not to prevent, only to control.

Ordinances and regulations have been instituted over the years without regard to whether or not they are in conflict with each other, producing only the "law of unintended consequences." All indications are that both the City and the developer are taking advantage of this confusion in order to push the project through. For instance, stating that replacing a parking lot with a structure has no impact is wrong on its face: a parking lot is open space which affords views as well as minimizing encroachment. Clearly, there are impacts; whether they are significant cannot be determined without an acknowledgement and evaluation.

Page one of the Letter of Determination dated November 20, 2019 states:

*...that based on the whole of the administrative record, the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;*

As stated previously, there is significant and substantial evidence that the project as currently proposed would negatively affect historic resources. Just because those resources are not located on the project site does not mean that they are not impacted. The above statement has clearly been made by someone not versed in the guiding principles of historic preservation or the procedures and criteria for evaluation.

Under Site Plan Review Findings, the CPC Decision, #10, Page 10, states:

*The project includes outdoor residential amenity spaces at the podium and building roof levels. The podium-level amenity space would include landscaping, gathering areas, paseos, outdoor cooking areas, and an outdoor swimming pool. Building roofs contain additional private amenity spaces that would include landscaping and outdoor lounge and cooking areas. The revised*

*project locates accessible rooftop amenities away from the perimeter of the building to minimize impacts on neighboring properties.*

Far from minimizing impacts on the surrounding neighborhood, this project would dramatically increase negative impacts. The balconies, rooftop decks, outdoor lounge and cooking (barbeque) area, and outdoor swimming pool represent cumulative impacts of noise and unwanted odors. Locating these areas away from the perimeter of the building will not contain sound or odor; sound reverberates and carries, and odor rises and drifts through the air.

The same section further states:

*The abundant landscaping will soften the appearance of the development, thus allowing the new design to blend in well with surrounding uses.*

The comment about landscaping softening the building's appearance is a tacit admission that the building has a hard, unpleasant design and needs softening. Indeed, the design apparently does not blend in well with the surrounding area—it is attempting to use landscaping as a disguise.

*The second driveway will be off of Severance Street where there will be one lane for vehicles to enter and another lane to exit.*

Funneling all of that traffic on Severance Street would be disastrous for the residents of Severance Street, which is narrow and contains many historic structures. It is obvious that everyone has failed to observe current traffic patterns and anticipated traffic and brushed aside its cumulative impacts.

There is no question that there are secondary (also known as indirect) impacts of the project on adjacent and neighboring historic resources (which include the Kerkhoff Residence, Ezra Stimson House, Mount St. Mary's Doheny Campus/Chester Place Historic District, St. Vincent DePaul Church, Fraternity/Sorority Row, and many private residences on Severance and Scarff Streets).

It is not my intent to present arguments in order to prevent all development in that location, only to impress upon the City the need to fully assess the potential impacts on the community. As it stands, the decision seems to have been made without all the facts being examined and is therefore substandard. Regardless of whether or not it is the case, the appearance of the City favoring the developer is a slap in the face of the citizens.

There are many types of impacts, none of which have been evaluated with regard to this project. It is imperative that a full CEQA review be done to address the impacts on the surrounding historic resources and make the necessary changes to the proposed project so that it is compatible with its neighbors. It is my hope that a proper CEQA evaluation be done. Only then can the project proceed in a manner appropriate to its location.

Sincerely,

**Mitzi March Mogul**

Mitzi March Mogul

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