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- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Compliant submissions received after the Initial Submission deadline up to 3:00 p.m. Thursday of the week prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Compliant submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

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SECONDARY SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3b. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission’s ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All materials in response to a Recommendation Report or additional comments which were received by the Commission Executive Assistant electronically no later than 3:00 p.m. Thursday of the week prior to the Commission meeting AND which do not exceed ten (10) pages including exhibits are included in this file.

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N. U. P. C. A.
NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION

August 30, 2018

South Los Angeles Area Planning Commission
Department of City Planning
200 N. Spring St., Room 272
Los Angeles, CA 90012

RE: APPEAL, Case No. DIR-2017-4072-COA-SPP-WDI
1276 West 29th Street, Los Angeles 90007

Response to Staff Appeal Recommendation Report

Dear Commissioners:

I would like to briefly address the Staff's Appeal Recommendation Report in this matter. There are misstatements I would like to correct.

1). The Report, on page A-3, indicates that the applicant retained an architectural historian, Katherine McGee, who evaluated the building's individual significance against local, state and federal standards. Notably, she did NOT evaluate this building utilizing the criteria set forth in the document, "*Korean Americans in Los Angeles, 1905-1980*" – the specific Context Statement for SurveyLA's new set of Asian-American Context Statements. That Survey did NOT indicate that this property was insignificant; rather it found it to be significantly associated with its theme, Korean Americans in Los Angeles, 1905-1980. We submitted the entire document for your review.

Understandably that document was not necessarily available to Ms. McGee during the period of her (paid) engagement. The applicant, however, could have chosen to engage the same professional team from Page & Turnbull, supported by key leaders in the Asian community, to do this evaluation. And, of course staff not just *could have* but *should have* utilized the **FINAL** *Korean Americans in Los Angeles, 1905-1980* Context Statement, completed, approved and released in April, 2018 before issuing a Determination two months later, in June 2018.

2). On page A-4, this new Appeal Report states that the “property was determined ineligible for designation.” By whom? Ms. McGee was hired by the applicant. In Los Angeles, only the actual Cultural Heritage Commission may determine if a property is eligible as a City Historic Cultural Monument. In California, only the State Office of Historic Preservation and its Commission may determine that a property is ineligible for the California or National Register. Ms. McGee provided an opinion; not a “determination.” This statement made by Staff is not a fact.

3). On the same page, last paragraph, Staff misrepresented my Appeal when it writes that I said Staff failed to consider the “draft” Korean Context statement. **It was not a draft document** at the time of either the Staff decision/Determination in this matter nor when I prepared the Appeal. The *Korean Americans in Los Angeles, 1905-1980* was final in April 2018, thus providing staff plenty of time to utilize it.

The member of the public who expressed a concern in 2017 did so before the document was prepared but a few days after City Planning had convened a group of experts in the Korean experience in Los Angeles plus members of the public, myself included, to gather information. At that meeting, this church was on the cover of the documents handed out – which certainly at that point were in a very rough draft format. However, nearly a year ensued before the issuance of the Determination in this matter, and the final document and its criteria were available for Staff to utilize.

4). On page A-5, Appeal Point 2, at no time did I suggest that grant funding for the Korean American Context Statement be utilized to assess this project. Rather, it is my strong opinion that when the City of Los Angeles utilizes public funds (in general) and seeks grants as a Certified Local Government – some grants themselves utilizing public taxpayer dollars, some sourced with private funds – then the Certified Local Government and those who work for it should then utilize the documents that derive from those grants (e.g., in this case, the five Asian-American Context Statements) and not simply file them in favor of applicants’ own choice of paid consultants. We – “we” meaning all of us who work for the City in any form – have an ethical and possibly legal requirement to actually utilize these grant funds received in the manner they were described to the grantor that they would be used for. This would include actually using the real Survey and not solely an assessment prepared by applicant’s own employee/contractor/consultant.

5). Regarding the utilization of the Secretary of Interior’s Standards to evaluate the interior sanctuary space (page A5, Appeal Point 3), there are several issues.

Primarily we are concerned about the treatment of the Sanctuary space. We feel it should be retained, while building housing in the addition. The City's Office of Historic Resources not long ago determined in a different case that also involved the adaptive reuse of a church sanctuary into a different function, that it is the "space, height and volume" of a sanctuary space that is a primary character-defining element of that space. It is interesting that OHR seemingly is making a different decision here. Of course, this hinges on whether or not the property does meet the criteria set forth in the *Korean Americans in Los Angeles, 1905-1980*, because if it does (and we think it does), then it in fact the sanctuary interior is subject to the Secretary of Interior's Standards. It doesn't matter that the North University park COA process evaluates only the exterior; this is an entitlement case, which triggers CEQA, which triggers the utilization of the Korean American Context Statement.

But not unimportantly, page A6, regarding the treatment of the exterior of the 1911 addition, which has been subject to change over time. Our concern is simply that Staff continues to fail to understand the meaning of the Standards, especially Standard No. 3, which states: "Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken." Staff responds that they are relying on Standard No. 9 in lieu of Standard No. 3. They should not pick and choose; both are applicable.

6). On page A-8: We simply do not understand why OHR staff would require one church (located at 3200 West Adams) to retain but cover its cross when it was adaptively reused, and a nearby church, 1276 West 29th Street, is approved for removing its cross. Work in a historic district is to be reversible; and, moreover, should parity apply here?

7). We will not be arguing at length today (meaning in this document) about mitigation measures and exemptions from CEQA, except insofar as to politely refer the Commissioners and Staff to the judge's ruling presented in the original Appeal, which is pertinent to this case (and in fact involved a nearly-identical situation where an applicant proposed the adaptive reuse of a religious building into student housing within the very same North University Park Specific Plan). The judge ruled against the City of Los Angeles and said (paraphrased): "you can't do it that way."

Thank you again for your patience and consideration.

Laura Meyers, on behalf of NUPCA
HOME: 1818 S. Gramercy Place, Los Angeles CA 90019
NUPCA: P.O. Box 15881, Los Angeles CA 90015

DAY OF HEARING SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3c. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission’s ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

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