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Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **“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 48-hours 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.

Material which does not comply with the submission rules is not distributed to the Commission.

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If you have any questions, please contact the Commission Office at (213) 978-1300.

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 48 hours prior to the Commission meeting AND which do not exceed ten (10) pages including exhibits are included in this file.

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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.

All submissions distributed to the Commission during the Commission Meeting are included in this file.

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If you have any questions, please contact the Commission Office at (213) 978-1300.

SUBMITTED BY:

Charles Rubin

Judge Charles G. Rubin (Retired)
P.O. Box 463
Beverly Hills, CA 90213
310-247-3232

May 14, 2019

Item #10

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CITY OF LOS ANGELES

MAY 16 2019

CITY PLANNING DEPT.
AREA PLANNING COMMISSION

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Cultural Heritage Commission
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 272
Los Angeles, CA 90012-4801

Re: Orange Street Gateway Chateaux North; 6401 West Orange Street; 621-623 South La Jolla Avenue; CHC-2019-2309-HCM

Dear Commissioners,

The above-referenced property is jointly owned by my brother, Dr. Robert T. Rubin, and me and is held in a corporation, Orange Street Townhomes, LLC. We recently were notified by letter from your office, dated April 24, 2019, that the property has been nominated for designation as a Historic-Cultural Monument (HCM). We believe that the assertion of the nominating party that the building is individually eligible for designation as a City of Los Angeles HCM as an excellent example of "Late Chateausque" architecture is highly questionable. Contrary to the claims of the nomination document, 6401 W. Orange Street is, in fact, a very modest application of the Chateausque style, exhibiting little of the dramatic features and complexity found in the best examples of Chateausque architecture in Los Angeles:

The modest application of Chateausque features exhibited in 6401 W. Orange Street contrasts greatly with the impressive Chateausque buildings that previously have been designated as HCMs. These include Le Trianon Apartments at 1750-1754 N. Serrano Avenue (HCM #616); the Château Élysée Hotel at 1806 -1830 Tamarind Avenue (HCM #329); the Chateau Marmont Hotel at 8215-8221 Sunset Boulevard (HCM #151); and the Chateau Colline at 10341-10335 W. Wilshire Blvd (HCM #703).

The historic context statement for SurveyLA, the City's comprehensive historic resources survey, states that resources evaluated under the Chateausque sub-theme are "significant in the area of architecture as excellent examples of the Chateausque style and exhibit quality of design through distinctive features." Eligibility standards under the Chateausque sub-theme make clear that a building must exhibit "quality of design through distinctive features," and be "an excellent example of Chateausque architecture," in order to be eligible. The claim that 6401 W. Orange Street actually meets this standard of excellence is difficult to understand.

In 2015, SurveyLA^[1] found 6401 W. Orange Street eligible for listing as a contributor to a potential historic district, the 6th Street-Orange Street Multi-Family Historic District. As such, the building was considered significant as one component of a large group of apartment buildings that *collectively* constitute a historic resource. SurveyLA did not identify 6401 W. Orange Street as *individually* eligible for designation as a historic resource. Other Chateausque apartment buildings in the

Wilshire Community Plan Area, however, were determined to be individually eligible. These include the Chateau Laurier Apartments (1929) designed by architect Leland A. Bryant at 4353 W. 5th Street; and an apartment building at 741 S. Burnside Avenue, constructed in 1931. Both of these buildings display more of the features and complexity associated with the Chateausque style. Moreover, the Wilshire Community Plan Area contains several apartment buildings designed in the Chateausque style which were *not* identified by SurveyLA as individually eligible, many of which are arguably more impressive as architecture than 6401 W. Orange Street.

Given that "SurveyLA field methodology has been informed by best practices in historic preservation including standards developed by the National Park Service and California Office of Historic Preservation,"^[2] it is difficult to believe that 6401 W. Orange Street was somehow missed or overlooked by the city preservation staff, expert consultants and distinguished advisors that made up the SurveyLA team. We therefore believe that 6401 W. Orange Street has only minimal features of the Chateausque style and therefore does not warrant designation as a Historic-Cultural Monument.

Yours sincerely,

Charles G. Rubin

[1] "SurveyLA Historic Resources Report Wilshire Community Plan Area, Appendix C: Historic Districts and Planning Districts," January 3, 2015.
[http://preservation.lacity.org/sites/default/files/Wilshire%20CPA%20Districts 1 190 2.pdf](http://preservation.lacity.org/sites/default/files/Wilshire%20CPA%20Districts%201%20190%202.pdf)

[2] <https://preservation.lacity.org/survey>



233 Wilshire Boulevard
Suite 150
Santa Monica, CA 90401
310.451.4488 phone
310.451.5279 fax

Item #6
esassoc.com
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SUBMITTED BY:

Margarita Jerabek

May 15, 2019

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MAY 16 2019

CITY PLANNING DEPT.
APR 16 2019

Cultural Heritage Commission
Los Angeles Department of City Planning
200 N. Spring Street
Los Angeles, California

Subject: Historic-Cultural Monument Application for the Schmidt Residence, 6555 West Franklin Avenue,
CHC-2019-774-HCM

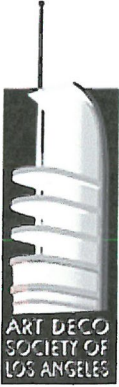
Dear Honorable Commissioners:

ESA was commissioned by Architect M. Michael Naim, to conduct historic architectural investigations regarding the potential eligibility of the subject property for designation as a Historic-Cultural Monument under the City's Cultural Heritage Ordinance. ESA conducted a peer review of the historic resources assessment report prepared by Nelson White (SWCA), and conducted a site survey of the subject property to assess its integrity and architectural merit. ESA has previously evaluated other residences by builder, Naldo F. Stokes, and is familiar with his body of work. ESA also has the necessary knowledge and experience to evaluate examples of Beaux Arts architecture in Los Angeles. In ESA's opinion, SWCA's assessment report is adequately prepared and ESA agrees with the finding of ineligibility for the subject property. In addition, ESA agrees with the findings of the City's Staff Recommendation Report.

The subject property is a modest, simplified example of Beaux-Arts residential architecture with decorative features present only on the front façade, including a classical frontispiece with broken pediment, and embossed ornamentation between the first and second levels and flanking the second floor windows. Although he was fairly prolific and included features of the Period Revival styles, Naldo Stokes was not a master builder and his work does not reflect an educated or sophisticated understanding of architecture or design. Furthermore, the subject residence is substantially altered, including replacement of the first floor casement windows on the front façade with fixed windows, replacement of a second-floor level bedroom window on the west side elevation, construction of a rear addition and alteration of the majority of the fenestration on the rear north elevation, and alteration of half of the east side elevation for kitchen improvements and construction of a secondary entrance. The exterior finish of the residence has been restuccoed with a course sprayed-on finish. The landscape setting of the subject property has been entirely altered with the existing non-original hedge plantings, perimeter plantings, front steps, and driveway; and the existing garage at the rear of the property has been substantially altered with a new garage door and windows. Therefore, ESA finds that the subject property is not a good representative example of Beaux-Arts Architecture in Los Angeles, and that it lacks integrity. ESA respectfully recommends to the Commission that they do not designate the subject property a Historic-Cultural Monument. There are many beautiful examples of Beaux Arts Architecture in Los Angeles, and the subject property is not one of them.

Sincerely,

Margarita Jerabek, Ph.D.
Director of Historic Resources



SUBMITTED BY:

Madhu Bahl

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CITY OF LOS ANGELES
MAY 16 2019

CITY PLANNING DEPT.
AREA PLANNING COMMISSION

Item #7

Dear Dr. Bahl-

Thank you for your enthusiastic and positive response to The Art Deco Society of Los Angeles' nomination of your historic property, GREEN DOG & CAT HOSPITAL, as a Los Angeles Historic-Cultural Monument! The Los Angeles Cultural Heritage Commission will hold a hearing for this nomination on **THURSDAY, MAY 16TH, 2019 at 10:00 AM** at Los Angeles City Hall. The Art Deco Society of Los Angeles would be honored if you were to attend this hearing along with members of our Preservation Committee to speak directly to the commissioners about your building. If you are unable to attend in person, or send a representative, then it would be equally helpful if you were to email The Art Deco Society of Los Angeles a written statement about your building that could be read to the commissioners.

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**Art Deco Society of
Los Angeles**
P.O. Box 972
Hollywood, CA 90078

Tel: 310.659-3326
artdeco@adsla.org

Facebook:
Art Deco Society of Los
Angeles
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@ArtDeco_LA

Los Angeles City Hall
200 N. Spring St. 10th Floor, Room 1010
Los Angeles, CA 90012
(enter on Main St.)

ADSLA Email: artdeco@adsla.org

Thank you for your attention to this matter.

Sincerely,

Celeste Hong, Vice-President, Art Deco Society of Los Angeles