

GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

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”**: 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”**: 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.

ENABLE BOOKMARS ONLINE:

**If you are using Explorer, you need will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

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

DAY OF HEARING SUBMISSIONS

WAHA

West Adams Heritage Association
2263 Harvard Boulevard, Historic West Adams, Los Angeles CA 90018

March 2, 2021

Hon. Commissioners, South Area Planning Commission

Att: Etta Armstrong, Commission Executive Assistant I (apcsouthla@lacity.org)

By e mail

Please consider the following comments regarding DIR-2020-2122-COA-DRB-SPP. We fully support the appeal and will attend today's meeting virtually. In addition to the appeal justification, please consider the following points.

- The North University Park Specific Plan was specifically adopted to designate qualitative and quantitative standards to regulate floor area ratios, the use of land and buildings, height and bulk of buildings, architectural and landscape treatment. This Director's decision fails this fundamental purpose.
- The Director's decision was made with no public hearing due to quorum issues. For the Director to fulfill his responsibility and make an informed decision, an appropriate public hearing should be held before requiring an appeal to the SAPC.
- This project fails to comply with the Secretary of the Interior's Standards:
 - o 9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion and massing that protect the integrity of the property and its environment.
- The proposed project destroys the historic character and setting of the site and irreparably harms the way the historic property is perceived and conveys its meaning.
- The new infill duplex and its ADU is taller and larger than the primary historic front house. The new structure is listed at "36 feet in height" which is stated as being "approximately 3 feet higher than

the existing Contributing structure." It is universally understood that a new rear structure should not be dominant to the primary front historic structure.

- It is also in the RD1.5 zoning of the specific plan which shows the intent was not to allow the kind of massive development that was encouraged in the R-3 areas of the plan. It is an interior lot not on a major street and should not be over intensified in its use.
- The character and setting should be preserved and not overwhelmed by a mammoth out of character new addition. Plus, the use of the ADU Ordinance to avoid normally required distance between buildings per code is hardly the kind of outcome the makers of the ADU laws were intending.
- Calling this massive 3 story rear structure "craftsman" is not supportable.
- The lack of green space and distance between buildings contradict the historic character and good environment standards.
- As designed the massive project will have severe and irreparable harm to a historic building and its setting. A categorical exemption should not be used unless redesigned to meet historic standards.

Thank you for your attention.

A handwritten signature in blue ink, appearing to read "Jean Frost", with a stylized flourish at the end.

Jean Frost

Vice President

WAHA