

**EDWARD VILLAREAL HUNT, AIA, ASLA, 4928 West Melrose Hill,
LA, CA 90029, edvhunt@earthlink.net, Mobile: 323-646-6287**

Re. 4511 Russell (Case # DIR 2018-2764-SPP; ENV-2018-2765-CE)

5/20/19

To Whom It May Concern:

I am a recently retired California Licensed Architect #11,473 with over 50 years of licensed practice specializing in Historic Restorations. My last 40 years were in Los Angeles with previous licenses in Texas and the State of New York. I am also a currently licensed a California Landscape Architect #2182, also specially specializing in historic landscape restorations.

I have reviewed the plans for the proposed project at 4511 Russell (Case # DIR 2018-2764-SPP; ENV-2018-2765-CE) as well as the Planning Department's determination letter and staff report and find that the Planning Department's approval of the project represents a failure to uphold the Vermont/Western Transit Oriented District Area Specific Plan (SNAP) which was approved by the City Council " to guide all development, including use, location, height and density, to assure compatibility of uses..." (Purpose E).

The proposed project is inconsistent with the requirements, guidelines and intent of the SNAP for the following reasons:

1. The SNAP clearly states that "Buildings should be compatible in form with the existing neighborhood atmosphere." Yet the proposed building at 4511 Russell is not compatible with the existing neighborhood atmosphere. The predominant architectural style is early 1900's Craftsman homes. These homes have overhanging eaves, exposed rafters under the eaves, covered front porches, pillars lining the entry, low pitched roofs, single protruding dormers, wood clapboards and shingle siding. Yet the proposed project has none of these features. Therefore it is not compatible in form with the existing neighborhood atmosphere.
1. Furthermore, the proposed project is a full story taller than all the other buildings on the block and it will be the only building on the block with roof decks. It is also a rectangular box with no edifying architectural features. Therefore the proposed project is not compatible with existing neighborhood atmosphere and is not in compliance with the SNAP's Development Standards.

1. In order to achieve compatibility, SNAP's Development Standards and Design Guidelines require new construction to emphasize articulation and architectural features such as awnings, arbors, open porches, breaks in the roofline, and other components necessary to "promote development that enhances the quality of the environment and the living conditions of the residents." In my professional estimation this project has none of those features and therefore does not promote the quality of the environment and the living conditions of the residents.
1. The proposed project design lacks the required roofline articulation. SNAP's Development Standards require that all roof lines in excess of 40 feet in horizontal length be broken up through the use of gables, plant-ons, or other means. The proposed building design fails to satisfy this requirement. There is only a slight recess at the roofline of the west elevation that in no manner provides a true break in the plane, while on the east elevation there is no break in the roofline at all.

While the Planning Department said that the faux pitched overhangs are a nod to Craftsman architecture, this is not a feature of Craftsman architecture and therefore in no way attempts to incorporate Craftsman design. Furthermore these faux pitched overhangs do not in fact provide any break in the roofline. They might as well be painted on. If this is what suffices for architectural integrity in today's Planning Department, then they need a serious education in architecture.

The Specific Neighborhood Area Plan also requires that "deviation from the Design Guidelines must be justified or explained to the Director of Planning or his/her representative during the Project Permit application process." Where is the justification for the clear violations of the SNAP that this project represents?

By approving this project, Planning Staff has abused its discretion and failed to uphold the city's own regulations. Since the proposed building's non-compliance with SNAP is evidence that the Project will have a significant negative effect on the environment the building is not eligible for the Class 3 exemption for apartment complexes.

In addition, this project also received a Categorical Exemption from CEQA. This is also not appropriate because this neighborhood has a preponderance of early 1900's homes and is therefore a potential HPOZ. I have read the letter from well-respected historian Charlie Fisher and agree with his conclusion that the Project is not exempt from CEQA because of the following exception in CEQA Guidelines 15300.2:

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

This neighborhood is architecturally significant because of the predominance of intact Craftsman homes from early 1910s. The handcrafted and natural

materials and a high quality of craftsmanship reflected in these homes and the elegant, traditional and truly Californian atmosphere they bring to this neighborhood is what the SNAP was intended to preserve and should not be destroyed for the cheap architectural monstrosity that is the proposed project. The SNAP was created to preserve neighborhood integrity and this project is the very opposite of that.

Furthermore, SNAP's Development Standards and Design Guidelines require new construction to "promote development that enhances the quality of the environment and the living conditions of the residents." The fact that the city received nine appeals from nearby residents ought to be proof that the residents themselves are aware that this project will not enhance their living conditions nor the quality of their environment. Planning should take that into consideration and not try to strong arm residents who clearly understand their neighborhoods and their living conditions better than the Planning Department.

The houses are contributing structures and their removal would undermine the ability of the area to qualify as an historic district, the replacement structures would undermine the eligibility of the HPOZ district. I believe the proposed project is not exempt from CEQA because of its negative impacts to Historic Resources.

Please call if any questions or if you need any additional information.

Sincerely,

Edward Villareal Hunt, ASLA, AIA
Retired California Architect # 11,473
323-646-6287