



## DEPARTMENT OF CITY PLANNING RECOMMENDATION REPORT

### City Planning Commission

**Date:** September 8, 2016  
**Time:** 8:30 a.m.  
**Place:** City Hall, Room 350  
200 N. Spring Street, Los Angeles,  
CA 90012

**Public Hearing:** June 14, 2016

**Appeal Status:** None

**Case No.:** CPC-2016-924-HPOZ  
**CEQA No.:** ENV-2016-925-CE  
**Council District:** 10-Wesson  
**Plan Areas:** Wilshire  
**Certified NC:** Olympic Park  
**GPLU:** Low II Residential  
**Zone:** R1-1-0  
**Applicant:** City of Los Angeles

**PROJECT LOCATION:** Properties generally bounded by W. Olympic Boulevard to the north; S. Victoria Avenue to the east; W. Pico Boulevard to the south, and S. Windsor Boulevard to the west.

**PROPOSED PROJECT:** Pursuant to LAMC Section 12.20.3 F, establishment of the Oxford Square Historic Preservation Overlay Zone (HPOZ) and adoption of the Oxford Square Preservation Plan.

**RECOMMENDED ACTION:**

- 1) **Recommend** that the City Council approve the establishment of the proposed Oxford Square Historic Preservation Overlay Zone (HPOZ);
- 2) **Find** that the proposed Oxford Square HPOZ ordinance boundaries are appropriate;
- 3) **Adopt** the Oxford Square HPOZ Preservation Plan;
- 4) **Adopt** the attached Findings; and
- 5) **Find** that the project is categorically exempt under the State CEQA Guidelines, Article 19, Section 15308, Class 8, and Article 19, Section 15331, Class 31 for the Oxford Square HPOZ and Preservation Plan.

VINCENT P. BERTONI, AICP  
Director of Planning

Ken Bernstein, AICP  
Manager, Office of Historic  
Resources

Naomi Guth  
City Planner

Prepared by:  
Bradley Furuya  
Planning Assistant  
(213) 978-1218

# TABLE OF CONTENTS

<b>Project Analysis .....</b>	<b>A-1</b>
Project Summary	
Conclusion	
<b>Findings .....</b>	<b>F-1</b>
HPOZ Ordinance Findings	
General Plan/Charter Findings	
CEQA Findings	
<b>Public Hearing and Communications.....</b>	<b>P-1</b>

## EXHIBITS:

- A – Boundary/Contributor Status Map
- B – Historic Resources Survey – As approved by the Cultural Heritage Commission on August 4, 2016
- C – Proposed Oxford Square HPOZ Preservation Plan
- D – Categorical Exemption
- E – Proposed Oxford Square HPOZ Adopting Ordinance

## PROJECT ANALYSIS

### Project Summary

Adoption of the proposed Oxford Square HPOZ would place the properties generally bounded by W. Olympic Boulevard to the north; S. Victoria Avenue to the east; W. Pico Boulevard to the south; and S. Windsor Boulevard to the west under the regulations of Los Angeles Municipal Code (LAMC) Section 12.20.3, the HPOZ Ordinance. Adoption of the HPOZ includes the certification of a Historic Resources Survey and boundaries, and adoption of a Preservation Plan to accompany the adopting ordinance.

The proposed Oxford Square HPOZ is a residential district located in the Wilshire Community Plan Area that consists of one to two-and-a-half story single family residences primarily built between 1907 and 1941. It comprises 191 properties and sits adjacent to three existing HPOZs: Windsor Village to the north, Wilshire Park to the northeast, and Country Club Park to the east.

The district features excellent examples of early 20<sup>th</sup> century architectural styles including Craftsman, Mediterranean Revival, Tudor Revival, Colonial Revival, and Spanish Colonial Revival. The majority of buildings retain historic design and features representative of their architectural style and period of development, a testament to their quality, craftsmanship, and maintenance. The district is characterized not only by its buildings but also by spatial and landscape features such as its singular makeup of single-family residences, with large, uniform setbacks and gently sloping lawns; wide, concrete streets; and broad parkways lined with mature Canary Island palm trees

The district is also significant for its association as a streetcar suburb. In 1886, Los Angeles' first electric streetcar, the Pico Heights line, was established. The line ran along what is now Pico Boulevard, originating from Main Street in downtown Los Angeles. In 1908, the Pico Heights line was extended to Rimpau Boulevard, just a few blocks west of Oxford Square. A year prior, developer Emil Firth subdivided the Oxford Square tract into large, single-family lots, which were advertised as "villa lots" in the exclusive Wilshire district. The first lots were sold in 1909 starting at \$1,000.

One building in the proposed Oxford Square HPOZ is designated a Los Angeles Historic-Cultural Monument. The William Grant Still House (HCM 169, adopted in 1976), located at 1262 S. Victoria Avenue, was also determined to be individually eligible for the National Register of Historic Places for its association with William Grant Still, a pioneering African American classical composer and the first African American to conduct the Los Angeles Philharmonic Orchestra in the 1930s.

An HPOZ for Oxford Square was initially proposed by local residents who became concerned with the increasing amount of out-of-scale and incompatible development that began to move into the neighborhood in the mid-2000's. Residents worked with the Council District 10 office, the Olympic Park Neighborhood Council, the Los Angeles Conservancy, the West Adams Heritage Association, and the Department of City Planning to build support for the adoption of an Oxford Square HPOZ.

In 2008, the Oxford Square Neighborhood Association received a grant from the Olympic Park Neighborhood Council to fund an initial study by Architectural Resources Group. The study identified geographic boundaries, recommended a period of significance, surveyed individual properties, and made a recommendation of eligibility for HPOZ designation. This initial study was used to inform the subsequent survey of Oxford Square as part of the larger SurveyLA project.

On November 4, 2014, a Council Motion (CF 14-0656) was adopted that instructed the Department of City Planning to study the possibility of adopting five new HPOZs, including one for Oxford Square, as a way to protect historic resources. On March 25, 2015, an Interim Control Ordinance (ICO) became effective under Ordinance No. 183496. The ICO established a moratorium on the issuance of building and demolition permits for properties within five proposed HPOZs, including the proposed Oxford Square HPOZ. On June 10, 2016, Vincent P. Bertoni, Director of Planning, formally initiated the adoption process of the proposed Oxford Square HPOZ.

### *Historic Preservation Overlay Zones (HPOZs)*

An HPOZ is an area of the city which is designated as containing structures, landscaping, natural features or sites having historic, architectural, cultural or aesthetic significance. HPOZs, commonly known as historic districts, provide for review of proposed exterior alterations and additions to historic properties within designated districts.

Recognizing the need to identify and protect neighborhoods with distinct architectural and cultural resources, the City Council adopted the ordinance enabling the creation of HPOZs in 1979 and Angelino Heights became Los Angeles' first HPOZ in 1983. Today, the City of Los Angeles has 30 designated HPOZs, with more than 10 additional districts under consideration. HPOZ areas range in size from neighborhoods of approximately 50 parcels to more than 4,000 properties. While most districts are primarily residential, many have a mix of single-family and multi-family housing, and some include commercial and industrial properties. HPOZs are established and administered by the Department of City Planning (in concert with the City Council). Individual buildings in an HPOZ need not be of landmark quality on their own: it is the collection of cohesive, unique, and intact historic resources that qualifies a neighborhood for HPOZ status.

An HPOZ is a zoning overlay that is identified through the addition of the HPOZ suffix to the existing zone. The underlying zoning is not changed when the HPOZ is established. The HPOZ Ordinance regulates the exterior of properties within the district, reviews new construction, and prohibits demolition of identified historic resources unless hardship can be proven. Projects are reviewed by the Department of City Planning and often the HPOZ Board (for larger projects) before work can be approved. Interior work, with no changes to the exterior, is exempt from review. The HPOZ Ordinance is one of the most powerful tools for the preservation and conservation of historic neighborhoods.

### *Oxford Square Historic Resources Survey*

LAMC Section 12.20.3 (the HPOZ Ordinance) requires that a Historic Resources Survey be prepared as part of the HPOZ establishment process. A Historic Resources Survey (Survey) determines the eligibility of an HPOZ and delineates its boundaries with a Survey Map. It also includes a Historic Context Statement that identifies a Period of Significance for the HPOZ and relates the history of the area by theme, place, and time. The Cultural Heritage Commission certified the Oxford Square Survey as to its accuracy and completeness on August 4, 2016.

The Survey also identifies all potential Contributing and Non-Contributing Elements in the proposed zone. Contributing and Altered Contributing Structures date from the HPOZ's Period of Significance and retain a high level of architectural integrity with some reversible alterations. Contributing and Altered Contributing properties are eligible for local financial incentives such as the Mills Act, a property tax reduction program which incentivizes rehabilitation of locally designated historic properties. Non-Contributing Structures include properties that date from the

HPOZ's Period of Significance, but have irreversible alterations, are structures built outside of the Period of Significance, or are vacant lots.

In 1985, a Historic Resources Survey was completed by the City of Los Angeles Department of Public Works, Bureau of Engineering. The west section of this survey—bounded by Olympic Boulevard to the north, Pico Boulevard to the south, Crenshaw Boulevard to the east, and Rimpau Boulevard to the west—included the area of the proposed Oxford Square HPOZ. No formal designations resulted from the survey; however, several buildings in the proposed Oxford Square HPOZ were determined to be individually eligible for listing in the National Register of Historic Places.

In 1991, Myra Frank & Associates conducted a Historic Resources Survey of Oxford Square in compliance with Section 106 requirements for the proposed extension of the Metro Red Line Mid-City segment. This survey identified an Oxford Square Craftsman District, which only included properties in the 1200 block of South Victoria Avenue.

In January and February 2014, an intensive field survey of Oxford Square was performed by Architectural Resources Group and published as part of the survey for the Wilshire Community Plan Area, a portion of the larger, citywide SurveyLA project. The Oxford Square HPOZ Historic Resources Survey evaluated 191 parcels of which 134 (70%) were identified as Contributing and 57 (30%) as Non-Contributing. Of the 134 Contributors, 81 were given the status of Altered Contributors due to minor, reversible alterations that were identified at the properties.

Based on feedback from the community and additional staff review from site visits, the Survey was modified, with approval from the Cultural Heritage Commission, by reclassifying three properties formerly identified as Non-Contributing in the original Survey to Altered Contributor status. The three properties that were reclassified were 1106 South Victoria Avenue, 1110 South Victoria Avenue, and 1211 South Victoria Avenue. The reclassification of these three properties brought the number of Contributing properties to 137 (72%) and the number of Non-Contributing properties to 54 (28%). The total number of properties within the proposed HPOZ and the boundaries of the proposed HPOZ remained unchanged.

The Survey identified the Period of Significance to be from 1907 to 1941, the time when most of the Contributing buildings were constructed. The Historic Context Statement details the settlement of the area, the integrity of the architecture, and the cultural significance of its development as a streetcar suburb. The Historic Context Statement can be found in Exhibit C, attached.

#### *Oxford Square HPOZ Preservation Plan*

The Preservation Plan provides clear preservation goals and guidelines, sets expectations for high quality design, and applies review procedures equitably and consistently to all affected properties. The Preservation Plan also includes a discussion of the history of the neighborhood. Department of City Planning Staff proposes simultaneous adoption of a Preservation Plan with the proposed HPOZ district because having a Preservation Plan in place at the time the HPOZ goes into effect provides for much more efficient implementation of the HPOZ.

#### Guidelines

A Preservation Plan is a document intended by LAMC Section 12.20.3.E to be used by the Director, HPOZ Board, property owners and residents in the application of preservation principles within an HPOZ. The Preservation Plan is the guiding document used to review projects within the HPOZ and is based upon the Secretary of the Interior's Standards for Rehabilitation, national guidelines used to review projects involving historic resources. Derived

from the Standards, the Preservation Plan Guidelines set clear and predictable expectations as to the design and review of proposed projects within an HPOZ. Specifically, the guidelines address rehabilitation, additions, new construction, front yard landscapes, and streetscapes.

From January 2016 to May 2016, through a series of neighborhood meetings and working groups, staff worked with stakeholders to prepare a Draft Preservation Plan that meets the historic preservation goals of the community, while upholding the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties. As such, the Preservation Plan focuses most review and strict conformance with preservation standards on the primary facade, and allows for more flexibility on side and non-visible facades. In adopting a historic district, it is important that a Preservation Plan reflect the needs and desires of the community in which it is applied. For example, Guideline 8.2.10 states, "Additions that include a new floor (for instance a new second floor on a single story house) are generally discouraged. Second story additions are generally more appropriate on blocks where the majority of contributing houses are two stories. When additions that comprise a new floor can be found appropriate, such additions should be located to the rear of the structure." A copy of the Proposed Preservation Plan is included as Exhibit C of this packet.

### Review Procedures

The Preservation Plan defines the scope of projects reviewed under the HPOZ Ordinance and identifies the type of work that would be delegated to Planning staff for review without requiring review by the HPOZ Board. For example, the Preservation Plan exempts some types of non-visible projects from HPOZ review while focusing guidelines on character-defining features located on street facing facades that will have the greatest impact.

During the public outreach and comment period, community members expressed a preference that the review process for paint be exempt instead of delegated to staff, as initially proposed. After careful consideration by staff, the draft Preservation Plan has been revised to reflect this change. The draft Preservation Plan now states the following as exempt: "Exterior painting or staining involving new colors that are appropriate for the architectural style of the structure, as identified in the Historic Resources Survey (consult Chapter 3: Architectural Styles for appropriate colors), not including paint applied to previously unpainted surfaces such as stone, masonry or stained wood". The intent of this change was to give applicants more flexibility in selecting paint colors while still adhering to the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties. Staff determined paint to be an easily reversible alteration that does not significantly detract from the historic character of structures. Moreover, exempting paint from staff review will help to streamline the HPOZ review process especially as the HPOZ Program continues to expand.

### **Conclusion**

Oxford Square has been identified as a neighborhood with both architectural and cultural significance in the City of Los Angeles. The Context Statement carefully and accurately explains the neighborhood's history and evolution over the past 109 years, while the Survey demonstrates that Oxford Square retains a high degree of architectural integrity. Additionally, the majority of the Oxford Square community has been in strong support of the HPOZ. Based on the attached Findings, it is the recommendation of the Department of City Planning and the Cultural Heritage Commission that the City Planning Commission adopt the Oxford Square HPOZ Preservation Plan and recommend the adoption of the HPOZ, based on the attached Findings, to the City Council.

## FINDINGS

### A. 12.20.3.F – Procedures for Establishment, Boundary Change or Repeal of Preservation Zone

The processing of an initiation or an application to establish, change the boundaries of or repeal a Preservation Zone shall conform with all the requirements of LAMC Section 12.32 A-D and the following additional requirements:

#### 12.20.3.F.2 – Initiation of Preservation Zone

##### **a) By the City Council, the City Planning Commission, the Director of Planning and the Cultural Heritage Commission.**

On November 4, 2014, a Council Motion (CF 14-0656) was adopted that instructed the Department of City Planning to study the possibility of adopting five new HPOZs, including one for Oxford Square, as a way to protect historic resources. On March 25, 2015, an Interim Control Ordinance (ICO) became effective under Ordinance No. 183496. The ICO established a moratorium on the issuance of building and demolition permits for properties within five proposed HPOZs, including the proposed Oxford Square HPOZ. On June 10, 2016, Vincent P. Bertoni, Director of Planning, formally initiated the adoption process of the proposed Oxford Square HPOZ.

#### 12.20.3.F.3 – Historic Resources Survey

##### **a) Purpose. Each Preservation Zone shall have a Historic Resources Survey, which identifies all Contributing and Non-Contributing Elements and is certified by the Cultural Heritage Commission to its accuracy and completeness.**

At its meeting on August 4, 2016, the Cultural Heritage Commission certified the Historic Resources Survey for its accuracy and completeness. The Commission certified the Historic Resources Survey with the modifications proposed by Department of City Planning staff. Three properties—1106 South Victoria Avenue, 1110 South Victoria Avenue, and 1211 South Victoria Avenue—were reclassified from Non-Contributing to Altered Contributing status.

##### **b) Context Statement. The Survey shall be accompanied by a Context Statement establishing the relation between the physical environment of the proposed HPOZ and its history, thereby allowing the identification of historic features in the area as Contributing or Non-Contributing. The Context Statement shall represent the history of the area by theme, place, and time. It must also define the various historical factors that shaped the development of the area and define a period of significance for the Preservation Zone.**

In January and February 2014, Architectural Resources Group developed an intensive field survey for Oxford Square as part of the survey for the Wilshire Community Plan Area, a portion of the larger, citywide SurveyLA project. In line with the requirements of the project, the Survey contained a history of the neighborhood and identified every property in the neighborhood as either Contributing or Non-Contributing.

The Oxford Square HPOZ represents a specific period of development, and the Context Statement establishes the relationship between the physical environment and its place in history. The Survey determined that the proposed Oxford Square HPOZ is significant for its

diverse mix of early 1900's architectural styles and its relationship to the early phases of residential development in Los Angeles historically located adjacent to streetcar lines. The full Context Statement is available in Proposed Oxford Square Preservation Plan (Exhibit C).

ARG determined the area's Period of Significance to be 1907-1941, which captures the tract's main period of development. Two Contexts/Themes that pertain to the Oxford Square HPOZ are identified in the Context Statement: *Streetcar Suburbanization* and *Architecture and Design*.

**c) Findings of Contribution. No building, structure, Landscaping, or Natural Feature shall be considered a Contributing Element unless it is identified as a Contributing Element in the Historic Resources survey for the applicable Preservation Zone. Features designated as Contributing shall meet one of more of the following criteria:**

**(1) adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time;**

**(2) owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or**

**(3) retaining the structure would help preserve and protect an historic place or area of historic interest in the City.**

In addition to these criteria, Architectural Resources Group used National Register Bulletin 24 to inform the evaluation process for properties that were built during the Period of Significance (1907-1941) but had suffered some alterations. The Survey area comprises 191 properties, of which 134 were originally identified as Contributing (70%) and 57 (30%) as Non-Contributing. After the survey was modified and approved by the Cultural Heritage Commission, the proposed Oxford Square HPOZ has 137 (72%) Contributing properties and 54 (28%) Non-Contributing properties.

The Historic Resources Survey concluded that Oxford Square HPOZ meets the criteria for a Historic Preservation Overlay Zone, because of the high concentration of Contributing structures exemplified by the collection of Arts and Crafts and Period Revival architecture in a cohesive neighborhood setting that retains much of its original, historic character. The Contributing buildings are the original structures from the period of development which occurred from 1907 through 1941. The Contributing properties add to the historic architectural qualities or historic associations for which they are significant because they were present during the Period of Significance, and possess historic integrity reflecting their character at that time. The proposed Oxford Square HPOZ meets the criteria for HPOZ designation because the district as a whole contains residences of high architectural quality that effectively represent the development history of this portion of Los Angeles.

## **B. 12.32 A-D – Land Use Legislative Actions**

The HPOZ Ordinance requires that, in addition to specific requirements for the establishment of an HPOZ, that the proposed HPOZ shall conform to the requirements of LAMC Section 12.32 A – D for Land Use Legislation Actions. The Code section authorizes the Director of Planning to make a recommendation for action on the matter, before which the Director may direct a Hearing Officer to hold a public hearing and make a report and recommendation. The official public hearing must be properly noticed at least 24 days in advance in at least one general

circulation newspaper in the City and by mailing written notice to the owners of all property within and outside the City that is within 500 feet of the area proposed to be changed.

#### **A) Notice**

The Department of City Planning held a public hearing on the proposed Oxford Square HPOZ and Preservation Plan on June 14, 2016 at the Queen Anne Recreation Center Gymnasium (1240 West Boulevard, Los Angeles, CA 90019). On May 16, 2016, more than 24 days in advance of the meeting, a notice of this public hearing was mailed to all owners and occupants within the proposed HPOZ boundaries and within a 500 foot radius of the HPOZ. The notice was provided in English, Korean, and Spanish text. Prior to the public hearing, an open house and public workshop took place in the community on May 24, 2016, which was announced by the same notice as the Public Hearing. Notice for the public hearing before the Planning and Land Use Management Committee will be published in the *Los Angeles Daily Journal* by the City Clerk at least 24 days in advance.

#### **B) General Plan/Charter Findings**

LAMC 12.32.C.2 requires that “after receipt of the Director’s recommendation, the Planning Commission shall hold a public hearing and make a report and recommendation to the Council regarding the relation of the proposed land use ordinance to the General Plan and whether adoption of the proposed land use ordinance will be in conformity with public necessity, convenience, general welfare and good zoning practice.”

The establishment of the Oxford Square HPOZ and the adoption of its Preservation Plan are in substantial conformance with the purposes, intents, and provisions of the General Plan, and will be in conformity with public necessity, convenience, general welfare and good zoning practice in that it implements the following objectives of the 1) Wilshire Community Plan, which is the land use element of the General Plan, as well as the 2) Conservation Element and 3) Housing Element of the General Plan:

#### **1) 2001 Wilshire Community Plan**

##### **Land Use Policies and Programs**

**Objective 1-1: Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010.**

Policy 1-1.1: Protect existing stable single family and low density residential neighborhoods from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life.

Policy 1-1.2: Promote neighborhood preservation in all stable residential neighborhoods.

Policy 1-1.3: Provide for adequate Multiple Family residential development.

Policy 1-1.4: Provide for housing along mixed-use boulevards where appropriate.

The proposed Oxford Square HPOZ will help to protect existing single-family and low density residential neighborhoods by preserving existing historic structures and requiring that new infill development be built in a scale and design that is compatible with the historic character of the neighborhood. Contributing and Altered Contributing properties within the proposed Oxford Square HPOZ boundaries are eligible for the City's Mills Act program, which offers a financial incentive for property owners to restore, maintain, and rehabilitate historic properties in exchange for substantial reductions in property taxes

**Objective 1-3: Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.**

Policy 1-3.1: Promote architectural compatibility and landscaping for new Multiple Family residential development to protect the character and scale of existing residential neighborhoods.

Policy 1-3.2: Support historic preservation goals in neighborhoods of architectural merit and/or historic significance.

Policy 1-3.3: Promote the preservation and rehabilitation of individual residential buildings of historic significance.

The proposed Oxford Square HPOZ and Preservation Plan clearly meet the intent of these preservation related objectives and policies because the Oxford Square HPOZ Survey has identified and documented the subject area's historic resources on detailed survey pages. The adoption of the Oxford Square HPOZ will ensure that the district's identified resources will be preserved, rehabilitated, and restored in the coming years. Oxford Square's unique and historic neighborhood character will be protected by HPOZ zoning and all rehabilitation projects and new infill projects will be required to follow the guidelines of the Oxford Square Preservation Plan.

**HISTORIC AND CULTURAL RESOURCES**

**GOAL 17: PRESERVE AND RESTORE CULTURAL RESOURCES, NEIGHBORHOODS AND LANDMARKS WHICH HAVE HISTORICAL AND/OR CULTURAL SIGNIFICANCE**

**Objective 17-2: Preserve and enhance neighborhoods having a distinctive and significant historical character.**

Policy 17-2.1: Continue to identify and document Wilshire Community Plan Area Cultural and Historical Monuments.

*Program:* Continue to apply the City's zoning regulations which provide for the documentation and establishment of Historic Preservation Overlay Zones (HPOZ).

**Objective 17-3: Encourage private owners of historic resources to maintain and enhance their properties in a manner that will preserve the integrity of such resources.**

Policy 17-3.1: Assist private owners of historic resources to maintain and enhance their properties in a manner that will preserve the integrity of such resources.

*Program:* Support the creation and implementation of Hancock Park, Windsor Square, and other areas of architectural or historical significance as historic districts under the Planning Department's HPOZ program

*Program:* Continue to adhere to the City's historic properties preservation ordinances and Cultural Heritage Commission requirements for preservation and implementation of design standards.

*Program:* Utilize City historic properties restoration programs which provide funding for renovating and/or reusing historic structures.

The Wilshire Community Plan Area contains eight existing HPOZs, with three additional HPOZs—this proposed Oxford Square HPOZ, Miracle Mile, and Carthay Square—currently in the adoption process. The establishment of the Oxford Square HPOZ will further protect and enhance the use of historic structures in the neighborhood by encouraging rehabilitation, providing design review and preventing incompatible alterations. The rehabilitation guidelines in the Preservation Plan, derived from the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties, outline how to properly maintain and sensitively make additions to historic properties. The Mills Act Program gives property owners the opportunity to apply for a reduction in property taxes and use the savings as a funding source for rehabilitation. Additionally, the HPOZ Board, experts in the fields of architecture, real estate, construction, and the local community, will provide volunteer design review and share successful rehabilitation methods.

## **2) 2001 Conservation Element of the General Plan**

**Section 5 Cultural and Historical Objective: Protect important cultural and historical sites and resources for historical, cultural, research, and community education purposes.**

Policy: Continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.

Adoption of the Oxford Square HPOZ and Preservation Plan will require that the Director of Planning or local HPOZ Board review all modifications, additions and infill development on properties within the district. The Central Area Planning Commission has the authority to approve demolitions to Contributing structures in very limited circumstances. The HPOZ and its Preservation Plan will ensure that maintenance, repair, rehabilitation, restoration, additions, relocations and new infill construction is conducted in a historically appropriate manner that is consistent with the character of the neighborhood, the Period of Significance (1907-1941), and the identified architectural styles. Moreover, the HPOZ will protect historic resources from demolition and potentially irreversible alterations that are incompatible with the neighborhood, and thereby protect the historic resources and their character defining features.

## **3) 2013-2021 Housing Element of the General Plan**

**Objective 1.2: Preserve quality rental and ownership housing for households of all income levels and special needs.**

Policy 1.2.6: Provide incentives for the preservation of historic residential structures.

*Program # 46: Historic Preservation*

Designate historic and culturally significant neighborhoods as Historic Preservation Overlay Zones (HPOZs) and individual buildings as Historic-Cultural Monuments (HCMs). Such designations allow historic residential buildings to qualify for tax incentives and other incentives for their rehabilitation and adaptive reuse. Explore the provision of additional incentives for the rehabilitation of affordable housing and for low-income homeowners of historic properties in HPOZs. Facilitate the removal of barriers to accessibility in historic buildings.

*Program # 47: Mills Act Implementation*

The Mills Act is a statewide program implemented at the local level. It allows qualifying owners of historic properties to receive a potential property tax reduction and use the savings to help rehabilitate, restore, and maintain their homes. The Office of Historic Resources at the Department of City Planning oversees the project work for the substantial rehabilitation of homes. This program ensures adequate maintenance of housing stock in economically diverse neighborhoods.

The establishment of the Oxford Square HPOZ will provide owners of Contributing and Altered Contributing properties the opportunity to apply for the Mills Act, a property tax reduction program that incentivizes the rehabilitation and maintenance of locally designated historic properties. Properties must have official designation as a local historic resource in order to apply for and participate in the program. As such, the Mills Act Program incentivizes historic designation and preservation of historic resources.

**Objective 2.4: Promote livable neighborhoods with a mix of housing types, quality design, and a scale and character that respects unique residential neighborhoods in the City.**

Policy 2.4.1: Promote preservation of neighborhood character in balance with facilitating new development.

Policy 2.4.2: Develop and implement design standards that promote quality residential development.

*Program # 92: Planning for Neighborhood Character*

Conduct regular updates of Community Plans in order to address changing local needs. Adopt implementation tools, such as overlay zones and design guidelines to guide new development and protect existing neighborhood character. Explore mechanisms to address better transitions between single family and multi-family development, between commercial and residential development, and between industrial and residential development. Enforce the Baseline Mansionization Ordinance, which limits the size of homes in proportion to lot size throughout the City. Create new Residential Floor Area districts to protect neighborhood character. Use the Community Plan Implementation Overlay districts as another neighborhood character tool.

The adoption of the Oxford Square HPOZ and its Preservation Plan will preserve historically significant housing and will ensure that new infill construction is compatible with the area's architectural and historic character. Through the HPOZ review process, all major exterior modifications, new construction, and demolitions must comply with the Oxford Square Preservation Plan, which serves as the district's design standards. Rehabilitation and repair is normally the preferred approach in HPOZs, though new construction is possible on vacant or Non-Contributing lots. HPOZ staff and the HPOZ Board, which will be composed of historic

preservation professionals, contractors, and architects, can assist property owners by offering guidance on how to rehabilitate their properties in a cost-effective and historically appropriate manner. The intent of the Oxford Square HPOZ is to preserve neighborhood character and guide new development to be compatible in scale and massing with historic properties.

### C. California Environmental Quality Act (CEQA)

Department of City Planning staff concludes that Categorical Exemptions Class 8 and 31 of the State CEQA Guidelines are appropriate and that the exceptions to these two categorical exemptions do not apply. Categorical Exemption, Article 19, Section 15308, Class 8 “consists of actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment.” Categorical Exemption, Article 19, Section 15331, Class 31 “consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, or reconstruction of historical resources in a manner consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Buildings (1995), Weeks and Grimmer.”

Individual construction projects that are subject to the HPOZ and the Preservation Plan will be required to go through project specific environmental review if required under CEQA. Thus, the establishment of an HPOZ does not supersede the California Environmental Quality Act, or other Los Angeles Municipal Code requirements.

**State of California CEQA Guidelines, Article 19, Section 15308, Class 8** “*consists of actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment. Construction activities and relaxation of standards allowing environmental degradation are not included in this exemption.*”

The certification of the Oxford Square Historic Resources Survey in conjunction with the establishment of a Historic Preservation Overlay Zone and Preservation Plan regulates construction activities to ensure the protection of a City historic resource: the Oxford Square neighborhood. In fact, the purpose of the proposed HPOZ is to prevent significant environmental impacts to a historic and cultural resource identified in the Wilshire Community Plan. Without regulation of construction activities in Oxford Square, the historic integrity of the neighborhood could be lost through incompatible alterations and new construction and the demolition of irreplaceable historic structures. The design guidelines in the Oxford Square Preservation Plan are based upon the Secretary of the Interior’s Standards for Rehabilitation and provide guidance on the historically appropriate construction activities in order to ensure the continued preservation of the Oxford Square neighborhood. The use of Categorical Exemption Class 8 from the State CEQA Guidelines is consistent with other California jurisdictions, which find that the regulations placed upon historic districts is necessary for the protection of the environment and will make sure that maintenance, repair, restoration, and rehabilitation do not degrade the historic resource.

**State of California CEQA Guidelines, Article 19, Section 15331, Class 31** “*consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, or reconstruction of historical resources in a manner consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer.*”

The establishment of the Oxford Square HPOZ and Preservation Plan falls under Categorical Exemption Class 31 for historic resource restoration and rehabilitation. Construction projects within the HPOZ would be reviewed for conformance with the Oxford Square Preservation Plan, which implements the Secretary of the Interior's Standards for Rehabilitation. The Preservation Plan explicitly draws from the Secretary of the Interior's Standards for Rehabilitation by calling for the preservation and repair of historic features and materials, before replacement. Whenever replacement of historic features is necessary due to deterioration, the Plan requires that new features match the original in size, shape, appearance, and material. For example, Section 7.4, Arcades, Patios, Porches & Balconies states that "If elements of the porch, such as decorative brackets or columns, must be replaced, replacement materials should exactly match the originals in design and materials." This guideline conforms to the Secretary of the Interior's Standards in that replacement features are to match the original in size, appearance, and whenever possible materials. The proposed HPOZ would effectively require projects to adhere to the Oxford Square Preservation Plan, which elaborates and clarifies the Secretary of the Interior's Standards for Rehabilitation as it relates to the unique conditions of the Oxford Square neighborhood. This will protect Oxford Square from construction activities that could damage its historic integrity and ensure that maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction is conducted in a historically appropriate manner.

### ***Exceptions to the Use of Categorical Exemptions***

Planning staff evaluated all the potential exceptions to the use of Categorical Exemptions for the proposed project and determined that none of these exceptions apply as explained below:

***Cumulative Impact*** - "All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant." The exception applies when, although a particular project may not have a significant impact, the impact of successive projects, of the same type, in the same place, over time is significant.

There are currently eight HPOZs within the Wilshire Community Plan area. The parcels of the pending Oxford Square HPOZ, in the Wilshire Community Plan, have generally been developed to the maximum zoning capacity. The parcels in the pending Oxford Square HPOZ are located in a Low II density land use designation, which is essentially a single-family zone. It is the intent of the HPOZ program to ensure that proposed projects and new development are compatible in overall scale, size, massing, bulk, setback, and design with the surrounding HPOZ neighborhood and Community Plan areas. Adoption of the pending Oxford Square HPOZ and Preservation Plan will not alter the environment, but will address development within the HPOZ boundaries to ensure that future projects and development are compatible with the HPOZ and Wilshire Community Plan area; therefore protecting the historic resources within the HPOZ. Consequently, there is no cumulative impact on the environment from previous HPOZ adoptions, current HPOZ adoptions, or future HPOZ adoptions.

***Significant Effect*** - "A categorical exemption shall not be used for any activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." This exception applies when, although the project may otherwise be exempt, there is a reasonable possibility that the project will have a significant effect due to unusual circumstances. Examples include projects which may affect scenic or historical resources.

Like the other thirty HPOZs in the City, the proposed Oxford Square HPOZ and Preservation Plan would, through its design regulations, protect identified historic resources. There are no unusual circumstances that would have a significant impact on the environment due to the

adoption of the Oxford Square HPOZ and Preservation Plan. Therefore, there is no possibility of significant effects on the environment.

*Scenic Highway - "A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR." This exception applies when a projects may result in damage to scenic resources within a duly designated scenic highway.*

The proposed Oxford Square HPOZ does not contain any State or City designated scenic highways or parkways. Thus, the proposed Oxford Square HPOZ and Preservation Plan would not negatively impact scenic resources within a duly designated scenic highway. Rather, the proposed HPOZ and Preservation Plan would protect the unique character of the neighborhood, which retains much of its original design, street grid pattern, and generous building setbacks.

*Hazardous Waste Site - "A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code." This exception applies when a project is located on a site or facility listed pursuant to California Government Code 65962.5.*

The Department of Toxic Substances Control (DTSC) has not listed any parcel in Oxford Square as a hazardous material site.

*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 resources." This exception applies when a projects may cause a substantial adverse change in the significance of an historical resource.*

The proposed project would not cause an adverse change in the significance of a historical resource as defined in State CEQA 15064.5; rather, the proposed project would protect identified historic structures through the Historic Preservation Overlay Zone (HPOZ). The proposed HPOZ would ensure that exterior work on properties within the proposed Oxford Square HPOZ area is consistent with the Secretary of the Interior's Standards for Rehabilitation as clarified and elaborated in the proposed Preservation Plan and would require an additional level of review (prior to obtaining other Planning entitlements and building permits), so that new additions or alterations are conducted in a historically appropriate manner, preserving the historic integrity of the property and its environment.

Categorical Exemption ENV-2016-925-CE was prepared on March 16, 2016 and is included as Exhibit D.

### **Summary of the Required Public Hearing held June 14, 2016**

A public hearing regarding the proposed Oxford Square Historic Preservation Overlay Zone (HPOZ) was conducted by Hearing Officer Haydee Urita-Lopez on June 14, 2016 at the Queen Anne Recreation Center Gymnasium at 1240 West Boulevard, Los Angeles, CA, 90019. On May 16, 2016, more than 24 days in advance of the hearing, a public hearing notice was mailed to all owners and occupants within the proposed HPOZ boundaries and within a 500 foot radius of the HPOZ. The notice was provided in English, Korean, and Spanish text.

53 people signed in at the public hearing. At the start of the public hearing, approximately 57 people were in attendance. Reactions to the HPOZ from residents and property owners were mixed, though a strong majority was in support of the HPOZ. A representative from both the West Adams Heritage Association and the Oxford Square Neighborhood Association spoke in support of the HPOZ. Summaries of public testimony from the June 14, 2016 public hearing are included below:

**Speaker Cards:** Thirty-five (35) in support; three (3) in opposition

#### **Organizations testifying in Support:**

West Adams Heritage Association, Oxford Square Neighborhood Association

#### **Organizations testifying in Opposition:**

None

#### **Summary of Public Hearing Testimony:**

The comments received at the Public Hearing were predominantly in favor of the establishment of the Oxford Square HPOZ. Those in support, including many current residents, expressed that the HPOZ not only protects the architecture and character of the neighborhood, but is a way to impart knowledge of the historic community within the City as a whole. Without preservation, the unique character of the community could be lost; the HPOZ can serve as motivation to keep history and the corresponding built environment alive. A representative from the West Adams Heritage Association spoke in support of the project and emphasized the importance of HPOZ districts as an effective tool to preserve neighborhood character. The president of the Oxford Square Neighborhood Association echoed those comments and also noted that the Preservation Plan Guidelines were designed to be flexible and unique to the Oxford Square neighborhood. Other longtime residents gave personal accounts of growing up in the neighborhood and preserving the special sense of community that exists in Oxford Square. Three members of the community spoke in opposition to the HPOZ adoption, stating that an HPOZ was not the appropriate tool for Oxford Square. Citing a negative experience in a different HPOZ, one of the three opposing speakers also referenced the HPOZ process being burdensome and overly restrictive.

#### **Summary of Correspondence Received**

The Department of City Planning received 35 written letters, all in support of the proposed HPOZ. Two signed petitions were also received. One, signed by 32 residents, voiced opposition to the proposed HPOZ, citing restrictiveness to property owners. The other petition supported adoption of the Oxford Square HPOZ and was signed by 33 individuals.

### **Summary of the Cultural Heritage Commission Meeting held August 4, 2016**

The proposed Oxford Square Historic Preservation Overlay Zone (HPOZ) went before the Cultural Heritage Commission on August 4, 2016 at City Hall, 200 N. Spring Street, Rm. 1010, Los Angeles, CA 90012. There were three speakers at the meeting and all three spoke in opposition to the establishment of the HPOZ. Two of the three speakers expressed concern for a lack of information throughout the adoption process. The third cited a frustrating experience with a different HPOZ and claimed that most people in the neighborhood opposed the HPOZ. Two of the three speakers also spoke in opposition to the HPOZ at the public hearing on June 14, 2016.

### **Action of the Cultural Heritage Commission**

The Cultural Heritage Commission, with a four member quorum, moved to:

- 1) **Certify** the Historic Resources Survey, with the recommended changes, as to its accuracy and completeness;
- 2) **Recommend** that the City Planning Commission approve the establishment of the boundaries for the proposed Oxford Square HPOZ;
- 3) **Recommend** that the City Planning Commission adopt the Oxford Square HPOZ Preservation Plan;
- 4) **Find** that the structures, landscaping and natural features within the proposed Oxford Square HPOZ meet one or more of the following criteria:
  - add to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or
  - owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
  - retaining the building, structure, landscaping, or natural feature, would contribute to the preservation and protection of an historic place or area of historic interest in the city.
- 5) **Find** that the project is categorically exempt under the State CEQA Guidelines, Article 19, Section 15308, Class 8 and Article 19, Section 15331, Class 31.

### **Summary of Correspondence Received**

The Department of City Planning has received one petition submitted at the Cultural Heritage Commission meeting expressing opposition to the Oxford Square HPOZ. This petition, signed by 32 residents, was the same petition submitted during the public comment period following the public hearing that was held on June 14, 2016.