

Communication from Public

Name: Josh Kolodny
Date Submitted: 07/02/2020 09:36 AM
Council File No: 20-0328

Comments for Public Posting: Dear Members of the Committee, I am writing in support of the appeal filed by Mr. Childs that a CEQA report should be required and performed for the above listed case. Until January of this year, I was the architect member on the Adams-Normandie HPOZ board. This project came before our board at a very advanced state due to our board not having a quorum to be able to hold meetings for almost one year. The design of this project, we were told had been worked out with the Office of Historic resources (OHR) and HPOZ Planning staff. As the HPOZ review is focused solely on the exterior of the building, we were not able to discuss any of the things going on inside the building which might be manifesting on the Exterior. In addition to those limits of our review, we had just attended the annual HPOZ training workshop, where we were told about how the recently approved state law SB330, the Housing Accountability Act (HAA) had changed the way guidelines such as the HPOZ Preservation Plans were now to be regarded in terms of allowable development limits for new housing projects – meaning not enforceable. I would like to introduce the approved HPOZ board minutes from the meeting where we reviewed this project for the record (see attached in this document). I want to state for the record that I am in favor of a new mixed use / multi-family project here on this site, but there are several aspects in the design of this project, that I believe are detrimental and that would (hopefully) come to light as part of the CEQA review process. The project as currently designed at 5-stories high is too tall for this historic district, and especially so as it is immediately adjacent to an historic church which has a very prominent presence (see the HPOZ meeting notes for a more detailed discourse). The developers of this project say that this height is necessary to fit in this number of units, but that claim is false. I have had the plans reviewed by colleagues who specialize in multi-family housing and the comments were that the building should be able to hold this same number of units in a shorter, 4-story building, which is a more appropriate height for this district. In the past, the HOPZ board has reviewed and approved other multi-family 4-story tall projects along W. Adams Blvd. The interior layout of the units is very concerning for a few reasons and likely the driving factor in the developer's need to build a 5-story building to house this number of units. It would seem

likely that these apartments are specifically designed as student rentals with a high potential for placing multiple people in each bedroom to maximize rental income, as the floor plan is really not a viable one for a family to live in. The “Living Room” of the units is almost non-existent. This “room” is windowless, is much smaller than the smallest bedroom in this complex. In the best of cases, it’s almost half hallway, and in the worst of cases (Unit styles B3 & C11) it is only a label on paper and not even a space that can be used in this sense at all (see the attached marked up plans).

Bedrooms The most glaring aspect of the design of this building is that a great many of the units have bedrooms which are double or triple the size of a typical bedroom in an apartment. These “Super Bedrooms” account for 30% of the total number of bedrooms in this building. Other than being able to accommodate multiple people in a bedroom without increasing the number of habitable rooms in a unit to avoid triggering additional code requirements, I cannot think of another reason why a developer would pay all this extra money to build such a tall building with such large rooms for so few units. If one were to assume a 1-person/bedroom occupancy as a standard, then these “super bedrooms” could provide for an occupancy increase of approximately +33% in this building, which is quite substantial.

Parking By my estimation, this building is under-parked, even for being in a Transit district. There are 45 apartment units in this building: (1) Studio unit, (9) 2-Bedroom units, (34) 3-Bedroom units and (1) 5-Bedroom unit. There are 59 stalls provided for residential parking. What is not mentioned in the parking analysis calculations is that 34 of these spaces are in a tandem configuration, thus each pair of tandem spaces is dedicated to serving a single unit = 17 Tandem pairs. $59 - 34 = 25$ individual stalls. $17 + 25 = 42$. The math for a total of stalls provided may work out to show the correct numbers needed to satisfy the code, but the layout of the actual parking seems like it doesn’t meet the actual useable intent of this requirement, leaving 3 of the units without any parking in the building. I believe that there are enough questionable aspects about the design of this project that a CEQA report should be required so that this project would have a chance to become a benefit to the neighborhood in which it’s located and not just in someone’s ledger book.

To: Los Angeles City Council
Planning and Land Use Management Committee

From: Joshua Kolodny

Date: July 2, 2020

Re: 1421 URSA Adams Boulevard

DIR-2019-2727-CCMP-1A
ENV-2019-2728-CE-1A
Council District 8

Dear Members of the Committee,

I am writing in support of the appeal filed by Mr. Childs that a CEQA report should be required and performed for the above listed case.

Until January of this year, I was the architect member on the Adams-Normandie HPOZ board.

This project came before our board at a very advanced state due to our board not having a quorum to be able to hold meetings for almost one year. The design of this project, we were told had been worked out with the Office of Historic resources (OHR) and HPOZ Planning staff. As the HPOZ review is focused solely on the exterior of the building, we were not able to discuss any of the things going on inside the building which might be manifesting on the Exterior

In addition to those limits of our review, we had just attended the annual HPOZ training workshop, where we were told about how the recently approved state law SB330, the Housing Accountability Act (HAA) had changed the way guidelines such as the HPOZ Preservation Plans were now to be regarded in terms of allowable development limits for new housing projects – meaning not enforceable.

I would like to introduce the approved HPOZ board minutes from the meeting where we reviewed this project for the record (see attached in this document).

I want to state for the record that I am in favor of a new mixed use / multi-family project here on this site, but there are several aspects in the design of this project, that I believe are detrimental and that would (hopefully) come to light as part of the CEQA review process.

The project as currently designed at 5-stories high is too tall for this historic district, and especially so as it is immediately adjacent to an historic church which has a very prominent presence (see the HPOZ meeting notes for a more detailed discourse). The developers of this project say that this height is necessary to fit in this number of units, but that claim is false. I have had the plans reviewed by colleagues who specialize in multi-family housing and the comments were that the building should be able to hold this same number of units in a shorter, 4-story building, which is a more appropriate height for this district. In the past, the HOPZ board has reviewed and approved other multi-family 4-story tall projects along W. Adams Blvd.

The interior layout of the units is very concerning for a few reasons and likely the driving factor in the developer's need to build a 5-story building to house this number of units. It would seem likely that these apartments are specifically designed as student rentals with a high potential for placing multiple people in each bedroom to maximize rental income, as the floor plan is really not a viable one for a family to live in.

The "Living Room" of the units is almost non-existent. This "room" is windowless, is much smaller than the smallest bedroom in this complex. In the best of cases, it's almost half hallway, and in the worst of cases (Unit styles B3 & C11) it is only a label on paper and not even a space that can be used in this sense at all (see the attached marked up plans).

Bedrooms

The most glaring aspect of the design of this building is that a great many of the units have bedrooms which are double or triple the size of a typical bedroom in an apartment. These "**Super Bedrooms**" account for 30% of the total number of bedrooms in this building. Other than being able to accommodate multiple people in a bedroom without increasing the number of habitable rooms in a unit to avoid triggering additional code requirements, I cannot think of another reason why a developer would pay all this extra money to build such a tall building with such large rooms for so few units. If one were to assume a 1-person/bedroom occupancy as a standard, then these "super bedrooms" could provide for an occupancy increase of approximately +33% in this building, which is quite substantial.

Parking

By my estimation, this building is under-parked, even for being in a Transit district.

There are **45** apartment units in this building: (1) Studio unit, (9) 2-Bedroom units, (34) 3-Bedroom units and (1) 5-Bedroom unit.

There are 59 stalls provided for residential parking. What is not mentioned in the parking analysis calculations is that 34 of these spaces are in a tandem configuration, thus each pair of tandem spaces is dedicated to serving a single unit = 17 Tandem pairs. $59 - 34 = 25$ individual stalls. $17 + 25 = 42$. The math for a total of stalls provided may work out to show the correct numbers needed to satisfy the code, but the layout of the actual parking seems like it doesn't meet the actual useable intent of this requirement, leaving 3 of the units without any parking in the building.

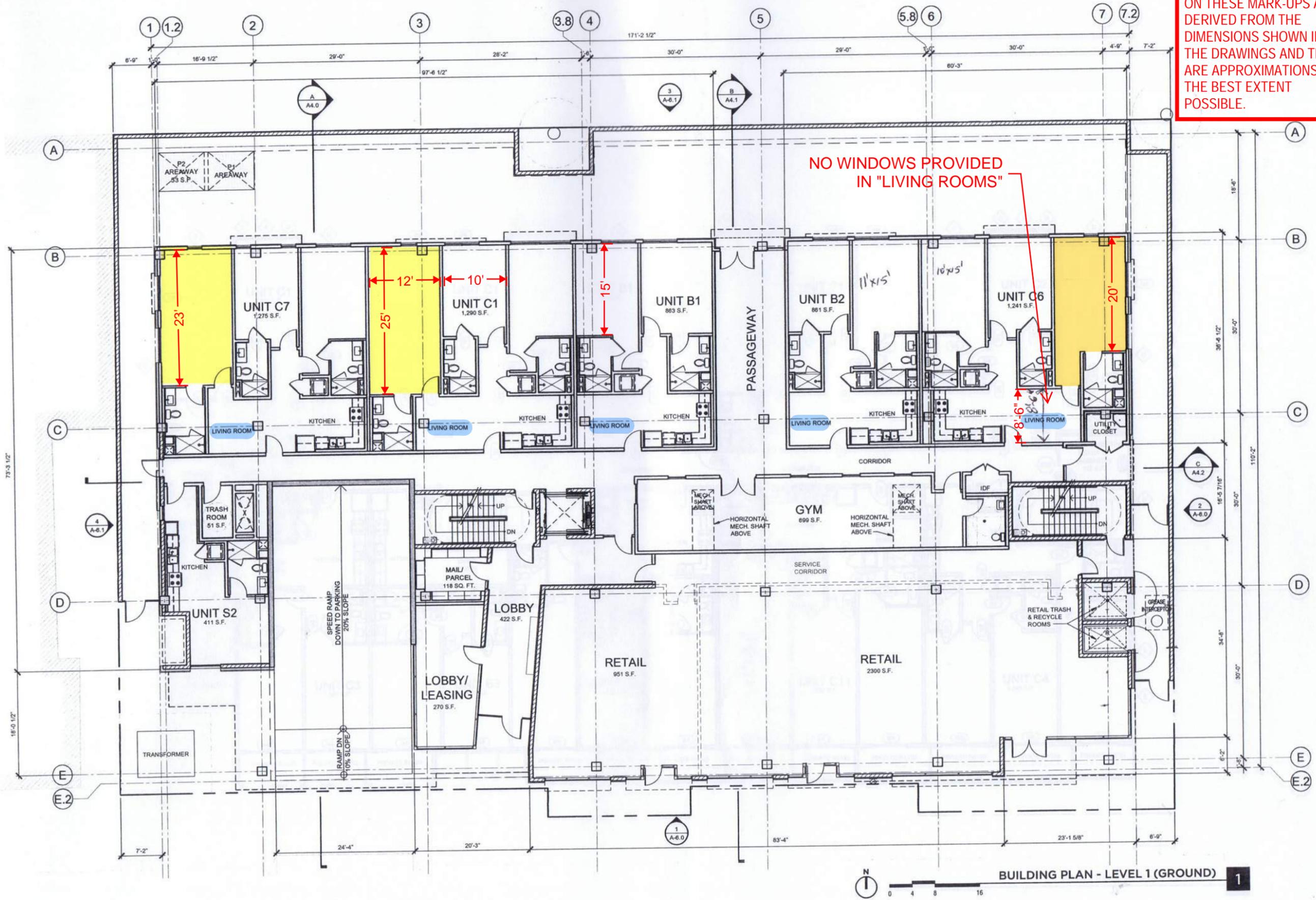
I believe that there are enough questionable aspects about the design of this project that a CEQA report should be required so that this project would have a chance to become a benefit to the neighborhood in which it's located and not just in someone's ledger book. I urge you to consider this effort be made to help protect the historic character of this HOPZ, and the quality of life in this community.

I thank you for your consideration in this matter.

Sincerely,

Joshua Kolodny

NOTE:
 THE DIMENSIONS SHOWN
 ON THESE MARK-UPS ARE
 DERIVED FROM THE
 DIMENSIONS SHOWN IN
 THE DRAWINGS AND THUS
 ARE APPROXIMATIONS TO
 THE BEST EXTENT
 POSSIBLE.



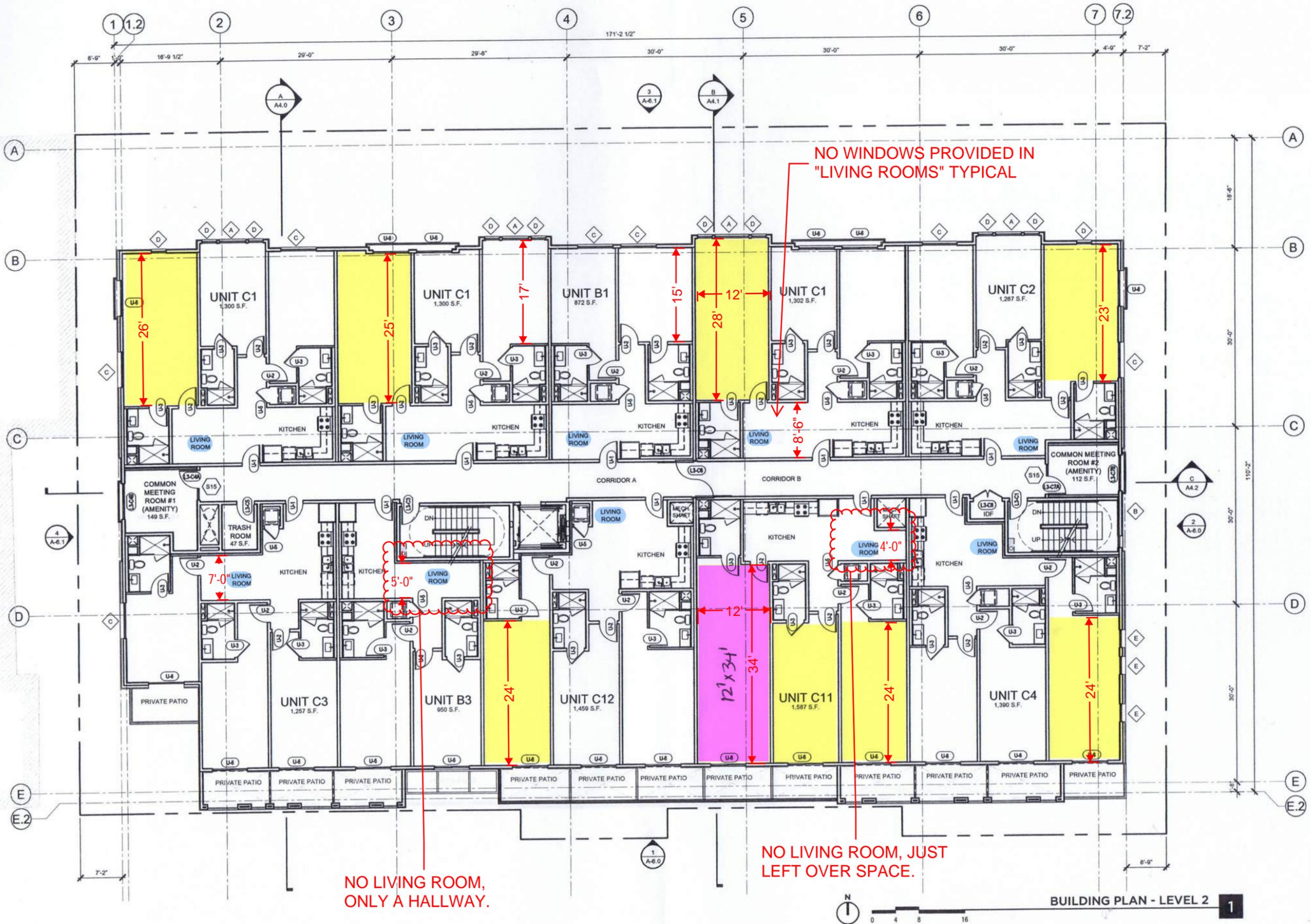
1421 W. ADAMS BLVD.
 Los Angeles, ca

BUILDING PLAN - LEVEL 1 (GROUND)

ORION CAPITAL

NEXT
 A-20
 08.12.19/REV 3
 18-102

BUILDING PLAN - LEVEL 1 (GROUND)



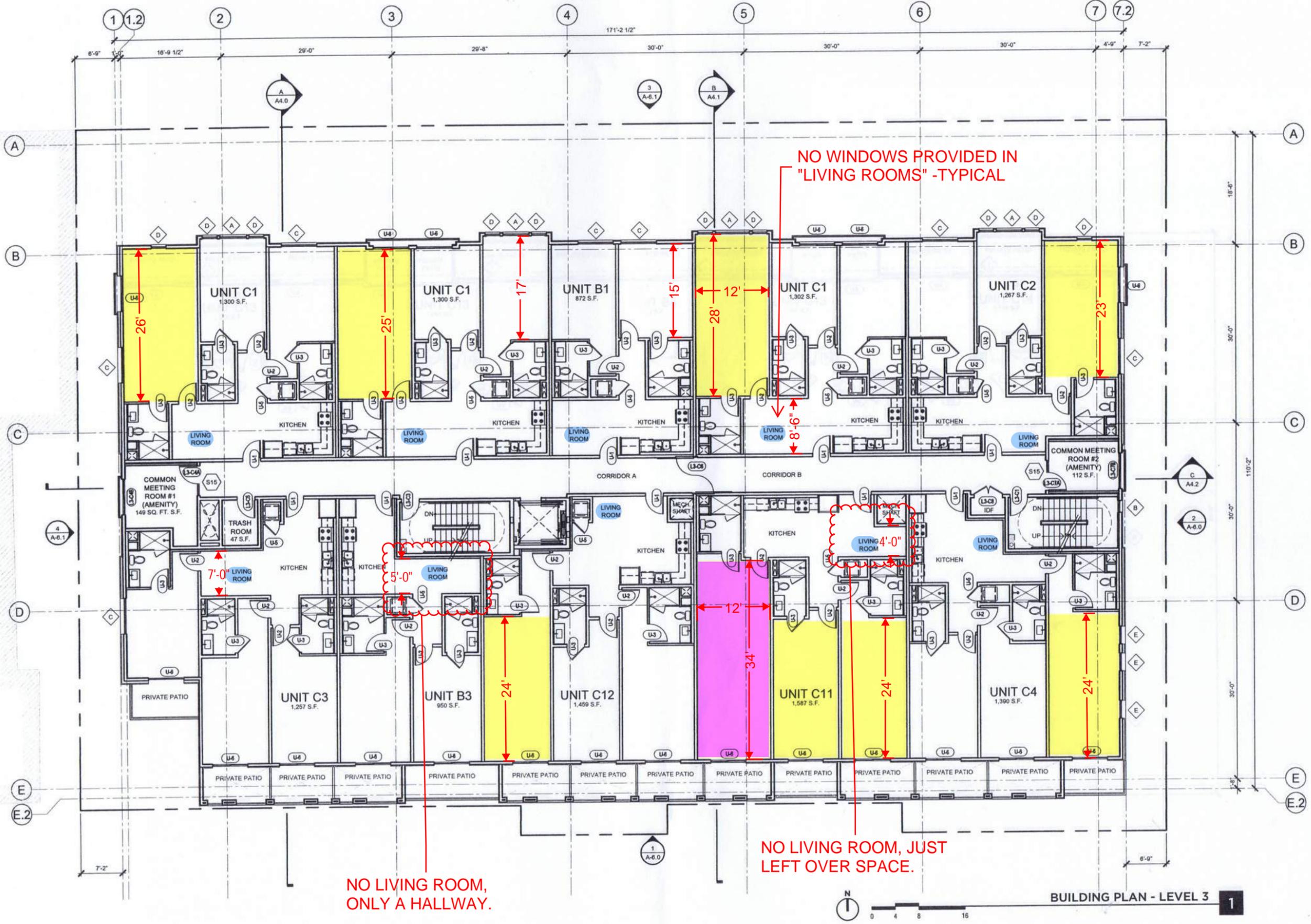
NO WINDOWS PROVIDED IN
"LIVING ROOMS" TYPICAL

NO LIVING ROOM,
ONLY A HALLWAY.

NO LIVING ROOM, JUST
LEFT OVER SPACE.

BUILDING PLAN - LEVEL 2

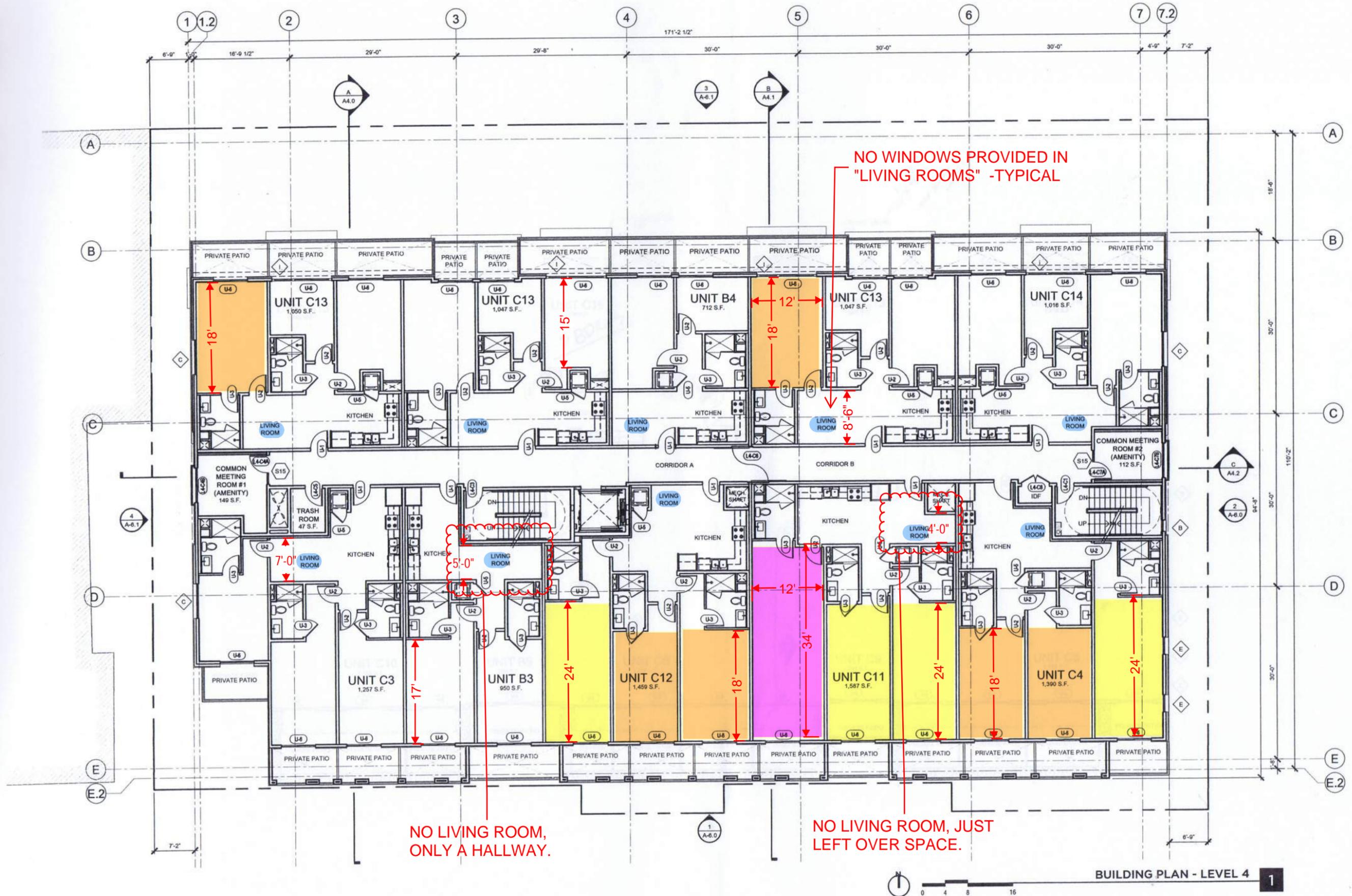




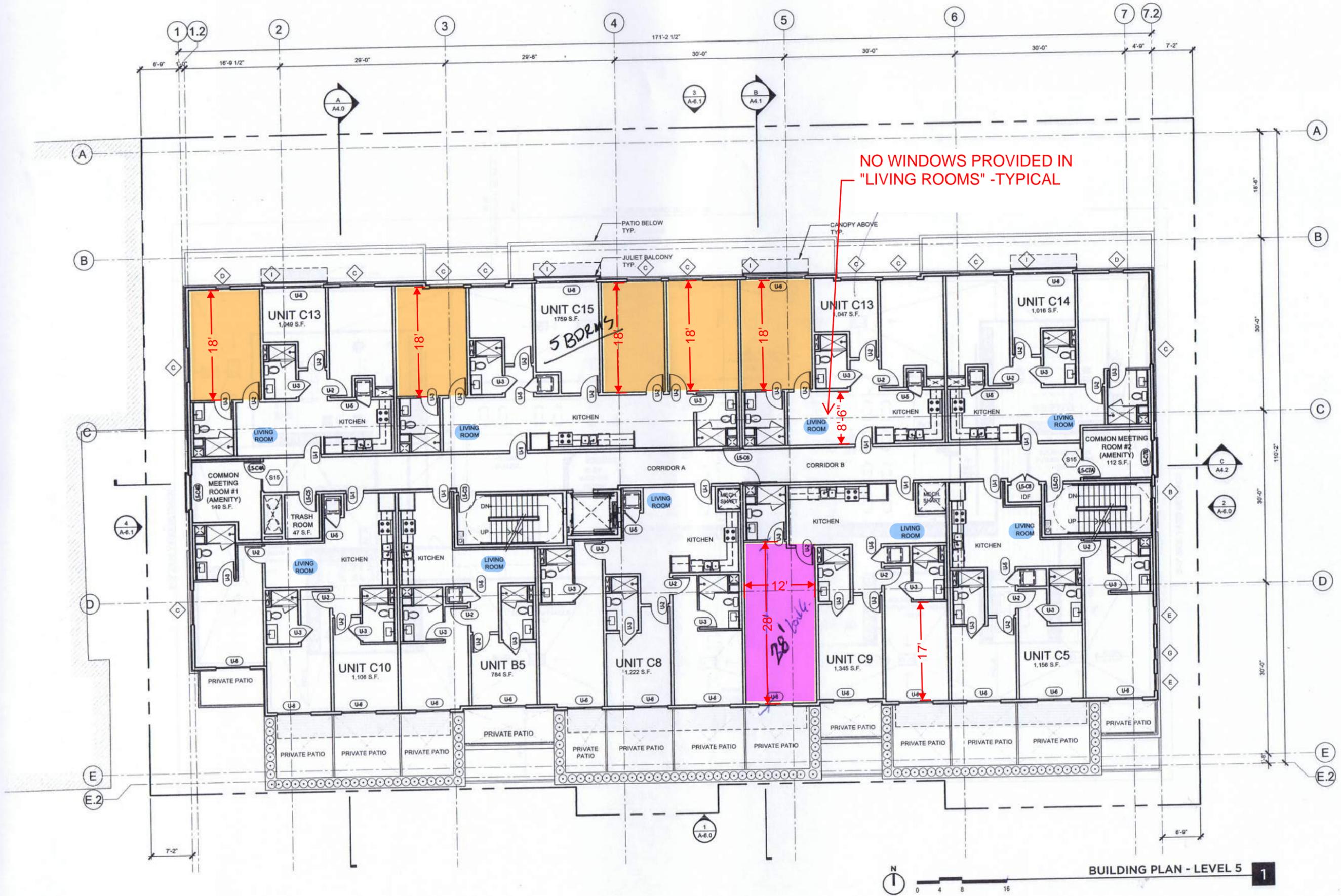
NO WINDOWS PROVIDED IN
"LIVING ROOMS" - TYPICAL

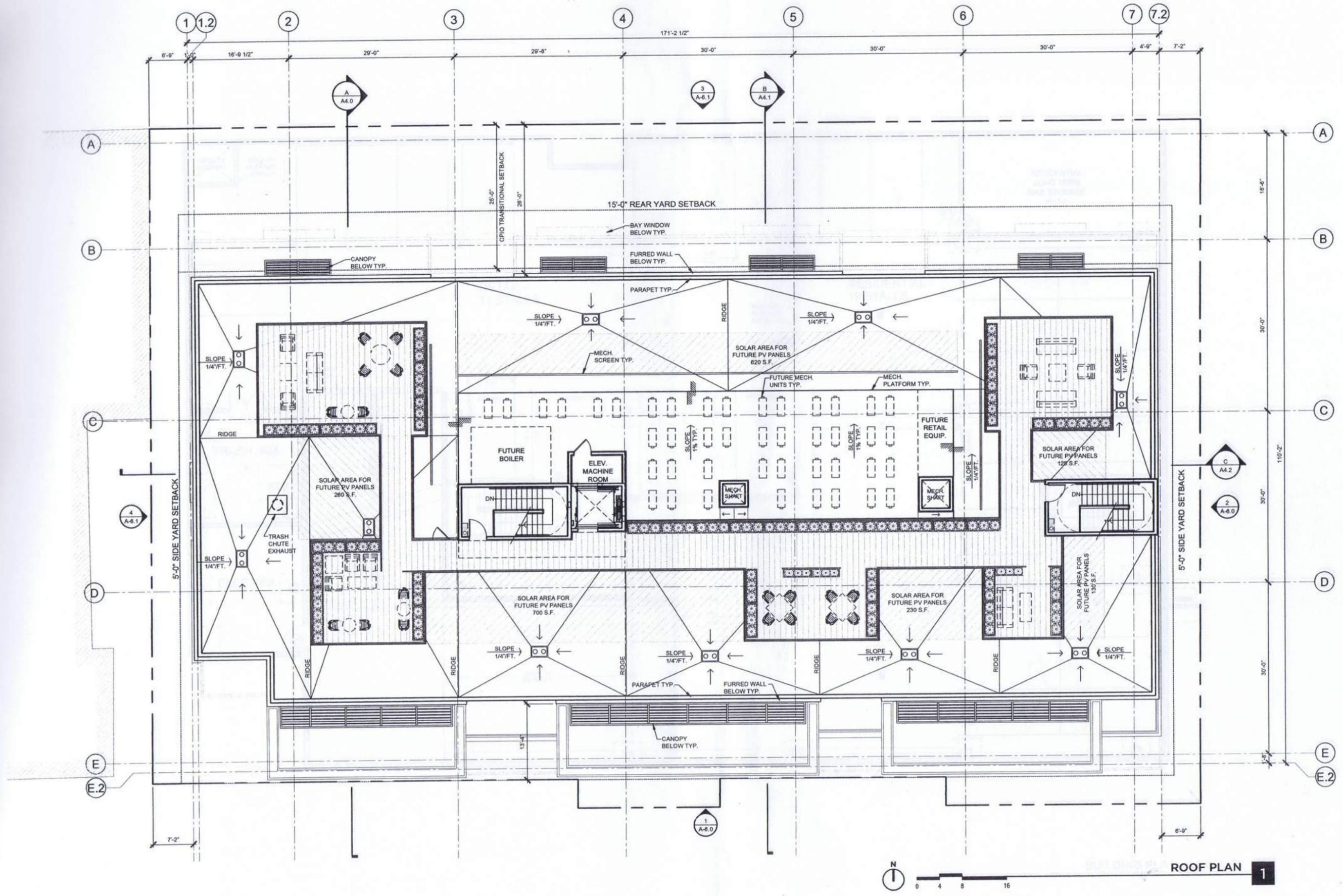
NO LIVING ROOM,
ONLY A HALLWAY.

NO LIVING ROOM, JUST
LEFT OVER SPACE.

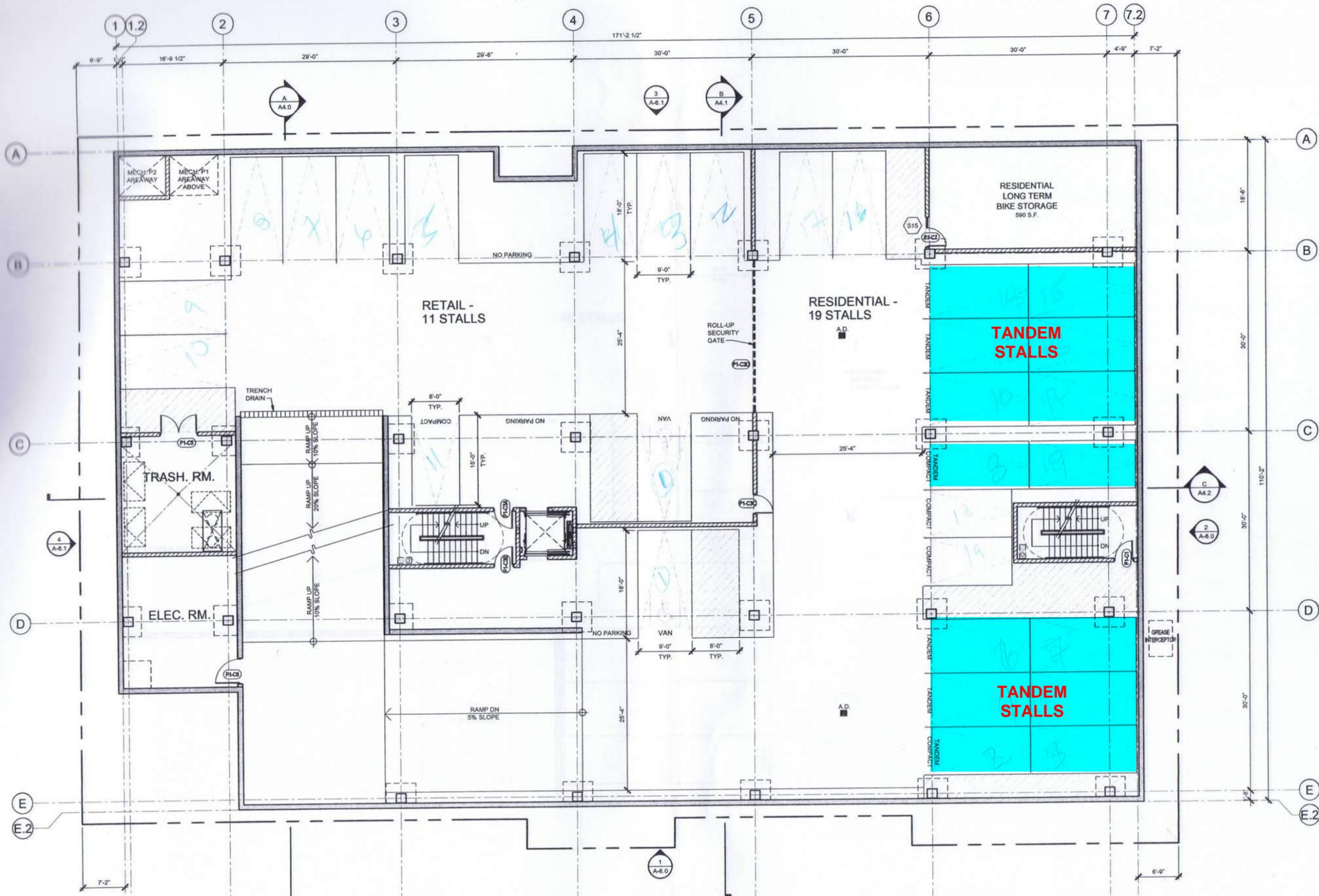


BUILDING PLAN - LEVEL 4 1





ROOF PLAN 1

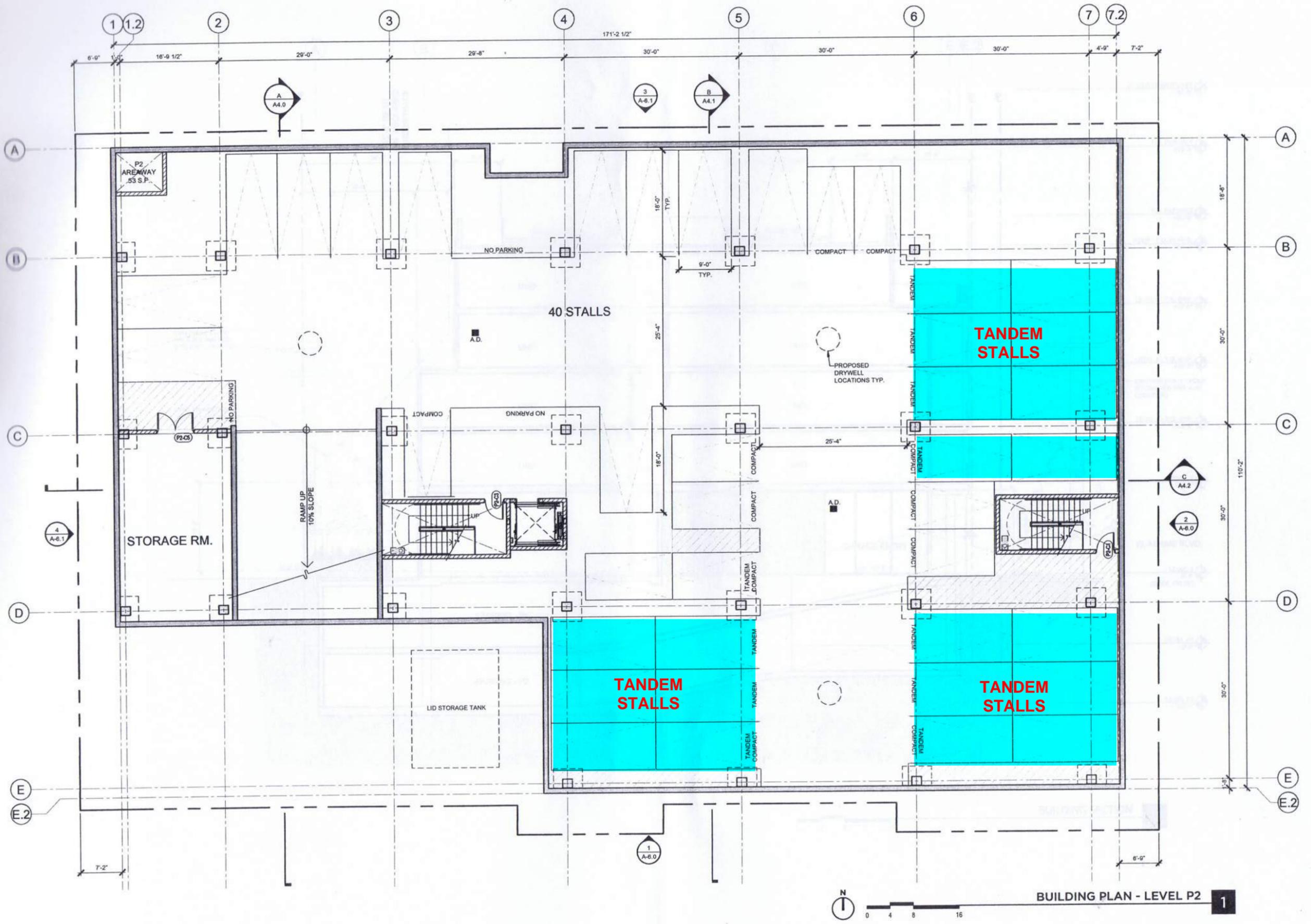


BUILDING PLAN - LEVEL P1 **1**

1421 W. ADAMS BLVD.
Los Angeles, ca

BUILDING PLAN - LEVEL P1

ORION CAPITAL



Meeting Minutes
APPROVED (11/6/19)



Los Angeles City Planning Department
Office of Historic Resources

PUBLIC NOTICE
ADAMS-NORMANDIE HISTORIC PRESERVATION OVERLAY ZONE
BOARD MEETING

Board Members

Mario F. Chavarria – Chair **Pres.**
Josh Kolodny – Architect/Vice-Chair **Pres.**
Patrick Joyce - Secretary **Pres.**

Ethel Rubio - Member **Pres.**
Vacant - Member **Pres. Abs.**

Meeting Information - ****PLEASE NOTE SPECIAL MEETING LOCATION AND TIME****

Date: Wednesday, October 2, 2019

Place: Jefferson-Vassie D. Wright Memorial Branch Library
2211 W. Jefferson Boulevard
Los Angeles, CA 90018

Time: 6:00 pm

UPDATED AGENDA

- | | |
|---|--|
| 1 Call to Order | Roll Call |
| 2 Introduction | Purposes of the HPOZ, roles of the Board and City Staff, and Meeting Procedure |
| 3 Approval of Minutes | 9/4/2019 approved |
| 4 Staff/Board Communication | |
| 5 Public Comment | Public comment of non-agenda items for a maximum of 10 minutes
1 person spoke. |
| 6 Conforming Work | |
| A. Contributing Elements | None
Approved, Rejected, Continued_____, No Action, Ayes, Nays |
| B. Non-Contributing Elements | None
Approved, Rejected, Continued_____, No Action, Ayes, Nays |
| 7 Public Hearing Notice For the Following Items* | |
| A. Certificates of Appropriateness | None |

B. Certificates of Compatibility

1421-1431 W. Adams Blvd.

DIR-2019-2727-CCMP; ENV-2019-2728-CE

Applicant: Henry Fan

3 members of the public spoke.

Demolition of three existing Non-Contributing commercial buildings (parcels 1421, 1429, and 1431 W. Adams Blvd) and construction of an approx. 65,140 square-foot, five-story, 45-unit mixed-use building with roof deck. Project to include approx. 3,640 square feet of retail at the ground level; two levels of subterranean parking, with parking for 70 cars and 38 bicycles; a new driveway and curb cut; new landscape; and the restoration of the parkway.



The HPOZ board heard the 3 members of the public speak and a presentation by Henry Fan.

The assessment by all of the board members and based on the guidelines in the Preservation Plan, was that the proposed building is too tall for the district and this stretch of Adams Blvd. The proposed project is 5 stories high and the determination was that it should be limited to 4 stories to be appropriate for the District; but the board has been informed by the Planning Dept and City Attorney that the terms in the preservation plan as written do not hold sway over allowable development limits as set forth by the Housing Accountability Act and other zoning regulations such as the CPIO Sub Areas, etc. This project is also adjacent to an iconic, historic church and is as tall as the peak of the church roof. As with most church architecture within cities, this church

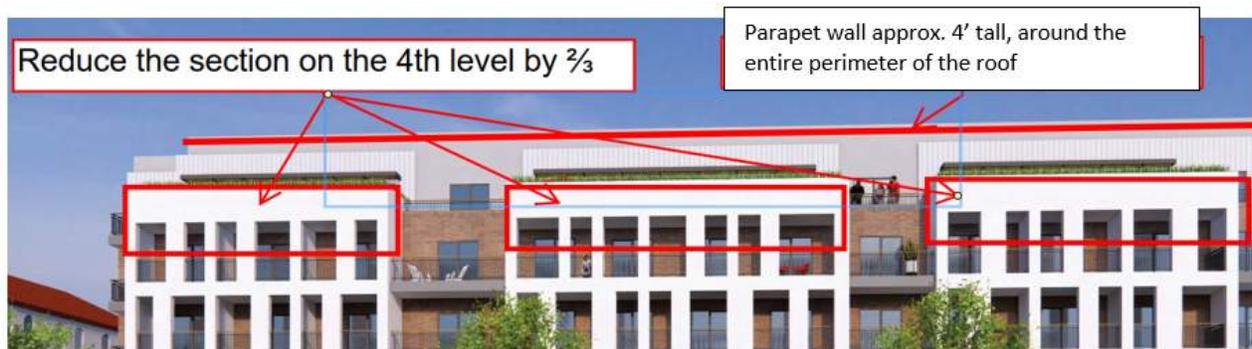
has an iconic presence on the block due to its shape and size, being larger and more prominent than the surrounding buildings. With the scale of this proposed project, that street identity and presence in the community is greatly diminished.

Although we are not allowed to comment on it, Josh has entered comments at the meeting, stating that the arrangement of the units is very capricious, and directly has led to the large number of stories in this design. The large majority of the units are 3 bedroom, 3 bath, with the floor area of each unit being mostly comprised of bedrooms. There are some units where a bedroom is 11' x 25' (or in some units even 35'). The "Living Room" for the units is basically an 8' wide hallway to get to the bedrooms, there is no Dining area. Josh pointed out that these are not designed as units for the community as the applicant has proffered; these are intended solely for student housing, and the business model is clearly to generate as much income by cramming in as many beds as possible into each unit. It was Josh's assertion that allowed density of units does not have to be related to such a large volume of a building when in an historic district such as this one, but realizes that as communicated at the most recent HPOZ training session, the City will not support this view.

Given the position the board has been placed in by the City's position on this matter, Ethel, Josh and Patrick felt the project could be approved, but with some conditions to reduce the visual impact of the building massing and certain other adjustments to improve the building's presence on the street.

BUILDING MASS - There are a couple of aspects of the building's design that gives it a more massive appearance than are necessary, without changing the floor plan or SF contained within.

- 1.) There is a parapet wall approx 4' tall, around the entire perimeter of the roof, which contributes unnecessarily to the buildings height and massing. This parapet does not need to be this tall, as the occupiable roof deck areas are set several feet back from the roof edges and can have their own guardrails and would also have the benefit of not being visible from the street.
- 2.) The exterior facade facing the street has balconies which are recessed in a grid-like element with solid sides and roofs on floors 2, 3 & 4. While it is very nice as an architectural element, the bulk of this also contributes to blocking the view of the Church looking westwards down Adams. The board has suggested that the applicant look into removing the solid sides and roof of the balconies on the 4th floor to break down the massing of the facade and allow more of the church building to be visible when looking westward, and this will also result in reducing the overall massing of the building.



BUILDING ENTRANCE - The entrance to the building (for the residents) is not evident as it is with other buildings in the district. The applicants architect maintains that as a commercial building it does not warrant attention being brought to the resident's entrance, but it was pointed out that in fact, the building is a residential building with a small amount of commercial space at its base, and as such, the entrance to the building should be made more prominent and identifiable, and be more in keeping with the historic fabric of the district.



Mario maintains that the project needs to be reduced to 4 stories.

Conditions

i. BUILDING MASS

- Remove parapet wall approx 4' tall, around the entire perimeter of the roof
- Removing the solid sides and roof of the balconies on the 4th floor

ii. BUILDING ENTRANCE

- Entrance to the building should be made more prominent and identifiable

3 of the 4 board members recommend approval with conditions.

Mario- No

Josh, Ethel and Patrick- Yes

8 Consultations

None

Recommend Filing, Recommend Denial,
Continued_____, No Action
Ayes, Nays

9 Other Board Business

HPOZ Board Training Debrief

Quorum Check

10 Miscellaneous

The next scheduled meeting is **Wednesday, October 16, 2019.**

Cancellation may occur due to the lack of agenda items to review.

*Under provisions in Section 12.20.3 I (Notice and Public Hearing) of the Municipal Code, the owners and occupants of all properties abutting, across the street or alley from, or having a common corner with the subject property shall receive notice of the application for Certificate of Appropriateness at least ten (10) days prior to the date of the HPOZ Board meeting. Further, the applicant shall post the site in a conspicuous place ten (10) days prior to the date of the HPOZ Board meeting.

Under provisions of the Brown Act (Gov. Code Sec. 54959-54960), the HPOZ Board is a "legislative body" and must: 1. Conduct all quorum meetings in public; and (2.) Seventy-two (72) hours before public meetings, post all agenda or issues considered for discussion. (The public notices are posted at the Department of City Planning and at the Main Lobby of City Hall East as well as on the Internet at <http://cityplanning.lacity.org>)

If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized here, or in written correspondence on the matters delivered to this agency at or prior to the public hearing.

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. The meeting facility and its parking are wheelchair accessible. Sign language interpreters, assistive listening devices, language translators, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the staff person referenced in this notice.

Materials submitted for any above-referenced cases are available for public review at the Department of City Planning, for more information contact the planner below.

Contact Information:

Department of City Planning
Office of Historic Resources
221 N. Figueroa Street, Ste. 1350
Los Angeles CA 90012

Mickie Torres-Gil
Tel : (213) 847-3691
micaela.torres-gil@lacity.org

Code Enforcement:
Dept of Building and Safety
(Single Family Dwellings or
Commercial Buildings)
888-524-2845 or
888-833-8389

Housing Department
Multi-family Dwellings
866-557-7368

Council District #8
8475 S. Vermont Avenue
Los Angeles CA 90044
(213) 485-7683

Council District #1
Councilmember Gil Cedillo
City Hall, Room 410
200 N. Spring St.
Los Angeles CA 90012
Tel: (213) 473-7001