

ADAMS DOCKWEILER HERITAGE ORGANIZING COMMITTEE

April 01, 2024

Los Angeles City Council  
200 N. Spring Street / L.A. CA.90012  
Planning and Land Use Management Committee P.L.U.M.

- Councilmember Harris-Dawson
- Councilmember Heather Hutt
- Councilmember Katy Yaroslavsky
- Councilmember Imelda Padilla
- Councilmember John Lee

RE: CF 23-0623-S1

Honorable Committee Members

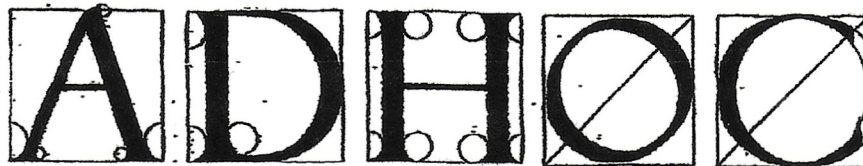
I am writing as Chair of the Adams Dockweiler Heritage Organizing Committee (ADHOC) to request that the current Proposed ED1 Ordinance (CF-23???-S1) be amended to include modifying language which provides for necessary Exceptions that will assure needed protections for our City's Historic-Cultural legacy.

Our City's current CEQA policies fail in their evaluations of the significance of potential negative impacts to extant: a) historic settings, b) historic streetscapes, and (c) in the identification of the complexities of the proclaimed Non-Contributors as identified in the City's limited historic surveys and reports.

Frankly, as a professional historic-preservation consultant I find our City's Planning Departments fixation for the issuance of a ministerial CE to settle all bets for CEQA clearance to be abusive and negligent. This poorly written ED-1 Ordinance will only codify this myopic failing in the City's CEQA review responsibility.

As an example, I am including my initial comments about the ED1 Ordinance after I discovered it existed and was already in an administrative approval process (02-02-24). This action was for a location in a National Register Historic District as well as being in an Historic Preservation Overlay Zone (University Park H.P.O.Z.)

My discovery of the existence of the pending ED1 Ordinance happened during my investigation of the unusual delays of my CEQA appeal PLUM Hearing for an Infill project at 2323 Scarff St. (UP-HPOZ) [Case No ZA-2021-6672-DB-CU-CCMP.ENV-2021-6673-EAF]. That Case was a 10-unit 45 bed-&-bath for 90 USC-students. While facing our very winnable CEQA Appeal they silently "withdrew" their market-rate Project for an administrative "Clearance" in January as a gigantic 78-bedroom all-affordable and a CEQA Exemption in an HPOZ without an approved City Ordinance to empower any approval. I call this a shenanigan.



ADAMS DOCKWEILER HERITAGE ORGANIZING COMMITTEE

February 02, 2024  
Los Angeles Department of City Planning  
Attention: Michelle Singh, Senior Planner  
Via Email: Michelle.Singh@lacity.org

RE: **Case No. ADM-2024-272-DB-VHCA-ED1**  
Related: Case No. ZA-2021-6672-DB-CU-CCMP / ENV-2021-6673-EAF  
CASE No. DIR-2008-3375-COA / ENV-2008-3376-CE  
2323 Scarff Street, LA CA 90007 / CD-1  
University Park Historic Preservation Overlay Zone  
St. James Park National Register Historic District

Michelle Singh, Senior Planner,

I am writing as Chair of the Adams Dockweiler Heritage Organizing Committee (ADHOC) to request that current Proposed ED1 Project, at 2323 Scarff Street, not be considered as "Ministerial" but as an "Exception" to the Categorical Exemption and therefore be required to provide an Initial Study and Checklist and possible MND.

Our objections and concerns over this newly proposed Project-Alternative-1, which now replaces the original approved plans for a 10-unit / 45-bedroom USC student-housing mini-dorm (Case No. ZA-2021-6672-DB-CU-CCMP / ENV-2021-6673-EAF) are primarily the same objections as found in our extensive comments submitted to that public record including the community's Appeal process (CF-2352800).

ADHOC is part of the community's opposition to that Infill Project's design which fails to comply with the Secretary of the Interior's Standards and Guidelines for Historic Districts. The Project's design failure was due to its total lack of compatibility with the required prevailing historical contextual elements of: Height, Scale, Massing, and Setbacks. Unfortunately the new Project-Alternative-ED1 suffers from a similar design flaw that seeks an over-expansion, in all directions, of the architectural envelopment: height, scale, massing, and setbacks.

Current ZIMAS reports that on January 09, 2024 the developers had "*withdrawn*" their permit application for the USC-student mini-dorm Project. We understand that it is these same student-housing developers that are now seeking an "All-Affordable Housing Project" approval. Although ADHOC certainly welcomes this new change in use we cannot support this developer's continuing excessive desire for maximum land-use exploitation at the loss of historic resources.

University Park's special historic environmental context is being undermined and degraded by the cumulative impacts of out-of-scale non-compatible student housing. Developers are seizing on new state land-use laws to exploit the vulnerable historic districts around USC and throughout West Adams. Today we have greed driven bottom-liners in a feeding frenzy for the old housing around campus creating an expanding list of cumulative impacts to the historic setting.

By paying no heed to the new laws' carve-outs for the protection of the City's historic assets, the City Attorney Office, the Planning Department, the Office of Historic Resources, the Cultural Heritage Commission, all have been negligent in their stewardship responsibilities for our designated cultural heritage. Their myopic and obsessive use of the Categorical Exemption for historic resources is an abuse of their discretionary power and detrimental to the community's historical integrity.

The concept of Specific Overlay Districts has been part of the City's Land Use Planning for generations. Here in University Park The Community Redevelopment Agency has been active since the 1960's. Community Redevelopment overlay zones (Hoover & Adams-Normandie 4321 Projects),

empowered the community's voice in planning and land use issues through their public Project Area Committees.

I served for 12 years as Chair of the Housing & Planning Sub-Committee for the AN-4321 PAC. CRA's programming included grants, subsidies, soft-second loans, and design guidelines for historic properties. All the CRA's Overlay Districts were administered by special CRA regulations, which in many instances superceded the City's codes, in dealing with land-use issues. When the California State Governor pulled the plug on CRA it silenced its economic engine for rehabilitation and silenced the PAC's voice on what the community needed.

However our community voice found its' second home in the bi-monthly public hearings conducted by different overlay districts with their own specialized regulations. Hearings held by the University Park HPOZ Board, the Adams-Normandie HPOZ Board, and the North University Park Specific Plan Board supply opportunity for our voice to continue to speak out for the full protection of its finite historic resources.

As Chair of ADHOC I am one of the founders of the UP-HPOZ. I was the UP-HPOZ Board's first member. I served by appointment of the City's Cultural Heritage Commission as their "historic preservation" representative. I was the Board Secretary and a primary participant in the creation of the University Park HPOZ Preservation Plan (UPPP). As a chair-emeritus I continue my stewardship and supply the new members with the history of the Board's past actions relative to current issues.

When the City has the opportunity to grant protections, which are available by statute, and instead chooses to dismiss complex issues by their "Policy" decisions, it should not be a surprise when our community speaks out. The "Granting" of an Exception to an Exemption is not a cardinal sin as OHR Policy-makers proclaim, but a logically supportable conclusion based on facts.

The Project site, although currently a vacant lot, is a significant contextual component of two designated historic preservation overlay protection zones:

- UNIVERSITY PARK HISTORIC PRESERVATION OVERLAY ZONE,
- ST. JAMES PARK NATIONAL REGISTER HISTORIC DISTRICT.

On November 16, 2021 the University Park Historic Preservation Overlay Zone Board voted unanimously to DENY the Applicant's proposed in-fill residential Project: **Case No. ZA-2021-6672-DB-CU-CCMP/ENV-2021-6673-EAF**. Their conclusion Findings were based on the proposed Project's design failure to comply with the University Park Preservation Plan (UPPP) and therefore its potential adverse impact on the historic district.

A development that is not in compliance with the UPPP cannot be found to be exempt under CEQA but must be granted an Exception to the CE under CEQA criteria. The UP-HPOZ Board also made a Finding against the CE and for the Exception.

As a former UP-HPOZ Board Chair let me explain part of the Overlay's administrative process: When the University Park HPOZ Board reviews a proposed project for compliance with the UPPP an initial consideration involves the critical analysis of the major component issues of Height, Massing, and Setback. All project review of those component issues are based on the subject site's historic context on its' own unique historic blockface.

Given the University Park HPOZ's "Period-of-Significance" encompasses over 50 years of development, there has been, over time, changes that can affect an individual blockfaces' integrity. The UPPP review process examines the recognized historic pattern of development for a particular blockface and compares it with the current conditions on that blockface.

When and if an individual block still retains enough extant historic structures that contribute to a quantifiable statistic then that statistical number is know as the "Prevailing." The Prevailing Finding on an individual block face for example might include the height or setback or both. The point is that it changes from blockface to blockface based on the historic patterns of development. When a Prevailing has been recognized it becomes the new measuring stick for compliance with the University Park Preservation Plan (and thereby for a CEQA Exemption).

When there is a quantifiable Prevailing number, that figure is used in the UP-Board calculations for compliance and not the current City codes. For example; in a 2008 Director of Planning's Determination for a USC-student housing project at 2317 Scarff (abutting the north side of the subject property) a Finding was made that the historic Prevailing front setback of the west side of Scarff Street was "**47 feet**". (CASE No. DIR-2008-3375-COA). The developer was unable to utilize the City Code's front setback of only 15-feet and be in compliance with the UPPP. The developer modified the design by voluntarily reducing the unit-count from that allowable by code and met the requirements of the University Park Preservation Plan.

Scarff Street's historic Prevailing front setback of 47 feet applies only to the west-side blockface and to no other blockface in the historic districts. Every singular blockface may or may not have a historic Prevailing front setback. There are approximately 140 unique blockfaces contributing to the historic fabric that comprises the historic district. There could be therefore 140 Prevailing situations. Although there may be different statistical numbers throughout, the historic

district, it does not mean they are "subjective". They are "quantifiable" and irrefutable as the Director of Planning's Finding concluded for the west side of Scarff Street in his 2008 Determination for 2317 Scarff.

I noted earlier that the original USC student housing project's ZA-Approval (and its ENV-CE) was appealed. When the Appeal issue came before the City Planning Commission they failed to support the Project. Our Appeal then moved forward to the City Council's Planning and Land Use Committee (PLUM). A public hearing was scheduled for August 15, 2023 but was continued, at the hearing, to September 19, 2023. At that September hearing it was again continued, to October 03, 2023. At that October hearing it was continued yet again but this time without a date. We are still waiting to hear.

Frankly, at this time, I am unfamiliar and concerned with what the "withdrawn" procedure note on ZIMAS entails. Have the developers actually terminated the USC student housing project? Does the "withdrawn" action allow some form of later re-submittal? What, if any, are the time frame requirements? It appears that the developers, sensing a potential CEQA litigation, simply changed course when the All-Affordable Project was guaranteed and potential profits made more available.

Their USC student-housing project had 45-bedrooms for rent. The All-Affordable Project now offers the opportunity for 82-bedrooms, an increase of 37-bedrooms to add to their rental equation. It is a civic outrage that a City must offer extravagant incentives to bribe developers to supply affordable housing. Affordable housing could be and should be a requirement for all buildings and not a subsidy for the exploiters.

By placing their out of scale ED1 project on historic Scarff Street the City is aiding and abetting the developers' deliberate actions to undermine and degrade the historic integrity of the Historic Districts. The proposed 5-story building will be the largest residential structure in the University Park HPOZ. Additionally their site on Scarff Street is the very heart-center of the ST. JAMES PARK NATIONAL REGISTER HISTORIC DISTRICT (1991).

The ST. JAMES PARK DISTRICT includes 90 Contributing historic structures. The District also includes one historic house that is Individually Listed on the National Register of Historic Places (1988). The SEAMAN-FORSHAY Residence (1887) is a two-story Queen Anne-Eastlake Victorian, Located at 2341 Scarff Street. It is just 3-lots south of the subject site. The SEAMAN-FORSHAY Residence in addition to being individually listed on the National Register and as a "Contributor" to both National Register District and the UP-H.P.O.Z overlay districts is also a Los Angeles Historic-Cultural Monument; LA-HCM-408 (1989).

Across the City the 11 LA Historic-Cultural Monuments that are located along the 2300-block of Scarff Street rank second to only the 12 LA-HCM's along the 1300 block of Carroll Avenue in the Angelino Heights HPOZ. As Chair of A.D.H.O.C. I was responsible for the designation of all 11 of the LA-HCM's, the creation of the ST. JAMES PARK NATIONAL REGISTER HISTORIC DISTRICT, and the certification of the University Park H.P.O.Z. I serve today as a steward of these recognized historic assets to our City's cultural legacy. Any proposed new Infill project's compatibility with the existing historic context is critical in maintaining the administrative justification of the historic eligibility ratios. This is especially true with listed National Register properties

This intrusion's looming scale will not only visually dominate the historic blockface and the surrounding District but will also destabilize and corrode the context and integrity of the historical designation itself. The City's administrative responsibility for processing historic properties listed on the National Register District overlay requires additional and more stringent procedures than those applied by the City's for H.P.O.Z. listed properties. Government agencies at the federal, state, and local levels utilize the Secretary of the Interior's Standards and Guidelines, as administered by the National Park Service, in determining what appropriate actions should be required in the stewardship of historic properties.

Although the Secretary's Standards are universally applied at all levels of government there are some administrative variances between municipalities as well as at the different levels of ascendancy; local, state, federal as reflected in their empowering statutes: California Environmental Quality Act (CEQA), the National Environmental Quality Act (NEPA). One example of the different interpretations that can occur is a particular critical element, which is found in our Appeal of the USC student-housing Case and now effects CEQA for the proposed ED1 All-Affordable Case as well.

As the UP-HPOZ Board's Archivist I will take you into the deep-weeds of the issues background: The Los Angeles City Council certified the Historic Resources Survey for the University Park HPOZ overlay in 1999. That survey only lists the existing structures and identifies them as either: Contributing, Contributing-Altered, or Non-Contributing. The vacant lots are not identified.

However the City Planning Department's policy considers all vacant-lots as Non-Contributors for administrative processing purposes. That policy however cannot simply be re-applied to properties listed on the National Register of Historic Places, such as in our ST. JAMES PARK HISTORIC DISTRICT.

The vacant lots in National Register Historic Districts have no designation as Non-Contributing or Contributing, they are a neutral for accounting purposes

when resolving applicable standards. When determining a proposed district's eligibility for the National Register there is the significant concern about the proportional relationship between the number of Contributing and Non-Contributing structures.

The State Office of Historic Preservation's staff applies a rigorous analysis of the comparative numbers to insure an appropriate balance and can make significant boundary adjustments to a proposal. Our original ADHOC proposal (1989) was for a designation of a large encompassing National Register Historic District, the ST.JAMES PARK & PARK GROVE HISTORIC DISTRICT for 264 structures. That concept was amended by SHPO. An alternative proposal, developed in response to the Staff's recommendation, was for two smaller Historic Districts: TWENTIETH STREET (10 structures) and ST JAMES PARK (107 structures) which were certified in 1990.

The final ST.JAMES PARK boundaries were very carefully pruned, like a Bonsai tree, to extract the optimum of Contributors in order to create an acceptable ratio of Contributor verses the Non-Contributors. The west-side of Scarff Street's 14 existing structures were initially well balanced, divided between 11-Contributors and 3-NonContributors (=78%-21%). However during the subsequent years changes have eroded that balance.

Two of the Contributors 2317 & 2377 were victims of illegal demolitions thereby redefining the balance from 11-3 to 9-3. However when the lost Contributor at 2317 was redeveloped it became a Non-Contributor so the 9-3 becomes 9-4. The other lost Contributor lot, 2377 is expected to have its' Non-Contributor replacement within two years, so 9-4 will soon become 9-5 (=64%-35%). The cumulative impacts by the continuing negative shifts in balance Will Be Impacted by the ED1, when that vacant lot becomes another new Non-Contributor and changes the ratio from 9-5 to 9-6 (=60%-40%).

One or two more negative changes by any newly added Non-Contributors can potentially degrade the status of this historic blockface section of the HISTORIC DISTRICT and face its potential discrediting. The Office of Historic Resources and the Zoning Administrator both abused their discretion when they ignored potential impacts to the ST. JAMES PARK NATIONAL REGISTER HISTORIC DISTRICT and processed the ENV-CE as if only their HPOZ criteria were relevant for purposes CEQA.

I am attaching a letter I submitted to the public record for the never happening P.L.U.M. public hearings. I sent the letter to continue using my voice as a credited professional Historic Preservation Consultant and a land-use authority in University Park. I wrote in opposition to the original Project for its'

failure to comply with the Secretary of the Interior's Standards as defined and applied in the University Park Preservation Plan.

The City, along with their inappropriate use of a CE for purposes of CEQA, failed their stewardship when they disregarded their available discretion under the SB1818 Density Bonus Program and approved the Project. The City had the opportunity to not grant an incentive that would have an adverse impact on real property listed in the California Register of Historical resources (Government Code Statute 65915, Subdivision (d)(3)). As I noted the ED1 Project suffers from the very same lack-of-compatibility faults as the original Project only more so given its' even greater intrusive scale.

I am also attaching a letter submitted to the City Planning Commission's public hearing (6/15/23). Mr. Anderson is a highly esteemed historic preservation planner and preservation consultant. Mr. Anderson worked with ADHOC in the research and preparation of the successful nomination submission for the St. JAMES PARK designation. As an authority of National Register requirements his comments against the original Project have extra gravitas. He points to the "Substantial evidence in light of the whole record that the proposed project may have a significant effect on historic resources'...and that the "alteration of resources or its immediate surrounding such that a significance of an historic resource would be materially impaired" as related to the application of CEQA Guidelines section 15064(a)(1) and 15061.5(b)(1).

Current State laws allow for "exception carve-outs" for special purpose sites, including historic districts. The City must honor its covenant with the community to insure all available opportunities to protect its historic resources are utilized to their fullest. The City must not abandon their stewardship of historic properties because its City Attorney is overwhelmed by potential costly developer litigation. The City must not defer its duties to the community for resolution. The City must reject the ED1 Project as a Ministerial, reject a CE and commit to an Initial Study and Checklist to investigate the potential impacts to the integrity the National Register District overlay and the UP-HPOZ overlay.

Thank in advance you for your consideration of these materials  
Jim Childs Chair A.D.H.O.C.  
213-747-2526 / jeanjim2341@att.net / 2341 Scarff Street, University Park Los Angeles 90007

To assist your Case review efforts I am attaching:

- (1.) Comment Letter (to original Case-Project) by Historic Preservation consultant Carson Anderson on the potential negative impacts to the St. James Park National Register Historic District.
- (2.) Comment Letter (to the original Case-Project) from Historic Preservation consultant Jim Childs on impacts to the St. James Park National Register Historic District

## Communication from Public

ADM-2024-272-DB-VHCA-ED1

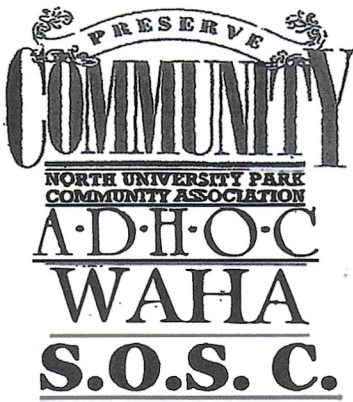
**Name:** Carson Anthony Anderson

**Date Submitted:** 06/15/2023 05:50 PM

**Council File No:** 23-0528

**Comments for Public Posting:** I write in opposition to the determination made by the Zoning Administrator (ZA) in adopting a Categorical Exemption and granting approval of the 10-unit development project proposed at 2323 Scarff Street (ZA -2021-6672-DB-CU-CCMP-HCA-1A and ENV-2021-6673-CE). My credentials include my more than 35 years experience as a historic preservation planner and preservation consultant, insights gained from researching and preparing the St. James Park National Register nomination (1989-1990), service on the University Park HPOZ Board for nearly a decade (roughly 1994 to 2003) and extensive experience documenting historic resources and reviewing infill development proposed in historic settings (Los Angeles, Pasadena and Sacramento). The proposed project is incompatible with the historic design character of the St. James Park Historic District in terms of scale, massing/design articulation, lot coverage, and notably, in the building's divergence from the prevailing 45-foot front yard setback. A fact which -- in combination with the building's proposed white color -- serves to accentuate the project's incompatibility with its fragile historic design setting. The substance of the historic district's designation is largely sidestepped in ZA determination through assertions that the proposed development is largely comparable to other multi-habitable-room developments completed or underway in the adjoining neighborhood but located outside a 1,000-foot radius of the historic district, or that several contributing structures in the district are approximately of the same height as the project. Development within the boundaries of the historic district is the proper benchmark for evaluating the impact of the proposed infill development, not multi-habitable-room development outside the district. Mention of the the 35-40-foot height of nearby Late Victorian single-family-designed dwellings and of the Albemarle Apartments (2343 Scarff) to justify the height of the proposed project is also misleading owing to the different massing, articulation, lot coverage and diverging floor plates of the historic structures. Owing to these considerations, the project poses a potentially significant adverse impact to the historic resources of the historic district and its vulnerable historic design setting -- including in particular the abutting individually-landmarked historic building located to the south at 2325-2327 Scarff (1908;

George Wyman, architect) and the abutting contributing historic building on the north (2317 Scarff). With reference to the Density Bonus Provisions used to justify a categorical Exemption and approve the development, local governments are granted discretion in granting an incentive or concession that would have an adverse impact on any real property that is listed in the California Register of Historical Resources (Government Code Statute 65915, Subdivision (d)(3)). By inference, the St. James Park National Register District properties meet this definition of listed properties. The administrative record for this project documents overwhelmingly opposition by a range of community and citywide preservation advocacy organizations (viz., The Los Angeles Conservancy, West Adams Heritage Association, ADHOC, NUPCA) as well as by the Empowerment Congress' Neighborhood Development Council (NANDC), the District 1 Council Office, and the University Park HPOZ Board-- whose words are strikingly unambiguous: "It is voted to recommend denial based on inconsistency with the University Park Preservation Plan residential infill standards with reference to location, siting, design, massing and orientation, and previously prevailing setbacks." The objections presented by the various parties cited above suggests that there is "substantial evidence in light of the whole record" before Council that the proposed project may have a significant effect on historic resources. This is one of the relevant screening considerations found in CEQA Guidelines section 15064(a)(1). The Guidelines further state that the "...alteration of the resources or its immediate surroundings such that a significance of an historic resource would be materially impaired" constitutes a significant impact (CEQA Guidelines section 15061.5(b)(1)).



ADM-2024-272-DB-VHCA-ED1

## Save Our Scarff-street Coalition



Proposed multi-family residential building at 2323 Scarff Street, front, east elevation

Los Angeles City Council and PLUM,  
CF 23-0528,  
ZA-2021-6672-DB-CU-CCMP-HCA-1  
APPEAL:  
Certificate of Compatibility  
Density Bonus / Conditional Use  
2323 Scarff Street  
University Park HPOZ  
St. James Park National Register  
Historic District, CD-1

Honorable Members of City Council and PLUM,

Above is the “THOUSAND WORD” picture for this Case. Please look at it. Can you seriously Find that this proposed Infill Project is “compatible” with its neighbors. No, you can’t.

If it were not for the required regulatory administrative evaluations, your decision would have been a simple No. There are however very significant requirements for this Project’s approval with a CE environmental clearance. This Project cannot be Categorically Exempt because of negative impacts to both the ST. JAMES PARK NATIONAL REGISTER HISTORIC DISTRICT and the University Park Historic Preservation Overlay Zone (H,P,O,Z.).

Since this vacant lot is within the University Park HPOZ it is subject to the application of the University Park Preservation Plan (UPPP). This Preservation Plan is a City requirement and its’ format is the template for all 35 HPOZ’s. The Plan’s format allows for necessary modifications for the varying conditions and characteristics of each of the specific plans’ overlay area. For the purposes of bureaucratic processing CEQA across the whole City, the City Attorney believes that “Compliance with a Preservation Plan” ensures conformance with Secretary of the Interior’s Standards (SIS) and therefore is a CE.

Hey, this is simple enough: follow the Preservation Plan and you’re clear. The issue before you is whether this Infill Project meets the University Park Preservation Plan or NOT. If it doesn’t conform to the University Park Preservation Plan but you have to approve it no matter what (State Law-City Attorney) then go ahead and approve it. However, you must not then Find it to be a CE for purposes of CEQA. A new environmental process must begin, considering that the issues raised in this over 1,239 pages of Case-submissions contain substantial evidence that this Project does not comply with University Park Preservation Plan.

However, those pesky requirements do not end with satisfying just the HPOZ evaluation because this vacant lot is also in the ST. JAMES PARK NATIONAL REGISTER HISTORIC DISTRICT. All proposed Infill projects within a National Register Historic District are required to be compliant with the Secretary of the Interior’s Standards. The federal government doesn’t offer a friendly how-to-do it “Preservation

Plan.” They do offer some Advisory Bulletins, but they’re scholarly written and difficult to digest for local stakeholders and can be subjectively interpreted by decision makers.

But there is good news here because LA City’s is a Certified Local Government (CLG). The City Attorney, believes in the HPOZ-template, that easy to read guide, with its built in compliance for CEQA can thereby double for a National Register issue. That concept of one-size-fits-all may be sufficient most of the time, but not here, not this time. Some local administrative interpretations of state and federal rules can be in conflict. This Case is an illustrative example: The City’s listing for the process of a vacant-lot within a Historic District, is as a Non-Contributor. This affords the Planning Department greater latitude in applying their development standards.

The National Register identification differs; in their listings only the “*buildings*” count as either Contributing or Non Contributing, a vacant lot is a “neutral”. This difference is completely obfuscated by the Planning Department’s processing of this Case. The map of the ST. JAMES PARK DISTRICT shows no designation for the vacant lot at 2323. When the SHPO reviews and evaluates a potential national register historic district, the balance between the proportional dominance of the Contributing *buildings* over the Non-Contributing *buildings* is what counts, not vacant lots.

The the west side of Scarff Street’s evaluation-standing is already suffering from cumulative impacts; two Contributing Historic homes (2317 & 2377) were illegally demolished plus one new Infill Non-Contributor was constructed (2317). When the ST. JAMES PARK district was designated (1991) the ratio was 11 Contributors to 3 Non-Contributing buildings (78% to 21%). With an approval for this Project the ratio becomes 9 Contributors to 5 Non-Contributors (64% to 35%). How this negative shift affects the whole of the National Register historic itself is unknown because it has been ignored. It must be accounted for and that will not happen if you approve the Project’s CE.

The Orion Infill Project exceeds being just a Non-Contributor because it is also qualifies as an Intrusion. The developers, Henry Fan and Charles Kim have chosen to reject the requirements of the UP-Preservation Plan. As property owners, for several years, of the nearby historic MINOR HOUSE at 2301 Scarff they have had to appear several times before the UP-Board. They are fully cognizant of OHR processes and are still unrelentingly pushing the envelope on their entitlements just as they have inflated the buildings’ envelope to an unacceptably bloated design, and expanded their Intrusion into the historic Prevailing front setback of 47 feet. Their Intrusion will significantly compromise the historic integrity of the remaining historic Prevailing setbacks. Their Intrusion will stop the visual setback at just 4-lots. However, if it conformed to the UPPP’s Prevailing requirements the number would be 6-lots of sightline which will allow the viewer to comprehend the historic pattern of development and experience the sense of place.

I speak to these issues as a professional Historic Preservation Consultant and advocate. I speak to these issues as a founding Board member of the University Park HPOZ. and as a drafter of the University Park Preservation Plan. I speak to these issues as Chair of A.D.H.O.C. and who is responsible for the designation of all 11 of the Los Angeles / Historic Cultural Monuments that align historic Scarff Street. I speak as the nominator for the National Register historic district. I also speak as a homeowner on Scarff Street who has had the good fortune to be living in the historic SEAMAN-FORSHAY HOUSE (1887 declared LA/HCM #408) for these past 44 years. The opportunity to learn what it takes to be a good “steward” has been a rewarding experience. As a good steward I ask the commissioners to support the appeal and to deny the designation.

Jim Childs APPELLANT

2341 Scarff Street, University Park, Los Angeles California 90007