UNITED NEIGHBORHOODS NEIGHBORHOOD COUNCIL

United Neighborhoods of the Historic
Arlington Heights, West Adams,
and Jefferson Park Communities
Neighborhood Council

via email

December 5, 2025

Ken Bernstein
Principal City Planner and Manager, Office of Historic Resources
Christina Park, City Planner and HPOZ Supervisor, Office of Historic Resources
Micaela Torres-Gil, City Planning Associate, Office of Historic Resources
Office of Historic Resources, Los Angeles Department of City Planning
221 N. Figueroa St., Suite 1350
Los Angeles, CA 90012

RE: Los Angeles City Planning Addressing Objective Design Review Standards

Dear Mr. Bernstein:

The United Neighborhoods Neighborhood Council (UNNC) represents the historic neighborhoods of Arlington Heights, West Adams and Jefferson Park (along with West Adams Heights, Angelus Vista, Kinney Heights, and other neighborhoods) within Los Angeles City Council District (CD) 10. The UNNC has a long record of supporting equity and diversity in affordable housing. We also support major housing, mixed-use projects along our corridors, and, importantly, preservation of historic resources. Within CD 10 are seven Historic Preservation Overlay Zones (HPOZ) constituting 20% of the City's HPOZ program, namely; Country Club, Harvard Heights, Jefferson Park, LaFayette Square, Oxford Square, West Adams Terrace, and Western Heights, four of which are within the UNNC boundary.

We both applaud and have concerns about the City's effort to update rules and policies regarding "*objective design review standards*" that will promote the construction of responsible new housing that demonstrates respect for historic resources and communities. As part of the process of standards development, the Planning Department should avail itself of the expertise held individually and collectively by the City's Neighborhood Councils and diverse Los Angeles communities.

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REQUESTS:

The promulgation and implementation of "*objective design review standards*" will have great impact on our community and others. We, therefore, request that your department include ***engaged community conversation and consultation on the front end of any activities*** that may lead to changes in how the City addresses and revises rules regarding "*objective design review standards*".

We understand from City documents such as the "*Missing Middle Fact Sheet,* presentations to some HPOZ boards such as University Park but not the UNNC HPOZs, and communications with our constituent organization, Jefferson Park United, that Planning may intend to apply modification of City rules on "*objective design review standards,*" to communities with designated Historic Properties and Districts, but not necessarily Specific Plans, Community Plan Implementation Overlay (CPIO) Districts, or state- and federally-designated districts.

It is also unclear whether the new "*objective standards*" will apply to all infill projects, or only to those on commercial corridors. The few community stakeholders who have heard or seen presentations have come away with different understandings, including perhaps that the HPOZ Preservation Plan chapters on commercial infill may or may not be fully revised; and/or infill projects within residential neighborhoods may or may not be included.

UNNC has heard serious concerns from our constituents about the following:

1. Aggressive Timeline Without Sufficient Community Input:

UNNC appreciates the need to deliver the draft standards as promptly as possible. The very aggressive timeline indicated in the "*Missing Middle Fact Sheet*" and to Jefferson Park United, to present the draft "*objective design review standards*" to the City Planning Commission by "***late spring 2026***" will leave little time for real community conversation and consultation prior to drafting the proposal.

To achieve the goals of such an aggressive timeline requires the city to engage in prospective consultation and communication with Neighborhood Councils and local communities at the beginning of the process rather than in the middle or end when it will be too late to make necessary modifications to address legitimate local concerns. Community engagement and consultation should include a robust, engaged conversation with Neighborhood Councils and communities.

Each Neighborhood Council has a land-use committee and it would be appropriate for members of your department to attend the meetings of interested land-use committees and discuss the issues and concepts, and engage in conversation with the community early in the process of creating the standards rather than as an afterthought following the development of the standards.

2. Local v. General "*Objective Design Review Standards*":

The concept of "*objective design review standards*" may not allow for a "cookie cutter", one size fits all approach. Given the diversity of architecture in Los Angeles across many communities and their respective histories, it may not be appropriate to have one set of "*objective design review standards*" for all parts of the city. An "*objective design review standard*" may differ across the city to account for the local context. The goal should be creating "*objective design review standards*" that are thoughtful and address the needs of all communities.

For example, an "*objective design review standard*" for the Stonehurst HPOZ, where many of the structures were built of stone between 1923 and 1925 using native river rock selected from the nearby washes and the foothills of the Tujunga Valley, may not be relevant for the Gregory Ain-Mar Vista Tract HPOZ of mid-century homes; and neither HPOZ has much character in common with the HPOZs within UNNC, as the local context, history, architecture and development character/patterns differ dramatically in these unique, discrete neighborhoods.

3. Sharing the Southern California Association of Governments (SCAG) Grant with the Public.

We understand that the Office of Historic Resources (OHR) applied for and was awarded a SCAG grant to support this project, interviewed consultants, and created work programs without transparent notice to Council offices; HPOZ, specific plan, and design review boards; or neighborhood councils. UNNC understands that Planning received at least one request for a copy of the grant. UNNC also understands from communications with its president that Planning staff believes the grant limits your efforts. We do not understand why parameters of the grant may prevent the City from full compliance with state laws and the requirement that ALL design standards, including those that address historic preservation, must be in place by June 2026, in order to defer the full implementation of both SB 79 and other aspects of statewide housing law.

Therefore, we request that OHR provide UNNC with the SCAG grant proposal and the actual grant award documents. Alternatively, to meet the goals of transparency in government, the requested documents could be posted on the OHR website as soon as possible.

Avoid Creating "Orphans" in non-HPOZ Historic Districts:

As per above, we applaud the effort to maintain protections for the City's designated HPOZs. The project to create "*objective design review standards*" should address the unique regulatory nature of National Register and California Register districts, former Community Redevelopment Agency (CRA) redevelopment plans, and CPIO character overlays. We underscore the importance of the issue because the City ordinance requires the use of the Secretary of Interior Standards, rather than create preservation plans, to assess proposed work on buildings in such districts. Yet, we understand that, per current legal opinions, the Secretary's Standards are subjective and therefore, without regulatory efficacy.

You indicated in an email to UNNC president Laura Meyers and CD10 staff that "We do anticipate that, if the resulting standards seem applicable and appropriate to National and California Register districts and/or other districts such as those in CPIOs or future Conservation Districts enabled by the New Zoning Code, we can consider extending these in a subsequent phase." But there is no time for a "subsequent phase" to create "*objective design review standards*" and meet the state's deadline, June 2026. Therefore, it is imperative that the creation of the new "*objective standards*" include the unique context of non-HPOZ historic districts.

We appreciate that time is of the essence. It is our understanding that other California cities (large and small), including Sacramento, Solvang and Fremont, have already engaged in a similar exercise as the Los Angeles Planning Department project. For example, the City of San Francisco published its 100-page "*objective design review standards*" that comply with the Housing Accountability Act (HAA) and other state laws earlier this year, as a part of its Housing Element. UNNC assumes Planning staff have performed a comprehensive review of these city's approved policies to identify and evaluate standards that may work for Los Angeles, thus avoiding wasting time and resources by "reinventing the wheel."

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Considering the time constraints, UNNC asks that the Planning Department engage the Neighborhood Councils and local communities immediately in this project. We understand through the above referenced communication with you that Planning is considering holding meetings with groups or coalitions of pertinent Neighborhood Councils and/or community-based historic preservation advocacy organizations, and UNNC requests to be included in that effort.

As noted above, UNNC has a strong history of supporting both affordable housing proposals and preservation of historic resources within and adjacent to our footprint. We have voted to approve thousands of affordable units. The UNNC and our community stand ready to assist your department in the effort to create "*objective design review standards*" by bringing our expertise to the table.

Thank you for your consideration.

Sincerely,

Laura Meyers

Laura Meyers
President, United Neighborhoods Neighborhood Council

cc:
Heather Hutt, Councilperson CD10
Vincent Bertoni, Director, City Planning
Kimani Black, Chief of Staff, CD10
Andrew Westall, Chief Deputy, CD10
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