SUBJECT: APPEAL OF THE HISTORIC PRESERVATION COMMISSION’S RECOMMENDATION THAT THE CITY COUNCIL APPROVE THE CULTURAL RESOURCE DESIGNATION OF THE FRONT DUPLEX ON THE PROPERTY LOCATED AT 1251 DETROIT STREET

INITIATED BY: PLANNING & DEVELOPMENT SERVICES DEPARTMENT
(John Keho, AICP, Director)
(Jennifer Alkire, AICP, Planning Manager, CHPP)
(Antonio Castillo, Senior Planner)
(Gurdeep Kaur, Assistant Planner)

STATEMENT ON THE SUBJECT:
This item is regarding an appeal, filed by the property owner, challenging the Historic Preservation Commission’s adoption of Resolution No. HPC 19-137 recommending that the City Council designate the front duplex on the property located at 1251 Detroit Street, West Hollywood, California as a local cultural resource.

RECOMMENDATION:
Staff recommends that the City Council hold a public hearing, consider all pertinent testimony, deny the appeal and affirm the Historic Preservation Commission’s recommendation to the City Council by adopting the following resolution:

1. Resolution No. 20-____: “A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF WEST HOLLYWOOD DENYING AN APPEAL FILED BY KATHY YOUNESSI AND APPROVING THE CULTURAL RESOURCE DESIGNATION OF THE PROPERTY AT 1251 DETROIT STREET, WEST HOLLYWOOD, CALIFORNIA (CRD19-0001).” (ATTACHMENT A)

BACKGROUND / ANALYSIS:
Site and Area Conditions
The subject property is a 6,725 square-foot rectangular shaped lot located on the west side of Detroit Street near the southwest intersection of Fountain Avenue that contains two buildings. At the front is the subject of this appeal: an approximately 2,064 square-foot, one-story Craftsman style residential duplex constructed in 1914. At the rear is a two-story duplex of no discernable style that was built between 1946 and 1948, and is not considered for designation because it does not contribute to the historical significance of the property. The front duplex exhibits many of the character-defining features of Southern California Craftsman architecture and retains sufficient integrity to convey its historical significance. The Historic Preservation Commission found that the property was eligible for designation under Criteria A-1 and B of WHMC 19.58.050.
Cultural Resource Designation Application

On November 1, 2017, a Development Permit application was submitted by Vista Ridge Ventures to demolish all structures on the site and redevelop it with a three-story, five-unit apartment building. This application included a Historic Resource Assessment that deemed that the property was not of historic significance. This contradicted an existing report on file with the City from April 2017. This discrepancy is explained in further detail below under "Historic Resource Assessments."

On May 6, 2019, Michael Younessi submitted an application on behalf of the property owner, Kathy Younessi in order to receive a final determination from the City regarding the historic resource status of the property. The Historic Preservation Commission heard the item on October 28, 2019, and voted to recommend to Council that the property be designated as a local cultural resource under Criteria A-1 and B of the West Hollywood Municipal Code (WHMC) Section 19.58.050:

Criteria for Designation

A. Exemplifies Special Elements of the City. It exemplifies or reflects special elements of the city's aesthetic, architectural, cultural, economic, engineering, political, natural, or social history and possesses integrity of design, location, materials, setting, workmanship feeling, and association in the following manner:
1. It embodies distinctive characteristics of a period, method, style, or type of construction, or is a valuable example of the use of indigenous materials or craftsmanship.

The duplex is a highly representative example of vernacular Craftsman architecture that maintains many of the character-defining features of the distinct style, which was primarily used in the design of single-family and duplex buildings in West Hollywood at the time. The period of significance is from the 1910s through 1926, which includes the construction of 1251 Detroit Street in 1914. The “R2, R3, R4 Multi-Family Survey Report” from 2008 describes duplexes as a popular form of building between the 1920s through 1940s consisting of a single, one-story building divided into two units. They typically maintain the density, form, and style of modest single-family housing with side-by-side composition on the main facades and entrances often paired under a single central porch or separated under individual porches. The Craftsman style design was used in both single-family and multi-family residences including duplexes and bungalow courts (R2, R3, R4 Multi-Family Survey Report 2008, pg. 41, 53). The City’s 2008 Multi-Family Survey states that “West Hollywood’s multi-family housing is highly significant both in the development of the community and, more broadly within the region. This significance is represented by a broad range of historic property types including: duplexes…” (R2, R3, R4 Multi-Family Survey Report 2008, pg. 40).

The distinctive characteristics of the building’s 1914-era Craftsman style bungalow design have been retained and include: compact massing and plan, gable roof with overhanging eaves, exposed rafters and purlins, wood clapboard siding, and windows with stylized muntin patterns. (R2, R3, R4 Multi-Family Survey Report 2008, pg. 53).

The building retains sufficient levels of integrity and continues to convey its historic significance. It remains on its original site and retains integrity of location. The building has a majority of the original exterior character-defining features of its original Craftsman design employed by original owner-builder Charles Dodge. Although there have been some alterations including a roof replacement, boarded windows and doors, and other general disrepair, the building retains sufficient integrity to convey its Craftsman design. The building’s setting has been altered with gradual development in the surrounding neighborhood, particularly the commercial development of the grocery store shopping center on the east side of the street. The west side of the street where this building is located continues to maintain the residential nature of the street and is comprised of the one- and two-story residential buildings that slowly developed on the block to form the extant neighborhood. The building retains a majority of its original exterior materials and workmanship with the exception of some materials that have been replaced, thus reflecting the craftsmanship of early 20th century Craftsman design and construction. The building reflects the feeling of a 1914 Southern California Craftsman bungalow residence through its exhibition of original aesthetics and sense of time. The building retains integrity of association including the look, feel, and appearance associated with the early development of West Hollywood and therefore continues to convey its Craftsman design.
B. Example of Distinguishing Characteristics. It is one of the few remaining examples in the city, region, state or nation, possessing distinguishing characteristics of an architectural or historical type or specimen.

The City of West Hollywood had two early periods of development; the 1890s with the establishment of the railyards in Sherman, and then the first two decades of the 20th century with the growth of the entertainment industry and the expansion of the streetcar line. The subject property was constructed during this second period, and many of the structures from this time have either been demolished or inappropriately remodeled resulting in a loss of integrity. It is one of the few remaining examples in the City that embodies the character-defining features of the Craftsman style that was once dominant in West Hollywood residential development during the first two decades of the 20th century. It is also a rare example of a Craftsman duplex in West Hollywood, a property type not abundantly built, and the survival of one with its character-defining features intact is noteworthy.

The National Parks Service publishes a series of Bulletins for the purpose of guiding designation and treatment of historic resources. These are available at nps.gov/subjects/nationalregister/publications.htm. Specifically, Bulletin 15 establishes criteria for applying the National Register Criteria for designation at the federal level. While this is generally a much higher threshold for application, the guidance is useful, and this National Register Bulletin is often referenced when applying criteria even at state and local levels of consideration.

The property meets the definition of “integrity” as defined by the Bulletin 15 in that it “retains the ability to convey its significance.” The design is the “combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property including such elements as organization of space, proportion, scale, technology, ornamentation, and materials.” (NRB-15 1995, pg. 44). The design of the Craftsman duplex, especially in contrast to the rear structure, highlights the attention to site planning, design, and proportion that are emblematic of Craftsman architecture. The “materials are the physical elements that were combined during a particular period of time and in a particular pattern or configuration to form a historic property” and workmanship is the “physical evidence of the crafts of a particular culture or people during any given period in history.” (NRB-15 1995, pg. 45). The subject property is an example of an owner-builder development in a style popular at the time of its construction comprised of materials available and accessible to the working middle class residents that built their home. These aspects of integrity are retained to a level sufficient to maintain the property’s historic “feeling- a property’s expression of the aesthetic or historic sense of a particular period of time” (NRB-15 1995, pg. 45).

Historic Resource Assessments

In 1987, the City completed its first historic resources survey that included a reconnaissance level survey of approximately 1,750 properties, including the subject property. In 2008, the City conducted a multi-family reconnaissance survey of all parcels zoned R2, R3 and R4, which also listed the subject property with the notation that its
architectural style was Craftsman and its integrity as “good.” However, neither survey identified the property as a potential resource. In a reconnaissance survey, surveyors only review the property from the public right of way. The reconnaissance is not intended to gain detailed information on particular structures or sites, but to capture a broad and general picture of the makeup of a neighborhood as a whole.

A Historic Resource Assessment (HRA) for the subject property dated April 28, 2017 was conducted by Leslie Heumann on behalf of Towne Capital Ventures, a party previously interested in purchasing the property. The HRA by Heumann concluded that the 1914 Craftsman duplex is eligible for listing in the National Register of Historic Places, California Register of Historic Resources, and West Hollywood Register of Cultural Resources for the reasons mentioned above. The Heumann HRA was not conducted on behalf of the current property owner, nor is it associated with the current development application. It is, however, part of the public record.

On November 1, 2017, a Development Permit application was submitted by Vista Ridge Ventures to demolish all structures on the site and redevelop it with a three-story, five-unit apartment building. This application included another HRA dated July 14, 2017, which was prepared by Anna Marie Brooks and concluded that the same duplex does not satisfy the criteria for designation at the federal, state or local levels. In reference to Criteria A-1, the HRA found that the subject property was a modest Craftsman Duplex that did not represent the work of a master builder or architect, did not possess high artistic value, and did not introduce anything new to the architecture vocabulary. To support these claims, the author referenced the building’s neglected state. The HRA cites unrepaired damage, a lack of maintenance, and an unusable driveway that forces tenants to park on the street. The Brooks assessment does not provide evidence to refute the claims that the property possesses characteristics important to this criterion, merely states that the property is in disrepair.

In reference to Criterion B, the HRA states that there are numerous better examples in the city of Craftsman Duplex Bungalows with distinguishing characteristics. The condition of a property cannot alone be the determining factor of its historic significance. Furthermore, while the author states there are other “better” examples of Craftsman Duplex Bungalows, she cites none in the HRA for reference.

Upon the review of both HRAs, staff concurred with the Heumann HRA finding that the duplex was individually eligible for local, state, and national registers, and determined the Brooks HRA contained inaccurate and incomplete information to support its conclusion, including the assumption that the building lacked integrity. According to the National Park Service, a property is eligible for designation if it retains the essential physical features that made up its character or appearance during the period of significance. The current condition of a property alone does not determine the criteria for eligibility.

The applicant then submitted a third HRA prepared by Kaplan Chen Kaplan (KCK) dated June 4, 2018, which also concluded that the Craftsman duplex was ineligible for the listing on the local, state, and national registers. The KCK HRA states that the property does
not qualify under Criterion A-1 because it is not the work of a master craftsman, the
property's condition is deteriorating, and elements have been altered. The HRA also
found that the property did not meet the requirements under Criterion B because its
condition has deteriorated to a point that has affected its integrity and the setting of the
surrounding properties has been greatly altered from its original state. The condition of
the property, although altered and deteriorated, maintains its integrity intact to convey its
historical architectural style. And while it is not the work of a significant architect or
builder, building permits indicate it may have been constructed by the original owner and
resident. This reflects an era of development where owners built the homes they were
going to live in. The average barber in this case was able to have the skills to construct
his house.

While the HRAs concurred on some of the character-defining features of the property,
they did not agree as to whether the subject duplex meets the criteria for significance,
namely integrity. All three HRAs concurred that the rear detached residential structure
had no distinct architectural style and was not significant to the historical significance of
the property.

In order to reach some clarity regarding the conflicting HRAs, the City consulted with its
historic preservation consultant, Chattel Inc. Chattel Inc evaluated the three HRAs and
prepared a peer review of the surveys that agreed with Heumann's HRA.

Subject property
Historic Preservation Commission Action

On October 28, 2019, the Historic Preservation Commission (HPC) held a duly noticed public hearing regarding the proposed cultural resource designation of the front duplex located at 1251 Detroit Street. Staff’s recommendation to HPC, as detailed in the HPC Staff Report supported the designation of the front duplex as a local cultural resource. At the Historic Preservation Commission public hearing, eleven members of the public spoke in favor of the designation and two representatives of the property owner spoke in opposition. After discussion and deliberation, HPC voted four-to-one (two commissioners were absent) in favor of Staff’s recommendation to adopt Resolution No. HPC 19-137, recommending that the City Council designate the property as a local cultural resource. The HPC staff report, adopted resolution, and meeting minutes are included as Attachments C-E.

Public Correspondence

At the time this staff report was published, staff received two emails from the public expressing support for the designation. (ATTACHMENT J)

APPEAL:

Any decision rendered by the Historic Preservation Commission may be appealed to the City Council, as outlined in Chapter 19.76 of the West Hollywood Municipal Code (WHMC). Pursuant to Section 19.76.030 of the WHMC, applications for appeals shall include a general statement specifying the basis for the appeal and the specific aspect of the decision being appealed. Appeals shall be based upon error in fact or dispute of findings. Additionally, an appeal shall be accompanied by supporting evidence substantiating the basis for the appeal.

On November 5, 2019, a timely appeal was filed by the property owner, Kathy Younessi requesting that the City Council reject the Historic Preservation Commission’s recommendation and deny designation of the property as a local cultural resource. The appeal documents are included as Attachment B.

In her appeal, Ms. Younessi cites technical errors, unsupported findings, lack of evidence, and questions the HRA peer review process. She asserts that the HPC staff report lacked sufficient evidence to support the designation and that the review process of the three Historic Resource Assessments posed a conflict of interest. The appeal claims that the findings for the recommendation are not substantiated with sufficient evidence. It asserts that the craftsman duplex is neither a rare surviving example nor a significant property type. As detailed in this report, staff finds that the appeal has not provided any new evidence or documentation of errors or identified unsupported findings that would justify overturning the Historic Preservation Commission’s action.

The appellant also expresses concern regarding the peer review process for the HRA. The appellant is questioning the transparency in the relationship between the author of the first HRA, Leslie Heumann, and the City’s consultant, Chattel, Inc. Leslie Heumann’s HRA of the property was not produced on behalf of Chattel, Inc. However, she is now
employed by Chattel, Inc. and their relationship dates back to 2013. The peer review of the three HRAs was also conducted by Chattel, Inc. This is explained in detail below.

The assertions made in the appeal and staff’s response are as follows:

**Assertion 1a:** The findings for the recommendation were not clearly defined. The Staff Report attempts to lay out a rationale for recommending designation but does not point to substantive evidence to support such a conclusion. It does not provide a rationale as to why its analysis sided with one Historic Resource Assessment (the HRA undertaken by a previous buyer authored by Leslie Heumann) over two other HRAs (subsequent HRAs conducted by Anna Marie Brooks and Kaplan Chen Kaplan) that came to a different conclusion. Instead, the City’s analysis relied on a peer review by its Historic Preservation Consultant (Chattel, Inc) that was suspect in its material value for reasons outlined in #3.

**Response 1a:** The findings for designation were based on information provided through the three HRAs and a site visit to examine the subject site and evaluate it based on the criteria for designation established in the WHMC. The HRA by Leslie Heumann cited evidence in accordance with the National Register Bulletin 15 that detailed each of the character-defining features of a Craftsman bungalow and how the subject property retained many of these elements including horizontal massing, proportionality throughout window and door relations, wood clapboard siding, large porches, gabled roofs, and other elements. It also presented a level of comprehensive research through verified historical records including directories and tax assessor’s records that portrays the history of West Hollywood and the subject property’s place within that larger story. The HRA by Anna Marie Brooks concurs with much of the information and provides the same referenced records as well. The other two assessments (Anna Brooks and KCK) focused on a few of the character-defining features that had been altered, such as the rafters. They lacked evidentiary support that discussed the entire property and instead, relied on assertions regarding the current state of the property. The current state of the property, although left in disrepair, continues to retain enough integrity to convey its distinctive Craftsman style. When an agency is faced with conflicting evidence, it is permitted to favor the opinions and estimates of some of the experts over the others. Here, city staff and the HPC have weighed the evidence and favor the findings in the Heumann HRA for reasons explained above.

**Assertion 1b:** Additionally, the staff report does not outline why the evidence in the initial HRA is considered significant in the context of West Hollywood. No finding based on substantial evidence is provided in the staff report or contained in the public record. Evidence presented in the staff report is light at best or nonexistent at worst. Thus, there was limited data for which Historic Preservation Commission members could use in their deliberations and therefore they were unable to form a basis for a decision or express why they relied on one set of evidence over another to render a decision.

**Response 1b:** The property’s qualifications for designation under local criteria A-1 and B are discussed at length on pages 2 and 3 of the adopted Resolution HPC 19-137 and on pages 5 through 7 of the October 28, 2019 HPC staff report. In addition, the basis
for staff’s recommendation is provided again on pages 2 through 4 of this report. The Heumann report details how the structure meets local criteria A-1 and B. The subsequent reports do not provide counterpoint evidence, but merely claim that the property does not retain sufficient integrity. As described further in the response to Assertion #3 below, staff did not “rely” upon a peer review conclusion, but instead weighed the various reports equally, independently conducted site inspections to observe the conditions of the character-defining features, and relied upon guidance from the National Register Bulletins and subject matter knowledge in Historic Preservation. After consideration of all the information available, staff reached the independent conclusion that the property retains a sufficient level of integrity and meets two criteria for designation as provided above. The question is not whether the City “sided” with one report over another, but whether the property meets the required criteria for designation. West Hollywood Planning Staff and the West Hollywood Historic Preservation Commission are uniquely qualified to apply the criteria for local significance, which reflect the City’s goals of identifying and protecting structures that represent the City’s unique cultural, historical, and social foundations. In this case, it is the recommendation of the Historic Preservation Commission, and staff, that it does in fact meet the criteria.

Assertion 2a:  Planning Staff made two conclusions as to reason the Report had stipulated recommending a designation. One such conclusion was the argument that a craftsman duplex was important to the City’s history. In the report conclusion, it framed this property/building as a “rare surviving example” in the City. Yet evidentiary material as to the importance to the City of this specific claim was not included in the report.

Response 2a: The R2, R3, R4 Multi-Family Survey Report published in 2008 of historic properties in West Hollywood defined the Craftsman Bungalow style as a significant architectural style in the City of West Hollywood. The context statement also identifies that Craftsman Architecture was used for both single-family and duplex housing types. Most of the materials remain intact and have not been so altered that the property doesn’t still convey a sense of time and place of its era of construction. In the 2008 Survey, 227 buildings were identified as Craftsman style architecture. Of those, seventeen Craftsman bungalows are locally designated cultural resources. This was not the single determining factor in evaluating the property’s eligibility. When determining if the property is eligible for designation, all of its aspects are considered in respect to the criteria, and it was determined to be eligible.

Assertion 2b: The City has never defined the duplex type as important to the City’s architectural or development history. The City’s Multi-Family Zone survey did not find the duplex property type significant enough to identify those buildings as a significant property type in its listing of properties surveyed. Under NRB 15, the fact that it is simply a duplex is not enough for a structure to be eligible. Further, a building typology (duplex vs. single family, for example) cannot be a characteristic as defined in the City’s Criteria #2. The subject property, as outlined in NRB15, stipulated that a subject property must have an important association with an event or trends and not for generic reasons.

Response 2b: The R2, R3, R4 Multi-Family Survey Report published in 2008 of
historic properties in West Hollywood identified duplexes as a significant property type in the City. The report states that the City’s multi-family housing is highly significant both in the development of the community and the region (R2, R3, R4 Multi-Family Survey Report, pg. 40).

The appellant asserts that staff has misinterpreted Criterion #2. The West Hollywood Municipal Code does not include a Criterion #2. If the appellant was referring to Criterion B, then it is important to note that the building’s duplex typology was not the main defining characteristic to qualify it here, but rather it’s Craftsman architecture. The property has not been nominated based on any criteria that requires important associations with an event or trend.

![Photograph taken for the 2008 Multi-Family Survey](image)

Assertion 2c: The other conclusion made a claim that the building is highly representative of the Craftsman design and that it maintained a high degree of integrity, both are in dispute. The building is only a modest example of the style and has lost architectural integrity due to significant alterations including the clipping of character-defining rafter trails and modification of major porch elements.

Response 2c: The HRAs by Brooks and KCK emphasize the current condition of the property and how its deteriorated state disqualifies it from designation. Both HRAs also mention that the property is not the work of a master and does not represent an architectural achievement or innovation. Based on the guidelines of the National Register Bulletin 15, workmanship can be expressed, as it is in the subject property, in vernacular methods of construction and plain finishes. It can be based on common traditions and still be a highly representative example of an architectural type. One example of his workmanship in the subject property is the joinery found in the king post. This can be seen from the porch. It is an example of the skill and handiwork infused in the construction of the property that was not identified or discussed in either of the later two HRAs.
The subject property has undergone alterations over time including a roof replacement to asphalt, the addition of security grilles to the windows and a thru-wall air conditioning unit, and the partial removal of window framing and molding on the south unit. However, the building continues to possess a high degree of integrity. Although analysis suggests the building’s rafter tails were shortened and the concrete flooring on the porches and bases of the porch columns have been covered with stucco that may compromise the structure’s material integrity, it is difficult to know for sure because no documentation of the original conditions of the rafter tails or the porches has been presented. More evidence is needed to verify the claims that these features have been altered since many Craftsman style duplexes exhibit similar conditions as the subject property, such as rafter tails that are cut in plane with the edge of the extended eave, scored concrete porch flooring and stuccoed pillars.

**Assertion 3:** The process of developing a peer review was substantially flawed. In an effort to gain certainty among conflicting reports, the City asked its Historic Preservation Consultant (Chattel, Inc.) to peer review all three HRAs. In accepting such a request, the Consultant failed to disclose its ongoing working relationship with the author of the Initial HRA (Leslie Heumann). Ultimately, the peer review sided with Heumann HRA. Evidence of a long-standing working relationship between Heumann and Chattel, Inc can be traced as far back as 2013 with various Staff Reports/ contracts from other local agencies listing Heumann as an agent for Chattel. It would have been improper for the City to knowingly hire a consultant to be an arbiter of conflicting evidence under the guise as a neutral third party when in fact a financial relationship existed between the Consultant and one of the HRA authors. In this case, there is no evidence that City had prior knowledge of that relationship.

**Response 3:** The city has an on-call historic preservation consultant, Chattel Inc, who peer reviews all third-party historic analysis that is submitted to the city as part of a development application. As is the city’s standard practice, city staff requested that Chattel peer review the three HRAs. Upon review in April 2017, Chattel determined that the other two HRAs did not provide sufficient evidence and the Heumann report provided the most robust body of evidence. At that time, Heumann was doing some limited contract work for Chattel and was not involved at all in the peer review. Upon release of the peer review results, the applicant raised a concern about the professional relationship between Heumann and Chattel. When staff learned about the professional connection between Chattel and Heumann, Staff acknowledged the potential or perception for a conflict of interest. Leslie Heumann’s assessment of the property was not produced on behalf of Chattel, Inc. However, she has been employed by Chattel, Inc. periodically over the last seven years and has since been hired as an employee. When the appellant (property owner) raised objections about the results of the peer review, staff agreed to not rely on the peer review in its analysis and take it out of consideration in its recommendation (even though the analysis was independent, valid, and supported by evidence). Staff understood the potential for an appearance of a conflict of interest and offered to work with another expert from the City’s pre-approved consultant list to prepare an additional HRA at the cost of the owner. The owner declined this option and chose to proceed in seeking a determination from the Historic Preservation Commission.
Planning staff reviewed each of the three Historic Resource Assessments as individual and equally-weighted evaluations and staff provided the ultimate recommendation to the HPC. That recommendation was independently reviewed by the City’s commission of experts on historic matters and that commission also reached the same conclusion. While the appellant may be dissatisfied with the staff and HPC’s recommendation, there is no evidence that Chattel’s connection to Ms. Heumann has in any way tainted this process. Even if it had, the independent and de novo review of all of the evidence by the HPC, and again by the City Council, eliminates even the appearance of the alleged bias towards the Heumann report. Staff has explained in this report the technical reason why it has favored the results of the Heumann report. When an agency is faced with conflicting evidence, it is permitted to favor the opinions and estimates of some of the experts over the others.

Through this process, staff found that the HRAs by Anna Marie Brooks and Kaplan Chen Kaplan failed to establish their claims through sufficient evidential support because they focused on the condition of the property and the few elements of it that had deteriorated over time or were altered. These reports did not discuss all of the character-defining features nor did they provide arguments as to why the property did not meet the criteria for eligibility. The HRAs by Anna Marie Brooks and Kaplan Chen Kaplan focus on the rafters, window frames, and porch. They do not provide a comprehensive evaluation of the site as a whole and all of the character-defining features extant in the property. Staff found that the HRA by Leslie Heumann was the most comprehensive based on the guidance from the National Park Service National Register Bulletins.

Applicants are often asked to provide additional information if an HRA fails to meet the level of detail and research needed to make a decision. Usually, the same author conducts further research to strengthen their argument and presents a revised HRA. However, in this case, the applicant provided an additional HRA by a different author, and this additional HRA still failed to refute the evidence presented in the Heumann HRA. That there are two reports does not negate the fact that they both fail to provide a comprehensive evaluation of the whole site and all of the character-defining features.

Given the evidence presented in the staff report and at the public hearing, the Historic Preservation Commission adopted Resolution HPC 19-137 recommending to City Council the designation of the front duplex located at 1251 Detroit Street as a local cultural resource.

Summary

As detailed above, staff finds that the appeal has not provided any new evidence that the property is not historic, it does not provide documentation of errors, it has not identified unsupported findings, and it has not proven a conflict of interest that would justify overturning the Historic Preservation Commission’s recommendation to the City Council. The site has been extensively reviewed for historic significance and determined to be eligible for designation under Criterion A-1 and B of the WHMC. Regardless of a perceived conflict in the peer review process, evidence has been presented that supports
the inclusion of the property on the local register and as such, staff recommends that City Council designate the property as a local cultural resource.

The General Plan outlines in HP-2 and HP-3, the goal to identify and designate cultural resources and protect them from demolition and inappropriate alterations. The subject property, as a designated cultural resource, furthers the city's core values of protecting cultural resources in the city from demolition and inappropriate alterations. The subject property retains all seven aspects of integrity, as detailed in Attachment C.

Following a public hearing with eleven members of the public in favor of the designation and two representatives of the applicant in opposition, the Historic Preservation Commission recommended the front duplex for designation. Staff recommends denial of the appeal and approval of the designation of the Craftsman bungalow at 1251 Detroit Street.

**CONFORMANCE WITH VISION 2020 AND THE GOALS OF THE WEST HOLLYWOOD GENERAL PLAN:**

This item is consistent with the Primary Strategic Goal(s) (PSG) and/or Ongoing Strategic Program(s) (OSP) of:

- PSG-1: Maintain the City's Unique Urban Balance with Emphasis on Residential Neighborhood Livability.

In addition, this item is compliant with the following goal(s) of the West Hollywood General Plan:

- HP-2: Continue to identify and evaluate cultural resources.
- HP-3: Protect cultural resources from demolition and inappropriate alterations.
- HP-5: Promote the preservation of cultural resources through maintenance and rehabilitation incentives and technical assistance.

**EVALUATION PROCESSES:**

N/A

**ENVIRONMENTAL SUSTAINABILITY AND HEALTH:**

The nomination application has been reviewed for compliance with the California Environmental Quality Act (CEQA). This application qualifies for a Categorical Exemption pursuant to section 15331 (Historic Resource Restoration/Rehabilitation) of the CEQA Guidelines. The exemption is applicable to projects entailing the maintenance, repair, and preservation of historical resources in a manner consistent with the Secretary of the Interior's Standards. Designation will ensure that the resources is protected and maintained through WHMC Chapter 19.58.
COMMUNITY ENGAGEMENT:
The application was originally scheduled to be heard at the Historic Preservation Commission meeting on August 26, 2019. While the hearing was duly noticed for this meeting, the item was continued at the applicant’s request. The public hearing then took place at a duly-noticed meeting on October 28, 2019. At the Historic Preservation Commission public hearing, eleven members of the public spoke in favor of the designation and two representatives of the property owner spoke in opposition. At the time this staff report was published, staff received one email from the public expressing support for the designation. Beginning on February 6, 2020, advertisements were posted in the Beverly Press and in the West Hollywood Independent. Copies of the staff report have been on file at the West Hollywood City Hall and West Hollywood Library since February 12, 2020.

OFFICE OF PRIMARY RESPONSIBILITY:
PLANNING & DEVELOPMENT SERVICES DEPARTMENT / CURRENT & HISTORIC PRESERVATION PLANNING DIVISION

FISCAL IMPACT:
There is no fiscal impact.

ATTACHMENTS:
A. Draft City Council Resolution (Cultural Resource Designation)
B. Appeal filed by Kathy Younessi
C. October 28, 2019, Historic Preservation Commission Resolution No. HPC 19-137
D. October 28, 2019, Historic Preservation Commission Staff Report
E. October 28, 2019, Historic Preservation Commission Minutes
F. Cultural Resource Designation Application
G. Historic Resource Assessment #1 (Heumann, April 28, 2017)
H. Historic Resource Assessment #2 (Brooks, July 14, 2017)
I. Historic Resource Assessment #3 (Kaplan Chen Kaplan, December 15, 2017)
J. Public Correspondence