

**From:** [Carol Lemlein](#)  
**To:** [Roger Genser](#); [Barry Rosenbaum](#); [Amy Beth Green](#); [dolly.sloan@smgov.net](mailto:dolly.sloan@smgov.net); [jodiknew@gmail.com](mailto:jodiknew@gmail.com); [Kenneth Breisch](#); [Richard Brand](#); [Planning Commission Comments](#)  
**Cc:** [Stephanie Reich](#)  
**Subject:** Re: Items 10B, 10C, and 10D on Landmarks Commission Agenda, 10/12/20  
**Date:** Monday, October 12, 2020 10:21:26 AM

---

EXTERNAL

Dear Landmarks Commission,

This letter addresses concerns raised by the three landmark designation applications, Items 10A, 10B and 10C. It was gratifying to see in these three designation applications on tonight's agenda that staff has streamlined the application process to make it more tenable for reduced staff capacity and more affordable for applicants.

My colleague Ruthann Lehrer, long the Architectural Historian on this Commission, has sent you specific recommendations regarding aspects of the properties which have been overlooked, which we believe to be at least partially the result of the process issues described below.

The approach staff has taken is dependent on a revised landmark designation application, which we don't have. As we can see by the results presented tonight, use of the current application for the streamlined process may not result in submissions with enough factual information upon which to make a determination. For this new process to be effective, the new application should address the criteria specifically and stress the need for documentation. Historically, the city's landmark designation application has been focused on providing a platform for any person, not only professionals, to present what they *believe* makes a property worthy of designation. Now we are requiring presentation of thoroughly researched facts that support designation. It's a whole new ballgame.

When the application form is revised to include a statement of findings according to the criteria for designation, the consultant's review of the materials should not be only a peer review of the research methodology, it should also be a peer review of the conclusions. Where the peer report finds deficiencies in the research or conclusions, the report can be presented to the applicant in order for them to correct the deficiencies before it is placed on the Commission agenda.

In the applications before you tonight, the applicants hired professional historic preservation consultants who are fully capable of presenting the kind of information, and drawing the necessary conclusions as suggested were lacking in the city consult's peer review. It would appear that they were not aware that that was the information called for in the application stage.

We suggest that the commission continue all three applications, to allow the applicant to present the complete information they would have presented if it had been clear in the application it was required.

Sincerely,

Carol Lemlein

Santa Monica Conservancy Advocacy Committee

**From:** [Ruthann Lehrer](#)  
**To:** [Roger Genser](#); [Roger Genser](#); [Barry Rosenbaum](#); [Dolly Sloan](#); [Amy Beth Green](#); [Kenneth Breisch](#); [Jodi Summers](#); [Richard Brand](#); [Planning Commission Comments](#)  
**Cc:** [Stephanie Reich](#)  
**Subject:** Item 10B on 10/12/20 agenda  
**Date:** Sunday, October 11, 2020 11:08:20 PM

---

EXTERNAL

October 12, 2020

Item 10B

Chair Genser and Commissioners

There appears to be a new process defined by staff for review of landmark designation applications, using a peer review report in place of the consultant reports of the past. The peer review provides an assessment of the adequacy of the information in the application, and helpful comments are given to the applicant for improving the application. One might assume that this feed-back to the applicant will enable the application to return back to the Commission in the future for full consideration of findings required for landmark designation.

Instead, what we find, is staff recommending denial of the designation. This seems premature. There have not yet been any findings put forth for the Landmark Commission's consideration. The landmark application form does not require this. In the past, the consultant report contained an evaluation of the criteria for designation, as well as an evaluation of integrity. Neither of these critical elements in assessing whether a property should be designated has been dealt with in this peer review report. A Statement of Official Action, whether affirmative or in denial of an application, is typically based upon the criteria assessment.

The appropriate action for the Commission would be to continue this item, and request that staff clarify the new procedure. Will the landmark application form be revised to include addressing the specific criteria for designation? Will consultant reports be prepared for the Landmarks Commission that include evaluations of the criteria and integrity?

The applicant should be given an opportunity to revise and resubmit this application. For this particular property, Structure of Merit as well as Landmark should be considered.

Thank you for your consideration.

Ruthann Lehrer