

July 28, 2026

Los Angeles City Planning
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**LOS ANGELES
CONSERVANCY**

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Re: Objective Design Standards in HPOZs

Dear Mickie Torres-Gil,

I am writing on behalf of the Los Angeles Conservancy to provide comment on the draft Objective Design Standards (ODSs) for Historic Preservation Overlay Zones (HPOZs). After careful review of the Draft that was released on June 22, we believe some fundamental changes are needed and more stringent, enforceable standards added.

The Conservancy recognizes the tight timeline to adopt these standards, but urge the Office of Historic Resources and its consultant to work swiftly towards resolution. In absence of adopted standards, multiple multifamily projects in HPOZs are moving through the planning pipeline with little to no design requirements.

As written, the current standards do not live up to the goals of this effort, but we expect it can be improved by incorporating feedback from the community. Residents of each respective HPOZ know their neighborhood and its built environment better than anyone. They have provided and will continue to provide more tailored and appropriate recommendations than we can compile. More direct outreach must be done to ensure these concerns are addressed.

The Conservancy is recommending some overall issues be addressed, but otherwise the comments respond following the format of the June 2026 draft, organized below.

Architectural Style and Preservation Plans

The Conservancy has received feedback and concurs that architectural style is not yet adequately addressed in the Draft ODS. The existing 35 HPOZ Preservation Plans contain strong guidance on aspects of style that can and



should be incorporated into final objective standards. Some styles may not be appropriate for larger multifamily units and could be excluded. We encourage further adoption of existing guidelines directly into these standards.

The Conservancy believes the ODSs can accommodate multiple style standards tailored to specific HPOZs, or a subset of HPOZs that reflect common characteristics and development patterns. While a Craftsman style may be appropriate in Highland Park, it may not be appropriate in other HPOZs, and it may also not be appropriate applied to a larger scale mixed use project. We encourage the Office of Historic Resources to further define these styles and determine where and in what development scenarios they are appropriate.

It should also be made clear that preservation plans with preexisting objective standards will continue to have those standards enforced.

Terminology

Some of the terms used within the Draft ODSs are confusing in their application and specificity. We have fielded multiple inquiries asking what each section of the ODS represents and on what types of projects they are applicable for. The term infill specifically is used as a catchall for almost all types of construction including new apartments, townhomes, and mixed-use projects. While technically correct, it makes following the standards difficult to parse. Please clarify which housing programs are pertain to each relevant section of the ODSs, and what scale of development is permitted.

Maximum Height/Stories

Multiple HPOZ stakeholders have raised concern about the permitted additional story of development. If a more restrictive standard were adopted as suggested by multiple neighborhood groups, could this standard be enforced? Are there specific scenarios where it may or may not be enforced?

Please clarify what the City interprets is the maximally restrictive policy that can be adopted, and provide some alternative approaches for consideration.

Demonstrated Testing Before Adoption

Given the number of recent projects in HPOZs that have made use of Executive Directive 1 (ED1), the State Density Bonus, or the Starter Home Revitalization Act, we recommend that the Office of Historic Resources and its consultant analyze various scenarios to determine how well the proposed ODSs work to ensure compatibility. Real case studies as well as hypothetical development projects should be tested. Results should be shared publicly to determine if the ODSs adequately respond to community concerns or need additional modifications before adoption.



Residential Infill

1. Setting, Location & Site Design

- Objective Standard 6, fences – Members of the public have raised concerns about proposed new fences in their HPOZs. While some HPOZs allow fencing, other HPOZs have a heavy emphasis on front lawns and semi-public landscapes. In these neighborhoods, fencing may be heavily discouraged. Our proposed change: Front yard fences shall be prohibited in HPOZs where that are already explicitly or heavily discouraged restricted.
- Objective standard, ground floor units – Contemporary townhomes and small lot subdivisions have a greater emphasis on vehicular access than older courtyard apartments or bungalow courts. Require ground floor access so that residents have direct access to common outdoor space, which promotes cross-ventilation within units and community building. Proposed new standard:
 - *All units on the ground floor shall have independent exterior access with a connection to a pedestrian path or common open space. Ground floor units shall be defined as any unit at -2 feet below to +4 above the finished grade adjacent to the unit.*



- Objective Standard, utilities – Proposed new standard: any new utilities must be underground where underground utilities are original to the neighborhood.

3. Roof Forms

- Objective standard 3, dormers – proposed change: As written, this standard appears too restrictive to accommodate larger Craftsman-style dormers. Percentages should be revised higher to at least 40% for single dormers and at least 60% for multiple dormers.



- Objective Standard, roof overhangs – Require deep overhangs to encourage shading, weather protection, and visual interest while emulating historical building practices. This standard seeks to prevent some of the popular but stark designs often used in Contemporary Farmhouse or Modern Shed styles, which often have minimal to zero overhangs. Greater overhangs should be required for style specific standards, such as Craftsman or Foursquare, but this standard sets a minimum. Proposed new standard:
 - Roof overhangs shall extend at least 4 inches from the exterior building wall, unless a flat roof with parapet is proposed. For buildings 2.5 stories or higher, the minimum overhang depth shall be at least 8 inches.
 - Exception, if a gable roof form is used, the gable end may use a 2” overhang or wrap the corner with roofing material.
 - This Standard shall not apply in the Balboa Highlands or Gregory Ain Mar Vista Tract HPOZs.



5. Materials and Details

Greater specificity on prohibited materials should be included in this section. Further definition of these restrictions should be increased beyond the main cladding. Architectural details such as railings, gutters and vents often set exceptional architectural projects apart, or can be quickly value engineered to the detriment of a project.

- Objective standard 1, prohibited façade materials – proposed addition: Add stacked stone to the list of prohibited cladding materials.



- Objective standard, railings and fences – new standard. Proposed text:
 - *The following materials are prohibited for use on all exterior fences and railings:*
 - *Vinyl*
 - *Glass*
 - *Stainless steel*
 - *Corten steel*
- Objective standard, gutters and downspouts– new standard. Proposed text:
 - *Vinyl gutters and downspouts are prohibited.*



- Objective standard, color – New developments sometimes display a lack of conviction in picking a timeless color scheme, incorporating too many colors and textures. This standard seeks to restrain the palette to ensure contributing structures remain the primary focus of visual attention within the HPOZs. Furthermore, excessively dark facades which contribute to heat gain and urban heat island effect are restricted.

Proposed text:

- *No more than two different colors shall be used as the field color of the building's façade. The field color shall not be black or any color with a Light Reflectance Value (LRV) of 20 or less. Accent colors are exempt from these requirements.*
 - Also consider: restricting colors or materials with a high LRV to reduce glare



7. Infill on Contributing Properties

- Objective standard, driveways – Many HPOZs contain a consistent rhythm of lawns and driveways, which define the streetscape. The preservation of this streetscape from the public right-of-way should be regulated. Proposed text:
 - *Existing driveways shall not be widened.*
- Objective standard, parking gates – In order to accommodate new units behind a contributing structure, a fenced parking enclosure may be requested. This new standard would regulate the placement of any fencing:
 - *Fencing and/or gates for parking areas shall be located at least 6 inches behind the front plane of the contributing property.*

Mixed Use Residential Infill

2. Massing and Orientation

- Objective standard 3, plane breaks – Rethink this standard entirely and provide better illustrations of the standard in practice. While providing some variation in mass may be desirable for larger projects, for small projects it is unnecessary and may even detract from the small-scale “Main Street” characteristics of a commercial corridor. The Conservancy’s proposed fix:
 - For larger buildings (frontages of 100 feet or more), require a plane break such as a bay window or notch into the building. This plane break would only be required at the second story and above so that the ground-floor storefronts can remain continuous. For medium sized buildings (less than 100 feet but larger than 50 feet), require shallower relief of 2 to 4 inches or a change in material. For small buildings (frontages of 50 feet or less), no modulation should be required.

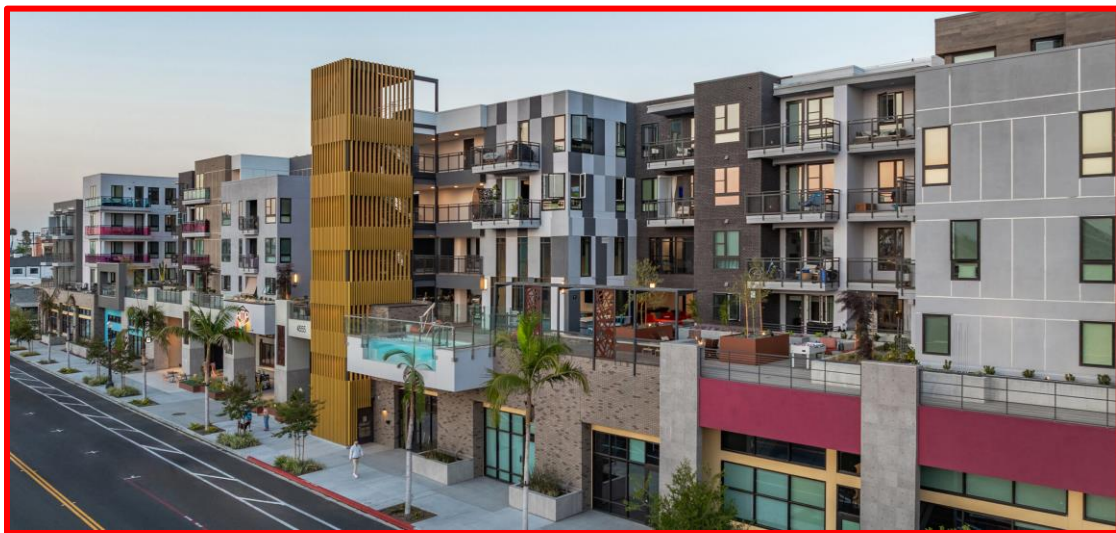


4. Materials and Details (Mixed-Use)

These changes are largely duplicative of previous comments on Residential Infill, but some varying restrictions for materials on mixed-use buildings and the recognition that a wider color palette may be appropriate.



- Objective standard 1, prohibited façade materials – proposed addition: Add stacked stone and faux wood veneer to the list of prohibited cladding materials.
 - Also consider: restricting more residential-scale materials such as clapboard siding, wood shingles or board and batten on larger mixed-use projects.
- Objective standard 2, architectural details – proposed change: Allow use of Glass Fiber Reinforced Concrete (GFRC) as a permitted material.
- Objective standard, railings and fences – new standard. Proposed text:
 - *The following materials are prohibited for use on all exterior fences and railings:*
 - Vinyl
 - Glass
 - Stainless steel
 - Corten steel
- Objective standard, gutters and downspouts– new standard. Proposed text:
 - *Vinyl gutters and downspouts are prohibited.*
- Objective standard, color – new standard. Proposed text:
 - *No more than three different colors shall be used as the field color of the building's façade. The field color shall not be black or any color with a Light Reflectance Value (LRV) of 20 or less. Accent and colors are exempt from these requirements.*
 - Also consider: restricting colors or materials with a high LRV to reduce glare



Los Angeles Objective Design Standards for Accessory Dwelling Units

The proposed ODSs for ADUs appear less defined and restrictive than the ODSs for infill. The Conservancy expects that the two separate ODS documents generally correspond before final adoption. We suggest that as standards for siting, bulk, or materiality are further defined for the Infill Housing section, that they are applied equally to ADUs.



Conclusion

The Conservancy appreciates the opportunity on these standards and recognizes the difficulty of the task at hand. We urge the Office of Historic Resources to incorporate our comments and input received from the community. If you seek any clarity on these proposed changes or additions, please feel free to reach out directly to us.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 member households throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Sincerely,



Andrew Salimian
Director of Advocacy

Cc: Ken Bernstein, Office of Historic Resources
Evanne St. Charles, Architectural Resources Group
John Bwarie, Stratiscope

