November 13, 2026

LOS ANGELES CONSERVANCY

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Los Angeles City Planning
Attn: Mickie Torres-Gil
City Planning Associate
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Re: Objective Design Standards in HPOZs

Dear Mickie Torres-Gil,

The Los Angeles Conservancy is pleased to see that the proposed Objective Design Standards (ODSs) for Historic Preservation Overlay Zones (HPOZs) released by the Office of Historic Resources have been significantly revised to address comments made by the Conservancy and local advocates. The revised October 14, 2026 draft standards provide more clarity on when the standards apply and are expanded to address concerns that are more detailed.

While the standards have improved, we acknowledge the need to further clarify and tighten the standards. We acknowledge the three main asks made by some of the HPOZs and historic neighborhoods, particularly the requests to close obvious loopholes and to address street visibility. In this letter, in follow-up to our July 28, 2026 comments, we offer strategies that can address these issues and strengthen the ODSs for HPOZs.

We thank you for your consideration of our comments before the upcoming Cultural Heritage Commission hearing.

Height Concerns and Targeted Relief

The Conservancy supports capping the number of stories for infill at the prevailing standard, as updated in this draft. This is similar in spirit to the guideline contains in HPOZs which calls for additions or infill to be subordinate in massing to contributing structures. It is our expectation that in many HPOZs, especially those with two or three story buildings, this standard will remain enforceable. However, a story limit does not alone

control overall height: Section A.2.2 measures finished-floor-to-ceiling height, leaving floor assemblies, roof volumes, parapets, and rooftop enclosures in need of explicit measurement rules.

We do have concerns about future projects in largely one-story blocks of HPOZs, especially those projects that utilize the Starter Home Revitalization Act (SHRA). It would appear that in these situations, the applicant would not be able to achieve the "protected density" as required by law and therefore the standard on height could be waived. Relief under the Starter Home Revitalization Act (SHRA) is not automatic. The City's October 28, 2025 implementation memorandum distinguishes expressly preempted standards from standards eligible for project-specific modification and calls for modification to the minimum extent required. That memorandum also states that the City may deny height-limit relief in single-family zones notwithstanding SHRA's protected-density provision.

We suggest the City request confirmation from the City Attorney on how that authority applies to the proposed HPOZ height and story limits, and incorporate the answer into the ODS adoption process. To date, the Office of Historic Resources has stated that this would be addressed in the implementation procedures, but more assurance is needed by the HPOZs beforehand.

Given the importance of this standard, we suggest a quantifiable backstop clause be included in limited situations. We suggest an addition to the height standard that reads:

> *If the prevailing number of stories is less than 1.5 and this standard is waived, then a project shall not exceed 2 stories. Additional relief shall be limited to the extent required by law. All other independently applicable standards remain in effect unless separately preempted or modified pursuant to applicable law*

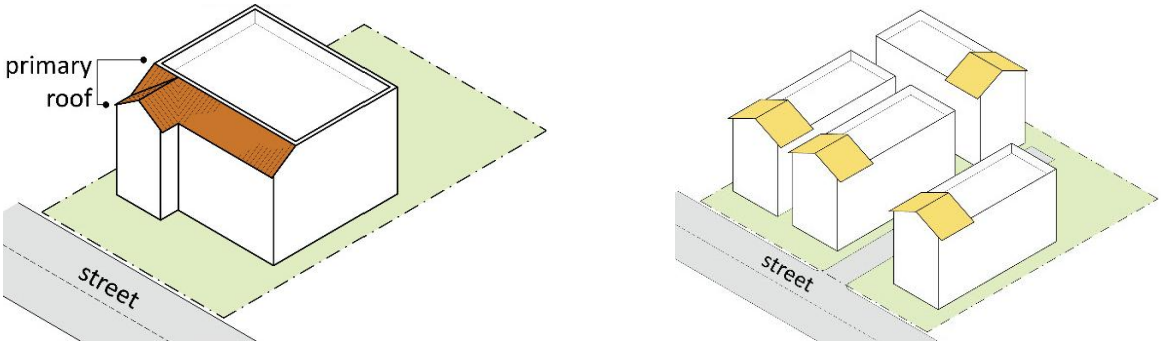
This amendment should address the risk of projects jumping from one story to three or more when the height standard is waived. We do not suggest that such an explicit clause is necessary for all of the standards, but merely this aspect given its importance. Where additional height is legally required, evaluate measurable upper-story setbacks as a separate safeguard rather than assuming all massing protections must also be waived.

Subject to City Attorney review, distinguish ODS standards superseded by law from those requiring project-specific justification, and publish decision-making procedures before adoption. The Conservancy supports lawful compliance and the smallest legally necessary height increase, with documented alternatives where authorized. The governing statute, not applicant preferences or generalized density claims, should control relief.



Roof Forms and Materials

Improvements have been made to the standards for Roof Forms and Materials in the October 2026 Draft compared to the June 2026 Draft of the proposed ODSs. Notable changes include the requirement that structures up to three stories in height adopt the prevailing primary roof type, as opposed to 2-and-a-half. Significant detail has also been added to the section pertaining to subdivision projects, with clear graphics and guidance on primary roof standards. Improved standards for roof overhangs and parapets, which will provide a layer of depth and shading to new structures, have also been introduced. However, roof forms should read as substantive building volumes, not shallow decorative elements applied to otherwise unrelated structures.



Left: Improved graphic for multifamily projects.
Right: New graphics for roofline standards on subdivision projects.

While these changes are a strong improvement from the first draft, further clarity is still needed to ensure compatibility. For properties adopting a pitched primary roof in the front and a flat roof in the rear, we recommend establishing minimum dimensions. Although the graphics provided are appropriate, we worry that some homebuilders may satisfy the requirement with only a minimal roof treatment tacked on to the front on the structure.

Issues of flat or tacked on façade treatments are most apparent along driveways and corner lots, where the side of the building is more visible from the street. In order to address this, we recommend a sliding standard based on the building's relationship to the street.

- *The pitched primary roof shall extend across the full street-facing building volume and at least 5 feet behind its exterior wall plane, excluding eaves and detached entrance canopies.*
- *Where a side elevation adjoins a driveway, the primary roof shall return at least 10 feet along that elevation, measured from the front exterior wall plane.*
- *On corner lots, the pitched primary roof shall return at least 15 feet along the street-facing side elevation, measured from the front exterior wall plane.*

While historic precedent inspires these standards, we believe they also live up to a 360-degree design approach, and may in part address the "street facing" request by the HPOZs.



Above: Corner roofline treatments in the Beverly Fairfax Historic District.

Coordinated Architectural Features, Styles, and Prevailing Context

Although the Conservancy requested definition of style in our previous letter, updates to the context-based approach should meaningfully address compatibility. In our estimation, the combination of new standards plus current Title 24 code is beginning to drive new infill projects to a more common typology. The explicit standards on window depth, roof forms, and materiality restrict some of the more common trends in contemporary architecture, and likely pushes design towards a common multifamily vernacular. It is important that new infill is compatible and differentiated, rather than reflect a specific style. The existence of existing vernacular homes in HPOZs, which often borrow elements of different styles, often prove that design principals outweigh style.

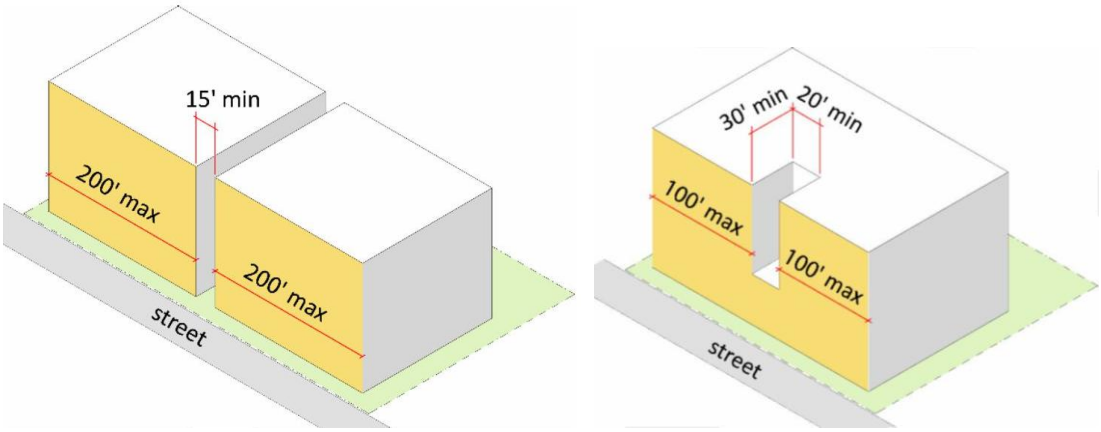
A remaining task is to coordinate these features across eligible project types, not simply add a subjective requirement to "match the prevailing style." Use linked Preservation Plans and City architectural guidance to adopt district-specific matrices defining measurable, coordinated design features, documented historic examples, compatible substitutes, and explicit modernist exceptions; publish them before applications and apply them consistently to projects. Require features reflecting the documented prevailing architectural vocabulary—or a choice of coherent feature sets where none predominates—to ensure compatible, differentiated design without subjective style judgments or exact historic replication.

Distinguish "street-facing" from "street-visible" and extend specified design standards across sections within the ODS using objective, illustrated sightline criteria finalized before adoption. Strengthen existing rooftop-equipment screening requirements with dimensioned sightline diagrams and measurable standards, while preserving State solar protections and narrow code or utility exceptions.

Clear Standards for Building Breaks in Mixed-Use Projects

The Conservancy strongly supports the revised standards for mixed-use projects. It appears that these standards are inspired by Los Angeles' many Beaux Arts arterial apartments. Furthermore, they generally align with standards adopted or under consideration in Pasadena and South Pasadena. We believe this is a positive change that will materially address building bulk while providing air and light to residential units.

These standards are more enforceable than general calls for "modulation," which can sometime be counterproductive. Define cumulative measurement across attached volumes, lot ties, and phases of the same project, and ensure required passageways and courtyards remain open and unobstructed. We recommend testing the 200-foot threshold against documented commercial parcel and storefront widths and establish measurable ground-floor bay spacing where needed below that threshold. Clarify transitions beside Contributors of different heights with dimensioned examples.



Above: Clearer, enforceable standards for mixed-use projects, with two options provided to applicants.

Shade Tree Definition

The section on subdivisions includes a standard that "*One 15-gallon shade tree shall be provided for every two lots…"* but it does not appear that a shade tree is adequately defined. While native trees should be included, consideration of drought tolerant, fast growing trees should also be included, especially those that are traditionally planted in HPOZs. We recommend the City utilize an existing or adopt a publicly available species list and measurable mature-canopy criterion, including climate-appropriate native and nonnative species compatible with documented district landscape patterns.

Close Applicability Gaps and Verify Compliance

Adopt uniform methods for selecting reference Contributors and calculating prevailing conditions, including ties, half-stories, multiple buildings, altered Contributors, and missing information. Establish a defined geographic fallback where a block face lacks Contributors rather than defaulting immediately to underlying zoning. Require a contextual survey worksheet with adopted Contributor status, photographs, measurements, and calculations, supported by numeric definitions for roof-pitch categories and other recurring terms. Require a publicly accessible compliance checklist identifying each applicable standard and any authorized modification, with verification through the applicable ministerial process and statutory deadlines. Public record access should not be confused with a new discretionary hearing or appeal.

The Conservancy joins others in urging a scheduled, parallel process to adopt equivalent protections for register-listed historic districts outside HPOZs, without delaying HPOZ ODS standards. Evaluate legally available interim measures while that work proceeds; do not leave the issue to an indefinite future phase.

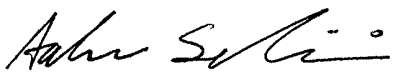
Conclusion

We thank the Office of Historic Resources and the consultants working on this effort for the broad improvements made to the draft Objective Development Standards (ODS), and for incorporating many of our previous comments. We recognize the need for the standards to provide meaningful regulation for ministerial projects, and realize the difficulty of establishing standards across Los Angeles' diverse Historic Preservation Overlay Zones.

As a best practice and to ensure the adopted ODS are operating as intended, we recommend establishing a twelve-month implementation review reporting project types, standards modified, legal bases for relief, and recurring design outcomes. The goal is to accommodate additional housing with meaningful, predictable preservation protections, not an appearance of regulation that disappears through broad exceptions or other, unanticipated gaps.

If clarification is needed for any of the recommendations included in this letter, please reach out to me at asalimain@laconservancy.org or at (213) 430-4203. We look forward to the next draft and the upcoming hearings.

Sincerely,



Andrew Salimian
Director of Advocacy

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