



June 26, 2013

The Honorable Wesley Chesbro
Chair, Committee on Natural Resources
1020 N Street, Room 164
Sacramento, CA 95814

Re: SB 731 (Steinberg)

Dear Chairperson Chesbro and Committee Members:

On behalf of the Los Angeles Conservancy and our nearly 6,500 members, I am writing to express our concern with SB 731 (Steinberg) pertaining to CEQA reform, specifically language that currently exists within this legislation that refers to aesthetic considerations. The Conservancy strongly believes this legislation will have a potentially detrimental impact on historic and cultural resources including buildings, sites, structures and landscapes.

Although the purpose of SB 731 is to streamline the CEQA process for certain development projects, the bill will also change how certain historic and cultural resources are treated as part of CEQA. It precludes the aesthetic impacts of a residential, mixed-use residential, or employment center project within a “transit priority area” from being considered as a significant impact on the environment. For geographically defined transit priority areas, aesthetic impacts would not be analyzed nor would mitigation be required.

The problem with this and the reason for our concern is that the aesthetics section of the CEQA document is often used to analyze neighborhood character of historic areas, including those issues of style, size, materials and landscaping that make neighborhoods unique and complement historic resources. Without any consideration for aesthetics, this leaves many historic neighborhoods and downtowns vulnerable and at risk.

SB 731 does not appear to delineate or offer any clear exception for projects that impact historic and cultural resources. Most important, the legislation, as currently written, does not fully support its sustainability goals as intended, as it is overly broad and applies to all projects within a geographic area, regardless of whether they further a Sustainable Communities Strategy.

The Los Angeles Conservancy requests that SB 731 be amended to clarify that this exemption does not apply to projects that may adversely affect historic resources, consistent with the limits on categorical exemptions currently under CEQA. This would allow impacts on historic resources to be avoided or mitigated, as necessary, to protect them from possible damage. Alternatively, exempted projects should be limited to those that are consistent with an adopted Sustainable Community Strategy and are located in communities with a local design review

and/or preservation ordinance. We urge you to consider these amendments to the SB 731 to address our concerns. If this is not possible, we urge your no vote.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 members 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.

If you have any questions, please feel free to contact me at ldishman@laconservancy.org or by phone at 213-430-4205.

Sincerely,

A handwritten signature in black ink that reads "Linda Dishman". The signature is written in a cursive, flowing style.

Linda Dishman
Executive Director

cc: California Preservation Foundation