



August 14, 2015

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Submitted electronically

Andrew Nirenberg
Acting Chief, Division of Right of Way and Land Surveys
ATTN: Affordable Sales Program
California Department of Transportation
1120 N. Street, MS 37
Sacramento, CA 95814
Email: Affordable_Sales_Program@dot.ca.gov

RE: SR 710 Homes sales, Affordable Sales Program

Dear Mr. Nirenberg,

The Los Angeles Conservancy offers the following comments on the Affordable Sales Program to ensure the disposition process adequately addresses historic resources. We are very encouraged by Caltrans' intent to release surplus properties and return them to the private housing market, which will ultimately strengthen and stabilize neighborhoods throughout Los Angeles, unincorporated areas of East Los Angeles, South Pasadena, and Pasadena. For the purposes of this letter and not to repeat comments already provided elsewhere, we are focusing on Los Angeles and the unincorporated areas of East Los Angeles.

The Conservancy would like to ensure protections are in place for identified historic properties that will ultimately transfer out of Caltrans' hands into private ownership. Part of this disposition process should include an up-to-date inventory of historic resources, identifying historic resources eligible at both the local, state and national levels. This includes properties that are individually significant and those located within eligible and/or listed historic districts. We are concerned that there is presently only a focus on National Register-listed or eligible properties. All transferred properties that are identified as historic, whether at the local, state or national levels, need to be adequately protected from future harmful alterations or demolition.

To date neither El Sereno nor the unincorporated areas of East Los Angeles have been fully inventoried. The City of Los Angeles' SurveyLA initiative is set to begin its survey of El Sereno in November, with results made publicly available later in



the Summer or Fall of 2016. The Conservancy is not aware of any such plans for the affected unincorporated areas of East Los Angeles. We would strongly encourage Caltrans to begin work to help undertake this effort, and again identify those resources eligible at both the local, state and national levels.

There also needs to be language and a clear process in place to ensure long-term protections before the disposition and sale of properties moves forward. This aspect should be resolved prior to the offering and sale of any historic resources, either individually or those located with identified historic districts. We are especially concerned as Phase 1B includes known historic resources within the El Sereno area. The Conservancy believes a combination of local landmark designation and covenants and/or easements are necessary. We do not believe local landmark designation alone can fully address the need, as it provides greater uncertainty in terms of long-term protection as it is subject to change and political interference. Further, no such system currently exists for the unincorporated areas of East Los Angeles.

Caltrans should work with qualified easement-holding preservation organizations to further explore this process, to develop clear and appropriate language and address compensation that will be required to adequately enforce the covenant/easement long-term. The Conservancy has a conservation easement program in place already and we are happy to work with Caltrans to develop a process that might apply to the disposition of its historic properties, especially those located in the El Sereno and unincorporated areas of East Los Angeles. We suggest coordinating such a process with other relevant organizations as more than one entity might be involved, including Pasadena Heritage and the National Trust for Historic Preservation.

The Conservancy also strongly believes there should be a priority on existing and previous tenants in terms of priority, and community organizations that have clearly established an intent and working relationship with Caltrans to acquire a building that is now set for disposition.

One example is the Maycrest Bungalow Court at 4215-4223 North Maycrest Avenue in El Sereno. Caltrans has been working with El Sereno Bungalow Collective for more than five years to develop a reuse and plan for these long-vacant structures (empty since 1994). The Collective has a vested interest as an entity located immediately adjacent to this property. We greatly appreciate Caltrans willingness to date to entertain reuse options and provide access to these structures. We think it's important that the Collective, like current and former tenants in good standing, be given priority before private housing-related entities. If not the Collective directly, we think it's important to offer to the local government which may act as an intermediary to ensure the property is ultimately transferred into the right hands.

There needs to be greater clarification by Caltrans for these unique types of properties regarding their release and the establishment of a reasonable price (reflecting the existing conditions). Further we encourage Caltrans to develop a process that can identify and support circumstances (like the El Sereno Bungalow Collective) where properties are to be repurposed, by the cities and/or non-profit organizations, to provide public, free or low-cost services to low-income residents and are not to be redeveloped for profit.

We also want to strongly urge Caltrans to identify and treat the Maycrest Bungalow Court as an historic resource. We have consulted with SurveyLA on this property in advance of their upcoming survey of El Sereno. Initial feedback indicates these structures are eligible both locally and at the state level, and may be eligible for the National Register also, as this example represents a rare housing type and is particularly unique in its design and layout as a duplex form of a bungalow court.

Thank you for the opportunity to comment and provide feedback on the Affordable Sales Program. We look forward to working with Caltrans as this program is further defined and developed prior to any sales of historic resources. The Conservancy would like to serve as a resource and partner with Caltrans to ensure adequate long-term protection for these properties.

About the Conservancy:

The Conservancy is the largest local historic preservation organization in the United States, with over 6,500 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Thank you and please let me know if the Conservancy can be of any assistance or if you have any questions. Please feel free to contact me at afine@laconservancy.org or 213-430-4203.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Cindy Heitzman, California Preservation Foundation
Michael LoGrande, Ken Bernstein, City of Los Angeles, Department of City Planning, Office of
Historic Resources
Councilmember Jose Huizar
Betsy Merritt, Chris Morris, Brian Turner, National Trust for Historic Preservation
Claire Bogaard, No 710 Action Committee
Sue Mossman, Jesse Lattig, Pasadena Heritage