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Submitted electronically

City Planning Commission
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012
Email: cpc@lacity.org

**RE: Item 8: CPC-2016-2905-CPU (Boyle Heights Community Plan Update,
CEQA: ENV-2016-2906-EIR)**

Dear President Millman and Members of the City Planning Commission:

The Los Angeles Conservancy thanks the City for preparing the Boyle Heights Community Plan Update (CPU) and for the opportunity to provide comment to the City Planning Commission. The CPU is the culmination of many years of outreach and will guide development in Boyle Heights for the next twenty years. Because of its long-term application, it is vital for the City to provide a considered and comprehensive Community Plan that successfully plans for and protects some of Los Angeles's most important historic resources.

Boyle Heights is among the oldest neighborhoods in Los Angeles and was developed as one of the city's first residential suburbs. Referred to as the "Ellis Island of the West Coast" by longtime residents and historians alike, Boyle Heights reflects Los Angeles's diverse history and built heritage. Historic properties in the Boyle Heights Community Plan Area (CPA) are particularly at risk given the low percentage of designated historic resources and the increased levels of new and proposed development. According to the DEIR for the Boyle Heights Community Plan Update, there are a total of 153 parcels in the CPA identified as historic properties either individually or as contributors in a historic district. At the time of this writing, only 19 Historic-Cultural Monuments (HCMs) and no Historic Preservation Overlay Zones (HPOZs) are located in the CPA. Eight properties have been listed in the National Register of Historic Places. The CPU offers a unique opportunity to incentivize and plan for more proactive, robust protections for historic resources.

We submit the following comments to further ensure the intent and goals associated with historic resources effectively avoid and mitigate against significant and harmful impacts.

We support the following updates:

- Two-story height limit and application of "Character Commercial 1" Frontage in the Brooklyn Avenue Neighborhood Corridor (HCM #590)
- New zoning and use districts to retain existing longtime corner stores and legacy businesses in residential neighborhoods



Boyle Heights Community Plan

Los Angeles Conservancy

Page 2

- New zoning applied through character frontages and requirement that new infill development responds to neighborhood characteristics of historic neighborhoods in Community Plan Implementation Overlay (CPIO) Subarea B
- Improve compatibility between industrial land and residential neighborhoods through new zoning to limit future uses to light manufacturing, storage and distribution, and office space so industrial land uses do not adversely impact human health and the environment
- Use of CX2 and CX5 to feature a maximum size limit to ground story commercial to support existing and future small and longtime neighborhood-serving business

We do not think the Plan goes far enough in these areas and recommend the following:

- To provide consistency in the CPU, CPIO Historic Preservation Subarea B should be further expanded to include all local, state, and National Register eligible and identified historic districts, planning districts, and bungalow court properties in the CPA. This includes, but, is not limited to such historic resources as Stone Street Residential Historic District, Estrada Courts, and 1415-2417 Malabar Street Bungalow Court, all of which remain vulnerable to redevelopment and degradation.
- To address the affordable housing shortage and displacement concerns, we recommend adding demolition and permit delays for projects where an existing structure is 45 years of age or older in CPIO Subareas A and B
- Apply “CX5” Use District to a portion of First Street between Mathews and Fickett Streets where there is a concentration of small legacy businesses

With respect to preserving and celebrating Boyle Heights’ cultural heritage, a strong emphasis has been placed on ensuring new development is compatible with existing eligible residential historic districts and the designated Brooklyn Avenue Neighborhood Corridor (HCM #590) on Cesar Chavez Boulevard. While this approach is appreciated, it is limiting in its ability to preserve existing older and historic housing stock and significant finite historic resources in Boyle Heights.

The Conservancy has pressed for ways to strengthen these proposed provisions and additional aspects of the Boyle Heights Community Plan to support the preservation of historic resources. Thank you for all the City’s hard work in crafting this plan and for your consideration of our recommendations.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 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.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Senior Director of Advocacy

cc: Council District 14, Kevin de León
Office of Historic Resources

