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Submitted electronically via
<https://cityclerk.lacity.org/publiccomment/>

Planning and Land Use Management Committee
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

RE: Item 12: (Council File 23-0861)

Dear Council Chair Harris-Dawson and Members of the PLUM Committee:

The Los Angeles Conservancy thanks the Department of City Planning and the City Planning Commission for years of engagement and thoughtful consideration, resulting in the current plan update. We also applaud the City's effort to acknowledge and seek to rectify its past land use and planning policies that perpetuated racially motivated exclusionary practices that have had lasting negative impacts on neighborhoods and communities of color, including in Boyle Heights. As a framework for guiding growth, development, and investment for the next 20+ years, the plan is also an opportunity to preserve and celebrate Boyle Heights' cultural heritage.

The Conservancy has been engaged with the Community Plan Update process for Boyle Heights since its inception and submits the following comments, in addition to those previously submitted, to further ensure the intent, goals, and specific measures associated with historic resources are strengthened. In light of potential development pressures, including possible displacement, our purpose is to effectively avoid and mitigate against significant and harmful impacts to historic places.

We support:

- New zoning applied through character frontages.
- Requirements for new infill development to respond to neighborhood characteristics of historic neighborhoods in Community Plan Implementation Overlay (CPIO) Historic Preservation Subarea B.
- New zoning and use districts to support existing and future small and legacy businesses in the community plan area.
- New legacy small business special use program encouraging new developments in Hybrid Industrial zone to incorporate space for displaced longtime neighborhood businesses, while capping rent increases at 5% per year.



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

- CPIO Historic Preservation Subarea B should be expanded to include Wyvernwood Garden Apartments and all local, state, and National Register eligible and identified historic districts in the plan area to provide consistent policy on historic resources.
- Add demolition and permit delays for projects where an existing structure is 45 years of age or older in CPIO Subareas A and B to address the affordable housing shortage and displacement concerns.

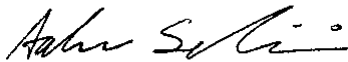
The Conservancy has sought to strengthen proposed provisions and additional aspects of the Boyle Heights Community Plan to support the preservation of historic resources. Thank you for all the City's hard work in shaping this plan and for your consideration of our recommendations.

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 asalimian@laconservancy.org should you have any questions or concerns.

Sincerely,



Andrew Salimian
Director of Advocacy

cc: Council District 14, Kevin de León
Los Angeles City Planning, Craig Weber
Office of Historic Resources, Ken Bernstein

