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September 20, 2024

Los Angeles City Planning Commission
Attn: Theadora Trindle, City Planner
200 North Spring Street, Room 340
Los Angeles, CA 90012
cpc@lacity.org

**Re: Housing Element Rezoning Program
CPC-2023-7068-CA**

Dear Commissioners,

In reviewing the draft Citywide Housing Inceptive Ordinance (CHIP), the Los Angeles Conservancy is providing comments that focus on potential adverse impacts in historic resources and recommendations for modifications.

Our primary concern is CHIP unjustly targets Los Angeles' historic low-rise multifamily neighborhoods and legacy businesses for redevelopment. These neighborhoods have produced the majority of accessible and affordable housing (RSO and Naturally Occurring Affordable Housing) in LA and are being asked to produce more. If implemented as currently envisioned, we believe CHIP will directly lead to the redevelopment of and unnecessary loss of existing multifamily housing, increasing the displacement of longtime tenants and the potential de-stabilization of neighborhoods.

In comments provided to City Planning staff on August 26th, the Conservancy made recommendations on how to rebalance the program to expand eligibility into some single-family zones and remove multifamily zones from consideration. We have reviewed the supplemental maps included in *Exhibit D: Single Family Considerations*. We thank staff for providing these detailed maps that respond to public comment. Upon review, we feel Options 1, 2 and 4 are too expansive and could have unintended consequences in historic neighborhoods, especially in the HPOZs located in the Central APC.



We continue to support Option 5, which removes R2 and RD zones from eligibility in the Opportunity Corridor Program. The memo notes that this change would remove approximately 1,900 parcels from the program, collectively containing thousands of Rent Stabilization Ordinance (RSO) Units. Many of these parcels fall in existing Historic Preservation Overlay Zones (HPOZs) including in Highland Park-Garvanza, Carthay Circle, and Angelino Heights, which are some of Los Angeles's most historic neighborhoods.



Left: 1435 Bellevue Ave. is a historic fourplex and a contributor to the Angelino Heights HPOZ. Its current zoning is RD2, but would be designated OC-1 in CHIP. Photo courtesy of Historic Places LA. Right: 4973 Franklin Ave. is an early Postwar apartment building, built 1948 in the Minimal Traditional style and identified as a contributor to the Los Feliz Square Multi-Family Residential Historic District by SurveyLA. It is currently zoned R2, but would be OC-2 in CHIP. Photo courtesy of Historic Places LA.

We understand that an offset must occur due to the reduction in capacity, and suggest that Option 3 be considered. Option 3 modestly upzones single-family zones but only in the areas with greatest access to the transit. This refined option introduces new low-rise typologies at a 2- to 3-story scale, which we believe can be compatible with single family zones. The option transitions from larger, denser development closest to transit to a lower scale towards the interior of neighborhoods. We also note that no HPOZs seem to be affected in this option – though many will be affected by the Corridor Transition and Opportunity Corridor programs. We suggest that these two options, adopted in conjunction, will help to relieve pressure on historic resources and existing multifamily housing while locating new missing-middle housing in the most necessary areas.



Eligible Historic Resources on Opportunity Corridors

Due to the concentration of new development intended to be located on commercial corridors in the CHIP Ordinance, there will be intense development pressure placed on these corridors. Not only will this likely lead to the loss of some historic buildings along these corridors, another potential unintended result will be the loss and displacement of longtime, legacy businesses.

While the Conservancy understands that some corridors are underutilized, or have large parcels suitable for redevelopment, many of Los Angeles' streets are defined by small-scale commercial and mixed-use buildings. These "background buildings" define some of the most iconic commercial streets, including Melrose Avenue and Beverly Boulevard. SurveyLA identified many of these buildings as eligible, either individually or as potential historic districts. As a planning approach, CHIP could help prioritize and direct redevelopment to parcels that do not contain historic resources or legacy businesses.



Left: Mel's on Ventura Blvd., built 1953, is an excellent example of an Armet & Davis Googie design. It has been determined eligible but not designated, and qualifies for the OC-3 program.

Right: Tempura House on Sawtelle Blvd. opened in 1949 and has been a fixture of Sawtelle's Japantown. Though eligible for designation, it qualifies for the OC-1 program. Photo courtesy of Historic Places LA.

Based upon comments made in our previous letter, city planning staff has crafted an incentive to encourage the preservation of the front portion of the façade and ensure architectural compatibility for new construction. While this is not the ideal preservation approach, the alternative would lead to the wholesale destruction of these buildings. We believe it is a compromise approach, and would like it strengthened to extend to more than just facades and be extended to include meaningful portions of historic buildings as a partial preservation outcome. As has been done in the Downtown Community Plan, we hope that additional tools to

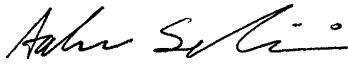


encourage preservation, such as a Transfer of Floor Area Rights (TFAR) can additionally be included in CHIP or in subsequent Community Plans.

About the Los Angeles Conservancy:

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

Sincerely,



Andrew Salimian
Director of Advocacy

- cc: Mayor Karen Bass
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Paul Krekorian, Council District 2
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