



September 24, 2012

Submitted by email

Ms. Debbie Lawrence, San Pedro Community Planner
Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
Email: Debbie.Lawrence@lacity.org

RE: San Pedro Community Plan Update Draft EIR, ENV-2009-1558-EIR

Dear Debbie:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the San Pedro Community Plan Update. The Los Angeles Conservancy is the largest local preservation organization in the United States, with over 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.

The Conservancy has long been active in the San Pedro area with a past walking tour of downtown San Pedro, support of the Vinegar Hill Historic Preservation Overlay Zone (HPOZ), and advocacy efforts at Fort MacArthur and the former Nike missile sites at White Point. We are currently engaged with the Port of Los Angeles to preserve historic sites at Terminal Island directly adjacent to San Pedro. We commend the goals and policies to protect historic resources and neighborhoods as stated in the August 2012 draft of the San Pedro Community Plan (the Plan), but additional evaluation of the Plan's potential adverse impacts is needed. We also urge consistency in the policies toward historic and cultural resources among the City's community plan updates.

I. Historic and Cultural Resources in San Pedro

Established in 1888 as its own city, San Pedro developed from a small outpost to a growing community with the arrival of the Southern Pacific Railroad to Los Angeles in the 1870s. The importance of San Pedro's harbor increased with this link to the transcontinental rail system that allowed trade and shipping to boom. Businesses and residences developed to support these enterprises and new neighborhoods formed on the bluffs and mesas near the harbor, including the current Vinegar Hill HPOZ just south of the business district around Beacon Street.

The establishment of the Port of Los Angeles in 1907, and the incorporation of San Pedro into the City of Los Angeles in 1909, further propelled the growth of San Pedro as a port

city. Centered on shipping, fishing, and other maritime industries, San Pedro attracted immigrants from coastal communities around the world including Portuguese, Scandinavians, Greeks, Croatian, Italians, and Japanese residents. The military also had a presence in the area as early as 1908, with Fort MacArthur established at Point Fermin to defend Southern California and serving as a military installation from World War I through the Cold War.

The Draft EIR identified twenty-six designated historic resources in San Pedro, including the San Pedro Municipal Building (1928), Warner Grand Theatre (1931), and the U.S. Post Office (1936). Properties formally determined eligible for the National Register of Historic Places, such as Rancho San Pedro housing development, and several City of Los Angeles Historic-Cultural Monuments (HCMs) are also identified.

II. Additional clarity of the Community Plan's impacts on historic resources is required

More potentially eligible historic resources exist in San Pedro, as identified through surveys by the former Community Redevelopment Agency of Los Angeles (CRA/LA) in its redevelopment areas, and by the City's SurveyLA efforts, which has completed the preliminary survey of San Pedro. The Draft EIR fails to include these survey results or evaluate the impact of the Plan on potential historic resources. The Final EIR should at a minimum include areas with concentrations of potential resources to assess impacts of the Plan's proposed goals and policies, and to assist with the development of appropriate planning policy, design guidelines, and sufficient staff resources for these areas. This is particularly important with the elimination of CRA/LA that resulted in the loss of the permit and design review aspects of implementing the Redevelopment Plans, which has yet to be replaced.

Additionally, the Draft EIR concludes that adoption of the Plan would result in less than significant impacts to historic resources. However, several factors with the potential to impact historic resources have not been addressed in the Plan or evaluated in the EIR. For instance, the opportunity areas identified for new residential development are sites with or adjacent to historic resources. Among these are the Rancho San Pedro housing project owned by the Housing Authority of the City of Los Angeles, the Fort MacArthur Upper and Middle Reservations, which include National Register-listed buildings and a historic district, and the Ponte Vista area outside of the plan area, but which includes the National Register-eligible Defense Fuel Supply Point Historic District reflecting the Navy's presence in San Pedro. The Plan does not mention or prioritize the historic status of these resources in the opportunity discussions. The Final EIR should consider whether projects at these and other opportunity areas will adversely impact historic resource and propose additional policies or mitigation measures to avoid any impacts.

Also, it appears that the zoning in the Regional Center and Commercial Center areas of downtown San Pedro may remain incompatible with scale of the identified historic resources, despite proposed limits on heights and an existing design overlay. The summary of proposed draft changes mentions consideration of a Transfer of

Development Rights (TFAR) program to protect historic resources in downtown San Pedro, though neither the Plan nor the Draft EIR reference such a program. A TFAR program can be an excellent tool to protect historic resources if the transfers are linked to the protection and maintenance of the historic resources.

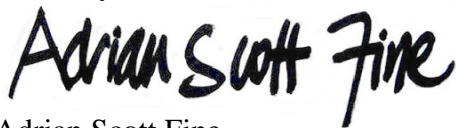
III. Consistency among community plan updates' approach toward historic and cultural resources is needed

The San Pedro Community Plan is the second community plan to be updated, following the adoption of the Hollywood Community Plan update in 2012. While the San Pedro update contains several direct and indirect efforts to protect historic resources, including encouraging adaptive reuse of bungalow and courtyard housing under small lot development, specific policies included in the Hollywood update are missing from this Plan. Similarly, the West Adams-Baldwin Hills-Leimert Park Community Plan update currently in environmental review proposes a different set of policies for that area. To reduce confusion and ensure a consistent approach across the plan areas, we recommend establishing a set of baseline policies toward historic and cultural resources, with additional provisions tailored to the unique conditions and priorities in each area. Such policies could include among others:

- Compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for historically sensitive properties.
- Encourage sensitive and/or adaptive reuse of historic building.
- Ensure compliance with the California Environmental Quality Act (CEQA) for projects that impact designated and potential historic resources.
- Incorporating development and preservation with smart growth and sustainability principles. The reinvestment, reuse and “greening” of the existing building stock are fundamental to sustainable development that can improve energy efficiency, reduce carbon usage, and be employed to combat climate change.

Thank you for the opportunity to comment on the Draft EIR for the San Pedro Community Plan Update. Please feel free to contact me at 213-430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: San Pedro Bay Historical Society
Councilmember Joe Buscaino, CD 15
Office of Historic Resources, City of Los Angeles