



December 11, 2012

Submitted by email

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**RE: Draft EIR for Granada Hills-Knollwood and Sylmar Community
Plan Updates, ENV-2006-5623 EIR and ENV-2006-5624-EIR**

Dear Ms. Vidal and Ms. Yllescas:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Granada Hills-Knollwood and Sylmar Community Plan Updates. We appreciate the inclusion of the stated goals and policies to protect historic resources and neighborhoods in the draft plans for both Granada Hills-Knollwood and Sylmar. The Draft EIR identifies only a handful of designated historic resources in both the Granada Hills-Knollwood and Sylmar community plan areas. However, many more potentially eligible historic resources are likely to exist in both areas, ranging from the earliest days of settlement in the late 19th century to more recent past resources.

As the City's SurveyLA initiative has yet to survey either of the plan areas, the potential adverse impacts of proposed zoning changes, community plan policies, and implementation overlay zones are difficult to evaluate. Nonetheless, any existing surveys, such as past community plan surveys or those conducted by the former Community Redevelopment Agency of Los Angeles (CRA/LA) in its redevelopment areas, should be mapped and included in the Final EIR. The potential impacts on identified resources and in areas with concentrations of historic resources should be fully evaluated. If adverse impacts from proposed land use changes are anticipated, areas should be downzoned or otherwise adjusted to conform to the appropriate scale of historic buildings and districts to minimize development pressures.

Additionally, we urge the incorporation of policies that reference the anticipated findings of SurveyLA and establishment of procedures to manage the potential resources identified. These policies and procedures should be consistent with other pending and adopted community plans as they relate to historic and cultural resources. Of the draft community plan updates released thus far, and reviewed by the Conservancy, the West Adams-Baldwin Hills-Leimert plan contains the most specific and integrated approach to

date and could serve as a good model for others. While the Granada Hills-Knollwood and Sylmar draft plans include some of the same policies, we recommend including other policies from the West Adams plan, particularly regarding compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for historically sensitive properties and evaluation of potential significance by the Office of Historic Resources for buildings 45 years or older.


The tools for implementing the community plans, such as community plan implementation overlay districts (CPIOs), specific plan amendments, and other overlays, can also incorporate similar incentives, standards, and support for reuse and compatibility as found in the West Adams-Baldwin Hills-Leimert CPIOs. The Final EIR should also include a draft of the Sylmar CPIO as well as proposed amendments to the Granada Hills Specific Plan.

Interests of the Los Angeles Conservancy:

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.

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

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, flowing style.

Adrian Scott Fine
Director of Advocacy

cc: Councilmember Richard Alarcón, Council District 7
Councilmember Mitchell Englander, Council District 12
Museum of the San Fernando Valley
Office of Historic Resources, City of Los Angeles