



November 13, 2012

Submitted by email

Mr. Reuben N. Caldwell, AICP
Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
Email: Reuben.Caldwell@lacity.org

**RE: West Adams-Baldwin Hills-Leimert New Community Plan Draft EIR,
ENV-2008-478-EIR**

Dear Mr. Caldwell:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the West Adams-Baldwin Hills-Leimert New Community Plan (the Community Plan). 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.

We commend the City for a thoughtful and innovative plan that fosters growth while respecting and protecting historically sensitive properties and existing neighborhood character. The plan area contains some of Los Angeles' most outstanding examples of urban design in Leimert Park and Village Green, as well as early twentieth-century and postwar residential neighborhoods, commercial streetcar corridors, and the built heritage of African-American and Japanese-American communities. The integration of preservation tools such as rehabilitation, adaptive reuse, architectural compatibility, and neighborhood conservation throughout the Community Plan demonstrates a nuanced approach that values a community's sense of place and its layers of history along side new development.

While the Conservancy applauds the intent of the Community Plan, we submit the following comments to further ensure its effectiveness and avoid impacts to historic resources.

I. Downzone areas outside of the implementation overlays to protect historic resource and encourage development in the intended areas

The Conservancy appreciates the inclusion of five Community Plan Implementation Overlay Districts (CPIOs) as well as amendments to the Crenshaw Corridor Specific Plan

to implement the Community Plan's policies. The CPIOs generally outline zoning and other development standards that together with the proposed review processes and meaningful incentives encourage reuse and rehabilitation of historic buildings as well as compatible infill. Unfortunately, the areas outside of the CPIOs fail to benefit from such protections or incentives and remain at risk of development pressure incompatible with the Community Plan.

The Community Plan attempts to address this gap through zoning adjustments, such as a height district change for Crenshaw Village and proposed Planning Districts, though with unspecified guidelines. Until more substantial protections are in place, we urge the City to review the areas outside the CPIOs, and downzone as necessary, to ensure zoning and height district designations are consistent with the existing neighborhoods. The multi-family residential zones may be most vulnerable, particularly if they currently contain single-family residential, duplex units or low-scale apartment complexes that contribute to a cohesive neighborhood character. Such areas include the two-story apartments along Leimert Blvd and in Leimert Park, the neighborhoods adjacent to CPIO boundaries, and other large-scale garden apartment communities near Village Green. Appropriate zoning further encourage development at the CPIO areas and away from stable neighborhoods.

II. Amend mitigation measures in the Draft EIR to avoid significant impacts

As the mitigation measures in the Draft EIR acknowledges, industrial properties in the plan area have yet to be surveyed for eligibility as historic resources. While the proposed review process for industrial sites in mitigation measure CR3 is appropriate, we suggest that the Office of Historic Resources should concur with the recommendation of the qualified architectural historian and not merely accept the reports for documentation. In addition, the language in mitigation measure CR4 should be amended to include subsequent updates to SurveyLA, as additional resources may be identified in future surveys or research.

III. Ensure the approach and policies toward historic and cultural resources are consistent among community plans

The Conservancy previously recommended establishing a set of baseline policies toward historic and cultural resources in all community plans to ensure a consistent approach across plan areas. The West Adams-Baldwin Hills-Leimert Plan is a good model, and we urge that its goals, policies, and incentives be adopted for subsequent community plans. This is especially important for the areas immediately adjacent, as the Commercial Corridors CPIO applies to streets that extend beyond the plan's borders. Extending the provisions of this plan to similar portions of Robertson, Pico, Washington, Venice, Jefferson, and Adams boulevards outside of the plan area will ensure a seamless transition among plan areas and maintain a cohesive planning approach.

IV. Clarify CPIO definitions and applicability to historic resources

The five CPIOs and the Crenshaw Corridor Specific Plan amendments include definitions for “Character Defining Elements,” “Rehabilitation,” and “Restoration.” If these terms apply specifically to historic resources, we recommend that they align with the definitions associated with the *Secretary of the Interior’s Standards for the Treatment of Historic Properties* (the Standards) as found at the National Park Service website www.nps.gov/hps/tps/standguide. This, or the most recent print publication from the National Park Service, should be the reference document for the Standards in the Community Plan and in the CPIOs, as the Standards may be redefined from time to time. In addition, the definition for “Designated Historic Resource” should remove the clause “as of the (*the effective date of this ordinance*),” as new resources will be identified and designated beyond the effective date of the ordinance and should be subject to the same processes.

Thank you for the opportunity to comment on the Draft EIR for the West Adams-Baldwin Hills-Leimert New Community Plan. 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, slightly slanted style.

Adrian Scott Fine
Director of Advocacy

cc: West Adams Heritage Association
Office of Historic Resources, City of Los Angeles
Council President Herb Wesson, Council District 10
Councilmember Bernard Parks, Council District 8
Councilmember Paul Koretz, Council District 5