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**Sent Electronically**

Mercy Lugo, Associate Planner  
City of Covina, Planning Division  
125 E. College Street  
Covina, CA 91723  
Email: [mlugo@covinaca.gov](mailto:mlugo@covinaca.gov)

**RE: The Covina Bowl Specific Plan Draft Environmental Impact Report**

Dear Ms. Lugo:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Covina Bowl Specific Plan Draft Environmental Impact Report (Draft EIR). The Conservancy appreciates the applicant's commitment to maintaining a meaningful partial preservation approach while structuring a feasible strategy for the redevelopment of the Covina Bowl site. Since the project's inception, the Conservancy and other community stakeholders, including the Friends of Covina Bowl, have worked closely with the applicant to find a win-win solution blending both rehabilitation with new housing construction.

Adaptively reusing properties with specifically designed uses often proves to be challenging on many levels, and while the proposed project is an example of imperfect partial preservation, we believe it retains key character defining features of the existing Covina Bowl building. This includes the pyramid structure, canopy, integral pole signage, and the coffee shop portion of the building (including associated interiors). Overall this will maintain the core of the front and sides of the existing building, while removing the later storefront addition and the rear portions where bowling lanes were once located. Based on the proposed removal of these portions of this building, we concur with the Draft EIR's Cultural Resource Assessment stating this project will result in a significant impact. This loss and proposed demolition cannot be mitigated to a less than significant impact. However, the mitigations measures outlined within the Draft EIR are important and needed to ensure the proposed partial preservation approach is fully achieved. The requirement to locally designate the Covina



Bowl as a historic landmark is also important to ensure protections and a design review process is afforded in the future.

While the Conservancy would like to see additional preservation alternatives considered, we understand the applicant has made meaningful strides to tell the Covina Bowl's story. There are however a number of questions that have arisen during our review of the Draft EIR. Namely, the lack of site plan, a complete and concise historic preservation plan, and complete rehabilitation timeline.

## **I. Greater clarity needs to be provided through detailed site plans in the Final EIR**

The Conservancy would like to see greater detail and clarity within the site plan within the Covina Bowl Specific Plan EIR. At present, the Draft EIR is not very detailed and provides little additional information than what was included within the Notice of Preparation (NOP). For a project such as this scale and scope, with an important historic preservation component, it is critical for the applicant to provide a fully detailed and visual plan to understand the overall scope of the project. Based on what is provided within the Draft EIR, it is not entirely clear what portions of the historic Covina Bowl will be removed, retained and preserved, and how new development will relate to the historic resource. This level of detail needs to be included as part of the Final EIR to ensure all expectations are being fully met and adhered to as part of any future certification of the EIR and project approvals. As stated in our NOP comment letter, we continue to be concerned by the potential for new construction to overpower the existing historic resource. We would like to see detailed elevation drawings for all sides of the Covina Bowl building and specifications that fully articulate preservation components and all elements to be preserved. This should include drawings that show how the new construction is to be related to the historic resource, in terms of scale, materiality, and overall relationship.

## **II. Provide a completed historic preservation plan**

The Conservancy greatly appreciates the applicant's commitment to preserving many of the key elements of the Covina Bowl. To add additional safeguards to the applicant's preservation processes, a historic preservation plan must be included in the Final EIR, and a requirement to produce prior to issuance of any construction permits and/or partial demolition.

A preservation plan generally includes a historic structures report (HSR), an important tool for preservation management and planning. The HSR will assess the structure's current condition so that property owners and project managers may prioritize and anticipate maintenance needs and select appropriate treatments during the rehabilitation process. In essence, the HSR serves as a guide for all changes made to a historic property during a project-repair, rehabilitation or restoration. Additionally, the preservation plan would specify treatments for architectural elements that currently exist on interior surfaces but will become exterior elements after rehabilitation. This includes the Bouquet Canyon stone façade treatment and terrazzo flooring among others.



### **III. Requirement for historic preservation related construction to be completed concurrently with new development**

Without a detailed project timeline as part of the Draft EIR, it is unclear as to when the rehabilitation of the historic Covina Bowl will take place in relation to the new construction portion of the project. It is immensely important for the project team to specify when the rehabilitation will take place and for the City of Covina not issue a certificate of occupancy (COO) until the exterior rehabilitation is complete. Our understanding by the applicant is all exterior rehabilitation of the Covina Bowl building will commence alongside new construction and both will be completed as part of this project's approval and EIR. The Conservancy can cite numerous instances in the past when applicants have agreed to rehabilitate a historic resource in conjunction with new development, yet only not to follow through on a timely matter, leaving a historic resource in limbo and subject to further blight and potential destruction. It is critical to provide a detailed timeline, clarity and ensure preservation work is being overseen and signed off on by a qualified heritage conservation professional throughout this process. A COO should not be issued until all rehabilitation work is complete. .

We urge the City of Covina to require the applicant to complete all exterior rehabilitation work prior to any certificate of occupancy (COO) is obtained. This will ensure the Covina Bowl is complete and not left to continue to fall into disrepair.

### **IV. Conclusion**

The Conservancy greatly appreciates the applicant's commitment to adaptively reusing the Covina Bowl. While the project is partial preservation and imperfect, it does reflect the applicant's dedication to pursuing a win-win solution which we greatly appreciate and acknowledge. Despite the project's preservation minded solutions, there remains several questions. The Draft EIR lacks details so it is still unclear how the new development will be sited, therefore we request the applicant to include a detailed site plan package and renderings in the Final EIR to better understand the relationship between new construction with the historic Covina Bowl building. To fully understand what treatments will be used to preserve and adaptively reuse the building, we strongly encourage the applicant to complete a full historic preservation plan. Lastly, we urge the City of Covina to make it mandatory that all rehabilitation work be completed prior to issuance of a Certificate of Occupancy (COO)



**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 [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,



Adrian Scott Fine  
Senior Director of Advocacy

cc: Friends of Covina Bowl

