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Submitted electronically via LACouncilComment.com

City Council's Planning and Land Use Management Committee
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

RE: Council File 23-0861 (Boyle Heights Community Plan)

Dear Council Chair Harris-Dawson and Members of the PLUM Committee:

The Los Angeles Conservancy thanks the Department of City Planning and the City Planning Commission for their years of engagement and thoughtful consideration, resulting in the current plan update. We also applaud the City's effort to acknowledge and seek to rectify its past land use and planning policies that perpetuated racially motivated exclusionary practices that have had lasting negative impacts on neighborhoods and communities of color, including in Boyle Heights. As a framework for guiding growth, development, and investment for the next 20+ years, the plan is also an opportunity to preserve and celebrate Boyle Heights' cultural heritage.

The Conservancy has been engaged with the Community Plan Update process for Boyle Heights since its inception and submits the following comments, in addition to those previously submitted, to further ensure the intent, goals, and specific measures associated with historic resources are strengthened. In light of potential development pressures, including possible displacement, our purpose is to effectively avoid and mitigate against significant and harmful impacts.

- 1. Expand CPIO Historic Preservation Subarea B to include: all local, state, and National Register eligible and identified historic districts, including but not limited to Wyvernwood Garden Apartments and Stone Street Residential Historic District to provide consistency across the community plan area and protect historic residential districts from demolition and degradation.**
- 2. Protect legacy businesses and cultural institutions from displacement through zoning, land use districts, and other policies.**



- a. Adopt CX5 Use District on First Street between Matthews and Fickett Streets.
- b. Adopt RX2 Use districts to retain existing longtime corner stores in residential neighborhoods.

3. Encourage adaptive reuse, compatible infill, and community benefits including rehoming legacy small businesses within the eligible 500-600 South Anderson Street Industrial Business District and other identified parcels in the proposed Industrial Mixed Use 6 (IX6) District to meet affordable housing needs while protecting neighborhood character should mixed-used projects be introduced.

- a. The Director's Technical Memo to the PLUM Committee (Dated November 28, 2023) recommends adoption of LAMC Chapter 1A, Article 5 (Use), Sec.5C.4.6 (Legacy Small Business Special Use Program) in conjunction with the establishment of the Industrial Mixed-Use 6 (IX6) District (Director's Memo pp. 24-27). **The provision should be revised as follows (in red) to provide greater compatibility with the City of Los Angeles legacy business program adopted in July 2022 (Council File 19-0781) and to ensure greater sustainability for the legacy business in its new location:**

Sec.5C.4.6 Legacy Small Business Special Use Program

A. Intent.

To create long-lasting opportunities for existing **longtime** commercial tenants to remain in the communities they service.

C. Standards.

1. **The legacy small business is a community-serving business not franchised or affiliated with a national chain, and has contributed to the city's history, culture, and/or identity. The legacy small business shall have been within continuous operations within a 2 mile radius of the project site within the City or the community plan area for at least 20 years ~~10 years~~ with no break in its operations exceeding two years, and meet at least two of the following four standards:**

- a. Has no more than **50 ~~100~~** employees/shareholders;
- b. The business includes employees that can serve multi-lingual members of the community;
- c. Accepts government issued assistance such as Electronics Benefit Transfer (EBT);
- d. Pays employees wages equivalent to or greater than those specified in Sec.10.37.2 (Payment of Minimum Compensation to Employees) of Article 11 (Living Wage) of the Los Angeles Administrative Code.

E. Records and Agreements.

1. Lease

- a. A minimum 10-year lease with a legacy small business, with a 5 year renewal option, **and a limit of no more than 5% rent increase per year during the term of the lease** shall be required prior to a City Planning administrative sign-off or case condition clearance pursuant to Sec. 13B.3.1. (Administrative Review).



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 should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Senior Director of Advocacy

cc: Councilmember Kevin de León, District 14
Ken Bernstein, Office of Historic Resources

