

## Communication from Public

**Name:** Andrew Salimian, The Los Angeles Conservancy

**Date Submitted:** 11/15/2024 02:21 PM

**Council File No:** 21-1230-S9

**Comments for Public Posting:** Dear Members of the PLUM Committee, The Los Angeles Conservancy is writing in support of the proposed Citywide Adaptive Reuse Ordinance (ARO) with one minor suggested change pertaining to legacy businesses. We thank city staff for preparing a well-devised and clear ordinance, which will expand and enhance Los Angeles' groundbreaking 1999 ordinance. Throughout the years, we have heard support for the concept of adaptive reuse from our member base. It is one of the most sustainable building practices and has much less of an impact to adjacent communities than ground-up construction. It also does not displace existing tenants or lead to the redevelopment of existing RSO units. Due to the complexity of adaptive reuse projects, it is important that the ordinance remain flexible. There are a few positive changes in this draft of the Citywide ARO that we would like to support. We are pleased to see incentives introduced for Commercial Tenant Preservation or Retention and Legacy Small Businesses. The one requested change we have is that the 2 mile radius for qualification be expanded to 5 miles for legacy small businesses. The Conservancy supports greater clarification on street tree plantings. It is crucial that future adaptive reuse projects contribute to the urban canopy to combat the urban heat island effect in an era defined by climate change. We encourage the City of Los Angeles to consider future financial incentives to make adaptive projects viable. One of the most successful financial incentives, the Mills Act, has been temporarily put on hold as part of a program assessment. We urge the City to move expeditiously in this update – without the Mills Act, many of Downtown's early adaptive reuse projects would not have come to fruition. We hope that any updates to the Mills Act can be moved forward to support future adaptive reuse potential. We thank the Commission for considering our comments, and hope you will support this ordinance that will create new housing through preservation and adaptive reuse. Sincerely, Andrew Salimian Director of Advocacy



523 West Sixth Street, Suite 826  
Los Angeles, CA 90014

213 623 2489 OFFICE  
213 623 3909 FAX  
[laconservancy.org](http://laconservancy.org)

November 15, 2024

**Submitted electronically via**  
**<https://cityclerk.lacity.org/publiccomment/>**

Planning and Land Use Management Committee  
Attn: Holly Harper, Planning Assistant  
200 North Spring Street, Room 340  
Los Angeles, CA 90012

**Re: Citywide Adaptive Reuse Ordinance**  
**CF-21-1230-S9**

Dear Members of the PLUM Committee,

The Los Angeles Conservancy is writing in support of the proposed Citywide Adaptive Reuse Ordinance (ARO) with one minor suggested change pertaining to legacy businesses. We thank city staff for preparing a well-devised and clear ordinance, which will expand and enhance Los Angeles' groundbreaking 1999 ordinance.

Throughout the years, we have heard support for the concept of adaptive reuse from our member base. It is one of the most sustainable building practices and has much less of an impact to adjacent communities than ground-up construction. It also does not displace existing tenants or lead to the redevelopment of existing RSO units. Due to the complexity of adaptive reuse projects, it is important that the ordinance remain flexible.

There are a few positive changes in this draft of the Citywide ARO that we would like to support. We are pleased to see incentives introduced for Commercial Tenant Preservation or Retention and Legacy Small Businesses. The one requested change we have is that the 2 mile radius for qualification be expanded to 5 miles for legacy small businesses.



The Conservancy supports greater clarification on street tree plantings. It is crucial that future adaptive reuse projects contribute to the urban canopy to combat the urban heat island effect in an era defined by climate change.

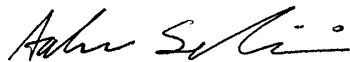
We encourage the City of Los Angeles to consider future financial incentives to make adaptive projects viable. One of the most successful financial incentives, the Mills Act, has been temporarily put on hold as part of a program assessment. We urge the City to move expeditiously in this update – without the Mills Act, many of Downtown’s early adaptive reuse projects would not have come to fruition. We hope that any updates to the Mills Act can be moved forward to support future adaptive reuse potential.

We thank the Commission for considering our comments, and hope you will support this ordinance that will create new housing through preservation and adaptive reuse.

**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 member households 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.

Sincerely,



Andrew Salimian  
Director of Advocacy

cc: Ken Bernstein, Office of Historic Resources  
Lambert Giessinger, Office of Historic Resources

