



February 24, 2020

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**RE: Notice of Preparation of a Draft Environmental Impact Report
for the Covina Bowl Specific Plan**

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for an environmental impact report (EIR) for the Covina Bowl Specific Plan Project (Project).

The Conservancy appreciates that the proposed project will partially retain and reuse the historic Covina Bowl building and sensitively incorporate new construction on the site. We submit the following comments to ensure that the rehabilitation and adaptive reuse of the Covina Bowl meets the Secretary of the Interior's Standards for Rehabilitation and, most importantly, retains its eligibility as a historic resource. The new infill construction should be compatible in scale and overall massing so as not to adversely impact the historic building.

With significant impacts anticipated, the Agency must require a range of preservation alternatives to be evaluated and adequate mitigation measures proposed as part of the environmental review process.

I. Historic Significance of the Covina Bowl

Blending Modernism with Egyptian exoticism, Covina Bowl embodies the exuberant postwar Googie architectural style with its enormous glass-filled pyramid entrance and soaring triangular "Covina" sign to attract motorists' attention. The zigzag entrance canopy floats above natural rock piers, melding modern forms with natural materials.



The Covina Bowl was built by and for the Brutocao brothers, local contractors, and developers. Long Beach-based architecture firm Powers, Daly, and DeRosa designed the building, which became the first full-service bowling center in America. The exotic Egyptian theme permeates every aspect of the building, including its enormous neon sign. Covina Bowl became the original prototype for 71 other bowling alleys designed by the firm across the country.

When completed in 1955, Covina Bowl was a complete entertainment center with billiard room, cocktail lounge, banquet hall/live entertainment showroom, coffee shop, conference and meeting rooms, childcare facility, and beauty parlor. Its famous Egyptian Room presented performers such as comic duo Rowan and Martin, Liberace, crooner Mel Tormé, the Smothers Brothers, and many others.

On opening day, February 11, 1956, Covina Bowl was lauded by the local press as “a fabulous recreation center whose opulence rivals that of the days of the Egyptian pharaohs,” “virtually a city within itself,” and “a Dream Palace of Recreation.” Bowling industry leader AMF in a congratulatory newspaper ad called Covina Bowl “The World’s Most Beautiful Bowling Establishment.” As bowling’s popularity began to wane in the 1970s, their large lots became more valuable as redevelopment sites for shopping centers or residential developments. As a result, bowling centers began to disappear, and by the 2000s, most were demolished.

II. Draft EIR should evaluate appropriate treatment options and mitigation measures for the Covina Bowl Project

Located in Planning Area 1 of the proposed project site, is 12,000 square feet of the Covina Bowl building. This section of the building includes the primary façade, main entry and entertainment areas built in 1955. This portion of the building maintains a high degree of integrity due to its many architecture-related character-defining features. Our understanding is these areas will be retained and adaptively reused for office, retail, coffee/bakery and other uses commonly found in neighborhood commercial zones. Special attention must be given to this portion of the proposed Project site as it comprises the only remaining section of the historic Covina Bowl.

Planning Area 2 comprises the remaining sections of the Covina Bowl building that include the 1962 addition designed by Powers, Daly, and DeRosa. The proposed Project will demolish all historic resources in Planning Area 2 and construction approximately 136 multi-family residential units. With the large number of proposed units, we have questions about new construction and how it may overpower the historic fabric of the remaining Covina Bowl. Therefore, it is imperative for new construction to be compatible with the *Secretary of the Interior’s Standards for Rehabilitation*. Compatibility will be achieved through appropriate scale, massing, and materiality. Furthermore, non-compatible new construction has the potential to adversely affect the Covina Bowl’s eligibility as a historic resource.

The proposed Project will rezone Planning Areas 3 and 4 for a range of new uses. However, no other plans are currently being proposed for these two areas and all buildings will remain. When future plans are



made for these areas, we expect a full environmental review to ensure compatability with the adjacent Covina Bowl.

As indicated in the NOP, the Project will impact cultural resources, and the Draft EIR should thoroughly study potential direct and indirect impacts of the project on the historic building, including any exterior and interior modifications and the proposed new construction.

To reduce potentially significant impacts, the Draft EIR should also include a detailed historic preservation plan that outlines recommended treatment options for the Covina Bowl's historic exterior and interior features. The plan should demonstrate adherence to the *Secretary of the Interior's Standards* and ensure that the building retains its eligibility as a historical resource. It should also include a full historic structures report (HSR), which would document and assess the building's unique existing conditions and provide clear guidelines for the appropriate treatments.

The NOP states that the Covina Bowl is proposed for listing on the National Register of Historic Places. The building has already been formally determined eligible for the National Register, as the Conservancy prepared and submitted a nomination to the State and National Park Service in 2016. Due to owner objections at the time the building was not listed, only determined eligible. The Conservancy strongly urges the project applicant and owner to move forward with the nomination and agree to listing as a form of mitigation and to offer additional economic incentives (such as state and federal tax credit for rehabilitation, if applicable in this case) for the proposed rehabilitation project. As the original applicant for this nomination we are happy to be of assistance in this process. .

III. Draft EIR should evaluate the impacts of new construction and demonstrate compatibility with the Covina Bowl

As described in the NOP, the proposed project would develop a mixed-use community that includes the partial adaptive reuse of the Covina Bowl building in Planning Area 1 of the Specific Plan, and development of 132 for-sale residential units within Planning Area 2. The residential buildings would be built on the parking lots of the Covina Bowl. Residential amenities would include courtyards, playground, fitness park, outdoor dining BBQ area and an outdoor lawn bowling amenity inspired by the historic architecture of the Covina Bowl. The Draft EIR should fully analyze and discuss the impacts of the proposed new construction on aesthetics and cultural resources. It should also contain detailed drawings to demonstrate the relationships between the new and historic buildings.

The new buildings should be designed in a manner that is both compatible and appropriate in terms of scale, massing, height, design, and materials to the historic building, in accordance with the *Secretary of the Interior's Standards*. They should be sufficiently set back and detailed as to not overwhelm or compete with the historic building. As a significant architectural feature, the proposed Project should



maintain the Covina Bowl's historic focal point and front entrance orientation as part of the proposed project.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 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,

A handwritten signature in black ink that reads "Adrian Scott Fine". The script is fluid and cursive, with the first letters of each name being capitalized and prominent.

Adrian Scott Fine
Director of Advocacy

cc: Friends of the Covina Bowl

