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Submitted Electronically

Jolee Hui
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RE: Notice of Preparation of a Draft Environmental Impact Report for the West LA Commons Project

Dear Jolee Hui:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the West LA Commons Project. The Project proposes to redevelop the existing West Los Angeles Civic Center with a new mixed-use development consisting of residential, neighborhood-serving commercial, municipal office, and senior/community center uses pursuant with the Project's Request for Proposals (RFP) released jointly by the City and County of Los Angeles.

The Conservancy supports the intent behind the redevelopment of the West Los Angeles Civic Center, and strongly believes a preservation-based Project retaining the site's eligibility as a historic district will successfully meet most of the Project goals and objectives. The Conservancy supports and recognizes the need for affordable housing, and does not dispute the Civic Center as an ideal location for housing. However, new development does not need to come at the expense of historic resources; rather it can and should work cohesively through an integration approach. Adaptive reuse is readily achievable in this Project, and can complement the proposed new, mixed income housing and infill construction.

The overall site plan appears compatible with a preservation-based approach, as new buildings of the same footprint are intended to replace the existing footprints for the Municipal and Courthouse buildings. We question why these buildings cannot be adaptively reused instead, and if this option has been fully analyzed to date. We anticipate the EIR will fully assess this option so as not to foreclose this without serious consideration



and analysis to demonstrate its possible feasibility. In addition, we would like to see the Google style Bandshell retained on site and, if relocated, done in a manner that meets the *Secretary of the Interior's Standards for Rehabilitation*, while retaining its eligibility as a historic resource.

While it may be easier to demolish everything and build subterranean parking over the entire site rather than build around the historic buildings, we need to balance the project objectives and goals so that one does not completely override others, especially if viable. The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.¹ Reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”² Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.³

I. Project Summary

The project site is approximately 8.68 acres, including 3.01 acres of land currently owned by the Judicial Council of California but subject to the County’s option to purchase. 4.62 acres owned by the City is to be redeveloped, with 1.05 acres of land owned by City that would remain as a Los Angeles Public Library branch. The Project would provide 926 residential units (495 market-rate and 431 income-restricted housing units with 961,290 square feet of residential floor area), 36,569 square feet of neighborhood-serving commercial (retail/restaurant) uses, 76,341 square feet of municipal office uses, and 23,868 square feet of senior community center uses. In total, the Project would have a floor area of 1,151,297 square feet. Nine new structures would be constructed ranging from two-to eight-stories , a total of 1,563 parking spaces provided within a three-level subterranean parking garage, and approximately 193,000 square feet of private, common, and publicly accessible open space (of which 112,382 square feet would comply with the LAMC definition of open space).

II. The West Los Angeles Civic Center is an identified historic resource

Developed in the mid-1950s to early 1960s, the West L.A. Civic Center is representative of suburban expansion in the post-WWII period and the need for government services in developing parts of the City. In 1956, the Los Angeles Public Library (LAPL) constructed its West Los Angeles Regional Branch for \$255,000 to serve as branch headquarters for the growing West L.A. communities of, Brentwood, Pacific Palisades, Venice, Westchester, Mar Vista, and Palms. Two years later, in 1958, the West Los Angeles Courthouse building was constructed and remained in operation until 2013. In 1960, the City constructed its West Los Angeles Municipal Building and the Felicia Mahood Multipurpose Center, Bandstand, hardscaping, landscaping, and associated surface parking lots.

In 2012, SurveyLA identified the West Los Angeles Civic Center as a potentially eligible historic district at the national, state, and local levels as an excellent and intact example of a branch civic

¹ Guideline § 15126.6(a).

² *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

³ Public Resources Code § 21081.5.



center in West Los Angeles. The site reflects the vision of the 1949 Master Plan of Branch Administrative Centers, which was intended to provide more efficient and convenient service to the public as well as the expansion of government services to address the unprecedented economic and population growth in post-WWII era in Los Angeles.

SurveyLA identified the Courthouse, Municipal Building, Felicia Mahood Center, West Los Angeles Regional Branch Library, Bandshell, and Plaza as all contributing resources to the potential historic district. The Conservancy understands there may be an updated evaluation and historic assessment, and we look forward to reviewing this analysis to better understand any revised findings and the methodology applied.

While not recognized through SurveyLA, the Civic Center also holds cultural significance to the international skateboarding community as one of the most important skateboarding sites around the world. This should be acknowledged and recognized as part of any updated historic assessment report. The Civic Center proved to be integral to the progression of street skateboarding. The site possesses a unique flow with ledges, stairs, and expanses of concrete ideal for beginners and professional skateboarders alike. For this reason, skaters are able to gather and progress their skills. Beginning in the early 1990s to today, many skaters find reverence at the Civic Center, here they connect with each other while building and strengthening their unique community.

For decades now the Civic Center has featured prominently in some of the most iconic skate videos. More often than not, video footage at the Civic Center highlights the rich diversity of the skateboarding community. Through public scoping meeting testimonials, skaters expressed the importance of this place to them personally and collectively. Many times these individuals referred to the Civic Center as the Wrigley Field and Fenway Park of skateboarding because of its status in the skateboarding zeitgeist.

Furthermore, the Conservancy believes resources including the Courthouse and Municipal buildings to be individually eligible for historic designation and therefore warrant a more holistic historic preservation approach. We strongly believe in a preservation-based outcome that saves the entirety of the Courthouse and Municipal buildings rather than demolition, salvage, or façade-only approaches that will not maintain historic eligibility.

As described in the Initial Study, new buildings would be reconstructed with the similar footprints. We believe it is possible for the applicant to preserve these buildings while expanding their footprint or adding new stories while still being in compliance with the *Secretary of the Interior's Standards for Rehabilitation*. Engaging structural engineering firms with backgrounds in historic preservation will likely offer innovative solutions that should be considered and explored fully by the project team and the EIR.

III. Project Request for Proposals (RFP) and Historic Preservation

In November 2019, the County of Los Angeles released its first Request for Proposals (RFP) for the Civic Center property. Upon reviewing this initial RFP, the Conservancy found that the County did not adequately address the impacts to historic resources and failed to list adaptive



reuse as a project alternative. Following our outreach, the County released a subsequent addendum to the RFP to address historic resources.

In May 2020, the County released a second RFP for the Civic Center following a joint agreement with the City. In this iteration, the RFP outlines ten key points and aspects it is seeking, including:

“Historic Preservation and Enhancement: Approaches any potential demolition or exterior alterations (to the extent included as part of a proposal) in a manner consistent with an appropriate historical analysis (e.g., in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties) and locates the majority of new construction within underutilized areas such as surface parking lots, embodies architectural styles that respect the history of the Project Site without being exclusively referential, and elevates the architectural experience of the Project Site for the broader community;”

In their recommendations for the RFP, Sapphos Environmental, Inc., the County’s contracted historic preservation consultants, recommends the successful project team’s proposals should “look to understand how the district can be maintained while achieving the project goals of creating affordable housing and other uses.”

While the proposed Project as described attempts to incorporate historic preservation, the Conservancy believes the proposal falls short of incorporating preservation in a meaningful and holistic way. As proposed, the project would result in the loss of eligibility as a historic district, and any individual designations, per the Project team’s historic preservation consultants’ findings.

The Conservancy supports the general goals and intent behind the redevelopment of the Civic Center, however strongly believes there is a win-win outcome available whereby historic preservation-based practices are better incorporated into the overall design. This would mean preserving more than just three facades on the Municipal building and metal screens from the Courthouse building. Through more comprehensive preservation solutions, the project would better align with the RFP, preservation standards, and the California Environmental Quality Act (CEQA) goals.

IV. The Draft EIR should fully analyze and incorporate existing historic resources in the proposed Project and Project Alternatives.

As noted in the Project’s Initial Study, the proposed Project would have significant unavoidable impacts to historic resources including demolition. For this reason, the Draft EIR must include a range of preservation-based alternatives that result in less than significant impacts to the West Los Angeles Civic Center.



The Conservancy urges the Project team to pursue more meaningful preservation based alternatives that maintain eligibility of the historic district and individually eligible resources determined eligible by Historic Resources Group (HRG), the contracted historic preservation consulting firm. As identified in SurveyLA, the potential West Los Angeles Civic Center Historic District includes the Courthouse and Municipal buildings, Felicia Mahood Center, Bandshell, and Civic Center Plaza. Each of these components contributes to the significance and helps to convey the site’s significance. Demolition and/or relocation of these resources greatly diminishes the sites integrity and should be avoided.

As proposed, the site plan has the ability to retain much of the plaza while maintaining key view sheds and pedestrian corridors. This is space that is most significant for skaters. Despite it being more recent history, it is nonetheless meaningful and should be honored. This may be done by preserving a sense of place that allows the Civic Center to be recognized for generations of skaters. Within the Plaza is the Googie style Bandshell, which we believe should be retained and preserved so that it maintains its integrity and eligibility as a historic resource, even if relocated onsite to better facilitate project objectives.

The Courthouse and Municipal buildings are integral for conveying the significance of the Civic Center. For this reason, as much of the historic fabric must be retained as possible and eligibility maintained. Through our meetings with the Project team, we learned that their engineers for the Project do not have extensive knowledge and experience working with historic buildings and finding creative solutions to address structural systems in older buildings. Given the applicant’s intent to preserve only a façade, we strongly urge the project team to engage with a qualified engineer that has worked on historic rehabilitation projects to determine if the full envelope of the historic Municipal Building can be retained. We understand there is a relationship between the engineer and developer; however, having a peer review and/or bringing on an engineer with historic preservation experience better enables them to find innovative, preservation-based solutions.

A key policy under the CEQA is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”⁴ To this end, CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”⁵

V. Conclusion

The Conservancy supports the aims of the proposed redevelopment efforts and the intent by the County, City and project team, as this Project intends to reactivate the site and provide housing opportunities, especially access to significant amounts of affordable housing. We also believe there is a greater win-win outcome possible here that pairs more meaningful preservation with new infill development than proposed in the Initial Study. We are confident that preservation-

⁴Public Resource Code, Sec. 21001 (b), (c).

⁵ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.



based alternatives, developed as part of the Draft EIR, will successfully meet project goals. The West Los Angeles Civic Center is an important historic resource with a multi-layered history and spans decades. From its initial construction as part of the 1949 Master Plan of Branch Administrative Centers to present day skateboarders, the Civic Center tells a uniquely Los Angeles story that is worth preserving. The Conservancy thanks the County, City and the project team for its willingness to meet and look forward to our continued dialogue.

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 Mike Bonin, Council District 11
West Los Angeles Sawtelle Neighborhood Council
City of Los Angeles, Department of Planning, Office of Historic Resources

