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Submitted by email

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Re: Notice of Preparation for the Sapphire Project, ENV-2015-3033-EIR

Dear Ms. Lee,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for Sapphire Project, located in the Westlake neighborhood of Los Angeles. The Conservancy believes that the project site contains two buildings – 1111 W. 6th Street and 1125 W. 6th Street – that qualify as historical resources based on their architectural significance and that they should be treated as such throughout the environmental review process. Both buildings are slated for demolition as part of the proposed new development.

As the proposed project would cause significant impacts to cultural resources, the Conservancy urges the City to mandate consideration of a range of potentially feasible preservation alternatives to demolition in the Draft Environmental Impact Report (EIR).

I. The Draft EIR should acknowledge 1111 W. 6th Street and 1125 W. 6th Street as “historical resources” under CEQA

The project site contains two excellent and rare examples of Late Moderne commercial architecture in Westlake. In 2014, both buildings were identified as eligible for historic designation through SurveyLA, the City of Los Angeles’ comprehensive citywide historic resources survey.

Also known as the California Teachers Association Building, 1111 W. 6th Street was designed by noted San Diego firm Kistner, Wright & Wright and completed in 1967. The symmetrical, four-story building features strong horizontal orientation, with continuous bands of steel-sash windows on the primary and rear elevations juxtaposed against smooth, unadorned stucco surfaces. The windows are “punched” into the walls with flat, projecting frames delineating each of the floors.



The linear composition of the building contrasts with the curved, one-story concrete wall positioned in front of the primary elevation, which is articulated with a stylized geometric relief. The ground floor features transparent glass windows and doors, as well as narrow concrete piers. The building retains a high degree of integrity and was determined eligible for listing in the National Register of Historic Places, California Register of Historical Resources, and as a Los Angeles Historic-Cultural Monument (HCM) through SurveyLA.

Located directly to the west, 1125 W. 6th Street was also designed by Kistner, Wright & Wright and was completed in 1955. According to the American Institute of Architects (AIA), the firm's Los Angeles office was housed in the building in the 1960s.¹ Like the adjacent property, the five-story commercial building features metal horizontal ribbon windows on its primary and rear elevations. The windows on the rear (north) façade wrap around the corners of the west and east elevations. The asymmetrical, recessed entrance features a low-rise canopy, which is supported by narrow concrete piers. Although the building contains a one-story addition, it has been determined eligible for listing in the California Register and as an HCM.

Headquartered in San Diego, the architectural and engineering firm of Kistner, Wright & Wright was responsible for a number of mid-century modern buildings in Southern California, including Cerritos College (1961), the Peck-Norman Building (1965), and the Norwalk Civic Center (1965). Theodore C. Kistner, a partner in the firm along with H.F. Wright and W.T. Wright, was also the official architect for the San Diego School Board and designed two Carnegie libraries in Chula Vista and East San Diego.

II. The Draft EIR should evaluate a range of reasonable alternatives that retain and reuse the historic buildings

A key policy under the California Environmental Quality Act (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."² 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."³

Courts often refer to the EIR as "the heart" of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would

¹ See George S. Koyl, ed., *American Architects Directory*, Vol. 2 (New York: R.R. Bowker Company and American Institute of Architects, 1962) and John F. Gane, ed., *American Architects Directory*, Vol. 3 (New York: R.R. Bowker Company and American Institute of Architects, 1970), <www.public.aia.org>.

² Public Resources Code §21001 (b), (c).

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



reduce or avoid those impacts.⁴ CEQA Guidelines require a range of alternatives to be considered in the EIR that would feasibly attain most of the basic project objectives but would avoid or “substantially lessen” the project’s significant adverse environmental effects. The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.⁵

As currently proposed, the project would raze several structures on the subject site, including the historic buildings at 1111 and 1125 W. 6th Street, for a nearly 350,000 square foot mixed-use development. It is clear that the proposed project, including demolition of two historical resources, would cause significant and irreversible adverse impacts to cultural resources.

The Draft EIR should consider a range of alternatives that reuse the historic buildings for uses consistent with the project description and incorporate higher density infill construction elsewhere on the site. Throughout the country, including California and Los Angeles, there are similar examples that demonstrate how new construction can be successfully integrated with existing historic buildings.

We strongly encourage the applicant and owner to explore the potential for this type of “win-win” outcome and preservation alternative. Overall, the proposed alternatives should comply with the *Secretary of the Interior’s Standards for Rehabilitation* and maintain the buildings’ eligibility as historical resources.

III. Conclusion

The Draft EIR should treat 1111 and 1125 W. 6th Street as historical resources, consistent with SurveyLA’s findings, and evaluate adverse impacts appropriately. The Conservancy believes that creative reuse options exist for both buildings and that they can be integrated successfully into a larger development for the site. We therefore urge the City to require a thoughtful and thorough consideration of preservation alternatives in the forthcoming Draft EIR. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,500 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.

⁴ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

⁵ PRC §§ 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.



Sincerely,

Adrian Scott Fine

Adrian Scott Fine
Director of Advocacy

cc: Councilmember Gilbert Cedillo, Council District 1
Ken Bernstein, Office of Historic Resources, Department of City Planning

