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Submitted electronically

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Re: Draft Supplemental Environmental Impact Report, Long Beach Civic Center Project

Dear Mr. Chalfant,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR).

The Conservancy has previously raised concerns over the environmental review process for the proposed demolition of the Long Beach Courthouse, and we appreciate the completion of a Draft SEIR that examines the Long Beach Civic Center as a whole. Nonetheless, the current analysis for the proposed Civic Center Project contains significant flaws with respect to cultural resources in several key areas and fails to adequately evaluate a range of meaningful preservation alternatives. **Most concerning is that no single preservation alternative is offered (only partial-preservation alternatives) within the Draft SEIR that assesses the reuse and continued eligibility of all of the affected cultural resources, despite being required by CEQA. This is in violation of CEQA and further demonstrates that the City is not seriously looking at preservation solutions and options in a good faith manner.**

We strongly believe that there are viable opportunities to retain and adaptively reuse the historic Courthouse, City Hall, and Main Library buildings as part of the proposed redevelopment of the site, and we urge the City to further analyze and select a true preservation alternative as the environmentally superior alternative.

I. Historic significance of the Long Beach Civic Center.

The proposed project seeks to demolish the Long Beach Courthouse, City Hall, and Main Library, three known historic resources that are eligible for listing in the California Register of Historical Resources and as Long Beach Historic Landmarks.



The Courthouse was determined eligible for the California Register in 2008 as part of the the City of Long Beach’s citywide survey of historic resources. The assessment identified the building as an excellent example of the Corporate International Style that retains most of its character-defining features. Completed in 1960, the steel-framed building was designed by master architect Kenneth S. Wing in conjunction with Francis J. Heusel. The rectangular-plan courthouse has curtain walls set with panels of glass and blue porcelain enamel corresponding to each floor and floor plate, while the west and east elevations have a contrasting treatment with precast aggregate concrete panels. Other distinguishing features of the building’s design include the recessed first floor set behind the columns of the structural framing, the transparant quality of the glass-enclosed staircase of the building’s southwest section, and terrazzo paving and raised concrete planters.

Completed in 1977, City Hall and the Main Library represented the realization of the 1950s Civic Center Master Plan, which envisioned a modern centralized hub for civic engagement and municipal services. The complex was designed by Allied Architects, which included Hugh and Donald Gibbs; Homolka & Associates; Killingsworth, Brady & Associates; Kenneth S. Wing and Associates; and Peter Walker as landscape architect. As built, City Hall and the Main Library are excellent examples of the Late Modern Style with integrated landscaping and reveal the collective efforts of this consortium of local master architects. The two buildings are connected by an open plaza, constructed primarily of brick and concrete with a designed modern landscape and amphitheater.

The fifteen-story glass, concrete, and aluminum City Hall building is the centerpiece of the Civic Center, designed to accommodate all City departments within the central tower. Distinctive features include monumental precast concrete corner piers, sleek glass curtain walls, and the plaza-facing glass door entrance. The council chambers are located on the plaza level and visible through a glass viewing area, which Docomomo Southern California has recognized as “a forward-thinking nod to transparency in local government.”

The two-story, rectangular-plan Main Library building was designed to be an integral part of the surrounding Lincoln Park and features a flat roof with planters and grass berms above reinforced concrete walls. In juxtaposition to the solid concrete massing, large clerestory windows allow natural light to filter into the public spaces.

II. Cultural Resources evaluation in Draft SEIR contains significant flaws.

The Conservancy believes that the Cultural Resources evaluation prepared for the Draft SEIR is flawed in several key areas and is inadequate for purposes of conducting a thorough environmental review. While the study acknowledges the eligibility of the Courthouse, City Hall, and the Main Library for listing on the California Register of Historical Resources and as City of Long Beach Historic Landmarks, we disagree with the methodology applied in the evaluation of a potential Civic Center historic district.

First, the Draft SEIR erroneously treats City Hall and the Main Library as a single historic resource as opposed to two separate resources. Though they are inextricably linked as part of the fulfillment of the 1950s Civic Center Master Plan under the direction of Allied Architects, they are distinct buildings in



design and execution. As such, they should have been evaluated separately for individual eligibility, as well as for eligibility as contributors to the potential historic district.

Second, the Conservancy disputes the proposed boundaries for and assessment of the potential Civic Center historic district and believes that the project site does indeed contain an eligible historic district. The Cultural Resources Study in the Draft SEIR states: “[w]hile the buildings and structures within the Civic Center are all functionally related and were each designed for municipal purposes, the alterations to the Public Safety Building and Lincoln Park and construction of the Broadway Parking Garage have reduced the integrity of the site and weakened its cohesive overall identity, making it ineligible for consideration as a CRHR or locally eligible historic district.”¹ We recognize that the 1960 Public Safety Building, though one of the first buildings to be constructed as part of the postwar redevelopment of the Civic Center, has been altered significantly over the years and no longer retains integrity. Similarly, Lincoln Park has been modified from its 1964 redesign and does not appear to be an eligible historic resource either. We question, however, the decision to evaluate the 1980s Broadway Parking Garage within the boundaries of the potential district, since it does not represent the realization of the Civic Center Master Plan and was constructed outside of the potential period of significance.

Despite alterations to the Public Safety Building and Lincoln Park, Conservancy strongly believes that the Civic Center superblock, its associated buildings (including the Courthouse, City Hall, and Main Library), and its designed plaza and landscapes do compose an eligible and intact historic district. The period of significance for the potential district is 1960 to 1977. Together, the contributing buildings and integrated landscapes express the vision of the 1950s Civic Center Master Plan, namely the creation of a modern, transparent, and consolidated governmental complex within the core of the city.

The Civic Center Project seeks to demolish the Courthouse, City Hall, and Main Library as well as the historic and cultural landscape in order to fulfill a proposed plan to redevelop the entire Civic Center site. This action would lead to the complete and significant loss of three individually eligible historic resources, which would be compounded by the loss of an eligible historic district. To this end, the Draft SEIR should have also evaluated the overall impacts to cultural resources that would occur as a result of the proposed project, from the standpoint of individually-eligible resources and as a historic district

III. Overly Narrow Project Objectives Improperly Limit the Full Consideration of Preservation Alternatives

Paradoxically, the project seeks to demolish the historic Courthouse and Civic Center in order to redevelop the site. As recognized by the DEIR, a significant adverse impact -- the loss of the Courthouse and Civic Center -- is the result of any attempt to meet these objectives. We strongly feel that the City cannot legitimately justify demolishing the Courthouse and Civic Center and obliterating significant and unique historic resources without the full consideration of viable preservation alternatives. As narrowly defined within the SEIR, it is virtually impossible to achieve a preservation outcome. We recognize that preserving and reusing the Courthouse and Civic Center may not be the City's preference, but the project

¹ City of Long Beach, *Civic Center Project Draft Supplemental Impact Report, Appendix C (2)*.



objectives cannot simply be assumed to be superior to the value of the historic resources that is being compromised.

The underlying purpose of the project is summarized in the following objective: “Redevelop the Civic Center mega-block into a vibrant mix of public and private space, including a grand Civic Plaza, which asserts the value and importance of the public realm, and which functions as the City’s center for governance, civic engagement and cultural and educational exchange.” Rehabilitating and reusing the historic resources within the potential Civic Center Historic District would reinforce the area’s civic and cultural identity, reinvigorate it for contemporary uses, and promote long-term sustainability.

As currently outlined, many of the proposed project objectives in the Draft SEIR are too narrowly defined and reveal the City’s pre-commitment to demolition as opposed to rehabilitation and potential reuse, which could similarly address public safety concerns. These include the first two objectives:

- Replace seismically deficient City Hall and Main Library in an expeditious manner; and
- Reduce public safety hazards by eliminating the risk of fire, structural collapse, personal injury to trespassers, vandalism and crime, by demolishing the structurally unsound, abandoned, and deteriorated former Long Beach Courthouse building.

It is well recognized that an overly narrow definition of project objectives undermines the purpose of CEQA by foreclosing consideration of less harmful alternatives.² With regard to the proposed project, two of the five objectives are so narrowly defined and subjective as to essentially eliminate any possibility of their being met by a preservation alternative. The Conservancy therefore requests that the DEIR contain a broader definition of project objectives, allowing for the full consideration of preservation alternatives.

IV. The Final SEIR should evaluate and select a bona fide preservation alternative as the environmentally superior alternative.

The Conservancy is deeply concerned over the absence of a range of meaningful preservation alternatives in the Draft SEIR. In our comments on the Draft EIR for the now-withdrawn Long Beach Courthouse Demolition Project, we urged the City to mandate the study of bona fide alternatives for retaining and reusing the Courthouse as part of a thoughtful planning process for the Civic Center at large. With the Draft SEIR, the City has once more failed to demonstrate the infeasibility of incorporating the Courthouse, City Hall, and Main Library into the new plan for revitalizing the Civic Center.

a. Deficiencies in current study of project alternatives, as no preservation alternative is offered that maintains eligibility of all of the affected cultural resources

² See *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438 (holding that when project objectives are defined too narrowly an EIR’s treatment of analysis may also be inadequate).



In addition to the required No Project/No Build Alternative, the Draft SEIR analyzes three alternatives, of which two would slightly reduce impacts to cultural resources. Alternative 2/Downtown Plan Buildout of Civic Center Area Alternative would retain the Main Library and Lincoln Park, but demolish the Courthouse and City Hall. Though few details are provided, this alternative's impact on historic resources would remain significant. Alternative 3/Adaptive Reuse Alternative would rehabilitate the Courthouse according to the *Secretary of the Interior's Standards for Rehabilitation* and reuse the building for governmental offices. While the Courthouse would retain its eligibility for the California Register under this alternative, City Hall and the Main Library would still be demolished, resulting in significant impacts.

Alternative 3 references an Adaptive Reuse Study (Study) prepared by RRM Design Group in 2014, which was also included in the Draft EIR for the Long Beach Courthouse Demolition Project. The Study is intended to "understand on a conceptual level the impacts of re-furbishing existing building configuration to be used primarily as City Hall and/or municipal offices." As we pointed out in our comment letter on the proposed Courthouse Demolition Project, this analysis is minimal in scope and provides few actual details on the existing conditions of the various building systems. The Study includes inaccurate information in key areas, stating that "the original heating, cooling, and ventilation systems are well beyond the normal service life expectancy." Furthermore, it fails to acknowledge that, in 1996, the County of Los Angeles undertook a major \$1.8 million energy efficiency upgrade of the building that focused on HVAC and lighting.³

The analysis in Alternative 3 of the proposed Civic Center Project does not address these deficiencies or offer any additional evidence to support claims that adaptive reuse would be infeasible. In assessing the impacts of Alternative 3 on Cultural Resources, the Draft SEIR states: "The adaptive reuse of the building, however, would require substantial alteration of interior and exterior features. The adaptive reuse would maintain the structure of the building, but its appearance and historic value may be diminished." While the project would adhere to the *Standards for Rehabilitation*, the City does not offer any insights into how the Courthouse's integrity could be compromised, and its discussion of this Alternative underscores the predisposition towards demolition.

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."⁴ To this end, CEQA requires public

³ Energy Star Labeled Building Profile:

http://www.energystar.gov/index.cfm?fuseaction=labeled_buildings.showProfile&profile_id=1313: This 6-story, 215,880 sq. ft., air-conditioned facility (302,896 GSF including parking lot and garage) received two new chillers; two sets of chilled water and condenser water pumps, each with premium efficiency pump motors, 24 variable frequency drives and compatible premium efficiency motors for air handling units; an airside economizer cycle; and a new analog/digital energy management system with centralized and local HVAC access control of the entire facility. The building's lighting system was also retrofitted with T8/electronic ballasts (from T12/magnetic ballast fluorescent); compact fluorescent lamps (from incandescent), high pressure sodium lamps (from mercury vapor); and LED exit signs.

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



agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”⁵

Courts often refer to the EIR as “the heart” of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.⁶ Based on objective analyses found in the EIR, agencies “shall mitigate or avoid the significant effects on the environment whenever it is feasible to do so.”⁷ 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.⁸

While the Adaptive Reuse Study ultimately concludes that “a renovation project of this size and complexity would cost far more than demolishing and replacing the existing building with entirely new construction,” **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.**

b. Meaningful adaptive reuse alternatives will meet most of the project objectives.

The Draft SEIR contends that the environmentally superior alternative is Alternative 1/Reduced Density Alternative, which does not include any preservation components that would reduce significant impacts to cultural resources. This determination is in error and inherently flawed and reveals the broader and problematic deficiencies with the City’s analysis and this SEIR. The Final SEIR should, in good faith, examine a range of additional preservation alternatives that retain and adaptively reuse the Courthouse, City Hall, and Main Library buildings as part of a comprehensive approach to the Civic Center. **Further, the SEIR needs to offer at least one preservation alternative that maintains the eligibility of the affected cultural resources, including the Courthouse and overall Civic Center complex (which includes the historic City Hall, Library and associated designed landscape). This alternative is not provided at all which does not adhere to CEQA provisions. Only partial-preservation alternatives are offered in the Draft SEIR. As stated, the City simply rejected considering and studying this option.**⁹

The Draft SEIR states that a Courthouse Adaptive Reuse and City Hall-Library Complex Rehabilitation Alternative was considered, but ultimately rejected. Though the 2014 Adaptive Reuse Study of the Courthouse is cited as evidence of this alternative’s infeasibility, no studies appear to have been conducted on City Hall and the Main Library. Without sufficient evidence, including detailed cost analyses and a thorough assessment of existing building conditions, we question how the City arrived at its determination that rehabilitation and reuse are infeasible.

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

⁶ *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.

⁷ Public Resource Code, Sec. 21002.1.

⁸ Public Resource Code, Sec. 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.

⁹ Civic Center Project SEIR, 6-14



Furthermore, we strongly believe that greater consideration and analysis should have been given to the three alternatives suggested by the Office of Historic Preservation, including the proposed Infill Alternative. The Draft SEIR fails to demonstrate, for example, the infeasibility of integrating sensitive infill development into the underutilized portions of the site. Adaptively reusing the Courthouse, City Hall, and Main Library buildings – in tandem with compatible infill construction – would meet most the central project objectives, including revitalizing the Civic Center area, enhancing connectivity between Downtown and the Civic Center, and facilitating a vibrant mix of public and private space. There are other civic center developments that have successfully been reused and upgraded to meet current government and alternative use requirements, including those involving similar Modernist structures that also required seismic and life safety solutions, not unlike those present for Long Beach. One example is the Civic Center in Richmond, California.¹⁰ We encourage the City to look to this example and others before foreclosing options for a viable preservation alternative.

While we recognize that the proposed Civic Center project reflects many of the guiding principles of the 2012 Downtown Plan, retaining and rehabilitating these known historic resources is also consistent with the City's outlined vision, which states: “[w]e value our buildings of historic merit and seek to preserve or restore them through adaptive reuse.”¹¹ Though the Downtown Plan EIR found that the implementation of the Downtown Plan would have a “significant and unavoidable impact resulting from the potential redevelopment of properties that are eligible [historic resources],” the City must also demonstrate a good-faith effort to examine and pursue the environmentally superior alternative that mitigates and/or avoids significant impacts.

Studies have consistently shown that, when comparing buildings of equal size and function, adaptive reuse nearly always offers greater environmental savings over demolition and new construction.¹² New energy efficient buildings can take up to eighty years to overcome the climate change impacts that result from their construction, whereas building reuse and retrofits can substantially reduce greenhouse gas emissions. Though the Draft SEIR notes that Alternative 3/Adaptive Reuse Alternative would “incrementally lessen impacts to GHG emissions,” it fails to explore the full environmental benefits of preservation.

Conclusion

Thank you for the opportunity to comment on the Draft SEIR for the Long Beach Civic Center Project. We welcome the opportunity to continue working with the City on efforts to identify opportunities for rehabilitation and adaptive reuse within the potential Civic Center Historic District. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

About the Los Angeles Conservancy:

¹⁰ Richmond, California Civic Center, <http://aiasf.org/programs/competition/design-awards/2010/richmond-civic-center/>

¹¹ City of Long Beach, *Civic Center Project Draft Supplemental Impact Report (2-28)*.

¹² Preservation Green Lab, National Trust for Historic Preservation, *The Greenest Building: Quantifying the Environmental Value of Building Reuse*, January 2012.



The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with more than 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. For over twenty-five years, the Conservancy and its volunteer Modern Committee have worked to raise awareness about Los Angeles' unique collection of mid-20th century modernist structures.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Long Beach Heritage
California Office of Historic Preservation
Docomomo-Southern California

