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Submitted electronically
Jim Doty, Environmental Affairs Officer
City of Los Angeles
Bureau of Engineering
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Los Angeles, CA 90012
Email: jim.doty@lacity.org

October 21, 2013

RE: Draft Environmental Impact Report (DEIR), Los Angeles Street Civic Building Project

Dear Mr. Doty:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Los Angeles Street Civic Building Project, which impacts the historic Parker Center building (originally known as the Police Facilities Building). The Conservancy urges the City of Los Angeles and the Bureau of Engineering to pursue an environmentally sensitive project that can minimize the greatest impacts to cultural and historical resources while still meeting many of the project objectives.

Without a preferred project named or selected at this time, three project alternatives are identified within the DEIR and are under consideration. All three will result in significant and unavoidable direct impacts on the Parker Center building, albeit to varying degrees. Only Alternatives B1 (rehabilitation) and B2 (rehabilitation, partial demolition and new addition) have the greatest potential for complying with the Secretary of the Interior's Standards for Rehabilitation (Standards), while maintaining Parker Center as a eligible historic resource. Alternative B3 calls for the complete demolition and redevelopment of the Parker Center site. Alternative B1 is identified within the DEIR as the environmentally superior alternative.

I. Parker Center is a significant historic and cultural resource.

The 1955 Parker Center has been previously identified as a historical resource, formally determined eligible for the National Register of Historic Places as a contributor to the Los Angeles Civic Center in 2010. At that time it was listed in the California Register of Historical Resources. It is significant for its design by Welton Becket and Associates and for the controversial Chief William H. Parker, who served as Chief of Police at the Los Angeles Police Department from 1950 to 1966.

The eight-story, International Style building with integrated art and landscaping components was a significant, postwar addition to the Los Angeles Civic Center. It features contrasting, rectilinear volumes, most apparent through its rectangular tower of administrative offices set atop a one-story base housing an administrative wing to the south and an auditorium to the north. The two-story jail portion of the

building also extends north from the tower. Horizontal bands of windows alternating with mosaic tiles dominate the north and south elevations of the tower, which features windowless west (main) and east elevations clad in ceramic veneer panels. Twelve delicate pilotis (isolated columns) clad in blue mosaic tile support the mass of the tower extending over the main entrance plaza at Los Angeles Street. The building's original design remains highly intact.

Parker Center includes two integrated, site-specific art pieces as part of the original design: the bronze sculpture "The Family Group" by artist Bernard J. Rosenthal on the building's exterior and the expansive mosaic "Theme Mural of Los Angeles" by artist Joseph Young on the interior; both are original to the building. The "Theme Mural of Los Angeles" depicts a stylized composition of images representing the Los Angeles cityscape, including such iconic landmarks as Los Angeles City Hall, Griffith Observatory, and Grauman's Chinese Theatre.

Parker Center was included in the Los Angeles Conservancy Modern Committee's 2003 tour "Built by Becket," which showcased notable designs of Welton Becket throughout Los Angeles County.

II. The Final EIR should evaluate a preservation alternative that avoids major impacts on cultural resources while achieving most of the project objectives.

The DEIR does not identify a preferred project, but rather three project alternatives. Alternative B1 would rehabilitate the current Parker Center building, converting it into offices for 875 City employees and include 319, 048 total square footage. Alternative B2 would involve partial demolition, rehabilitation and an addition, housing 1,775 City employees and include 522,260 total square footage. Alternative B3 demolishes the Parker Center building and constructs a new facility, housing 2,945 employees and includes 588,240 total square footage (and additional 22,970 for ancillary uses).

The Conservancy believes Alternatives B1 and B2 have the greatest potential of meeting the project objectives while also still maintaining the eligibility of the Parker Center as a historical resource. Each would receive a similar rehabilitation treatment for the historic building, while Alternative B2 would result in the loss of the jail section and involve the construction of an adjacent eleven-story tower and corridor connector.

In terms of establishing a need for the project, the DEIR states that 3,865 employees are currently off-site and a project objective is to locate City staff closer to City Hall. Yet there is no assessment, technical report, or space needs study provided within the DEIR that includes a departmental breakdown or cost-benefit analysis that substantiates this project objective. For instance, is 185-192 square feet per employee the desired outcome or consistent with all relocated City departments for the proposed project? Does this estimate reflect current industry standards or the growing trend for shared work environments with reduced square footage per employee? Are there better and more efficient ways to house employees that could generate greater space efficiencies? Given that none of the alternatives provided can fully meet the goal (B1 with 875; B2 with 1,775; B3 with 2,945), it would be helpful to fully understand and determine what level of staff thresholds are absolutely required as part of the scope of this project. The Conservancy requests this type of detailed analysis be provided prior to the selection of a preferred project.

Alternatives B2 and B3 both involve new construction at the site, with independent tower structures to be built. Through Alternative B2 there will be an eleven-story, 262,100 square foot tower on the site of the current jail structure. Though structurally independent, this will be connected to the current Parker Center building through a twenty-five-foot wide corridor at floors one through seven. The Alternative B3 calls for one or two buildings up to twenty-seven stories with a maximum height of 450 feet, with 753,730 square feet overall. Again, there is no needs analysis provided within the DEIR that substantiates what

amount of square footage or type of office facilities are required, by departmental breakdown or otherwise. This also raises the question of why Alternative B2's tower structure is capped at 200 feet and eleven stories. It stands to reason that additional height and density can be achieved through this preservation alternative with modification to provide a greater amount of overall square footage, thus housing even more of the desired employees at a central location. This modification can further enhance Alternative B2 with respect to meeting project objectives. The Final EIR should address these concerns and further refine Alternative B2 or provide as a modified, stand-alone alternative.

III. Rehabilitating the Parker Center building is acknowledged as the environmentally superior alternative and can be achieved while meeting the project's sustainability goals and green building objectives

The project seeks to meet the City's Green Building Code. Reuse of the existing Parker Center building is an inherently green and sustainable practice. According to the USGBC, LEED-certified existing buildings now surpass LEED-certified new construction, a trend that is expected to grow.[1] When a building is demolished and replaced, research demonstrates that it can take more than 30 years before any cumulative energy savings is achieved through even the most energy-efficient replacement building.[2]

The adverse environmental impact of demolishing the Parker Center building and constructing up to 753,730 square feet of space is tremendous, requiring enormous expenditures of energy, materials, and non-renewable resources. Even with recycling, the project will generate significant amounts of demolition and construction solid waste. The Conservancy disagrees with the DEIR's finding of "less than significant" and statements that Alternative B3 will "not result in a wasteful use of energy."[3] By contrast and through Alternatives B1 and/or B2, the Parker Center building can be retrofitted to achieve greater energy efficiency, with adaptive reuse saving energy and resources that otherwise would end up in the landfill. This has been a successful approach for other existing building types similar to the Parker Center, in Los Angeles and nationwide.

Any perceived deficiencies with the Parker Center building can be improved without full demolition and replacement. The Parker Center building could attain better performance through green operations and maintenance. Upgrades can be made to modernize the electrical and plumbing systems and sustainability features such as low-flow water fixtures, tankless water heaters, and energy-efficient lighting can be installed. The California Historic Building Code is also available to provide code flexibility for historic buildings to achieve performance standards equivalent to current building codes while still retaining their historic integrity.

IV. Feasible alternatives to demolition are provided within the DEIR

A key policy under 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] The lead agency cannot merely adopt a statement of overriding

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[1] "Huge Growth for LEED retrofits," www.greenbuildingpro.com, December 8, 2011
[2] National Trust for Historic Preservation, Preservation Green Lab, *The Greenest Building: Quantifying the Environmental Value of Building Reuse*,
[3] Los Angeles Street Civic Building Project, Chapter 1, Executive Summary, Page 1-34
[4] Public Resources Code §21001 (b), (c).
[5] *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; *also see* PRC §§ 21002, 21002.1.

considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.

It is undisputed that demolition and replacement of the Parker Center building would cause a substantial adverse and unavoidable impact to a significant historical resource. Therefore, if feasible alternatives to demolition of the Parker Center building exist that would generally meet the basic objectives of the project, the City of Los Angeles and Bureau of Engineering should avoid a project resulting in a significant impact.

As a contributor to the National Register-eligible Civic Center Historic District, the potential loss of the Parker Center Building is significant. The Final EIR should address the cumulative impacts of the proposed project and the loss of a significant mid-century modern resource within the historic district boundaries.

V. Alternatives B1 and B2 substantially lessen impacts on historic resources, while achieving most project objectives

Despite Alternative B1 being deemed the environmentally superior alternative, the DEIR states Alternative B3 would "best satisfy the project objectives because the greatest number of City employees could be relocated under this alternative and a new building would provide better fire-life safety and seismic safety features and comply with the City Green Building Code."[6] There are a number of errors in this statement and conclusion. As previously stated, there is no analysis provided within the DEIR that establishes a baseline or space needs assessment for City employees. A larger building may not be warranted or deemed efficient, as square footage alone cannot accurately reflect overall efficiencies. Also, as addressed earlier in our previous comments and as demonstrated through numerous studies, the reuse and retrofit of an existing building such as the Parker Center building has a greater ability to meet sustainability and green building policies over demolition and new construction

In terms of fire-life safety and seismic assertions made within the DEIR, no detailed analysis or technical studies are provided regarding these aspects. In our review of the limited materials within the DEIR and by talking with experts in the field of engineering and historic buildings, the proposed seismic strengthening in Alternatives B1 and B2 would meet all current fire-life safety and seismic standards for existing buildings. The Conservancy understands there will be minimal intervention required (through concrete shear walls and jackets) that will affect some historic fabric, such as the mosaic-clad columns at the front façade of the building. Once employed, these treatments will strengthen lateral stability. In contrast to statements made in the DEIR, these types of treatment should not be inferred or concluded to be as anything less than or inferior to the proposed new construction.

VI. Conclusion

We believe that creative reuse options exist for the historic Parker Center building, as an independent rehabilitation through Alternative B1 or as part of rehabilitation with complimentary new construction through Alternative B2. Both provide a wide range of options and flexibility while maintaining the eligibility of an existing building and historic resource, while meeting many of the project objectives. The preferred project should be environmentally sensitive and one that can minimize the greatest environmental impacts.

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[6] Los Angeles Street Civic Building Project, Chapter 1, Executive Summary, Page 1-35

Thank you for the opportunity to comment on the DEIR for the Los Angeles Street Civic Building Project. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

About the Conservancy
The Los Angeles Conservancy is the largest local historic preservation organization in the United States, established in 1978 to preserve and revitalize the significant architectural and cultural heritage of Los Angeles through advocacy and education. The Conservancy's all-volunteer Modern Committee has been at the forefront of preserving mid-century architecture since its inception in 1984.

Sincerely,

Adrian Scott Fine
Director of Advocacy

cc: City Councilmember Jose Huizar, Council District 14