



July 11, 2011

Submitted by email

Ms. Laura Sainz
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Office of Court Construction & Management
Judicial Council of California – Administrative Office of the Courts
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**RE: Notice of Preparation for the Glendale Courthouse Focused EIR,
Glendale, California**

Dear Ms.Saniz:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the New Glendale Courthouse project in Glendale, California. The Los Angeles Conservancy is the largest local preservation organization in the United States, with over 6,000 members throughout Los Angeles County. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education. Since 1984, the Conservancy's all-volunteer Modern Committee was worked to raise awareness about greater Los Angeles' unique collection of mid-twentieth century modernist structures that shaped the tastes and architectural trends of the entire nation.

Although we appreciate the Administrative Office of the Courts' (AOC) intent to retain the significant architectural elements of the existing courthouse, officially known as the Glendale County Building, the Conservancy remains concerned that full or substantial demolition of the 1959 building continues to be a possibility. Having recently toured the site with AOC staff, the Conservancy urges AOC to evaluate a range of alternatives in the environmental impact report (EIR) that adapts the building while incorporating new construction in a sensitive manner to ensure the Glendale County Building retains its eligibility as a historic resource.

I. Glendale County Building as a Historic Resource

Completed in 1959, the Glendale County Building is a notable postwar-era civic building in Glendale. Designed by local architect Arthur Wolfe with landscape architect Arthur G. Barton, the building stretches along an entire block on Broadway in the heart of the civic center. This distinctive building has long been recognized as an important example of

mid-century office design, and was included in the Los Angeles Conservancy Modern Committee's 2002 tour "Your Government in Glendale."

The building's modern design incorporates contrasting building materials and forms, along with integrated art and landscaping. Angular volumes surfaced in smooth architectural concrete panels contrast with a serpentine wall clad in unpainted brick. This curving wall surface is mirrored in the undulating underside of the T-shaped building's elevated rear wing, which is supported by tapered columns. Other distinctive elements of the building's design include the stepped entrance canopy that follows the sloping grade of the site, integrated planting beds, and the landscaped courtyard at the eastern end of the site. The north façade contains an integrated, site-specific ceramic sculpture by George Stanley depicting the ideals of liberty, freedom and justice under the law. Significant interior elements include the terrazzo flooring, floating staircase, large chandeliers with upright lamps, and the exposed interior of the serpentine brick wall with curved wood benches following the wall's contours. Architect Arthur Wolfe also designed other modernist civic and institutional projects in Glendale, including the 1959 County Health Center and a redesign of Maple Park in 1966, as well as elementary schools in Encino and Pacific Palisades.

The Glendale County Building anchors the County's presence in Glendale and was part of a wide-ranging capital building project of courthouses, sheriff stations, hospitals and other government services throughout the county in the postwar era. It was initially built to house two municipal courts, a Superior Court, and other county services available in Glendale, such as field offices for the Fifth District Supervisor, the District Attorney, the County Assessor, and the Probation Department. Based on its association with the Los Angeles County courts system and as a distinctive example of a type and period of construction by a locally significant architect, the Glendale County Building has been identified as individually eligible for the California Register of Historic Resources and the National Register of Historic Place in a reconnaissance-level survey conducted as part of the Glendale Downtown Specific Plan in 2006.

II. Project Alternatives

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."¹ 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."² 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

¹ Public Resource Code, Sec. 21001 (b), (c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

significant environmental impacts and analyzes a range of alternatives that reduce those impacts.³

To that end, the EIR for the New Glendale Courthouse should prioritize development of alternatives that avoid demolition of the Glendale County Building, taking advantage of code flexibility under the California Historical Building Code, past experience with upgrading historic structures for ADA compliance, and new efficient fixtures and equipment in order to improve seismic, accessibility, and energy performance of the existing structure. The EIR should include at least one feasible preservation alternative that attempts to meet the project objectives while incorporating new construction and retaining the Glendale County Building's eligibility as a historic resource. The EIR should consider a range of options that reuse the existing building to accommodate today's programmatic requirements, such as the self-help center, jury assembly room, or court administration and operations offices, in addition to housing the County agencies that will remain. Opportunities also exist to design in-fill construction on the site to provide the desired increase square footage, and essential separation of judges, juries, defendants, and the public, while complying with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. This may include utilizing the rear wing as a connector, integrating landscaping elements like courtyards to separate new and existing structures, or adding underground connections.

The Glendale County Building has proved adaptable in its past and the Conservancy strongly believes it can be adapted and incorporated into the current project.⁴ We look forward to working with AOC, the City of Glendale, and members of the community to develop a plan that both meets the project objectives and ensures the Glendale County Building will continue to serve the community as an anchor of the civic center. Thank you for the opportunity to comment on the Glendale Courthouse Focused EIR Notice of Preparation. Please add the Conservancy to the notice list for this project as the environmental review process continues and feel free to contact me at afine@laconservancy.org or 213-430-4203 should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, slightly slanted style.

Adrian Scott Fine
Director of Advocacy

cc: Glendale Historical Society
City of Glendale, Planning Division

³ *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.

⁴ Past adaptation of the building include completion in 1970 of two courtroom spaces that were built as part of the original construction but left unfinished in anticipation of future growth of the courts. The rear wing that initially housed the Probation Department was renovated into additional courtrooms in the 1980s.