

May 20, 2014

Mr. Theodore Irving, City Planner
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**Re: Mitigated Negative Declaration, Eldercare Facility project,
6530-60 Winnetka Avenue, ENV-2014-464-MND
(John Lautner-designed Crippled Children's Society
Rehabilitation Center)**

Dear Mr. Irving:

On behalf of the Los Angeles Conservancy, we submit these comments on the historic significance of the former Crippled Children's Society Rehabilitation Center ("Rehabilitation Center"), now AbilityFirst's Paul Weston Work Center at 6530-60 Winnetka Avenue and the need for a full Environmental Impact Report (EIR) prior to the approval of any project that would adversely impact this building. We understand that the proposed project will demolish the Rehabilitation Center and thus result in significant impacts, whereby the California Environmental Quality Act (CEQA) calls for the need to identify and consider a range of viable preservation alternatives.

The Mitigated Negative Declaration's (MND) conclusion that the project will have "no impact" on historical resources is based on flawed analysis. The MND fails to note that the Rehabilitation Center was identified by SurveyLA in 2013 as a potential historic resource eligible for both the California Register and local listing. Therefore, the city must reject the MND's finding that the project will have "no impact" on historic resources and require the preparation of an EIR.

I. Significance of Crippled Children's Society Rehabilitation Center and John Lautner

The Rehabilitation Center was designed by master architect John Lautner (1911-1994), whose influential career spanning four decades produced some of Southern California's most visionary examples of modern design. His buildings have been described as sculptural and sensory and were always designed to respond to their site.

Assisting Lautner with the design of the Rehabilitation Center was Helena Arahuate, who served as project architect. Paul Speer served as general contractor and Ben Noble, Paul Speer's associate, was in charge of the construction.



John Lautner's design for the Rehabilitation Center, completed in 1979, is one-of-a-kind. It was intended to suit the requirements of Mary Jane Moore, the director of the Woodland Hills Center. Mrs. Moore wanted to see everything in the Center from her office, without having to use cameras and a monitoring TV system. The director's office was at the center of a circular, pie-shaped plan and was raised three feet higher than the main floor. With no interior partitions, it provides total visibility to all the wings radiating from this center. The building had to include a speech and hearing department, a workshop, a multipurpose room, a recreation room, an indoor swimming pool, locker rooms, storage, mechanical room, garage, and parking areas. A summer swimming lake was proposed but never built. The Center had to be designed for growth, so it could be built in phases.

Each wing containing one of the departments listed above has glass on three sides, and faces landscaped areas that separate the wings and provide views, shading, and natural light. These garden-like areas continue in the form of pie-shaped skylights at the center of the building. The structure converges on a central column in the director's office and continues in the form of steel tie-downs, forming an open landscaped trellis outside the office, completing the circular plan. The trellis was designed to be densely planted, to provide shading to the director's office.

II. The MND's conclusion that the project will have "no impact" on historical resources is unsupported

The MND contains no evaluation of potential historic and/or cultural resources within the project area, yet the Rehabilitation Center proposed for demolition and replacement was previously evaluated by the city through SurveyLA and found to be a potential historic resource. SurveyLA, Los Angeles' first-ever comprehensive program to identify significant historic resources throughout the city, identified the Rehabilitation Center as a potential historic resource eligible for both the California Register and local listing in March 2013, describing it as "an excellent example of Late Modern/Expressionist architecture designed by master architect John Lautner."

In July 2013, the Los Angeles Conservancy featured the Rehabilitation Center as part of a program looking at Modernist architecture and planning of the 1940s-1990s throughout Los Angeles and the San Fernando Valley. We hosted a lecture at the Rehabilitation Center on July 27, 2013 that including a discussion about the building by architect Helena Arahueté. Attendees also toured the facility. Since 2013 the Conservancy has also featured this building on our website at <https://www.laconservancy.org/locations/abilityfirst%E2%80%99s-paul-weston-work-center>.

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."¹ Indeed, CEQA review has proven to be one of the most effective tools that we have to address the erosion of our cultural heritage. It can prevent irreversible losses through careful consideration of alternatives that achieve most of the project objectives while avoiding significant impacts on the environment.

With regard to the AbilityFirst property and the Rehabilitation Center, there appears to be an opportunity for development on the site while retaining and adaptively reusing the original building. Given that an known historical resource will be directly impacted by the proposed project, we urge the city to reject the MND and instead require the preparation of an EIR for this project, as required under CEQA.

¹ PRC §21001 (b), (c).



About the Los Angeles Conservancy:

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

Thank you for the opportunity to comment on the MND for the Eldercare Facility project. 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
Director of Advocacy

cc: Councilmember Bob Blumenfield
John Lautner Foundation
Office of Historic Resources, Department of City Planning

Attachment(s)

