



June 15, 2012

Submitted by email

Mr. Mahmood Karimzadeh, AIA
Principal Architect
City of Los Angeles
Public Works, Bureau of Engineering
Architectural Division, Municipal Facilities Program
1149 South Broadway, Suite 800
Los Angeles, CA 90015-2213
Email: oldparkercentereir@lacity.org

RE: Notice of Preparation for the LA Street Civic Building Project

Dear Mr. Karimzadeh:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation for the LA Street Civic Building Project, which impacts the historic Parker Center building. The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 7,000 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County.

In March 2012 the Conservancy met with City staff and its project team, understanding that three project alternatives will be fully evaluated within the Draft EIR. The following comments are intended to help in the development of these alternatives and a preferred project that meets the City's objectives while still maintaining Parker Center's eligibility as a historic resource.

I. Historic significance of Parker Center

Parker Center was designed by Welton Becket and Associates and completed in 1955. The eight-story, International Style building with integrated art and landscaping components was a significant, postwar addition to the Los Angeles Civic Center. It received critical acclaim upon opening for its innovative design that integrated virtually all departments of the municipal police department into a single facility. At the time this was unprecedented and a new type of building. Parker Center is credited as being influential in the design of other similar buildings that followed in other parts of the country.

Originally known as the Police Facilities Building, the building was posthumously named for Chief William H. Parker, who served as Chief of Police at the Los Angeles Police Department from 1950 to 1966. While Chief Parker's legacy has been mixed, he is

associated with reducing corruption in the department and developing administrative concepts that have since become established procedures. .

The building's original design remains highly intact. It features contrasting, rectilinear volumes, most apparent through its multi-story, 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 extends north from the tower at the rear. Horizontal bands of windows alternating with mosaic tiles dominate the north and south elevations of the tower, which features contrasting, 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.

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 and the expansive mosaic "Theme Mural of Los Angeles" by artist Joseph Young, which are both original to the building. "The Family Group," located to the right of the main entrance, is a wall-mounted, 14-foot tall bronze sculpture of four figures and represents a policeman protecting his family. "Theme Mural of Los Angeles," which is a cantilevered glass mosaic mural, served the dual purpose of civic art and as a screen for the telephone bank on its reverse side. The 36-by-6-foot mosaic 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 has long been recognized as a significant resource, and 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. Parker Center was identified as a historic resource eligible for listing in the California Register of Historical Resources in 2004 through a historical assessment prepared for the Proposed Public Safety Facilities Master Plan project. Additionally, Parker Center was identified as a historic resource eligible for listing in the National Register of Historic Resources in 2010 through the Regional Connector Transit Corridor project, which received concurrence from the California State Office of Historic Preservation.

II. Project Alternatives

A key policy under the California Environmental Quality Act 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 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 reduce or avoid those impacts. Based on the objective

¹ PRC §21001 (b), (c)

analyses found in the EIR, agencies “shall mitigate or avoid the significant effects on the environment...whenever it is feasible to do so.”²

According to CEQA Guidelines, a project that complies with the *Secretary of Interior’s Standards for the Treatment of Historic Properties* (Standards) has a less than significant impact on the historic resource.³ Alternative 1, rehabilitation and restoration of the existing Parker Center building, has the greatest potential for complying with the Standards and avoiding adverse impacts to a historic resource. Alternative 2, partial demolition and an addition to Parker Center, also has the potential to meet the Standards, or at a minimum, retain the site’s eligibility for local and national historic designation. Full demolition of Parker Center, as proposed in Alternative 3, would result in a significant unavoidable impact under CEQA.

The Standards are nationally-recognized guidelines for appropriate management of historic resources with four main treatment approaches. The ten broad principles under the Standards’ rehabilitation approach focus on retaining the historic materials and elements that convey the importance of the resource, often called the character-defining features, while allowing for flexibility in renovating the resource to meet current demands. The analysis in the Draft EIR should detail the character-defining features of the site, including exterior, interior, landscape, and art features, and evaluate the feasibility of addressing the project objectives while meeting the Standards.

For instance, the upper floors of Parker Center served as office space for the police department and could be reconfigured for continued office use by City departments. Some spaces, such as the auditorium and the commission boardroom, also could be retained for City use, while other areas, such as the jail wing or the crime labs, could be adapted for new uses. Other considerations, including green building features, seismic upgrades, and additions, can also be incorporated sensitively. The City should explore utilizing code flexibility provided under the California Historical Building Code to meet the performance requirements of current codes without sacrificing the resource’s historic integrity.

To address the goal of expanded square footage and a mixed use, the Draft EIR should fully evaluate the feasibility for sensitively-designed infill construction and additions on or near the project. Due to adjacent new construction within the last decade of added police facilities and a public parking garage on the block in which Parker Center is situated, available space is limited by past planning decisions. Nonetheless, infill construction could include a wide range of options, such as a slender structure at the northeast corner of the block, where a parking lot currently exists, low-scale commercial retail spaces along Judge John Aiso Street, or evaluating the feasibility of building atop the new garage at the corner of First Street and Aiso Street.

Additionally, opportunities to expand the new garage, or share the existing 300 parking spaces should be considered to meet the City Departments’ 500-1,000 space parking goal.

² PRC §21002.1

³ PRC §15064.5 (b)

Some spaces in the garage can be set aside for city use during the weekdays while remaining available for public use in the evenings or weekends to serve Little Tokyo's cultural, commercial, and dining attractions. Furthermore, creative design solutions that retain Parker Center should be considered to allow for pedestrian connectivity through the block.

The Draft EIR should evaluate a range of the various iterations possible under Alternatives 1 and 2 while retaining Parker Center's historic status. These may include full or partial demolition of the jail wing and/or the low-rise administration wing, and additions or stand-alone structures of various heights, masses, site placement, and connections to the original building. The recommendations for reuse and rehabilitation, green building design, seismic upgrades, parking, and connectivity mentioned above should also be considered for each alternative.

The Conservancy looks forward to working with the City and members of the community as this project moves forward. Please 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: Councilmember José Huizar, Council District 14
Office of Historic Resources, City of Los Angeles
Little Tokyo Service Center