



December 22, 2015

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Submitted Electronically

Ms. Erin Strelch
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Email: erin.strelch@lacity.org

**Re: Notice of Preparation for Wilshire Mullen Project,
ENV-2015-3719-EIR**

Dear Ms. Strelch,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for an environmental impact report (EIR) for the Wilshire Mullen project.

The Conservancy appreciates that the proposed project will retain and reuse the historic Farmers Insurance Home Office Building (“Farmers Building”) and incorporate new construction on existing surface parking lots and vacant residential lots. We submit the following comments to ensure that the rehabilitation and adaptive reuse of the Farmers Building meets the *Secretary of the Interior’s Standards for Rehabilitation*. The new infill construction should be compatible in scale and overall massing so as not to adversely impact the historic building and immediate neighborhood.

If significant impacts are anticipated, a range of preservation alternatives should be evaluated and adequate mitigation measures proposed as part of the environmental review process. In particular, we strongly recommend designation of the Farmers Building as a Historic-Cultural Monument (HCM) prior to project approval. This will ensure adequate long-term protection and a design review process.

I. Historic Significance of the Farmers Building



Designed by noted Los Angeles architectural firm of Walker and Eisen, the Farmers Building was completed in 1937 in the PWA Moderne style. Farmers Inter-Insurance Exchange, founded in 1928, commissioned the building as the headquarters for its growing company, which provided automobile, fire, and truck insurance to farmers and ranchers throughout Southern California. The original three-story building was expanded to seven stories in 1949, and the addition was designed by Claud Beelman and Herman Spackler. The addition skillfully matched the original construction in style, materials, and details. Constructed primarily of concrete, the building's key character-defining features include its flat roof, stepped entry pillar with horizontal triple scoring, bezeled windows, decorative metal screen, and cast stone finial.

The Farmers Building was identified through SurveyLA as being eligible for listing on the National Register of Historic Places, the California Register of Historical Resources, and as a Los Angeles HCM.¹ It is an excellent example of PWA Moderne commercial architecture designed by master architects and is significant as the corporate headquarters of Farmers Insurance Group.

II. Draft EIR should evaluate appropriate treatment options and mitigation measures for the Farmers Building

Located in the proposed “Block A” of the project site, the Farmers Building would be retained and adaptively reused for office space (floors 1-2) and condominiums (floors 3-8). As indicated in the NOP, the Draft EIR should thoroughly study potential direct and indirect impacts of the project on the historic building, including any exterior and interior modifications and the proposed new construction (described below).

In order to reduce potentially significant impacts, the Draft EIR should also include a detailed historic preservation plan that outlines recommended treatment options for the Farmers Building's historic exterior and interior features. The plan should demonstrate adherence to the *Secretary of the Interior's Standards* and ensure that the building retains its eligibility as an historical resource. It should also include a full historic structures report (HSR), which would document and assess the building's unique existing conditions and provide clear guidelines for the appropriate treatments.

The NOP states that the Farmers Building “is under consideration in a pending application for Historic [Cultural] Monument designation.” The Conservancy strongly urges the City and applicant to move forward with the nomination as a form of mitigation and an additional layer of protection. HCM designation would enable the City's Cultural Heritage Commission and staff

¹ City of Los Angeles, “Historic Resources Survey Report: Wilshire Community Plan Area.” Prepared by Architectural Resources Group, Inc., January 23, 2015.



to review and comment on the project design and details in compliance with the *Secretary of the Interior's Standards* and would create a public process for any future improvements.

Because the project contains numerous components, the nomination and review should occur *prior* to any issuance of building permits for all phases of development to ensure that questions of compatibility and appropriateness are adequately considered. The nomination should clearly identify both exterior and interior character-defining features, including any alterations that may have gained significance.

III. Draft EIR should evaluate impacts of new construction and demonstrate compatibility with the Farmers Building

As described in the NOP, the proposed project would construct eleven townhouse units on the surface parking adjacent to the Farmers Building, along with associated amenities. The Draft EIR should fully analyze and discuss the impacts of the proposed new construction on aesthetics and cultural resources, including the Farmers Building and surrounding neighborhood. It should also contain detailed drawings to demonstrate the relationships between the new and historic buildings.

The new residential buildings should be designed in a manner that is both compatible and appropriate in terms of scale, massing, height, design, and materials to the seven-story historic building, in accordance with the *Secretary of the Interior's Standards*. They should be sufficiently set back and detailed as to not overwhelm or compete with the historic building. As a significant architectural anchor on Wilshire Boulevard, the Farmers Building's historic focal point and front entrance orientation should be maintained as part of the proposed project.

About the Los Angeles Conservancy:

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.

Please feel free to contact me at 213-430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

Adrian Scott Fine



Adrian Scott Fine
Director of Advocacy

cc: Council District 4
City of Los Angeles, Office of Historic Resources
Art Deco Society of Los Angeles

