

DEPARTMENT OF
CITY PLANNING
OFFICE OF HISTORIC RESOURCES
200 N. SPRING STREET, ROOM 620
LOS ANGELES, CA 90012-4801
(213) 978-1200

CULTURAL HERITAGE COMMISSION

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VICE PRESIDENT

TARA J. HAMACHER
GAIL M. KENNARD
OZ SCOTT

FELY C. PINGOL
COMMISSION EXECUTIVE ASSISTANT
(213) 978-1294

CITY OF LOS ANGELES
CALIFORNIA



ANTONIO R. VILLARAIGOSA
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EXECUTIVE OFFICES

MICHAEL J. LOGRANDE
DIRECTOR
(213) 978-1271

ALAN BELL, AICP
DEPUTY DIRECTOR
(213) 978-1272

LISA WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1272

EVA YUAN-MCDANIEL
DEPUTY DIRECTOR
(213) 978-1273

FAX: (213) 978-1275

INFORMATION
www.planning.lacity.org

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City Planning Commission
200 North Spring Street, Rm 272
Los Angeles, CA 90012

Commissioners:

On behalf of the Cultural Heritage Commission, thank you for the opportunity to formally comment on the Final Environmental Impact Report (FEIR) for the Green Hollow Square Project. The Barry Building located at 11973 W. San Vicente Boulevard is designated as Historic-Cultural Monument (HCM) #887 under the City of Los Angeles' Cultural Heritage Ordinance and would be demolished under the proposed project. The project would also potentially impact the Coral Trees on the median strip of San Vicente Boulevard (Historic-Cultural Monument #148).

The Cultural Heritage Commission's primary responsibility in its capacity as a Mayor-appointed decision-making body is to oversee the preservation and safeguarding of the City of Los Angeles' over 1,000 Historic-Cultural Monuments. Since its establishment in 1962, demolition of an HCM has been contrary to the goals and principles of the Cultural Heritage Commission and the Cultural Heritage Ordinance. This Commission exists for the promotion and protection of Historic-Cultural Monuments and takes very seriously the prospect of an HCM being eliminated forever.

When designated as a Historic-Cultural Monument, the Barry Building met Cultural Heritage Ordinance criteria for "embodying the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction" as an example of International Style commercial architecture. Apart from the potential loss of the designated historic resource, the Barry Building is one of the few very rare examples of commercial mid-twentieth century modern design in the register of Historic-Cultural Monuments. In fact, a preliminary review suggests that the Barry Building is only one of three modernist commercial buildings out of over 1,000 designated Historic-Cultural Monuments: the only other two are the Neutra Office Building (HCM #676; constructed 1951) and the Jones and Emmons Building (HCM #696; constructed 1954).

After careful review of the Draft Environmental Impact Report (DEIR) in 2011, the Cultural Heritage Commission submitted a formal communication to the Department of City Planning expressing concern over the proposed demolition and supporting an adequate preservation alternative.

After thoughtfully reviewing the FEIR and listening to testimony at scheduled public hearings, the Cultural Heritage Commission provides the following comments:

1) The Cultural Heritage Commission opposes the demolition of the Barry Building and supports the Preservation Alternative (Alternative 4) that retains and integrates the Barry Building into the proposed project.

Any concerted effort to purposefully demolish a Historic-Cultural Monument for a replacement project is unacceptable. Pursuing the demolition of the Barry Building imperils the over 1,000 Historic-Cultural Monuments in the City of Los Angeles and sets a dangerous precedent.

The Cultural Heritage Commission believes that the Barry Building can be integrated into a new development while also meeting and exceeding the project goals of the proposed project. Other projects throughout the City of Los Angeles have been successful in incorporating Historic-Cultural Monuments through the guidance and support of the Cultural Heritage Commission and its Office of Historic Resources. We strongly support sensitive reuse of historic resources for new projects.

While the DEIR states that Alternative 4 may not meet Objective 1 and that “retention of the Barry Building may affect the architectural integration of the overall project,” the Cultural Heritage Commission’s response is to simply have the proposed development’s design better respond to the Barry Building’s mid-twentieth century design. These design modifications can be minimal and do not have to fundamentally alter the site planning and square-footage of the proposed project.

As identified in the FEIR, Alternative 4 proves to be the environmentally superior alternative. Having the same number of parking spaces as the proposed project with only a 5% reduction in square footage, a preservation alternative should also be able to meet the economic goals under Objective 4. With only minor design changes, Alternative 4 can also easily meet all project objectives without being rendered infeasible.

2) The Cultural Heritage Commission and the staff of the Office of Historic Resources will work with project representatives to further develop a successful Preservation Alternative.

The Cultural Heritage Commission and the Office of Historic Resources commit to serve as a resource to further refine the Preservation Alternative within the parameters of the FEIR to meet project objectives and goals. As supported by qualified preservation consultant reports in the FEIR, renovations and modifications to the Barry Building under the Preservation Alternative would not significantly alter its character-defining features and can comply with the Secretary of the Interior’s Standards for Rehabilitation. OHR staff is available to review and discuss changes to better incorporate the subject building into the new project once plans are developed and refined.

As stated in previous communications, the Cultural Heritage Commission also supports a building permit process in the future that would facilitate the construction of the proposed project under the preservation alternative. By not flagging properties beyond the subject building address, Office of Historic Resources review would be limited only to the existing building. This may potentially also permit some allowances from mandated building code upgrades, facilitating the successful reuse of the Barry Building.

3) The Coral Trees on the San Vicente Boulevard median (HCM #148) must not be altered or modified.

The Coral Trees on the median strip of San Vicente Boulevard between 26th Street and Bringham Avenue are Historic-Cultural Monument #148. The coral trees are part of the elegance of the San Vicente Blvd commercial corridor and are a major character-defining feature of the area. Removing and altering the coral trees and the median under the FEIR's optional proposals is unacceptable. The cumulative impact of past and potential future alterations to this landscaped median in other sections is also a concern for the Cultural Heritage Commission.

The Cultural Heritage Commission urges the City Council to support the selection of the preservation alternative as it both ensures the protection of the Barry Building as a Historic-Cultural Monument and allows for the proposed development to proceed. The future of other Historic-Cultural Monuments in the City of Los Angeles will be directly impacted by the results of the Environmental Impact Report for this project and we urge you to prevent the loss of a significant Historic-Cultural Monument.

Thank you for this opportunity.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Barron", with a long horizontal flourish extending to the right.

RICHARD BARRON, President
Cultural Heritage Commission