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April 19, 2011

Hadar Plafkin, Environmental Review Coordinator
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Plafkin,

On behalf of the Cultural Heritage Commission, thank you for the opportunity to formally comment on the Draft Environmental Impact Report (DEIR) for the Green Hollow Square Project. As you know, 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 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' nearly 1000 Historic-Cultural Monuments. Since its establishment in 1962, demolition of an HCM is 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 serious the prospect of an HCM being eliminated forever.

Another impacted Historic-Cultural Monument by the Green Hollow Square Project is the Coral Trees on San Vicente Boulevard (HCM #148). The Cultural Heritage Commission is concerned about alterations to this historic resource and the cumulative impacts to the landscaped median.

After thoughtfully reviewing the DEIR and listening to testimony at a public hearing held on April 7th, 2011, the Cultural Heritage Commission provides the following comments:

1) The Cultural Heritage Commission supports a preservation alternative that retains and integrates the Barry Building into the proposed project and preserves the Historic-Cultural Monument.

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 do not believe that our Historic-Cultural Monuments should be frozen in time but strongly support sensitive reuse of historic resources for new projects.

2) The Cultural Heritage Commission finds that Alternative 4 (“Preservation Alternative”) in the DEIR is inadequate.

Alternative 4 as currently presented in the DEIR is inadequate and a disingenuous attempt to provide a preservation alternative for the proposed project. This alternative does not appear to take seriously into consideration the existing historic resource and lacks detailed analysis compared to other alternatives in the DEIR. Retention of the Barry Building must be a primary responsibility of the proposed project’s applicant and must not be treated as a secondary issue or an afterthought. Renderings attempting to incorporate the Barry Building in the DEIR appear cartoonish and unprofessional and give the impression of entombing the historic building. This preservation alternative must provide renderings and analysis of the proposed development that both compliment and integrate the Barry Building

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.

Even with these concerns, Alternative 4 still proves to be the environmentally superior alternative as explicitly stated in the DEIR. 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.

3) The proposed demolition of the Barry Building sets a dangerous precedent for other designated Historic-Cultural Monuments in the City of Los Angeles.

The loss of a Historic-Cultural Monument is always a great tragedy for the City of Los Angeles. A concerted effort to purposefully demolish a Historic-Cultural Monument for a replacement project is unacceptable. Pursuing the demolition of the Barry Building imperils the nearly 1000 Historic-Cultural Monuments in the City of Los Angeles and sets a dangerous precedent.

4) The Barry Building is a rare example of a commercial mid-20th century modern Historic-Cultural Monument.

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 nearly 1000 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).

With the departure of Dutton’s Brentwood Bookstore and the introduction of new tenants to the storefront spaces, greater transparency and views have been restored to the Barry Building that bring it closer to its c. 1951 appearance. Along with the continued maintenance by the property owner, current photographs of the Barry Building reveal it to be in excellent condition.

5) 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 were designated as Historic-Cultural Monument #148 in 1976. 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 DEIR's different 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 Planning Department to address the comments and concerns raised in this letter. We urge the development of a viable preservation alternative that ensures the protection of the Barry Building as a Historic-Cultural Monument. 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. Please continue to integrate the Cultural Heritage Commission on any future proposed projects that impact Historic-Cultural Monuments.

Thank you for this opportunity.

Sincerely,



RICHARD BARRON, President
Cultural Heritage Commission