



February 3, 2011

Submitted electronically

Tracy Dudman
Senior Planner
Campus and Environmental Planning
UCLA Capital Programs
1060 Veteran Avenue
Los Angeles, California 90095-1365
Email: t.dudman@capnet.ucla.edu

Re: Notice of Preparation for an Environmental Impact Report UCLA Residential Conference Center

Dear Ms. Dudman:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) of an environmental impact report for the UCLA Residential Conference Center Project. The Los Angeles Conservancy is the historic preservation organization for the Los Angeles area and is the largest local preservation organization in the United States, with about 6,000 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles County through advocacy and education. The Conservancy's all-volunteer Modern Committee has been at the forefront of preserving mid-century architecture since its inception in 1984. Based on the architectural significance of the Faculty Center, we urge the University of California to fully consider a range of potentially feasible alternatives to demolition in the DEIR.

I. The DEIR Should Acknowledge The Faculty Center is a Historical Resource

Designed by the architectural firm of Austin, Field and Fry and completed in 1959, the Faculty Center is noteworthy for its use of the California ranch architectural style. This includes elements such as post and beam construction, large operable floor-to-ceiling windows, multiple fireplaces and cathedral ceilings, all of which incorporate intimate outdoor spaces and courtyards, taking advantage of sunlight and natural air for cross-ventilation. Most often this architectural style was employed for residential commissions, especially during the mid-century period. As a public building, the Faculty Center is rare in design, especially within the context of an institution of higher education where surrounding buildings are more formal in massing, scale and the use of materials.

The architects of the Faculty Center are also noteworthy. Austin, Field and Fry were responsible for many civic buildings throughout Los Angeles, including serving as part of a team of architects who designed the Los Angeles County Courthouse in 1958. Senior partner in

the firm, John C. Austin, was also responsible for the design of the 1928 Los Angeles City Hall, in association with two other firms.

The CEQA Guidelines consistently provide that a resource is to be treated as historically significant if it is listed on a local historic register or meets any one criterion for listing in the California Register of Historical Resources.¹ For purposes of CEQA review, a property's potential eligibility for an historic register, rather than actual listing, is sufficient evidence to consider that resource historic. As the authoritative guide to the state's significant architectural and cultural resources, the California Register serves to identify, evaluate, register, and protect California's historical resources. To be determined eligible for the California Register, an historical resource must be significant at the local, state, or national level under one or more of the following criteria:

1. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state or the nation.

In addition to meeting one of the four above criteria, California Register-eligible properties must retain sufficient integrity to convey historic significance; it need not retain all aspects of integrity, but only a sufficient degree of those aspects of integrity that relate to why it is significant. Despite minor alterations from a 1980s-era remodeling, the Faculty Center remains largely intact.

The Conservancy believes the Faculty Center should be fully evaluated as an historical resource, eligible for listing in the California Register, as the work of a master architect and as a unique example and use of California ranch style architecture (criterion 3).

II. Project Alternatives

The proposed project, consisting of a demolition of a historical resource, would cause significant and irreversible adverse impacts to cultural resources. Accordingly the DEIR must evaluate at least one bona fide potentially feasible preservation alternative that attempts to meet project objects, incorporates the Faculty Center into the project and retain its eligibility as a historical resource.

The California Environmental Quality Act "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation

¹ CEQA Guideline §15064.5 (a)(3).

measures can substantially lessen such effects.”² CEQA Guidelines require that a range of reasonable alternatives be considered in the EIR, with an emphasis on options capable of “substantially lessening” the project’s significant adverse environmental effects. The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA. To that end, the Draft EIR for the Residential Conference Center should prioritize development of alternatives that avoid demolition of the Faculty Center, and the resulting loss to the city’s cultural heritage.

To ensure fair consideration of preservation alternatives, the DEIR should first assess the feasibility of the proposed project in terms of current zoning limits, the capacity of existing infrastructure, cumulative impacts (including of cultural and historic resources), sustainability goals, and community plan objectives for nearby Westwood and Holmby Hills.

No Project Alternative: As required under CEQA, the DEIR must include a “no project” alternative that considers the viability of retaining the Faculty Center as is. The Faculty Center is well maintained though it does require some physical improvements, including a new roof, following a recent period of deferred maintenance. It also is well used and popular for its original function as a meeting and luncheon facility.

Reduced Scale Alternative: The DEIR should include a reduced scale alternative that would construct only a portion of the proposed project.

Project Site Alternative: The DEIR should include consideration of alternative sites for the proposed project, given the vast size and scale of the project location (UCLA campus). An alternate site would retain the existing Faculty Center and perhaps reduce cumulative impacts associated with land use and planning, noise and vibration, transportation and traffic congestion, utilities and greenhouse gas emissions.

With such overwhelming public sentiment in favor of preservation of the Faculty Center, the Conservancy hopes that University of California will reaffirm its long-standing tradition and commitment to its rich architectural heritage. Thank you for the opportunity to comment on the Notice of Preparation for the Residential Conference Center project at the Los Angeles campus. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,



Adrian Scott Fine
Directory of Advocacy

cc: Councilmember Paul Koretz, 5th District

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.