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**Re: Crossroads Hollywood Project, Draft Environmental Impact Report, DEIR, Case No. ENV-2015-2026-EIR (SCH No. 2015101073)**

Dear Mr. Huerta:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Crossroads Hollywood Project. On November 24, 2015 the Conservancy previously commented on the project's Notice of Preparation. Overall, more than six historic resources would be impacted, consisting of the demolition of eighty-four existing residential units (including 80 multi-family, affordable housing units and two duplexes) and low-density commercial/retail and office uses, as well as surface parking lots. Eight new mixed-use buildings, including three high-rise towers (up to 32-stories in height), are proposed. These impacts cannot be mitigated to a less-than-significant level.

The Conservancy has previously raised strong concerns about this project and its significant impacts on numerous local and California Register-eligible historic resources throughout the project area and broader Hollywood community. Despite our pressing for meaningful consideration of potentially feasible preservation alternatives to demolition, the DEIR does not adequately address this fundamental concern and requirement of the California Environmental Quality Act (CEQA).

### **I. Impacts to cultural resources**

The proposed project, spanning an eight-acre, four city block area in the heart of Hollywood, would result in both direct and indirect impacts on Hollywood. While we are pleased that the project calls for the retention, preservation and rehabilitation of the historic Crossroads of the World, impacts to other historic resources are significant.

One historic resource, the "Early American Building," would be relocated within the original boundaries of Crossroads of the World. It would be moved to the center of the Crossroads of the World property, altering the original plan and configuration of the historic resource. We are concerned that this relocation may create a false sense of history within Crossroads of the World. The integrity of Crossroads of the World may be further impacted due to the scale of the proposed, three high-rise



towers (Buildings C1, C2 and C3). How will these impacts be addressed and potentially mitigated?

The project also proposes demolition of all other existing historic resources on the project site. It seeks to construct approximately 1,432,500 square feet of floor area consisting of 950 residential units, 308 hotel rooms, approximately 95,000 square feet of office uses, and approximately 185,000 square feet of commercial/retail uses.

In addition to the historic Crossroads of the World property, which is listed in both the National Register of Historic Places and the California Register of Historical Resources as well as designated as Los Angeles Historic-Cultural Monument #134, six other properties within the proposed project area have been identified as California Register-eligible (status codes 3CS; 3CD; 3CB).

The most recent evaluation of properties in the project area was conducted as part of the 2010 Historic Resources Survey of the CRA's Hollywood Redevelopment Project Area and the DEIR Cultural Resources Appendix E. The following are identified within each of the project's proposed development parcels, A-D:

**A. Development Parcel A.** 1547 N. McCadden Place, Transitional Cottage (1907), (APN: 5547-020-025), 3CS

**B. Development Parcel B.** 6713-6719 W. Sunset Boulevard, Hollywood Reporter Building, (1936-7, 1948), (APN: 5547-020-005), 3CB; 1535 N. Las Palmas Avenue, prewar, Multi-Family Courtyard Apartment Grouping (1939) and 80 units of housing, (APN: 5547-020-001), 3CB; 1542 N. McCadden Place, Craftsman Residence, (1910), (APN: 5547-020-029), 3CS; and the Hollywood Reporter Building, located at 6713 Sunset Boulevard.

The Hollywood Reporter Building is historically significant both for its architecture and its association with publisher and businessman William Wilkerson and *The Hollywood Reporter*, the entertainment trade newspaper he founded in 1930 that operated from the property for six decades. *The Hollywood Reporter* was one of only two local publications, the other being *Variety*, that were devoted solely to entertainment news. Wilkerson, who started legendary Hollywood nightclubs including Café Trocadero and Ciro's, developed the Hollywood Reporter property during the 1930s and 40s, which evolved to include three connected structures.

Wilkerson hired architect Arthur W. Hawes to design what is now the rear, two-story portion in 1936 and hired master architects Douglas Honnold and George Vernon Russell that same year to remodel an existing one-story structure fronting Sunset Boulevard that housed Wilkerson's elegant men's haberdashery Sunset House for a time. Honnold's Streamline Moderne façade features book-matched, polished marble cladding contrasting with curving, ribbed concrete surfaces. Significant interior elements by Honnold and Russell include a fireplace featuring the Sunset House crest. A three-story addition to house printing and engraving was completed in 1948 and connected the front and rear structures, and *The Hollywood Reporter* operated out of the entire property through the early 1990s. *LA Weekly* next occupied the building through 2008.

**C. Development Parcel C.** 6683 W. Sunset Boulevard, Commercial Building (1923), (APN: 5547-019-023), 3CD; and the Crossroads of the World.

Designed by local architect Robert V. Derrah and completed in 1936, the Crossroads of the World was conceived as a cosmopolitan shopping center featuring merchandise from throughout the world and is one of Los Angeles' most iconic properties. Constructed as a pedestrian outdoor shopping mall, the complex utilizes a programmatic nautical theme paired with architectural styles derived



from around the world. The central building on Sunset Boulevard is designed in the form of a Streamline Moderne ship, which “sails” down an international street lined with shops designed in various styles. Cobblestone walkways, mature trees, extensive landscaping, fountains, outdoor seating areas and even a wishing well tie all of the buildings together, and enhance the international atmosphere.

**D. Development Parcel D.** 1606 N. Las Palmas Avenue, Craftsman Duplex (1912), (APN: 5547-014-027), 3CS

Further, this project will have indirect impacts on the historic Hollywood community and other nearby historic resources. This includes the Hollywood High School Historic District, the Blessed Sacrament Church and School, Hollywood Center Motel, an Art Deco office building at 1618 La Palmas Avenue, and an apartment building at 1523 McCadden Place.

In addition to impacts to individual and adjacent historic resources, the project significantly alters the historic street grid and setting of Hollywood, and has the potential to impact the community’s economic vitality. In Hollywood the “activity” has always been on the street and along the boulevards. This project is in direct conflict with community goals to revitalize and activate the historic boulevards of Sunset and Hollywood. Realigning Las Palmas Street and directing retail activity internally onto a through-block diagonal promenade will potentially impact Hollywood as a whole, as it could unintentionally redirect activity away from Hollywood’s historic boulevards.

Given the massive amount of new square footage added to Hollywood as part of this project and others (either also proposed or already approved), these types of indirect and cumulative impacts should be fully evaluated. At stake is the historic Hollywood community character. The proposed infill development, in massing, size, and density, has the potential to overwhelm the community.

## **II. Draft EIR should identify and evaluate a range of preservation alternatives that avoid major impacts on cultural resources while achieving most project goals**

A key policy under CEQA 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.”<sup>1</sup> To this end, CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”<sup>2</sup>

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.<sup>3</sup> The CEQA Guidelines require a range of alternatives to be considered in the EIR that would feasibly attain most of basic project objectives but would avoid or “substantially lessen” the project’s significant adverse environmental effects. The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.<sup>4</sup>

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<sup>1</sup> Public Resources Code §21001 (b), (c).

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

<sup>3</sup> *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

<sup>4</sup> PRC §§ 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.



The Draft EIR contains only one preservation alternative, Alternative 5/Historic Preservation, which would retain all six California Register-eligible properties paired with comparatively low density infill construction. This alternative, however, is incapable of meeting several of the core project objectives calling for high density development and a range of proposed uses. As presented, this alternative is unable to meet specific objectives, including “to construct a high-density, mixed-use[d] development;” “to develop a high-rise upscale hotel;” and “to locate a high-density residential and commercial mixed-use development.” **As a narrowly-defined preservation alternative, and the only one provided within the DEIR, it appears to be designed and intended to fail.**

The Conservancy is disappointed that a range of potentially feasible preservation alternatives were not evaluated, as we specifically addressed this point in our November 24, 2015 comments on the Notice of Preparation and urged for their inclusion in the DEIR.

The City and applicant have a mandate to reduce impacts wherever possible, yet the DEIR has not *thoroughly* evaluated the feasibility of retaining the six California Register-eligible resources. The sole preservation alternative evaluates whether all six potential resources could be retained, paired with low density infill construction that does not meet even the most basic project objectives of high density development.

As recognized in the DEIR, significant adverse impacts to cultural resources exist, as a direct result of attempts to meet identified project objectives. As part of CEQA the City’s core responsibility is to analyze and consider a range of alternatives that would reduce or avoid these impacts. Given the amount of significant impacts generated as a result of this proposed project, why was only one preservation alternative provided? Other similar projects have offered additional alternatives, including partial preservation alternatives that may be capable of fully meeting all or most of the project objectives while also reducing the impacts to some but perhaps not all cultural resources. This may include consideration of relocating some of the affected historic resources, either on or offsite, provided integrity and eligibility could be retained.

Though the project seeks to rehabilitate the landmarked Crossroads of the World, while laudable, does not lessen the responsibility of the applicant and lead agency to seriously consider a range of potentially feasible preservation alternatives that could retain one or more of the six California Register-eligible historic resources identified across the eight-acre project site.

The DEIR states these impacts are significant but unavoidable, and without sufficient mitigation measures. Given the clear inadequacy of the DEIR, we respectfully request the City and applicant reevaluate whether some of the potential resources might be feasibly retained as part of the project.

### **III. Demolition of cultural resources at odds with goals of the Hollywood Redevelopment Plan and Community Plan**

The Crossroads Hollywood Project is located in the Hollywood Redevelopment Plan area. As such, the project will have to make findings of consistency with that plan, which has a goal to promote the retention and reuse of historic structures. Subsection 11 of the Redevelopment Plan Goals states:

“Recognize, promote and support the retention, restoration and appropriate reuse of existing buildings, groupings of buildings and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria.”



Additionally, a core objective of the Hollywood Community Plan is to “encourage the protection and enhancement of the varied and distinctive residential character of the Community.”

The proposed project, located in the heart of Hollywood, would instead demolish all six California Register-eligible properties, including a building on the property directly tied to the Hollywood Entertainment industry, the Hollywood Reporter Building.

#### **IV. Incorporate clear guidelines and mitigation measures for new construction within project area**

The project needs to be more explicit and clear in identifying recommendations to guide new construction throughout the eight-acre, project area, including guidelines for scale, mass, height, fenestration, and building materials.

The Conservancy remains concerned over the impacts of proposed new construction on the Crossroads and larger Hollywood community, including nearby historic resources. Adequate guidance and mitigation is necessary to ensure they are designed in a way that is compatible with the historic materials, features, size, scale, proportion, and massing to protect the overall area and integrity of historic resources, including the Crossroads of the World property. Mitigation measures should also address impacts that could occur through the substantial foundation work and subterranean parking that is proposed. Without proper safeguards in place, damage is possible and settlement due to the removal of adjacent soil, etc.

New development should comply with the *Secretary of the Interior's Standards*, as interpreted by a qualified third-party preservation consultant. Standards #9 and #10 specifically apply and should be addressed, as recommended in the project's Historic Resources Technical Report. Without this guidance, the possibility of future impacts to occur remains high. To address this uncertainty, we believe that an appropriate solution would be for the City's Office of Historic Resources to review and concur with the recommendation of the consultant.

The National Park Service provides greater guidance in regards to the *Standards* and how to incorporate new construction, specifically stating “[I]ntroducing a new building or landscape feature that is out of scale or otherwise inappropriate to the setting's historic character” is not recommended. Given this, we strongly recommend the preparation of additional guidelines for planning and designing new construction in order to reduce future impacts and provide greater clarity. Guidelines should acknowledge the historic setting – including landscaping, open space, and existing street patterns. They should identify specific provisions for ensuring that these relationships and features are adequately retained and sensitively incorporated into new development.

#### **V. Conclusion**

The Conservancy has met with the applicant and we greatly appreciate their willingness to engage in ongoing discussions concerning the proposed project and its potential impacts on historic resources. We would appreciate the same opportunity to meet with the City to discuss this project as well. We are concerned about the overall project and its direct and indirect impacts on individual historic resources and the broader Hollywood community. We urge you to consider and develop additional preservation alternatives that may be capable of meeting project objectives and reducing significant adverse impacts.



**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 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.

Thank you for the opportunity to comment on the proposed project. Please do not hesitate to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,



Adrian Scott Fine  
Director of Advocacy

Enclosure

cc: City Councilmember Mitch O'Farrell, Council District 13  
Hollywood Heritage  
Art Deco Society of Los Angeles  
Office of Historic Resources, Department of City Planning

