

**Submitted electronically**

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**RE: Notice of Preparation, Crossroads Hollywood Project,  
ENV-2015-2026-EIR**

Dear Mr. Huerta:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Crossroads Hollywood Project, including the proposed modifications to the former Hollywood Reporter Building, the potential demolition of the Cape Cod/Early American Building that is part of the Crossroads of the World complex, and the proposed demolition of numerous California Register-eligible resources throughout the project area. As there will be significant impacts to cultural resources, we urge the city to mandate consideration of a range of potentially feasible preservation alternatives to demolition in the Draft Environmental Impact Report (EIR).

**I. Survey Evaluations and Historical Significance of Structures in Project Area**

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, several other structures within the proposed project area have been identified as California Register-eligible properties (status codes 3CS; 3CD; 3CB) or warranting special consideration in the local planning process (status code 6DQ). The most recent evaluation of properties in the project area was conducted as part of the 2010 Historic Resources Survey of the CRA/LA's Hollywood Redevelopment Project Area.

**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, 1948), (APN: 5547-020-005), 3CB
- 1505 N. Las Palmas Avenue, Spanish Colonial Revival bungalow (1921), (APN: 5547-020-003), 6DQ



- 1535 N. Las Palmas Avenue, prewar, Multi-Family Curtyard Apartment Grouping (1939), (APN: 5547-020-001), 3CB
- 1542 N. McCadden Place, Craftsman Residence, (1910), (APN: 5547-020-029), 3CS

**c. Development Parcel C**

- 6671-6679 W. Sunset Boulevard, Crossroads of the World (1936), (APN: 5547-019-032), 1S
- 6683 W. Sunset Boulevard, Commercial Building (1923), (APN: 5547-019-023), 3CD
- 1510 N. Las Palmas Avenue, Turn-of-the-Twentieth-Century Cottage (1905), (APN: 5547-019-022), 6DQ

**d. Development Parcel D**

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

**e. Crossroads of the World**

Designed by local architect Robert V. Derrah and completed in 1936, 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:

- The Streamline Modern style "ocean liner": Facing onto Sunset Boulevard, the ship features curved corners, red ship railings, porthole windows, rounded doors and numerous flat, horizontal surfaces. A central pylon supports a rotating globe with neon letters spelling "Crossroads of the World."
- The Spanish style building: To the east of the ship and facing onto Sunset Boulevard, this building is characterized by red tile roofs, arches, shutters and balconies with wrought-iron grilles.
- The California Mediterranean building: Adjoining the Spanish building, this features colorful hand-painted tiles, clay tile roofs and unusual windows.
- The Italian building: To the west of the ship and facing onto Sunset Boulevard, this building boasts Venetian Gothic detailing, a loggia and a wrought-iron gate.
- The French building: Adjoining the Italian building, this features stained glass windows, decorated "trompe d'oeil" shutters and a fleur-de-lis atop one of the chimneys.
- The Moorish building: In the center of the Crossroads complex, the Moorish building has pointed archways, a minaret and stenciled geometric designs.
- The Cape Cod/Early American building: A set of small buildings closest to Las Palmas Ave., the Cape Cod/Early American building includes high-pitched, shingle roofs and chimneys.
- The European village: Two buildings facing each other in a village setting, these feature half-timbering, dormer windows and towers.
- The lighthouse: facing Selma Avenue with a functioning revolving light.

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.



## f. **Hollywood Reporter Building**

The Hollywood Reporter Building, located at 6713 Sunset Boulevard, has been identified as eligible for listing in the California Register of Historical Resources.

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.

## II. **Impacts to Historic and Cultural Resources**

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>

### a. **Crossroads of the World**

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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.4<sup>th</sup> 1112, 1123.

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



We applaud the decision to retain, preserve, and rehabilitate the iconic Crossroads of the World as part of the project. Crossroads of the World 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.

The Notice of Preparation and Initial Study do not discuss the demolition of any part of Crossroads of the World, yet the Conceptual Site Plan illustrated in Figure A-4 of the Initial Study omits depiction of the Cape Cod/Early American Building, which is the westernmost structure of the historic complex fronting N. Las Palmas Avenue. The north portion of proposed Building C1 and the alignment of the Pedestrian Passageway are instead shown covering the site currently occupied by the Cape Cod/Early American Building.

The loss of even one of the structures comprising Crossroads of the World would be a significant impact, as each building of the complex is designed in a distinct architectural style as part of the retail center's programmatic international theme.

If the proposed project contemplates the demolition of the Cape Cod/Early American Building of Crossroads of the World to make way for Building C1, the Draft EIR must consider preservation alternatives and appropriate mitigation measures to substantially lessen or avoid such impacts.

The Draft EIR should evaluate the aesthetic impact of the proposed new construction adjacent to Crossroads of the World. New construction should be designed in a manner that is both compatible and appropriate in scale and massing to protect the integrity of the Crossroads of the World complex in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

## **b. Hollywood Reporter Building**

An illustration of proposed Building B3 as part of the overall project shows the mixed-use tower surrounding the entire building envelope of the Hollywood Reporter Building, save for its Streamline Moderne street façade, and rising 32 floors to reach a maximum height of 390 feet.

The Conservancy is greatly concerned over the possible adverse impact of proposed modifications to the Hollywood Reporter Building. It appears that the project proposes either partial or substantial demolition of the structure while retaining its Streamline Moderne façade, with new construction proposed to rise above and around it. Demolition of a structure while retaining its façade neither constitutes preservation nor mitigates the structure's loss. In addition to the loss of historic fabric, the scale, dimensions and placement of Building B3 would overwhelm the Hollywood Reporter Building.

If the proposed project is found to adversely impact the Hollywood Reporter Building, the EIR must consider preservation alternatives and appropriate mitigation measures to substantially lessen or avoid such impacts.

Opportunities exist to design Building B3 in a manner appropriate in scale and massing to protect the integrity and setting of the Hollywood Reporter Building in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. This may include re-orientation, scaling back, or sufficient setbacks to ensure the new construction does not overwhelm the Hollywood Reporter Building.



### **c. Potential Historic Resources in Each Development Parcel**

As noted above, each of the four development parcels of the project site contains potential historic resources that are proposed for demolition. Collectively, these structures represent a diversity of architectural styles and building types and an authentic snapshot of early development in the heart of Hollywood.

The proposed demolition of these structures would result in significant adverse impacts on historic resources under CEQA, warranting detailed consideration of alternatives and mitigation measures in the Draft EIR to lessen or avoid such impacts.

Because the mixed-use project proposes 950 residential units, the Draft EIR should consider a range of options that retain some of the historic residential structures as part of the project for continued use as residences while retaining their eligibility for listing as historic resources. Redistributing the proposed density to other appropriate locations on the project site may facilitate the retention of more of the historic structures as part of the project.

Rehabilitation and adaptive reuse of existing historic structures on the project site provides an opportunity to create a dynamic and vibrant urban project with a mix of building types and styles with both historic and new construction.

Additionally, the Initial Study states that “the Project would incorporate features to support and promote environmental sustainability.” The rehabilitation of historic building stock as part of the project, in addition to Crossroads of the World, would add another layer of sustainability to the project beyond the currently planned energy conservation, water conservation, and waste reduction features.

### **III. Conclusion**

To ensure fair consideration of preservation alternatives, the Draft EIR should first assess the feasibility of the proposed project in terms of current zoning limits, the capacity of existing infrastructure, cumulative impacts (including of historic resources), and sustainability goals. If the proposed project is found to adversely impact historic resources and their character-defining features, the EIR must consider preservation alternatives and appropriate mitigation measures to substantially lessen or avoid such impacts. The relationship between the proposed project and the Hollywood Community Plan should also be addressed in the EIR.

We believe that creative reuse options exist that would meaningfully rehabilitate the Hollywood Reporter Building and several of the historic residential structures and integrate them successfully into the larger development project for the site while retaining their eligibility as potential historic resources. Additionally, the design of proposed new construction should be modified to allow the Cape Cod/Early American Building at Crossroads of the World to remain as part of the historic complex.

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the proposed Crossroads Hollywood project. Please feel free to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions.

#### **About the Conservancy**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 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.

Sincerely,

*Adrian Scott Fine*

Adrian Scott Fine  
Director of Advocacy

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

