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September 20, 2024

Los Angeles Metro, c/o Roger Martin
Metro One Gateway Plaza, Mail Stop: 99-22-5
Los Angeles, CA 90012
klinenorth@metro.net

Re: Draft Environmental Impact Report for the K Line Northern Extension

Dear Roger Martin,

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (Draft EIR) for the proposed K Line Northern Extensions. The Conservancy is concerned about the significant number of proposed demolitions proposed to build and operate the line. We understand that the Draft Environmental Impact Report is taking a conservative approach and is including more demolitions than may be warranted, but we believe further clarifications, options, and mitigation measures must be identified at this early stage to ensure the continued preservation of historic resources in Hollywood and West Hollywood.

Study Impacts to the Hollywood Boulevard Commercial and Entertainment District

Although three alignments are currently under consideration, four buildings at risk of demolition are located at the intersection of Hollywood Blvd. and Highland Ave., and would be impacted in all three alignments. The sites would be used for new stations and construction staging. The buildings include:

- 6806 Hollywood Boulevard
- Rexall Drug Store, Lee Drug Company (6800 Hollywood Boulevard)
- Bank of America (6780 Hollywood Boulevard)
- Hollywood Theatre (6766 Hollywood Boulevard)



All four buildings are contributors to the Hollywood Boulevard Commercial and Entertainment District, which was listed in the National Register in 1984. Over the last 40 years, a number of original contributors in the district have been demolished or significantly altered, and new non-contextual infill approved.

The Conservancy believes that four additional demolitions and new construction may impair the integrity of the district as a whole, making it no longer eligible for National Register listing. The District as a whole is considered a resource and potential impacts should be studied, which is a common and necessary practice for projects proposed within the District boundaries. For a recent example, please refer to the *Hollywood Central Historic Resources Technical Report*, prepared by Historic Resources Group and dated December 23, 2022. The report evaluates CEQA impacts on individual contributors to the District but also the District as a whole. The project as proposed may have impacts to several aspects integrity including *design, setting, materials, workmanship, and feeling*, but this has not been adequately studied in the current DEIR.

Identify Preservation or Adaptive Reuse Options for Station Entrances

The Conservancy is urging Metro to identify and select a preservation-based approach in the Final Environmental Impact Report (EIR). Metro’s August 15, 2024 Virtual Public Hearing on the K Line Northern Extension included a renderings of the future D Line Westwood Station that will be integrated into the Paul R. Williams designed Linde (Westwood) Medical Plaza. Given the historic importance of the Hollywood Boulevard Commercial and Entertainment District and its fragile nature, we believe a similar approach is suitable for Hollywood. We remain neutral on the proposed location of a station, but believe there is adequate space to provide an additional station within the footprint of one or two existing buildings without leading to demolition.

We hope a similar approach be identified for the Santa Palm Car Wash in West Hollywood, which could be potentially be demolished in the one of the alignments. The car wash site is less site constrained than the Hollywood/Highland Station, there may even be an the opportunity to add a new station canopy in the rear of the site while adapting the historic car wash as transit-serving retail.

We can achieve both preservation and transit goals. The Conservancy, along with other partner organizations, are urging Metro to refine the project to respect Hollywood and West Hollywood’s heritage.



Introduce Stronger Mitigation Measure to Protect Historic Resources

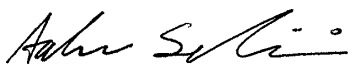
When the D Line was being planned over a decade ago, Metro faced similar issues in designing station entrances that might conflict with historic buildings. Metro planned three potential stations within historic structures, including the aforementioned Linde (Westwood) Medical Plaza, the May Company Building, and the Union Bank Building in Beverly Hills. Metro also adopted a stronger mitigation measure than what is being proposed for the K Line. Mitigation measure “HR-1: Treatment to Avoid Adverse Effects” ensured compliance to the Secretary of the Interior’s Standards and required oversight by SHPO. Metro retained the services of a qualified historic preservation consultant to assist with design development, review and periodic construction monitoring. Given the similarities between these two projects and the potential impacts to historic resources, we ask Metro to adopt a similar mitigation measure for the K Line Northern Extension.

We can achieve both preservation and transit goals, but we believe adequate mitigation measures should be introduced at the environmental review stage to ensure preservation is included in the ultimate build-out of the project.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 member households 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,



Andrew Salimian
Director of Advocacy

cc: Office of Mayor Karen Bass
Supervisor Lindsey P. Horvath
Ken Bernstein, Office of Historic Resources

