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Submitted electronically

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RE: Notice of Preparation, 7107 Hollywood Boulevard Project (Fifth Church of Christ, Scientist)

Dear Ms. Ibarra:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the 7107 Hollywood Boulevard Project, including the proposed demolition of the historic former Fifth Church of Christ, Scientist building in Los Angeles. Based on its architectural significance, the Conservancy believes the church building qualifies as a historical resource and should be treated as such through the CEQA and EIR process. As there will be a significant impact to a cultural resource, 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. The EIR should acknowledge Fifth Church as a “historical resource” under CEQA

The former Fifth Church of Christ, Scientist building is significant as both an example of modern ecclesiastical architecture and as a prominent, local example of Christian Science architecture from the postwar era.

The institutional structures of the Church of Christ, Scientist, one of the major religions founded in the United States, are part of a unique context shaped by the congregations’ choices of architectural styles and church sites. As summarized by historian Paul Eli Ivey in his seminal book *Prayers in Stone: Christian Science Architecture in the United States 1894-1930*, these factors often led to Christian Science congregations “placing their churches in emerging fashionable residential districts or even near newly expanding civic centers. The size, design, and visibility of these attractive structures...clearly positioned Christian Science in relation to larger, historical mainstream religions.”¹

¹ Ivey, Paul Eli. *Prayers in Stone: Christian Science Architecture in the United States 1894-1930*. Chicago: U. of Illinois Press, 1999: 3.



The congregation of Fifth Church of Christ, Scientist was incorporated in 1909 under the name First Church of Christ, Scientist, Hollywood. Following Hollywood's consolidation with Los Angeles in 1910, the congregation was obligated to change its name to Fifth Church of Christ, Scientist, Los Angeles to reflect Christian Science nomenclature; the ordinal number in the congregation's title denoting its order of founding within a particular municipality or jurisdiction. While the Fifth Church congregation sold the property in 2008, the site remains one of the oldest locations associated with Christian Science in Los Angeles County.

The congregation's decision to build the current edifice in 1959-60, after outgrowing their original 1,000 seat, 1916 Beaux Arts edifice on the same site, reflects the postwar growth of the region and the prominence of Fifth Church and its Hollywood location. Actress Ginger Rogers was among those in the Hollywood community who attended services at Fifth Church.² While many of the earlier Christian Science congregations throughout Los Angeles continued to worship in their original structures, Fifth Church became one of the few to erect a new and modern structure. Elsewhere throughout the city, new congregations were formed and built new structures to serve expanding suburban communities.

Constructed between 1959 and 1960 and designed by local architect Howard Elwell, the distinctive, fan-shaped church building is dramatically sited with a curved facade oriented toward the corner and grand entrances off both streets accessed through arched portals. The building is constructed of reinforced brick and reinforced concrete tilt-up panels, while the amphitheater-style auditorium was carefully designed for acoustical efficiency and features a fan-shaped accordion ceiling and canted rear walls. The lower level of the building contains the Reading Room. The landscaping is carefully designed to accentuate the unique geometry of the building and sloping site with curved retaining walls and raised planting beds.

II. The DEIR should evaluate a range of reasonable alternatives that retain and reuse Fifth Church building

A key policy under the California Environmental Quality Act (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."³ 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."⁴ Courts often refer to the EIR as "the heart" of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts."⁵

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.⁶ 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

² Thompson, Donald. Email correspondence with Marcello Vavala. 30 October 2014.

³ Public Resource Code, Sec. 21001 (b), (c).

⁴ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

⁵ *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.

⁶ *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.



statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.⁷

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. At minimum, the draft EIR should include at least one alternative that retains Fifth Church and complies with the *Secretary of the Interior's Standards for Rehabilitation* while maintaining Fifth Church's eligibility as a historic resource.

As currently proposed, the project would raze Fifth Church for a mixed use project consisting of three primary structures, subterranean parking, and a public plaza. The project site plan included in the NOP depicts the proposed "Tower building," "Boulevard Building," and inner courtyard occupying much of the footprint of Fifth Church.

The Draft EIR should consider a range of options that reuse the historic building for uses consistent with the project description, combined with infill construction elsewhere on the site to provide the desired aggregate of square footage. Potential alternatives in the Draft EIR could explore a redesign that relocates new construction onto the current parking lot surrounding Fifth Church, while repurposing the current landscaped corner of the property into the proposed public plaza.

The NOP states that proposed uses for the project will include several lounges, a media room, a business center, a conference room, a gym, and roof decks.⁸ Media room, business center, and conference room uses could be particularly well-suited for Fifth Church; the building's acoustically balanced auditorium, lower level reading room and foyers being conducive to these uses.

Because the proposed project has a goal of achieving LEED Silver certification, the energy conservation realized through preservation and adaptively reusing Fifth Church should also be analyzed in the draft EIR.

III. Conclusion

We believe that creative reuse options exist for Fifth Church and that it can be integrated successfully into a larger development project for the site. The proposed project should consider adapting the church building for commercial and/or retail use and incorporating it into the full project as a distinctive anchor of the community.

Thank you for the opportunity to comment on the NOP for the 7107 Hollywood Boulevard Project. We urge the city to require thoughtful and thorough consideration of preservation alternatives that would retain Fifth Church and incorporate it into the larger project. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

⁷ PRC §§ 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.

⁸ Melrose Triangle NOP, Feb. 2012: 2.



About the Conservancy

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, established in 1978 to preserve and revitalize the significant architectural and cultural heritage of Los Angeles through advocacy and education.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: City Councilmember Tom LaBonge, Council District 4
Hollywood Heritage
Office of Historic Resources, Department of City Planning

