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Submitted by email

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**Re: Final Environmental Impact Report for Paramount Pictures
Master Plan, ENV-2011-2460-EIR**

Dear Mr. Villani and Ms. Nuno-O'Donnell,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Final Environmental Impact Report (EIR) for the Paramount Pictures Master Plan project. Since this project began in 2011 the Conservancy has worked closely with the project team, and we are very appreciative of the approach to date and efforts to integrate the site's collection of historic resources into the proposed master plan. Overall, we believe our discussions with the applicant are positive and have allowed us to make real progress.

Given the extraordinary significance of the Paramount Pictures Main Lot and the extent of this long-term, twenty-five year master plan, we believe there are still several areas that require further consideration and attention before proceeding.

As stated in our Draft EIR comments, we remain concerned over the impact of the proposed project on the two potential historic districts and the individually eligible KCAL Building. In particular, we strongly recommend the preparation of detailed design standards to guide sensitive new construction in addition to the preservation plan; and the adoption of a clear design review process pertaining to work that may impact historic resources which includes the City's Office of Historic Resources in an official sign-off capacity. We also think it's important to revisit the potential for retention and adaptive reuse of historic Stages 19, 20 and 21.



Develop Clear Guidelines for New Construction in Identified Historic Districts

In its current form, the preservation plan outlines certain recommendations to guide new construction on the Main Lot, including guidelines for scale, mass, height, fenestration, and building materials. 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. The plan should identify more specific provisions for ensuring that these relationships and features are retained and sensitively incorporated into new development.

More explicit guidelines regulating the height and overall proportion of new construction are also needed. Though the preservation plan provides overarching recommendations for new construction throughout the project site, the current guidelines are largely open-ended and allow for broad interpretation. In addition to respecting the existing scale, height, and mass of the two historic districts, new structures should not include design elements that detract from or replicate the character-defining features of the district contributors. The plan should also provide greater specificity regarding appropriate building materials that are sensitive to the historic character of the project site.

Formally Integrate the City’s Office of Historic Resources into the Master Plan Review Process

The Conservancy has outstanding concerns over the methodology and proposed review process, and we strongly urge the City to address these issues before certifying the Final EIR. We are especially focused on this aspect in light of the amount of demolition of historic contributing resources that is proposed, and the resulting reduction in percentages for the overall integrity of the two historic districts.

As previously stated in our Draft EIR comments, we believe that there are strong, recent precedents for guiding the implementation of specific plans with clear preservation components. The University of Southern California (USC) Development Plan and Specific Plan (ENV-2009-271-EIR) is an excellent model for a comprehensive, 20-year master plan that balances historic preservation with compatible infill construction. Like the Paramount Pictures Historic Resources Preservation Plan, USC’s Adaptive Mitigation Management Approach (AMMA) provides detailed procedures for project review that directs development to sites without historic resources while requiring additional environmental review when extensive alterations or demolition of a contributing element is proposed.

With review and enforcement from the City’s Planning Department and, more specifically, the Office of Historic Resources, we believe that USC’s methodical approach to managing a large collection of historic resources over the course of a 20-year master plan establishes a clear model for Paramount Pictures to follow as a best practice (see attached Exhibit A). The Paramount Pictures Specific Plan should include precise language that outlines the role of the Office of Historic Resources in reviewing future proposals for any rehabilitation projects and new construction that is adjacent to contributing structures.

This recommendation for a more transparent review process incorporating the Office of Historic Resources would also help alleviate some of our ongoing concerns about new construction – proposed hi-rise tower – immediately adjacent to the historic KCAL Building. According to the Conceptual Site Plan, a new structure (up to 15 stories and 240 feet in height) would be constructed behind the KCAL Building, greatly exceeding the otherwise 75-foot height limit established for this zone. Our concern is primarily with the potential volume, scale, and massing of a large structure located directly behind the historic KCAL Building. To effectively address this aspect, we believe the new hi-rise tower needs to be pushed back as far as possible from the KCAL Building.

The Conservancy strongly encourages the applicant to consider a range of options for a more sensitive development, including redistributing the proposed density to other appropriate locations on the project site. In the absence of better protocols or relocating this proposed density elsewhere (as also suggested by Hollywood Heritage in their May 16, 2016 comments on the FEIR), the KCAL Building will potentially be overwhelmed by inappropriately scaled new development.

In response to our Draft EIR comments on this issue, the process now calls for the Planning Director to “consult” with the Office of Historic Resources. Given the vagueness of this process and it largely being a matter of interpretation with no specific guidance, we do not think this adequately addresses the problem.

Because the EIR only states that new development would comply with the *Standards* and the preservation plan, as interpreted by a qualified third-party preservation consultant, the possibility of future impacts to occur remains high. To address this uncertainty, we believe that an appropriate solution would be for the Office of Historic Resources to review and concur with the recommendation of the consultant and not merely be consulted with or accept the reports for documentation and verification.

We propose the Office of Historic Resources be provided full review and sign off capacity rather than only consultation. This level of authority to review and approve is necessary in the absence of any other review process, such as those afforded through Historic-Cultural Monument (HCM) designation and we do not believe that this change should delay the approval process. Again, the USC approach provides a good model, where the administration voluntarily initiated and agreed to designation of more than a dozen historic resources.

Further Investigate Options for the Retention and Reuse of Stages 19, 20 and 21.

Stages 19, 20 and 21 are perhaps the most visible aspect of the Paramount Pictures Main Lot to the public. The Stage 21 Studio Globe is an iconic element and important in terms of the historic significance and evolution of studio production and use at this location over time. With the understanding there are traffic mitigation issues that need to be addressed, we strongly urge the applicant to reconsider other options that can maintain this important façade wall while still allowing Paramount to address current and future needs. We strongly believe a win-win solution is possible and the Conservancy is happy to work collaboratively to develop some possible options that may not have been previously explored.

Conclusion

Given how much progress has already been made and that we are now primarily focused on only a few outstanding items, the Conservancy believes we can continue to make progress and work together toward solutions. The 1990 Studio Task Force MOU anticipated these types of issues and calls on the council office to assist in bringing parties together when there is disagreement. Given that we are at the Final EIR state, we would welcome this type of process and support from Councilmembers O'Farrell and Ryu, and that any meetings also include Hollywood Heritage along with Paramount.

Thank you for the opportunity to comment on this project. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, slightly slanted style.

Adrian Scott Fine
Director of Advocacy

cc: Council District 4
Council District 13
Office of Historic Resources, City of Los Angeles
Hollywood Heritage

Exhibit A.

University of Southern California University Park Campus Specific Plan Zones

Section 11. Requirements for Historic Review

A. General Requirements. The construction, alteration, addition, demolition, reconstruction, reuse, rehabilitation, relocation or removal of any building object within the Specific Plan area that is:
Identified in the AMMA as an individual resource; or

- b. Is a contributor or non-contributor to the Potential Historic District shown on Figure 7; or
- c. Is a potential development site located within the Potential Historic District shown on Figure 7; shall conform to the requirements of Section 11 and the Adaptive Mitigation Measures (AMMA), attached as Appendix F.

B. Minor Construction to Existing Building. Prior to the issuance of a building permit for any minor change or alteration, including but not limited to routine maintenance, minor system upgrade, change to secondary spaces (e.q. restrooms or storage spaces), or change to spaces that as an existing condition contain no character-defining features to properties that are Potential Historic District contributors, individually significant resources, or both, the applicant shall produce the following in consultation with the Los Angeles Office of Historic Resources (OHR):

- 1. A memorandum from a qualified professional, reviewed and approved by OHR confirming that no character-defining features will be permanently removed, altered or changed; and
- 2. A plan from a qualified professional, approved by OHR for the removal, storage, and reinstallation of such feature(s) if any character-defining features are proposed for temporary removal. The requirements of this Section shall not apply to minor alterations or changes to Potential Historic District non-contributors.

Rehabilitation of Existing Buildings per the-Secretary of the Interior's Standards. Prior to the issuance of a building permit for the rehabilitation of any existing building that is a Potential Historic District Contributor, noncontributory to the Potential Historic District, or individually significant resource (which does not qualify for a building permit under Section 11 (B) above), the applicant shall produce the following in consultation with OHR:

- 1. A report from a qualified historic preservation professional reviewed and approved by OHR, demonstrating that the rehabilitation:
 - ii. Complies with the Secretary of the Interior's Standards for Rehabilitation ("Standards");and
 - iii. Will not affect the eligibility of the Potential Historic District; and

- iv. Adheres to the Design Guidelines for New Construction in the AMMA ("Design Guidelines");
and

2. If the rehabilitation requires the temporary removal of character defining features, a plan for the removal, storage, and reinstallation of such feature(s).

E. Extensive Alteration or Demolition of Existing Building. Prior to the issuance of a building permit for the extensive alteration (such that the Historic Resource will no longer convey its historic significance) of any building that is a Potential Historic District Contributor, non-contributor, or individually significant resource, CEOA review shall be required, and the applicant shall submit to the Department of Building and Safety a report from a qualified historic preservation professional, which has been reviewed by the OHR, demonstrating that the alteration will not affect the eligibility of the Potential Historic District and adheres to the historic guidelines. Prior to the issuance of a demolition permit for the demolition of any building that is a Potential Historic District contributor or non-contributor to the Potential Historic District, or individually significant resource, CEQA review shall be required, and the applicant shall produce a mitigation plan prepared by a qualified historic preservation professional, which has been reviewed and approved by OHR, for the protection of the Potential Historic District during demolition and, new construction.

F. New Construction, Infill or Replacement of an Existing Building. Prior to obtaining a building permit, the applicant shall obtain a clearance from OHR certifying that the new construction:

1. Complies with the Secretary of the Interior's Standards for infill compatibility; and
2. Adheres to the Design Guidelines or New Construction in the AMMA ("Design Guidelines").