



May 11, 2015

Submitted by email

Sergio Ibarra

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

Email: Sergio.Ibarra@lacity.org

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

**Re: Draft Environmental Impact Report for 6250 Sunset Project,
ENV-2014-751-EIR**

Dear Mr. Ibarra,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the proposed 6250 Sunset Project in Hollywood.

We submit the following comments to ensure that the proposed project maintains the eligibility of the 1938 Earl Carroll Theatre (ECT) Building for the National Register of Historic Places, the California Register of Historical Resources, and as a Los Angeles Historic-Cultural Monument (HCM). We believe that the proposed project would benefit from a clear preservation plan that outlines appropriate exterior and interior treatments for the historic building, as well as clear parameters for its potential reuse in order to maintain its viability into the future as the centerpiece of the new development. Furthermore, we urge the applicant to apply for HCM status before the final approval of the project. This will ensure important character-defining features are preserved and establish a design review process to help guide these efforts now and in the future.

In addition, we have concerns regarding the impact of the proposed project on Pete's Flowers/Morgan Camera Shop, a National Register-eligible property adjacent to the project site, and encourage further refinement to reduce the potential adverse impact and to ensure that the building's character-defining features are clearly documented and preserved.



I. Historic significance of the Earl Carroll Theatre Building

Designed by master architect Gordon B. Kaufmann, the ECT Building is one of the few remaining examples of modern entertainment venues constructed at the height of Hollywood's Golden Age. At the time of its completion in 1938, the glamorous and technologically innovative nightclub reflected the rise of modern radio, television, and entertainment venues in the neighborhood around Sunset Boulevard and Vine Street. The *Los Angeles Times* hailed the building as "the first structure of its kind in the nation," and its runaway success led to the development of such iconic venues as Florentine Gardens (1938) and the Hollywood Palladium (1940).¹

Kaufmann's sleek Streamline Moderne design for renowned producer Earl Carroll's exuberant nightclub expressed the unique relationship between modern technology and aesthetics and the growth of Los Angeles' entertainment industry. The architect juxtaposed the building's exterior rectilinear massing with dramatic interior curves, creating dynamic geometries that represented the excitement and optimism of the era. The incorporation of features such as neon lighting and a rotating stage further underscored the project's innovation. Important exterior design elements include the unembellished reinforced concrete walls, the single-story concrete and steel portico, steel ribbon windows, and the three-bay steel porte-cochère. Significant interior features include the lobby entry, tear-drop shaped ticket counter, concave bar areas, lighting wells, figural sculptures, smoke-colored mirrors, etched glass murals, and the rotating stage.

II. Proposed project should include rehabilitation of significant historic features

While the proposed project would maintain the ECT Building and construct a new mixed-use building on the western portion of the project site, it does not commit to the rehabilitation of significant exterior and interior features at this time. The Draft EIR states that the project "includes the potential for minor maintenance and upgrades to the ECT Building exterior, and potential future tenant improvements to the interior of the ECT Building," but it does not offer any details regarding the proposed rehabilitation work. While the implementation of Mitigation Measure 1 (Standards Compliance Review) would provide a mechanism for ensuring that the building retains its eligibility as an historic resource if interior tenant improvements proceed in the future, the project's "selected exterior rehabilitation" should be clearly defined in the Final EIR.

Furthermore, the Conservancy strongly urges the applicant to develop a clear preservation plan for the ECT Building in conjunction with the proposed project, which would serve as an

¹ "Unique Project Well Advanced," *Los Angeles Times* (October 16, 1938).



important guiding document for the interior and exterior rehabilitation, as well as ongoing maintenance. The plan should include a full historic structures report (HSR), which would document and assess the building's unique existing conditions and provide clear recommendations for the appropriate treatments. Because the building has been modified at various points in its history, the preservation plan should make certain that any proposed alterations and treatments maintain the eligibility of the ETC Building for listing on the National Register of Historic Places, the California Register of Historical Resources, and as a Los Angeles Historic-Cultural Monument. The applicant should also establish a clear timeline for completing the work to ensure that the building is rehabilitated and revitalized in tandem with the new construction.

Incorporating the ECT Building's rehabilitation into the proposed project would further enhance its presence on Sunset Boulevard as a significant anchor in Hollywood's entertainment industry. Key components we strongly urge you to consider include rehabilitation of the original porte-cochère, repair of the reinforced concrete surfaces, restoration of the exterior signature blocks, restoration of the exterior neon lighting features (such as the signage and representation of Beryl Wallace), rehabilitation of the piers and window openings on the north elevation, restoration of lobby finishes, and repair of missing or broken interior decorative elements. The rotating stage, which is a rare and significant feature, should also be protected and preserved in-place.

III. Proposed project should ensure long-term viability of the Earl Carroll Theatre Building

In addition to defining a clear preservation plan, the proposed project should incorporate specific strategies for maintaining the ECT Building as a vibrant and economically sustainable entertainment facility. Given the ongoing transformation of its surrounding neighborhood, the Conservancy is deeply concerned over the ambiguity of the building's future use as described in the Draft EIR. We understand that the applicant may be considering reuse options, including creative office space, and we urge further exploration of a range of possibilities that would maintain the building's role in the entertainment industry, including its return to a theatre or venue.

As part of the ECT Building's future viability, we question the current proposal to allocate only 70 parking spaces for the historic building as part of the new development. The existing surface parking lot contains 139 spaces, and we understand that even that number is often insufficient to support the ECT Building's operations. We therefore believe that the current proposal is inadequate and that the applicant should commit to providing additional designated spaces for the ECT Building as part of the proposed project. A covenant should be placed on these parking spaces to ensure that they remain tied to the building in the future.



IV. Compatibility of new construction with the Earl Carroll Theatre Building

While the proposed project would alter the ECT Building's historic setting, the Conservancy believes that the impact of the new construction would be less than significant and that the building would still maintain its eligibility for the National Register. We agree that the design of the open-air paseo would provide a visual buffer between the proposed and existing buildings.

We also understand that the projecting canopy above the ground floor commercial spaces in the new building is similar in height and scale to the ECT Building's portico and the awnings on the adjacent Pete's Flowers/Morgan Camera Shop (6260 Sunset Boulevard), but we do request that the Final EIR specifically identify additional design features that are compatible with or stylistically reference the ECT Building in accordance with the *Secretary of the Interior's Standards for Rehabilitation*. Furthermore, we ask that the Final EIR contain supplementary renderings from various perspectives to clarify the spatial relationships, including massing and scale, between the new construction and both historic resources.

Moreover, we have concerns over the adverse impact of the project on the Pete's Flowers/Morgan Camera Shop building at 6260-62 Sunset Boulevard. We believe that the scale and design of the new seven-story building, including the projecting balconies, would overwhelm the 1938 commercial building, in addition to obscuring the painted advertisement on the eastern elevation that has been visible historically from Sunset Boulevard and the project site. Pete's Flowers/Morgan Camera Shop, which has been determined eligible for listing on the National Register, is distinguished by its bold historic signage, and the painted advertisement constitutes a significant character-defining feature.

We support the recommendation in the Draft EIR to prepare an updated DPR Survey Form for Pete's Flowers/Morgan Camera Shop in order to ensure that the building's historic signage is documented in full. Furthermore, we urge the applicant to consider additional mitigation measures or design features that would further reduce the adverse impacts. For example, we encourage the project team to explore a more substantial setback on the western elevation of the proposed building to provide a greater buffer between the new and existing structures. We also propose incorporating a new interpretive feature, such as a silkscreen mural or photo display, onto the western elevation of the new building that commemorates the obscured signage, as has been successfully done on Broadway and in other parts of the city.

With respect to both the ECT Building and Pete's Flowers/Morgan Camera Shop, the Conservancy requests that the Final EIR include a provision stating that a qualified historic preservation professional will monitor the construction process to ensure that both historic resources are stabilized and protected.



Because of the prominent role of signage on the project site and surrounding block – both historically and today – the Conservancy also recommends that the applicant establish a cohesive and sensitive signage program that is compatible with both the ECT Building and Pete’s Flowers/Morgan Camera Shop. The signage program should provide guidelines for the storefronts in the new building, as well as guidelines for the ECT Building should a change of use occur in the future.

V. Nominate the Earl Carroll Theatre Building as an Historic-Cultural Monument to ensure proposed project meets Standards

Given the significance of the property and its relationship to neighboring historic resources, including the Palladium and CBS Columbia Square, the Conservancy strongly urges the applicant to nominate the ECT Building for local Historic-Cultural Monument (HCM) status as an additional measure of protection. The Draft EIR recognizes that the building is a “rare” surviving example of its architectural and property type, making formal designation all the more essential.² In recent years, the owners of both CBS Columbia Square and the Palladium have nominated or committed to nominating their historic properties for HCM status, in addition to defining clear preservation and operating plans for those buildings. We believe that the same standards should apply to the ECT Building in order to safeguard the cultural identity and viability of this important historic entertainment corridor on Sunset Boulevard.

HCM designation would enable the City’s Cultural Heritage Commission and staff to review and comment on the project design and details for compliance with the *Secretary of the Interior’s Standards*. It would also create a public process for any future improvements. Because the project contains numerous components, the nomination and review should occur *prior* to any issuance of building permits for all phases of development to ensure that questions of compatibility and appropriateness are adequately considered.

The HCM nomination should clearly identify both exterior and interior character-defining features, including any alterations that may have gained significance as part of a subsequent period of significance.

Given the substantial role of the ECT Building in the development of the Hollywood entertainment industry, the Conservancy also urges the applicant to consider options for more permanent protection, including a conservation easement. An easement, which is a private agreement that could offer potential tax benefits, would ensure that the property is sensitively preserved and maintained in perpetuity. Because it would not be subject to external pressures,

² City of Los Angeles, *6250 Sunset Project Draft Environmental Impact Report* (4.C.2-2)



an easement would offer community stakeholders long-term assurance over the ECT Building's future.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 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 this project. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

Adrian Scott Fine

Adrian Scott Fine
Director of Advocacy

cc: Council District 13
Office of Historic Resources, City of Los Angeles
Hollywood Heritage
Art Deco Society of Los Angeles

