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**Submitted by email**

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**Re: Notice of Preparation for the Robertson Lane Hotel Project**

January 23, 2015

Dear Ms. Alkire,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Robertson Lane Hotel Project, including the proposed demolition of the former Mitchell Camera Company building at 661 North Robertson Boulevard. The Conservancy believes that the building qualifies as an historical resource for its associations with the motion picture industry and West Hollywood's pioneering gay community, and it should be treated as such throughout the environmental review process.

As the proposed project would cause a significant impact to a cultural resource, the Conservancy urges the City to mandate consideration of a range of preservation alternatives to demolition in the Draft Environmental Impact Report (DEIR).

**I. The DEIR should acknowledge 661 North Robertson Boulevard as an "historical resource" under CEQA**

Built in 1929, the structure located at 661 North Robertson Boulevard embodies a number of significant historical patterns in West Hollywood, from the development of the entertainment industry to the rise of nightlife visibly catering to the gay community. The Mitchell Camera Company, founded in 1919 as the National Motion Picture Repair Company, originally constructed the three story steel-frame building to house manufacturing operations for its motion picture cameras, selecting a site across the street from its business office. When the company broke ground on the building in West Hollywood, the *Los Angeles Times* declared that "the beginning of an industrial era in that district has passed."<sup>1</sup>

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<sup>1</sup> "Company Will Make Cameras in New Plant," *Los Angeles Times*, March 10, 1929.



For decades, Mitchell cameras were mainstays of Hollywood studios. Within a year of the Robertson Boulevard factory's completion, the company reported annual sales of \$1 million, contributing to the rise of Hollywood as a center for manufacturing in the film industry.<sup>2</sup> Because William Fox, founder of the Fox Film Corporation, held a fifty percent stake in the company, Mitchell Camera was often at the center of Fox's disputes with its competitors. In 1941, the company constructed a new wing on the factory in order to increase its production capacity and meet current demand for the cameras.<sup>3</sup> The expansion extended the building to La Peer Drive, where a second entrance to the building is located.

With the onset of World War II, many of the country's manufacturing operations were redirected towards the war effort, and, by some accounts, the Mitchell Camera factory may have played a significant role in developing new military technology, including the infamous Norden bombsight used in the atomic bombing of Hiroshima in 1945.<sup>4</sup> Although evidence related to the Norden technology is thin, references to the camera factory's role in wartime manufacturing have surfaced over time.

In 1946, Mitchell Camera Company relocated its operations to a factory in Glendale, and the West Hollywood factory building was converted to a military salvage depot and, later, a furniture factory. By the early 1960s, the site had been abandoned. In 1967, architect, attorney, and artist Ron Buck purchased the building and transformed it into an exclusive, invitation-only nightclub, naming it The Factory. It quickly earned a loyal following of A-list guests, who were attracted to the live entertainment, gourmet food, and exuberant décor. Above all, it was a place to be seen, leading the *Times* to remark, "It specializes in celebrity watchbirds you are usually watching *you*."<sup>5</sup>

The Factory featured multiple performance stages and four rooms reminiscent of movie sets, divided by repurposed stained glass windows, and guests sat on an array of furniture, including recycled church pews. Buck converted the lower floor into an art gallery, which has since seen a range of uses, including a cabaret theater and a hardware store.

Despite its initial popularity, interest in The Factory had faded by the early 1970s, causing the club to close its doors in 1972. Over the next several years, the building was home to a series of new tenants before reopening as Studio One in 1975, a transformative discotheque within West Hollywood's gay community. Owner Scott Forbes, a Beverly Hills optometrist turned party promoter, envisioned the club as a visible nexus in the heart of the community. He told a reporter in 1976, "Studio One was planned, designed and conceived for gay people, gay male people...Any straight people here are guests of the gay community. This is gay!"<sup>6</sup>

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<sup>2</sup> "Film Equipment Production Centered Here: Manufacturers Favor Hollywood Locations," *Los Angeles Times*, August 24, 1930.

<sup>3</sup> "Millions Pour into Los Angeles for Industrial Development," *Los Angeles Times*, April 13, 1941.

<sup>4</sup> Gustave Heully, "Ever Wonder: Was the Factory a Factory?" *WEHOville*, September 23, 2013.

<sup>5</sup> Joyce Haber, "New Fun Run," *Los Angeles Times*, September 14, 1967.

<sup>6</sup> Jack Slater, "Discotheques Dance to Another Tune," *Los Angeles Times*, August 11, 1976.



The disco music and dance scene first emerged within the context of New York’s gay bar subculture in the 1970s. Debuting at the height of the disco era, Studio One was open seven days a week and reflected national trends in nightlife and entertainment. Its name a nod to its Hollywood history, the club could accommodate up to 1,000 guests, who were drawn in each night by the glamorous mirrored disco balls, elaborate sound and lighting systems (including the use of strobe lights, neon, and lasers), and the always-packed dance floor. Although Studio One was occasionally criticized for door policies that excluded many women and non-white patrons, the club nonetheless stood out as an important anchor in West Hollywood’s gay community, hosting numerous philanthropic events and establishing a handful of traditions, such as “Gay Day” at local amusement parks, that continue today. Owner Forbes positioned Studio One as a natural successor to the popular clubs of the early ‘70s, telling the *Times*, “Disco to a gay person is very much a social necessity. It’s where a gay person can meet people.”<sup>7</sup>

Studio One remained in operation until 1988 and was widely recognized during its tenure in the former camera factory as one of the most successful discotheques in the United States. Since the business’s closure, the building at 661 North Robertson Boulevard has continued to function as a nightclub, including successful stints under two influential lesbian proprietresses. Today, the building stands as a rare and tangible link to West Hollywood’s early motion picture industry, as well as the embodiment of the city’s gay community and cultural identity in the 1970s and ‘80s.

## **II. The DEIR should acknowledge a significant impact to a cultural resource and provide a range of preservation alternatives**

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.”<sup>8</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>9</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>10</sup> CEQA Guidelines require a range of alternatives to be considered in the EIR that would feasibly attain most of the basic project objectives but would avoid or “substantially lessen” the project’s significant adverse environmental effects. The lead agency cannot merely adopt a

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<sup>7</sup> Dennis Hunt, “Disco Clubs: Down But Not Out,” *Los Angeles Times*, April 8, 1980.

<sup>8</sup> Public Resources Code §21001 (b), (c).

<sup>9</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

<sup>10</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.



statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.<sup>11</sup>

As currently proposed, the project would raze several structures on the subject site, including the historic building at 661 North Robertson Boulevard, for a 252,700 square foot mixed-use development. It is undisputed that the proposed project, including demolition of an historical resource, would cause significant and irreversible adverse impacts to cultural resources. The DEIR should consider a range of alternatives that reuse the historic building for uses consistent with the project description and incorporate it into new construction elsewhere on the site. The proposed alternatives should comply with the *Secretary of the Interior's Standards for Rehabilitation* and maintain 661 North Robertson Boulevard's eligibility as an historical resource.

We urge the City of West Hollywood to uphold its historic preservation goals outlined in its General Plan by incorporating the former Mitchell's Camera Company building into the proposed Robertson Lane Hotel Project. Fronted on both Robertson and La Peer with entrances on all sides, the building has a long history of reinvention that makes it a prime candidate for reuse as part of the proposed project. It provides a unique opportunity to create a dynamic and walkable urban center with a mix of building heights and styles of both historic and new construction.

The West Hollywood Historic Preservation Commission may be able to provide assistance on this project and should be consulted early for valuable input and recommendations. Further, the Commission may be able to provide suggestions on crafting appropriate alternatives that would reuse the historic building at 661 North Robertson Boulevard while retaining its eligibility as an historical resource.

### **III. Conclusion**

Thank you for the opportunity to comment on the NOP for the Robertson Lane Hotel Project. We believe that creative reuse options exist for the historic building at 661 North Robertson Boulevard and that it can be integrated successfully into a larger development project. The proposed project should consider adapting the former factory and nightclub for commercial hotel and retail use and incorporating it into the full project as a distinctive anchor of the West Hollywood community.

We urge the City to require a thoughtful and thorough consideration of preservation alternatives in the upcoming DEIR. 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 Los Angeles Conservancy:**

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<sup>11</sup> PRC §§ 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.



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.

Sincerely,

*Adrian Scott Fine*

Adrian Scott Fine  
Director of Advocacy

cc: West Hollywood Historic Preservation Commission  
West Hollywood Preservation Alliance

