August 14, 2018

Mr. John Di Mario  
Development Services Director  
Development Services Department  
City of La Puente  
15900 E. Main Street  
La Puente, CA 91744  
jdimario@lapuente.org

Re: 22-Unit Condominium Project, Star Theater, 145 N. First Street, La Puente

Dear Mr. Di Mario:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the 22-Unit Condominium Project at 145 N. First Street and the proposed demolition of the Star Theater. Given the rarity and historical significance of the Star Theater, the Conservancy and our many supporters are strongly concerned about the loss of this important community asset.

The NOP and Initial Study, partly in response to earlier comments submitted by the Los Angeles Conservancy on June 20, 2017, determines that the Star Theater should be evaluated as a historic resource pursuant to the California Environmental Quality Act (CEQA).

As there will be an unavoidable significant impact, the City will need to consider potentially feasible alternatives to demolition. As required by CEQA, the Draft Environmental Impact Report (EIR) shall fully consider and include a range (more than one) of preservation alternatives that could accomplish the goals of the project while retaining the continued eligibility of the Star Theater.

I. Significance of the Star Theater and S. Charles Lee

Located at 145 N. First Street, the Star Theater is notable as the only surviving lamella roof theater designed by master architect S. Charles Lee in Los Angeles County. Lee, whose architecture office was located in Los Angeles, is recognized for his influential international career spanning three decades that produced some of Southern California’s most innovative movie theatres including both the Tower Theater (1927) and Los Angeles Theater (1931) in downtown LA and the Academy Theater (1939) in Inglewood.

The Star Theater, constructed between 1947-48 and opened as the Puente Theater, is a rare and significant example of Lee’s postwar theater designs,
constructed during the final years of his career and showcasing his continued experimentation with new forms and technology to respond to changing needs.

Utilizing wood lamella construction for its roof and featuring monumentally scaled, freestanding signage that rises twice the height of the theater building, Lee’s design for the Star Theater is directly influenced by two important postwar-era trends: lingering wartime restrictions on building materials and the growing prominence of the automobile.

Lee designed a total of five lamella roof theaters in California during the late 1940s, two each in Los Angeles and San Diego Counties and one in Tulare County. Two have been demolished, with one remaining in each of the three counties. Lamella construction, introduced to the United States in 1925 and used primarily for industrial structures and building types such as auto showrooms and grocery markets, is comprised of diamond-shaped bracing formed of short lengths of lumber that can span great distances without view-obstructing columns or trusses. Lee embraced another benefit afforded by lamella construction, as it required no steel and wood was an unrestricted material. While the lower curved walls of the auditorium’s interior are plastered, the distinctive diamond-shaped bracing of the lamella roof is left exposed to form the ceiling.

The Star Theater is unique among Lee’s five lamella roof theaters as the only one in which the half-cylinder shape of the roof also forms the design of the façade. The other four were designed with rectangular facades that concealed the shape of the auditorium from the street. As such, only the Star Theater conveys its iconic form from the exterior.

Another unusual feature of the Star Theater is the monumentally-scaled signage, situated directly adjacent to the front right corner of the theater. While Lee was a major innovator of integrated signage for his theater designs, several examples of which reached lofty heights aimed at attracting patrons traveling in their automobiles, the signage he designed for the Star Theater is unique among theater buildings for its size and scale as a freestanding sign and its dual function as a giant flagpole, rising twice the height of the theater building. The sign structure is comprised of five alternating pairs of slim metal poles evenly braced by horizontal members, which lends a striking grid-like appearance. A large, neon-illuminated star is perched atop the structure, next to a flagpole rising above the outermost pole.

The Star Theater is profiled in the 1994 S. Charles Lee monograph *The Show Starts on the Sidewalk: An Architectural History of the Movie Theater* by Maggie Valentine, Ph.D, architecture professor at the University of Texas at San Antonio. The University of California, Los Angeles holds the S. Charles Lee Collection, which contains numerous historic photographs of the Star Theater under construction and following completion.

The Conservancy believes the Star Theater qualifies as a historical resource for purposes of project review under CEQA as a rare and unusual example of postwar theater design and as a rare and notable example of the work of master architect S. Charles Lee. It is also a rare resource type utilizing a lamella roof and monumentally scaled, freestanding signage that rises twice the height of the theater building—both unusual among theaters as a building type and which together make the Star Theater a singular example of early postwar theater design.
II. Environmental Review Process Must Remain Objective and Free From Bias

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. Based on objective analyses found in the EIR, agencies “shall mitigate or avoid the significant effects on the environment whenever it is feasible to do so.”

An agency may not pre-commit to a project before CEQA review is completed, because “[a] fundamental purpose of an EIR is to provide decision makers with information they can use in deciding whether to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved.”

It is therefore concerning and problematic that subjective and biased content is present in the NOP that suggests a preferred and predetermined outcome before any project analysis has commenced. In the Project History section, a paragraph focused on a timeline of the operation of the Star Theater from 1948 through 2004 veers toward a litany of negative events, such as “the theater became a source of illicit activity and the Los Angeles County Sheriff’s Department had many calls for service regarding of the movie theater.” While these details are not in dispute, the cumulative effect in crafting such a narrative for inclusion in the NOP is to portray the building, which is an architecturally and culturally significant resource, as negative, undesirable, and perhaps inferior to the proposed project.

Further into the Project History section, the statement is made that “the feasibility to reuse the existing structure is highly unlikely.” Without any analysis to substantiate such feasibility, such a statement displays clear bias and undermines the very purpose of the environmental review process.

The Cultural Resources section of the Initial Study Checklist also contains problematic language suggesting a preferred and predetermined outcome. In the subsection devoted to establishing whether the proposed project may cause a potentially significant impact, a finding is made that the Star Theater is eligible for listing in the California Register of Historical Resources and its loss would constitute a substantial adverse change. Yet immediately following this finding, the same section includes language suggesting the purported benefits of the proposed project over retaining the Star Theater, stating “Development of the Proposed Project site would provide a residential catalyst that may lead to developments of other projects that can make the area more economically viable and provide community-oriented construction.” Such language does not belong in an impact analysis section evaluating cultural resources. Furthermore, the subjective nature of the statement—implying that a project alternative combining new development while adaptively reusing the theater would not be capable of serving as an economic catalyst—suggests the City’s predetermined preference for the proposed project.

Also included in the Cultural Resources section of the Initial Study Checklist is the City’s claim that the Star Theater’s architectural design—the very quality that establishes its significance as a historical resource—is inappropriate in the City’s Downtown Business District. The NOP states “the

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2 Public Resource Code, Sec. 21002.1.
3 Laurel Highlands Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376, 394.
The architectural style of the building is what prevents the integration of the theater into the Main Street architectural fabric outlined in the Architectural Design Guidelines, set forth in the Downtown Business District Specific Plan (“DBDSP”). The DBDSP calls for buildings to be located side-by-side for a continuous façade along the public right-of-way, and based on the unique design of the theater, it is difficult to achieve the Main Street look with a semi-circular building. Using a myopic interpretation of the DBDSP to suggest that retention of the Star Theater is less suitable than the proposed project yet again showcases bias and the City’s preference for the proposed project. Such bias has no place in the environmental review process, which must remain objective. The property contains a vacant theater building, which operated intermittently during recent years before its purchase by the current owner. The Star Theater in 2018 has much in common with numerous historic structures throughout the region and nation: a long-underutilized historic building that has great potential for an adaptive reuse project.

The project’s objectives, laudable or otherwise, cannot simply be assumed to be superior to the value of the historic resources that are being compromised. Rather, CEQA requires that a project determined to have significant negative environmental impacts not be approved if economically feasible and environmentally superior alternatives exist.4

III. Draft EIR Must Evaluate a Range of Potentially Feasible Preservation Alternatives

A key policy under 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.”5 Indeed, CEQA review has proven to be one of the most effective tools that we have to address the erosion of our cultural heritage. It can prevent irreversible losses through careful consideration of alternatives that achieve most of the project objectives while avoiding significant impacts on the environment.

Under CEQA, if feasible alternatives to the proposed project exist that would reduce impacts on a historic resource to a less then significant level and “generally meet the basic objectives to the project,” the lead agency should deny approval of the project. The increased costs of an alternative do not necessarily make it economically infeasible.6

We believe there is an opportunity for the successful development on the project site while retaining and adaptively reusing the historic Star Theater. Many successful development projects pair the rehabilitation of a historic resource with sensitive new construction and numerous historic theaters throughout the nation have been successfully repurposed through adaptive reuse.

The draft EIR should evaluate the feasibility of a reduced density alternative that maintains the Star Theater on site while adjusting the number and configuration of townhome units. Reducing the number of townhomes to accommodate the Star Theater will not diminish the project’s objectives to provide new condominium units in the downtown setting of the project site.

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4 21001, 21081.
5 PRC §21001 (b), (c).
6 PRC §21061.1
The Star Theater could be reused in a number of capacities, including continued use as a theater or entertainment venue, conversion to a church, or conversion to retail. Rehabilitation alternatives that utilize a historic theater’s interior layout of stage and auditorium, such as continued use as an entertainment venue, a church, or other non-profit organization, are most conducive to the retention of historic fabric. Conversion to retail is another option that can be accomplished with the assistance of a preservation architect and can be done in a way that is reversible and sensitive to the existing historic fabric.

The feasibility of adaptive reuse alternatives should consider the potential to lease the Star Theater to a tenant group that would operate out of the space. This is a critical point, as the structure lends itself to a variety of uses that could benefit the local community and remain economically feasible as an income producing property.

As an example, the local, non-profit organization Arteologists, which is currently operating out of leased space at 15815 Main Street on the same block as the proposed project, has long expressed interest in either acquiring the Star Theater property or leasing the historic venue to rehabilitate for their arts-based community programming. They have reached out to the property owner several times to discuss their interest. The City can play a role in facilitating that conversation as part of the process of evaluating project alternatives.

Historic theaters are proven community revitalizers and they also catalyze other business development, create jobs, and improve the local quality of life—qualities that align with goals of the DBDSP. We believe clear opportunities exist to find a win-win solution that can accomplish the goals of the proposed project while also revitalizing the historic Star Theater with a compatible new use.

**About the Los Angeles Conservancy:**
The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 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 the proposed project. We hope the City of La Puente will evaluate a full range of preservation alternatives as part of the draft EIR. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,

Adrian Scott Fine
Director of Advocacy

cc: Escott Norton, Los Angeles Historic Theater Foundation