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Submitted electronically

Jennifer Alkire, AICP
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City of West Hollywood
8300 Santa Monica Boulevard
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RE: Draft EIR Robertson Lane Hotel Project

Dear Ms. Alkire,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to review and provide comments on the draft environmental impact report (DEIR) for the proposed Robertson Lane Hotel Project. The project proposes a redevelopment of the existing, nearly two-acre site and affects multiple parcels, including the historic building and resource known as "The Factory." It is significant for its associations with the Mitchell Camera Company and Studio One. In January of 2015, the Conservancy previously commented on the Notice of Preparation (NOP) for this project.

Since this project was initially publicly announced with full demolition proposed, the Conservancy has been working to ensure a meaningful preservation outcome and preservation of The Factory. What has developed and evolved following many discussions and conversations is a proposed project that 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. As an example of adaptive reuse, The Factory building is now proposed as a core, highly visible feature of the proposed project. To achieve this goal, it involves the dismantling, truncating, relocation and rehabilitation of a substantial portion of The Factory, as a partial preservation approach.



I. DEIR Project Analysis Acknowledges Potential Impacts and Consideration of Mitigation Measures

The Conservancy approaches every preservation issue and project as a case-by-case situation, each with unique circumstances. The Robertson Lane Hotel Project is no exception, as it offers both constraints and opportunities when exploring various preservation-based solutions. Our preference is always for the full preservation and retention of a historic resource and minimizing impacts wherever possible. This is the core tenet and policy under the California Environmental Quality Act (CEQA), whereby it 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."¹ 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."²

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.³ The DEIR for the Robertson Lane Hotel Project provides an analysis of the proposed project and potential impacts. The DEIR identifies six aspects of the proposed project that have the potential to result in substantial adverse changes, which would impact The Factory's character-defining features and integrity, and thus eligibility. Further it identifies four aspects of the proposed project that would reinforce and maintain the historic character of The Factory building. The Conservancy has reviewed and concurs with this level of analysis, and agrees that various proposed actions have the ability to impact The Factory in both negative and positive ways.

As detailed in the DEIR, a package of substantive mitigation measures (MM-CUL 1 – MM-CUL 11) is proposed to reduce impacts and ensure The Factory maintains its integrity and eligibility as an historic resource. As proposed, a portion of The Factory is intended to be preserved, though essentially reconstituted as a smaller structure than currently exists and at a different orientation on site. The Conservancy has studied this issue and pressed for retention of as much of the original building as possible.

We believe the proposed partial preservation project is meaningful and achieves a preservation outcome, especially when combined with the suggested package of mitigation measures. Some unique considerations make this possible, in part due to the nature of the historical resource itself and its modular Truscon construction. While not all of the physical fabric is to be retained, the remainder is identical in appearance. Further, it is a type of construction where it was not uncommon to be erected in various sizes and shapes of modules and/or dismantled and rebuilt elsewhere. This is an important and contributing factor where partial preservation still retains the majority of The Factory's primary character defining features and overall integrity.

¹ Public Resources Code §21001 (b), (c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

³ *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.



II. Mitigation Measures Should Reflect the Broad History of The Factory

The Factory is a significant historic resource and treated as such as part of this DEIR, for its associations with the early Hollywood film manufacturing industry and later for its role as Studio One and contributions to LGBTQ heritage.

It is important to fully acknowledge that The Factory is significant for its layered historic and cultural narrative that transcends two very different periods and types of history. The DEIR includes a Historical Resources Technical Report (HRTR, Appendix D1) that details the history and significance of The Factory. It is important to note, however, for the purposes of this DEIR and specific mitigation measures contained within, the HRTR narrative does not fully encapsulate the complexity and more controversial aspects of the narrative, most notable during the Studio One era.

Patterns of active discrimination from within LGBTQ communities – as revealed through some of Studio One’s policies and operations – are important to recognize and learn from. It should be a part of the specific required mitigation measures to lessen impacts and ensure the full story of The Factory is told. When opened as Studio One in 1975, it was a transformative discotheque within West Hollywood’s gay community and a source of empowerment. 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!”⁴ In contrast, for many LGBTQ people of color and women, Studio One represents a much different experience, one of discrimination and being denied access. Yet the story does not end there. Exclusionary policies at Studio One, for example, also inspired advances and greater inclusion at other nightclubs in Greater Los Angeles and in the City of West Hollywood more broadly, making it a significant part of the region’s social history.

The Conservancy and advocates from LGBTQ communities want to see all sides of this nuanced story represented, even aspects that some might equate to negative or “bad” history. So as not to get overlooked or forgotten in the future following project approvals, we suggest this be included and stated more specifically in the HRTR and as part of specific mitigation measures (MM-CUL 1 – MM-CUL 11). We suggest Mitigation Measure 7 be further detailed to include and address the complexity of Studio One’s legacy and a range of perspectives when planning any interpretation and commemoration of the nightclub’s use of the building. A diversity of stakeholders representing local LGBTQ communities should also be consulted and included as part of the process for review and approval.

Overall we think the mitigation measures are thoughtful and will allow a diverse public to access, experience, and understand The Factory building in a way that is not possible today. Ensuring The Factory’s two eras of history and significance are included and showcased is especially important.

⁴ Jack Slater, “Discotheques Dance to Another Tune,” *Los Angeles Times*, August 11, 1976.



III. Conclusion

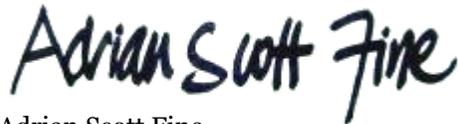
The proposed project would not be considered by many as perfect preservation, something the Conservancy fully acknowledges. As stated previously, we always strive to secure full preservation whenever possible. We and others have worked hard to ensure this project results in meaningful preservation and to minimize potential impacts through a robust package of mitigation measures. Given the project scope and constraints, it is a difficult challenge. However, the Conservancy strongly believes the proposed project strikes a balance and reduces impacts on historical resources to a less than significant level. For these reasons we offer our support for the Robertson Lane Hotel Project.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 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.

The Conservancy commends the Faring Capital Group for embracing a preservation and adaptive reuse approach for The Factory. Thank you for your consideration of our comments. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,



Adrian Scott Fine
Director of Advocacy

