



August 18, 2014

Submitted through public testimony

City of West Hollywood
Honorable Mayor and Members of City Council
8300 Santa Monica Blvd
West Hollywood, CA 90069

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**RE: Final Environmental Impact Report, the Melrose Triangle Project
(Jones Dog & Cat Hospital Building, 9080 Santa Monica
Boulevard)**

Honorable Mayor and members of the City Council, I'm Adrian Scott Fine, Director of Advocacy for the Los Angeles Conservancy.

On behalf of the Los Angeles Conservancy and our more-than 6,000 members, thank you for the opportunity to comment on the Final Environmental Impact Report (FEIR) for the Melrose Triangle Project.

Since March of 2012, as part of the formal Environmental Impact Review (EIR) process for this project, the Conservancy has been requesting that a preservation alternative be explored that reuses and incorporates the existing 1938 Jones Dog & Cat Hospital building into the larger project. This is a rare and significant Streamline Moderne building designed by the architectural firm of Wurdeman and Becket.

This is not about stopping the project, rather modifying and improving it. There is an opportunity for a "win-win" here, with meaningful preservation that can allow the existing historic building to be reused while still calling for an exciting and cohesive gateway project to move forward.

Preservation and development are not mutually exclusive. A number of developers have told us that in the end, preservation made their projects even better that they would have been otherwise. We clearly see that potential here, and we believe that the residents of West Hollywood deserve a truly great project that celebrates the community's history.



While the EIR talks about a preservation alternative, claiming it meets “many” and “a majority” of the project objectives and states it is the environmentally superior alternative, this alternative is largely in name only.

Here’s why: 1) unlike the proposed project, there are no drawings or schematics that show the historic building in the EIR as part of an alternative, anywhere; 2) there are no details provided, other than some square footage numbers; and 3) there is no information – substantive or otherwise -- about how the historic building would be reused or made a part of the project, in any way. That’s not typical or standard practice of an EIR.

The City of West Hollywood has a duty under the California Environmental Quality Act (CEQA) to fully identify and evaluate alternatives. An EIR must be supported by substantial evidence that shows there was an actual consideration of alternatives and mitigation measures, and the process by which decisions were made by the City. Despite a recent letter by the applicant’s attorney attempting to argue these points and defend the EIR, the record and EIR stand for itself.

The Conservancy is concerned that a true, bona-fide preservation alternative has not been provided, and we believe the EIR before you tonight is inadequate and flawed. Further, the City cannot merely adopt a statement of overriding considerations and approve a project that has significant environmental impacts. Instead the City must first adopt feasible alternatives and mitigation measures. CEQA does not authorize a lead agency to proceed with a project that will have significant, unmitigated effects on the environment, based simply on weighing those effects against the project’s perceived benefits.

The Conservancy had been hopeful that a revised plan incorporating the historic building as part of the project would result from recent discussions with the applicant’s representatives. The proposal to reconstruct a small sliver of the front façade and apply it onto a new building mid-block along the planned paseo is not meaningful preservation or something the Conservancy can support. This approach does not adhere to standard preservation practices, allow for the building to maintain eligibility as an historic resource, or meet the *Secretary of the Interior’s Standards for the Treatment of Historic Properties*.

The Conservancy can point to other projects that have successfully married preservation with new development, creating great places that honor the past without needlessly throwing it away. That is what the Conservancy and so many others are asking for tonight.

We need your help and leadership to make this happen, and we respectfully request that you not adopt the final EIR or certify this project at this time. Instead let us hit the pause button and work together to develop a project that we can all fully support.

Attached you will find supporting documentation for the record, including the following:



- 1) August 18, 2014 letter from Conservancy's attorney, Susan Brandt Hawley (sent separately directly to City Council);
- 2) Conservancy correspondence on the Notice of Preparation, March 12, 2012; and Final Environmental Impact Report, August 7, 2014; and,
- 3) Documentation of the historic 1938 Jones Dog & Cat Hospital building, including photos from July, 2014 by Hunter Kerhart; historic images from 1938, and drawings by Wurdeman and Becket, courtesy of the Getty Research Institute.

Thank you for the opportunity to comment on the EIR for the Melrose Triangle Project. The Conservancy welcomes the opportunity to meet and work with the City of West Hollywood to advance both preservation and development goals. 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 script is fluid and cursive, with the first letters of each name being capitalized and prominent.

Adrian Scott Fine
Director of Advocacy

