March 12, 2012

Submitted electronically
Mr. David DeGrazia
Senior Planner
West Hollywood City Hall
8300 Santa Monica Boulevard
West Hollywood, CA 90069
Email: ddegrazia@weho.org

Re: Notice of Preparation -- Melrose Triangle Project

Dear Mr. DeGrazia:

On behalf of the Los Angeles Conservancy, we submit these comments on the proposed Melrose Triangle Project and the need to consider alternatives that retain the Streamline Moderne commercial building at 9080 Santa Monica Boulevard as part of the ongoing environmental review process. The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,700 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.

A. Architectural significance of 9080 Santa Monica Boulevard

The structure at 9080 Santa Monica Boulevard is a notable and rare surviving example of a Streamline Moderne commercial building in the City of West Hollywood. Originally constructed in 1928, the building exhibits several character defining features associated with the Streamline Moderne style, including smooth wall surfaces, curved corners and volumes, an emphasized horizontal design, window fenestration defined by continuous ribbons across the façade, extensive use of glass block, and polished stainless steel for the entrance canopy and vertical fins rising above the main door.

Taking its name from the curved form of a teardrop, which was the most efficient shape in lowering the wind resistance of an object placed in the stream lines of a wind tunnel, the Streamline Moderne evoked a sense of modern efficiency with sleek finishes, curved surfaces, and a spare use of detailing which often included pronounced horizontal banding and, to a lesser extent, vertical banding accents. As an architectural style, Streamline Moderne was applied to numerous building types and uses, ranging from both single family and multi-family residential dwellings in particular regions such as greater Los Angeles, to a wide variety of commercial

buildings including medical offices, department stores, grocery stores, movie theaters, gas stations, bus stations and restaurants throughout the nation.

The January 2008 draft EIR prepared for an earlier version of the Melrose Triangle Project found that “the building appears to be eligible under Criterion 3 as a fine example of Streamline Moderne architecture” and noted that it “is in good condition and retains its integrity.” Within West Hollywood’s borders, there are exceedingly few examples of the Streamline Moderne style, making 9080 Santa Monica Boulevard a particularly rare resource type for the city.

West Hollywood has long been praised for the community’s commitment and dedication to historic preservation and was recognized for those efforts by the National Trust for Historic Preservation in 2007 as one of America’s “Dozen Distinctive Destinations.” The City’s General Plan has a strong Historic Preservation element, establishing several goals for preserving the city’s unique architectural heritage, specifically stating the following:

“With the tourism, interior design, and film industries playing important roles in the economy, West Hollywood’s cultural resources create an inviting and attractive built environment for the business community. Familiar landmarks also establish a sense of permanence and well-being for residents.”

B. The Draft EIR should evaluate a range of reasonable alternatives that retain and reuse the historic building at 9080 Santa Monica Boulevard

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.” 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.” 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.

As currently proposed, the project would raze all existing buildings within the project area, including the historic building at 9080 Santa Monica Boulevard, for a mixed use project consisting of three primary structures, subterranean parking, and a pedestrian paseo. The project site plan included in the NOP depicts the proposed “Gateway building” occupying much of the footprint of 9080 Santa Monica Boulevard.

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2 Melrose Triangle draft EIR, Jan. 2008: 4.4-5.
3 West Hollywood General Plan, Historic Preservation Element, 4-3.
4 Public Resource Code, Sec. 21001 (b), (c).
5 Sierra Club v. Gilroy City Council (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.
It is undisputed that the proposed project, including demolition of an identified historical resource, would cause significant and irreversible adverse impacts to cultural resources. Accordingly, the Draft EIR must evaluate at least one potentially feasible alternative that incorporates the historic building at 9080 Santa Monica Boulevard into the project and retains its eligibility as a historical resource. The Draft EIR should consider a range of options that reuse the historic building for uses consistent with the project description, combined with infill construction elsewhere on the site to provide the desired aggregate of square footage. Potential alternatives in the Draft EIR could explore a redesign of the proposed “Gateway building,” such as a distinctive flatiron design that responds to the site’s triangular western portion and orientation facing eastbound traffic along Santa Monica Boulevard.

The NOP states that proposed uses for the project will include general retail, art galleries, design showroom, and café/restaurant uses to be located along Melrose Avenue and Santa Monica Boulevard at the project’s street level.\(^8\) Art gallery and showroom uses could be particularly well-suited for 9080 Santa Monica Boulevard; the building’s extensive bands of glass block provide abundant natural and diffused lighting conducive to these uses.

Compared to the previous project proposed for the site, the current proposed project is significantly reduced in scale: 76 residential units from a previous total of 195; a maximum of 5 floors for building heights, reduced from 6 floors; and 4 subterranean levels, reduced from 6. This reduction in scale from the previous version of the project provides further flexibility for retaining and reusing 9080 Santa Monica Boulevard while still attaining most of the project objectives, necessary square footage, and parking.

Despite the reduced scale of the current project, the number of proposed parking spaces has increased from 856 to a total of 923. Because the proposed project appears to exceed city parking requirements (170 cited as required for previous project),\(^9\) preservation options should not be considered infeasible simply by failing to provide the total desired number of spaces. Under the various alternatives that can be explored in the Draft EIR, the proposed underground levels could be built around the perimeter of the historic building at 9080 Santa Monica Boulevard, potentially with additional levels of subterranean parking at other portions of the project area.

We urge the City of West Hollywood to uphold its historic preservation goals outlined in the recently-updated General Plan by incorporating the historic building at 9080 Santa Monica Boulevard into the Melrose Triangle Project. It provides an opportunity to create a dynamic and vibrant urban project with a mix of building heights and styles, of both historic and new construction. Typical of older commercial buildings, the building at 9080 Santa Monica Boulevard extends directly to the sidewalk at the lot line -- a quality which promotes lively street life by placing business storefronts directly adjacent to pedestrian traffic. The new infill construction proposed for the Melrose Triangle Project should also provide street frontage adjacent to the Santa Monica Boulevard sidewalk which will complement the existing character of the historic building at 9080 Santa Monica Boulevard.

\(^9\) Melrose Triangle draft EIR, Jan. 2008: 3-6.
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 9080 Santa Monica Boulevard while retaining its eligibility as an identified historic resource.

Thank you for the opportunity to comment on the Notice of Preparation for the Melrose Triangle Project. The Conservancy looks forward to reviewing and commenting on the forthcoming Draft EIR for 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
Director of Advocacy

cc: West Hollywood Historic Preservation Commission
    Art Deco Society of Los Angeles