



December 8, 2014

**Submitted by email**

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**Re: Draft Environmental Impact Report for Palladium  
Residences, ENV-2013-1938-EIR**

Dear Ms. Ibarra,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Palladium Residences project, located at 6201 West Sunset Boulevard in Hollywood.

The Conservancy commends the applicant, CH Palladium, LLC, for its commitment to protecting and enhancing the historic Palladium as a first-rate entertainment venue and the centerpiece of the sensitive new development. Conservancy staff has met with the project team and representatives from Hollywood Heritage most recently in early December. We are pleased with the thoughtful plans to reinvigorate the historic venue and its streetscape presence along Sunset Boulevard.

We submit the following comments to encourage additional refinement of the proposed project in order to further reduce impacts to the historic building and to ensure its continued vitality in the heart of Hollywood. In particular, we urge the applicant to expand the proposed project's scope to include the Palladium's full interior rehabilitation and to apply for Historic-Cultural Monument (HCM) status before the final approval of the project. This will ensure important interior elements are preserved and there will be a design review process in place to help guide these efforts now and in the future.



## **I. Historic significance of the Palladium**

Designed by noted Los Angeles architect Gordon B. Kaufmann, the Palladium was completed in 1940 in a simple Moderne style that belies the dramatic curves of the interior. The curving rear automobile entrance leads into a circular foyer topped by a domed ceiling with a central Art Deco wood relief. The rounded columns, walls, ceiling soffit, and balcony stair railing in the entrance foyer from Sunset Boulevard convey a quiet glamour. In the main ballroom, the curved balcony, ceiling, and wood floor pattern all align to create a dynamic space.

Since its opening in 1940, the Palladium has been a popular venue for dance, live music, and special events through different eras as musical tastes have changed. Since its opening night, with big band leader Tommy Dorsey and his orchestra featuring an up-and-coming Frank Sinatra as the band vocalist, the Palladium has become a part of the lively Hollywood nightclub scene. It has also hosted political events and awards shows, and remains one of the most prominent entertainment venues in Hollywood.

## **II. Proposed project maintains the Palladium's eligibility as an historic resource**

The draft EIR addresses a number of the Conservancy's previous concerns, and we appreciate the project team's efforts to carefully and respectfully integrate the new buildings around the Palladium. The two proposed 28-story towers have been designed to frame and complement the entertainment venue, preserving significant views of the building and reactivating historic development patterns. The new construction would be sufficiently differentiated from the existing building, though compatible in massing and design features. Their proposed curvilinear silhouettes and exterior details reference the Palladium's historic fabric without competing or overwhelming it. Furthermore, the reduced height and increased setback of the building on the corner of Sunset and Argyle reinforces the Palladium's central position.

In addition, the project's lighting plan retains the existing Palladium features (lighted marquee, vertical blade signage, and façade lighting) and maintains the building's prominent historic role as a focal point on Sunset Boulevard. Exterior lighting of the new buildings should not detract or take attention away from the Palladium's nighttime presence.

We similarly are encouraged by the applicant's commitment to developing an interpretive program to promote public appreciation for the rich history of the Palladium and Hollywood at-large. In particular, we applaud the decision to convene a community advisory group to guide those efforts.



We concur with the draft EIR's assessment that project impacts to the Palladium would be less than significant, as would impacts to the four identified historic resources in the immediate vicinity.

### **III. Include the Palladium's full interior rehabilitation as part of project scope**

While the current project would retain and enhance the Palladium, it does not commit to the vital rehabilitation of interior features and spaces at this time. As previously advised, the Conservancy strongly urges the applicant to incorporate the building's full interior rehabilitation as a key component of the proposed project. This undertaking would further enhance the Palladium's status as an iconic entertainment venue for the 21<sup>st</sup> century.

The expanded project should include rehabilitation of the ballroom's plaster ceiling and wood flooring, improvements to the lobby areas and restrooms, as well as replacement of the bank of non-historic entry doors on Sunset. With respect to the entry doors, a treatment that restores and/or evokes the original transparency and arrival sequence would help enliven the street presence and further support the economic viability of the adjacent storefronts. In our ongoing conversations with the applicant, we have emphasized the importance of reactivating the Palladium storefronts, and we value their willingness to introduce temporary retail uses into those spaces prior to the start of construction as a means of generating daytime activity.

We understand that additional studies of the Palladium's interior were conducted as part of the exterior rehabilitation in 2008 (with funding assistance provided by the Community Redevelopment Agency of Los Angeles) and may be available today in lieu of a full historic structures report. If available, this should be incorporated within the final EIR to serve as a reference and guide for the interior rehabilitation now and in the future.

### **IV. Initiate Historic-Cultural Monument (HCM) designation prior to project approval**

The Conservancy applauds the applicant's decision to nominate the Palladium for Historic-Cultural Monument (HCM) status in order to preserve and protect the building into the future, and we understand that the applicant has met with the City's Office of Historic Resources to discuss the proposed project. We continue to stress the importance, however, of amending the requirement to apply for HCM status to occur *prior* to the issuance of the building permits.

This would enable the City's Cultural Heritage Commission and staff to review and comment on the project design and details for compliance with the *Secretary of the Interior's Standards for Treatment of Historic Properties*. It would also ensure that the HCM nomination proceeds independently of any unanticipated project delays after the certification of the final EIR.



Furthermore, we want to emphasize the importance of including the Palladium's interior character-defining features in the HCM nomination. This will enable the applicant to apply for tax benefits through the City's Mills Act program in order to offset costs associated with the much-needed interior rehabilitation. Pursuing HCM designation independently of the project entitlement process could allow that work to proceed as part of the original project scope.

**About the Los Angeles Conservancy:**

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.

Thank you for the opportunity to comment on this project. Please feel free to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions.

Sincerely,

*Adrian Scott Fine*

Adrian Scott Fine  
Director of Advocacy

cc: Council District 13  
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Hollywood Heritage  
California Office of Historic Preservation

