



September 9, 2013

Submitted electronically

Ms. Luciralia Ibarra
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Email: luciralia.ibarra@lacity.org

Re: Notice of Preparation 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 Notice of Preparation (NOP) for an environmental impact report (EIR) for the Palladium Residences project located at 6201 West Sunset Boulevard in Hollywood.

The Conservancy appreciates that the project will protect and enhance the historic Palladium entertainment venue while proposing new development on the surface parking lots to the west and north (rear) of the site. We submit the following comments to ensure the new infill construction will be compatible in scale and massing and not adversely impact the historic building. We also urge an expanded scope of work to incorporate the Palladium's interior and its full rehabilitation as part of the project. If significant impacts are anticipated, preservation alternatives should be evaluated and adequate mitigation measures proposed as part of the environmental review process.

I. Significance of Historic 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. From 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 became a part of the lively Hollywood nightclub scene. Through the 1940s and 1950s, it was the home of swing dance and big band music. The 1960s brought Lawrence Welk and his champagne music and eventually rock and roll acts in

the 1970s, 1980s, and 1990s. It has also hosted political events and awards shows, and remains one of the most prominent entertainment venues in Hollywood.

The Palladium has been identified as eligible for listing in the National Register of Historic Places in several past surveys by the Community Redevelopment Agency of Los Angeles (CRA). With CRA funding, the concrete exterior was rehabilitated in 2008 and the Sunset Boulevard façade restored to its original 1940 appearance with a reconstructed neon blade sign, flanking grid elements, and neon dancing figures. Our understanding is the City holds a protective covenant on the building that covers the exterior, as a condition of the CRA funding agreement. In 2009 this exterior rehabilitation project received a Preservation Award from the Conservancy.

II. Draft EIR Should Evaluate Impacts of New Construction and Address Efforts to Maintain Compatibility with the Palladium

The draft EIR should fully evaluate the aesthetic impact of the proposed new construction on the Palladium. The two new 28-story buildings should be designed in a manner that is both compatible and appropriate in scale and massing to the one-story Palladium and in accordance with the *Secretary of the Interior's Standards for Treatment of Historic Properties* (Standards). They should be sufficiently set back and detailed as to not overwhelm or compete with the historic building. The draft EIR should also consider the importance of the Palladium's nighttime presence (lighted marque, vertical blade signage, and façade lighting) that was restored and enhanced in the exterior rehabilitation of 2008. The project should evaluate the proposed project's lighting plan to retain the Palladium as the central focus of the site and maintain its historic role along Sunset. Additionally, any street vacation of El Centro Avenue should maintain the Palladium's loading dock access for its continued viability as an entertainment venue.

If the proposed project is found to adversely impact the Palladium and its character-defining features, the EIR must consider preservation alternatives and appropriate mitigation measures to substantially lessen or avoid such impacts. For instance, the requirement to apply for Historic-Cultural Monument status should occur prior to the issuance of the building permits so that the City's Cultural Heritage Commission (CHC) and its Office of Historic Resource have an opportunity to review and comment on the project design and details for compliance with the Standards. It may also be appropriate for the CHC to weigh in during the environmental review process to encourage coordination and ensure the proposed project will retain the Palladium's eligibility for local designation.

III. Incorporate Palladium's Full Interior Rehabilitation as Part of Project Scope

As currently proposed, the project would retain the Palladium and could include additional rehabilitation of interior features as well as the retail storefronts along Sunset. We strongly urge the applicant to commit to the building's full interior rehabilitation and incorporate this as a key part of the proposed project. This 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 entry doors on Sunset with a treatment to simulate and evoke the original opening.

In particular, restoring transparency and an arrival sequence to the Sunset entrance and the Palladium's historic focal point will help to enliven the street presence and further support the economic viability of the adjacent storefronts.

We understand through CRA's financing agreement in 2008 that additional studies of the Palladium's interior were conducted as part of the exterior rehabilitation and may be available today in lieu of a full historic structures report. If available this should be included within the draft EIR to serve as a reference and guide for the interior rehabilitation. Including the interior rehabilitation as part of the project and committing to meeting the Standards will ensure that the project will avoid significant adverse impacts and retain its National Register eligibility.

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.

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 signature is written in a cursive, slightly slanted style.

Adrian Scott Fine
Director of Advocacy

cc: Council District 13
Office of Historic Resources, City of Los Angeles
Hollywood Heritage