



December 10, 2012

Submitted by email

Srimal Hewawitharana , Environmental Specialist II
Los Angeles Department of City Planning
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Los Angeles, CA 90012
Email: srimal.hewawitharana@lacity.org

RE: Millennium Hollywood Project Draft EIR (ENV-2011-675 EIR)

Dear Srimal:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Millennium Hollywood Project which, through its inclusion, directly impacts the iconic 1956 Capitol Records building.

The Conservancy, along with Hollywood Heritage, has long been active in protecting and advocating for the historic resources in Hollywood, particularly in and around the National Register-listed Hollywood Boulevard Commercial and Entertainment District immediately south of the project site. In 2006, the Conservancy's Modern Committee successfully nominated Capitol Records for designation as a City of Los Angeles Historic-Cultural Monument (HCM). The Conservancy commends the project applicant, Millennium Partners and Argent Ventures, for placing and sensitively considering the preservation of Capitol Records and the Gogerty Building at the core of the proposed development. We are encouraged by the direction of this project to date, however we do have some questions and think additional safeguards are necessary to address the larger preservation goals.

I. Scale new construction appropriately to ensure compatibility with historic resources

The Conservancy appreciates the efforts of the project team to incorporate new construction carefully and respectfully around Capitol Records. Areas for new buildings are located to the west and south to avoid impacts to several character-defining features of Capitol Records called out in its Historic-Cultural Monument (HCM) nomination. Specifically, proposed new construction would generally avoid obstructing significant views of Capitol Records from the 101 Freeway and be sited away from Capitol Records' famed underground recording studios and reverberation chambers.

While these efforts are commendable, we remain concerned the allowable scale and massing threatens to overwhelm Capitol Records and the surrounding historic buildings, immediately adjacent and nearby along Hollywood Boulevard. Two of the four proposed height zones in the Development Regulations allow for towers up to 585 feet, significantly taller than the adjacent 165-foot Capitol Records on the East Site as well as the two-story theatre built in 1926 (Hollywood Playhouse) just south of the West Site. The buildings along Hollywood Boulevard are also generally below 150 feet, including the low-scaled 1930 Pantages Theater, built in 1930 and directly abutting the southern edge of the East Site.

Historic buildings can often coexist with taller buildings, but the project's maximum allowable height would dwarf its immediate neighbors and compete for status with the already iconic circular tower of Capitol Records. We urge the applicant to consider lower height maximums or allocating available square footage more evenly across the project site to be more compatible with the lower scaled historic properties and the National Register-listed historic district in this area of Hollywood. This may be addressed to some degree already yet the preferred project and Development Regulations, as currently outlined in the Draft EIR, do not necessarily provide this level of detail and clarity.

II. Incorporate precise preservation-oriented standards and guidelines in the Development Regulations

Despite the placement and siting of new construction on the West and East Sites, significant impacts to Capitol Records may still occur. The draft Development Regulations, which will be attached to and enforceable through a Development Agreement, aims to ensure compatibility with historic resources by establishing required standards and recommended guidelines for new design elements. However, the existing draft document lacks sufficient detail to mitigate impacts and provide surety in a reliable and predictable manner.

For instance, the figures in section 6.1.2 appear to require 10-foot setbacks at the south and east edges of Capitol Records' base and an additional 50-foot setback east of the tower curve. However, these standards are not articulated in the text of the Development Regulations. If these setbacks are to protect the underground recording studios and reverb chambers, the location of these features should be referenced and clearly labeled in the Development Regulations and the required setbacks established. Additional open space or other appropriate uses may also be encouraged to increase the buffer between these areas and any new structures.

Similarly, another significant view of Capitol Records, the one from the corner of Hollywood and Vine, may be impacted by the location and design of new construction on the project site. The Draft EIR identifies significant adverse impacts to this view for building envelopes built to the maximum heights of 220 and 400 feet. In theory, the Development Regulations would narrow the floor plates as towers extend higher to avoid obstructing this view. However, the regulations fail to provide standards or guidelines that direct siting of any portion of new construction away from this view corridor.

Additionally, the required 10-foot setback from Vine Street for any portion of the building up to 150 feet, and an additional 10-foot setback for towers above 150 feet are insufficient to maintain even partial views of the 165-foot tall Capitol Records. More specific and detailed setbacks, massing, angles or other elements of the Development Regulations should be established to protect the integrity of Capitol Records and the nearby historic resources.

III. Modify the Development Agreement and mitigation measures with additional safeguards

a. Design review and approval by the Cultural Heritage Commission

While the buildable area overlaps only a portion of the HCM-designated Capitol Records parcel, it seems appropriate that the city's Cultural Heritage Commission review and comment on the ultimate design of new elements at the project site given the importance of Capitol Records and the likelihood of adverse impacts of new construction. This review should occur prior to any issuance of building permits for all phases of development to ensure final details of design, siting, cladding materials, and other elements of compatibility are adequately considered.

b. Post-construction noise and vibration monitoring

We appreciate the proposed monitoring of vibration and differential settlement impacts on sensitive historic resources during construction. Such monitoring can identify potential impacts during construction and mitigate issues before major damage can occur. In the event that substantial damage results due to the project construction, we urge the applicant to commit to repairing any damage, conforming to the Secretary of the Interior's Standards. All work shall be overseen by a qualified architectural historian or preservation professional.

In addition, we urge the project applicant to commit to ongoing noise and vibration monitoring of the Capitol Records recording studios and reverb chambers following construction and during the initial operation of new uses surrounding the historic building. While the applicant currently owns all of the parcels and has a vested interest in protecting the operation of Capitol Records, ownership may change in the future necessitating the need for a process to address operational impacts..

c. Revise the exceeding long development period

The Conservancy remains concerned about long-term implications of the twenty-five year development term requested by the project application. Projects of a similar scope and scale have been approved in the City with development terms ranging from ten to fifteen years. Approval of the proposed development term would severely limit consideration of other opportunities that may arise in the future, including new development that may be more appropriate for the site in the future. The ownership, economic and social circumstances, as well as the design and land use priorities will

change greatly during the twenty-five year period currently requested by the project applicant.

The proposed project does not appear to warrant this exceptionally long development term, therefore we urge a time period more in line with similar projects approved by the City.

Interests of the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local preservation organization in the United States, with over 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. Since 1984, the Conservancy's all-volunteer Modern Committee has worked to raise awareness about Los Angeles' unique collection of mid-twentieth century modernist structures that shaped the tastes and architectural trends of the entire nation.

Thank you for the opportunity to comment on the Draft EIR for the Millennium Hollywood Project. 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: Hollywood Heritage
Council President Eric Garcetti, Council District 13
Office of Historic Resources, City of Los Angeles