



May 31, 2011

**Submitted by email**

Ms. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012  
Email: [Srimal@hewawitharana@lacity.org](mailto:Srimal@hewawitharana@lacity.org)

**RE: Notice of Preparation for the Millennium Hollywood Project, ENV-2011-675-EIR**

Dear Ms. Hewawitharana:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Millennium Hollywood Project. The Los Angeles Conservancy is the largest local 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 through advocacy and education. Since 1984, the Conservancy's all-volunteer Modern Committee was 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.

We applaud the decision to retain the iconic Capitol Records Tower and its current office and music recording use at the project site. We submit the following comments to ensure that new infill construction surrounding Capitol Records will be compatible and not adversely impact the historic building. If significant impacts are anticipated, preservation alternatives must be evaluated and adequate mitigation measures proposed as part of the ongoing environmental review process.

Completed in 1956, the Capitol Records Tower is an instantly recognizable icon of mid-century modern architecture, successfully melding high style with rational design principles. Designed by Louis Naidorf of Welton Becket and Associates, it was the world's first circular office tower, though according to Naidorf, its resemblance to a stack of records was unintentional. The building's recording studio below the one-story base of the tower, and its state-of-the-art reverberation chambers, located below the parking lot east of the structure, hosted legendary recording sessions by artists including Frank Sinatra, Nat "King" Cole, The Beatles, and The Beach Boys. In 2006, the Conservancy's Modern Committee nominated the Capitol Records Tower as a City of Los Angeles Historic-Cultural Monument (HCM).

While Capitol Records is not proposed for demolition, surrounding new construction proposed as part of the project will be directly adjacent to the building and may adversely impact its significant spaces and views. For example, vibration and differential settlement resulting from construction-related activities may potentially damage the physical structure of the building, and/or impinge on the operation of the recording studios and reverb chambers. We urge the inclusion of a structural and acoustical technical report in the EIR that evaluates such impacts as well as potential long-term implications associated with the use of the new buildings once they are completed and in operation.

In addition, views of Capitol Records from points throughout Hollywood have remained virtually unobstructed for over 50 years, particularly but not limited to the views from the 101 Freeway and the intersection of Hollywood and Vine. The Millennium Hollywood Project, along with a series of nearby proposed projects such as 6230 Yucca, have the potential to incrementally envelop Capitol Records until the landmark tower is relegated to the shadows of new high-rises and its symbolic role as a beacon of Hollywood is diminished. The EIR should evaluate the aesthetic impact of the current project, and the cumulative impact from surrounding entitled and proposed projects, to avoid the piecemeal destruction of this world-famous vista.

Opportunities exist to design the proposed new construction in a manner appropriate in scale and massing to protect the integrity of Capitol Records and its setting in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. This may include re-orientation, scaling back, or sufficient setbacks to ensure the new construction does not overwhelm Capitol Records. As such, the proposed Equivalency Program, which would allow for transfer of floor area among the parcels within the project site, should be evaluated for the potential to impact Capitol Records if scenarios may result in building heights, designs or floor plates incompatible with the historic building. Similarly, the potential impacts as a result of the requested discretionary actions for floor area ratio (FAR) in excess of the current zoning and a height district change to remove D development limitations should also be evaluated, particularly for shade and shadow impact to Capitol Records.

If the proposed project is found to adversely impact Capitol Records and its character-defining features, the EIR must consider preservation alternatives and appropriate mitigation measures to substantially lessen or avoid such impacts. The Conservancy is also concerned about long-term implications of a 25-year development term as requested by the project application. This appears to be exceedingly long and may limit consideration of more appropriate opportunities as the economic climate and demand for uses change in the future. The relationship between the proposed project and the Hollywood Community Plan update that is currently under review should also be addressed in the EIR.

Thank you for the opportunity to comment on the Millennium Hollywood Project NOP. Please add the Conservancy to the notice list for this project as the environmental review process continues and feel free to contact me at [afine@laconservancy.org](mailto:afine@laconservancy.org) or 213-430-4203 should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, flowing style.

Adrian Scott Fine  
Director of Advocacy

cc: Hollywood Heritage, Inc.  
Council President Eric Garcetti, Council District 13  
Office of Historic Resources