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**Sent Electronically**

Daniel Villa, Senior Planner  
City of Burbank Planning Division  
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Burbank, CA 91502  
Email: [dvilla@burbankca.gov](mailto:dvilla@burbankca.gov)

**RE: Draft Environmental Impact Report for the 3700 Riverside Drive Mixed-Use Project**

Dear Mr. Villa:

On Behalf of the Los Angeles Conservancy I am writing to comment on the Draft Environmental Impact Report (Draft EIR) for the 3700 Riverside Drive Mixed-Use Project. As proposed, the project would demolish the existing Lakeside Car Wash and construct a seven-story, mixed-use development consisting of 49 condominium units, 2,000 square feet of ground-level restaurant/retail use, a pocket park, and surface and subterranean parking. Four of the 49 condominiums would be set aside as affordable housing units for very low income households.

We thank the City staff and applicant for meeting with Conservancy staff throughout the Draft EIR comment period so that we could better understand the project needs, challenges, and implications on the historic car wash building.

**I. The Lakeside Carwash is a historic resource found eligible for local, state, and national designation.**

Constructed in 1956, the Lakeside Car Wash blends Ranch and Googie architectural styles to create a uniquely Southern California building. With its long, low, and rambling roofline clad in terracotta tile, the building emulates Valley Ranch style housing tracts while its stylized pylon sign and space age Palm Room ground the Lakeside Car Wash as an auto-centric destination. In many aspects, the building resembles Googie coffee shops of the day.



In 1963, the Lakeside Car Wash was awarded the Los Angeles Beautiful award for its “excellence in landscaping, exterior housekeeping, and contributions to the beauty of their area.” The competition looked at over 300 buildings throughout the Valley and awarded only eight with the title. In 2000, the *Los Angeles Times* referenced the Lakeside Car Wash in its Google architecture tour. In 2002, the *Times* paid particular attention to the car wash in another article on L.A.’s Google architecture.

As detailed in the Cultural Resources Assessment appendix of the Draft EIR, Rincon Consultants, Inc. found the Lakeside Car Wash to be eligible for designation at the local, state, and national levels under Criteria A/1/A and C/3/c as it represents Burbank’s Post-War development and auto-centric architecture.

## **II. Project objectives are overly prescriptive.**

Project Objective 10 reads, “Facilitate preservation of the existing freestanding pylon sign through on-site relocation, as well as preserve the history of the site’s operation as a car wash by the inclusion of historical records and photographs within the Project’s common areas.”

It is our experience that objectives with this level of specificity lead the project and limit potential for more extensive preservation-based alternatives and outcomes. This objective prioritizes the signage as the key character-defining feature, leaving little consideration for a full or partial preservation alternative. As the lead agency, the City initiated this process with a biased objective. This objective to be more inclusive of preservation in general, not singularly focused on the sign. While retaining and reusing the signage is commendable, as contemplated by the applicant from the start, the sign itself is not the sole historic resource.

## **III. Eligibility retention within the Partial Preservation Alternative.**

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.”<sup>1</sup> To this end, 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.”<sup>2</sup> The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.<sup>3</sup> Reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”<sup>4</sup> Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.<sup>5</sup>

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<sup>1</sup>Public Resource Code, Sec. 21001 (b), (c).

<sup>2</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

<sup>3</sup> Guideline § 15126.6(a).

<sup>4</sup> *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

<sup>5</sup> Public Resources Code § 21081.5.



As noted, the Lakeside Car Wash has been determined eligible for designation at the local, state, and national levels. We appreciate the project team's inclusion and consideration of a Partial Preservation Alternative, which has been deemed the environmentally superior alternative. We understand that this option may prove difficult and may require reconstruction of the car wash building rather than a relocation on site. Given this scope of the Partial Preservation Alternative, has there been analysis provided evaluating if the reconstructed building retains eligibility for the local, state, and National registers?

**IV. Additional mitigation should be included in the Final EIR.**

The Draft EIR includes a number of mitigation measures to address significant adverse impacts resulting from the proposed project. CUL-5 and 6 are those that pertain specifically to the site's historic resources. CUL-5 references archival documentation of as-built and as-found conditions prior to the issuance of demolition permits. This documentation would be in accordance with the Historic American Building Survey (HABS) Level III guidelines and shall include high-resolution digital photographic recordation, a historic narrative report, and a compilation of historic research completed by a qualified architectural historian. CUL-6 addresses possible interpretive displays with retrospective materials that detail the history and significance of the Lakeside Car Wash.

While we recognize these mitigation measures as useful, the Conservancy believes additional mitigation measures are necessary and could be included in lieu of others to better plan for and protect similar historic resources in the future. Mitigation of this type should be meaningful, including helping to manage future new development through the identification of historic resources and a thoughtful planning process. The Conservancy suggests a mitigation measure be included as a condition for this EIR and any project approval to fund a historic resources survey and context for Mid-Century commercial buildings throughout Burbank. It is the Conservancy's understanding that there has not been a survey of this type completed to date. As a direct nexus to this project undertaking and a demonstrated need, a historic resources survey and/or context would greatly assist future redevelopment endeavors, by provided a resource that can be easily referenced by city staff and prospective development interests prior to property purchase or contemplation of future development.

**V. The Los Angeles Conservancy requests continued meetings with the project team representatives.**

The Conservancy thanks the Mr. Villa for meeting with the Conservancy in June, and the development team for meeting with us on a number of occasions throughout the public comment period. The Conservancy always strives for win-win, preservation-based outcomes. Where necessary, we also believe meaningful mitigation has an important role to play.



## VI. Conclusion

The Conservancy continues to be concerned by the proposed demolition of the Lakeside Car Wash as part of the 3700 Riverside Drive Mixed-Use Project with limited mitigation. The site has been determined eligible for listing on local, state, and national registers. We agree that the property retains a high degree of integrity and successfully conveys its significance as a post-war car wash under Criteria A/1/A and C/3/C. The Conservancy urges the project team include the following in the Final EIR:

1. More meaningful mitigation measures that include the completion of a citywide thematic historic resources survey and context for Mid-Century commercial resources.
2. Further clarity of eligibility following the potential Partial Preservation Alternative.
3. Broadening of Project Objective 10.

### **About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 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.

Please do not hesitate to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,



Adrian Scott Fine  
Senior Director of Advocacy

cc: Modernism Committee, Los Angeles Conservancy

