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Sent Electronically

Ms. Mindy Nguyen
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Email: mindy.nguyen@lacity.org

RE: Hollywood Center Project Draft Environmental Impact Report, ENV-2018-2116-EIR

Dear Ms. Nguyen:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Hollywood Center Project, which directly impacts the iconic 1956 Capitol Records Building and adjacent National Register of Historic Places listed Hollywood Boulevard Commercial and Entertainment Historic District.

The Los Angeles Conservancy, along with Hollywood Heritage, has long advocated for the protection of historic resources in Hollywood. In 2006, the Conservancy's Modern Committee successfully nominated the Capitol Records Building for designation as a City of Los Angeles Historic-Cultural Monument (HCM). Since the project's initial environmental review in 2011-2012, then known as the Millennium Hollywood, the developer worked closely with the Conservancy and made significant improvements to the project to accommodate the area's historic resources. We appreciate that many of these provisions are accounted for and included in the current proposed project.

The Conservancy appreciates the efforts of the project team to incorporate new construction carefully and respectfully adjacent to the Capitol Records Building. Through the use of setbacks, visual buffers, and open space between the proposed project and the Capital Records Building, the applicant has designed a project that accommodates significant viewsheds from the 101 Freeway to the north and the intersection of Hollywood Boulevard and Vine Street to the south.



Despite the above considerations, the Conservancy continues to believe the project to be out of scale with the surrounding historic built environment. The project encompasses two project sites that are intersected by Vine Street along a north/south axis. The project proposes a 595-foot tall residential tower on the project's East Site, and a 469-foot tall residential tower on the West Site. The two towers will dwarf the 165-foot tall Capitol Records Building and adjacent Hollywood Boulevard Commercial and Entertainment Historic District. The buildings within the district's boundaries are primarily between 1-2 stories with taller buildings reaching 14 stories. As such, the applicant should consider a lower height for its residential towers.

I. Modify mitigation measures to incorporate additional safeguards.

a. Design review and approval by the Cultural Heritage Commission and Office of Historic Resources.

Because of the high concentration of historic resources in the project's "Area of Potential Impact," the project warrants design review by the City's Cultural Heritage Commission (CHC) and Office of Historic Resources (OHR) prior to issuance of any building permits.

As noted above, the project is divided into two project sites referred to as the East and West Sites. Two historic resources located within the project's East Site: the Capitol Records Building (HCM #857) and the H.L. Gogerty Building (California Register eligible).

Immediately south of the project sites is the Hollywood Boulevard Commercial and Entertainment Historic District. Between Argyle and Ivar Avenues, the project's east and west boundaries, are nine district contributors. These include:

- Hollywood Walk of Fame (HCM #194)
- Bank of Hollywood/Equitable Building (HCM #1088)
- Pantages Theater (HCM #193)
- Taft Building and Neon Sign (HCM#666)
- B.H. Dyas Department Store Building/Broadway Department Store (HCM #664)
- Avalon Hollywood (immediately adjacent)
- Hollywood Knickerbocker Hotel
- Guaranty Building
- Regency Building

In addition to the Hollywood Boulevard Commercial and Entertainment District, the Hollywood North Multifamily Residential Historic District is located immediately northwest of the project's West Site. Within the residential district there are twelve district contributors, including the Halifax Apartments, an individually listed National Register property.

Mandatory review by CHC and OHR will better enable the applicant to avoid any unforeseen adverse impacts to this important concentration of historic resources.



b. The final EIR should include additional mitigation measures for construction noise and vibration in recording studios and reverberation chambers.

Capitol Records is home to some of the most iconic recording studios and reverberation chambers in the world. These areas possess distinct conditions that contribute to their desirability and unique sound quality. Throughout the Draft EIR, the significance of Capitol Records' studios and chambers are noted, but no specific mitigation measures are provided to protect their unique conditions. Because sound quality is vital to their operation and historic significance, we request the applicant to include additional mitigation measures for these areas in the Final EIR. Additional measures should be differentiated from those noted in the Draft EIR for architectural monitoring. By creating new mitigation measures, the applicant will ensure continued studio operation during and beyond the project's construction phase. The new measures should include parties responsible for monitoring and protocols should sound/vibration hit the specified threshold.

Additionally, we encourage the applicant to include a detailed map of the recording studios and reverberation chambers with their proximity to new construction in the Final EIR. Several of these studios/chambers are located under the complex's parking lot outside the building footprint. Maintaining the quality of sound within these areas should be considered an equal priority to architecture.

c. Completion of a preservation plan for the Capitol Records Complex, H.L. Gogerty Building, and Avalon Hollywood before permits are filed.

The Conservancy greatly appreciates all efforts by the applicant to protect the integrity of the adjacent historic resources. To add an additional safeguard for the Capitol Records Complex and H.L. Gogerty Building, we urge the applicant to complete historic preservation plans for each resource prior to the issuance of any and all construction permits. Once completed, the preservation plans should be reviewed and approved by the Cultural Heritage Commission and Office of Historic Resources.

The preservation plans are to include historic structures report (HSR) for each property. The HSR is an important tool for preservation management and planning. The HSR will assess the structures current conditions so that property owners or managers may prioritize maintenance and select appropriate treatments. In essence the HSR serves as a guide for all changes made to a historic property during a project-repair, rehabilitation or restoration. In addition to the HSR, the preservation plan would include a greater level of detail for the connectivity between the Capitol Records Complex, Hollywood Walk of Fame, Pantages Theater, Avalon Hollywood and new construction. In particular, this section would analyze how the pedestrian experiences these historic resources from the Project Site's perimeters and from within the paseos.



d. Inclusion of new historic interpretive displays.

The inclusion of new historic interpretive displays are tools used to explain the historical significance of the location and setting of new developments. Such displays work to enhance a visitor's experience by connecting them to the past. The Draft EIR does not include any potential opportunities for interpretative displays within the Project Site. We urge the applicant to work with Hollywood Heritage to incorporate design features in telling the story of the Capitol Records Complex and Hollywood as a whole.

II. Conclusion

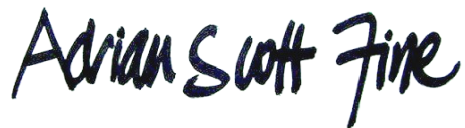
The Conservancy is encouraged by the applicant's willingness to make historic preservation a priority in their project design. However, the Conservancy believes additional measures are needed in the Final EIR to maintain the integrity of area's historic resources. To summarize, we urge the applicant to include design review by the Cultural Heritage Commission and the Office of Historic Resources before permit issuance; additional mitigation measures for construction noise and vibration monitoring inside recording studios and reverberation chambers; the completion of a historic preservation plan for the Capitol Records Building and H.L. Gogerty Building; and the inclusion of historic interpretive displays in conjunction with Hollywood Heritage.

About the Los Angeles Conservancy:

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

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

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Councilmember Mitch O'Farrell, District 13
City of Los Angeles Department of City Planning, Office of Historic Resources

