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Sent Electronically

Paul Caporaso
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**RE: Notice of Preparation (NOP) for the TVC 2050 Project
Environmental Impact Report (ENV-2021-4091-EIR)**

Dear Paul Caporaso:

On Behalf of the Los Angeles Conservancy, I am writing to comment on the Notice of Preparation (NOP) for the TVC 2050 Project Environmental Impact Report (EIR). The project would establish the TVC 2050 Specific Plan to allow for the modernization and expansion of media production facilities within the Television City Studio campus. In 2018, the Conservancy initiated and worked closely with CBS to designate this studio as Historic-Cultural Monument (HCM) #1167.

The proposed project is ambitious and will greatly expand the current and longtime use of this historic television production facility. While we are encouraged by the applicant's enthusiasm to reinvigorate the current facility and expand stages for use in the twenty-first century, we are not without strong concerns regarding the project's proposed density and its impact on Television City's integrity and continued eligibility as a Historic-Cultural Monument (HCM). The Conservancy has been meeting with representatives of Hackman Capital and their team, and we appreciate the openness to discuss issues and collaboration to date. We are very hopeful that we will reach a point where we can support this project and deem it physically compatible with the historic resource, however we are not there yet and as envisioned within this NOP.

The proposed project will substantially alter the physical appearance, visual representation, and overall view shed of the historic resource. On all fronts, it is our strong belief that the existing project proposal does not currently meet accepted or adopted preservation standards widely used at the local, state and national levels. For these reasons, our desire is to see substantial



modifications made to this proposed project and schematics submitted as part of this initial application. Before the Draft Environmental Impact Report (DEIR) stage of this process, it is critically important that this project is brought into compliance and adhere to preservation standards, namely the *Secretary of the Interior's Standards*. Further, this project and the DEIR will need to address and meet preservation parameters established within the HCM for this historic resource.

For background, CBS Television City opened in 1952 at the corner of Beverly Boulevard and Fairfax Avenue as the first large-scale facility designed specifically for television production in the United States. CBS hired local architecture firm Pereira & Luckman, with Gin Wong as the lead designer, to design the company's new headquarters, which contained soundstages, studios, editing rooms, offices, rehearsal halls, shops, and storage. Since its construction, Television City has been home to some of America's most iconic television series like *The Carol Burnett Show* and *All in the Family*. It was designated and listed as a HCM for both its architectural and cultural associations.

I. TVC 2050 Specific Plan

As proposed the TVC 2050 Specific Plan consists of a \$1.25-billion project and calls for the modernization and expansion of Television City's entire 25-acre campus. The proposed plan would permit approximately 1,626,180 square feet of new development, the retention of approximately 247,820 square feet of existing space, and the demolition of up to approximately 495,860 square feet of existing media production facilities. The project references two options for phasing new construction. These include a single-phased project over a 30-month period or a multiple phased plan which could extend the full buildout over the course of 20 years with approximate completion in 2043.

Given the proposed project is requesting a variety of actions, from a General Plan Amendment and Zone Change to a Specific Plan approval, the DEIR should clearly detail the process by which each of these actions will occur in terms of sequencing as each is a separate discretionary action and will subsequently result in impacts.

While the Conservancy supports reinvestment and job creation generated through construction and expansion of Television City, a significant amount of the existing complex will be demolished, including portions of the historic building. Due to this and cumulative impacts, we request the DEIR analyze this aspect to determine how much of the existing historic building will remain to ensure the physical integrity and continued eligibility is maintained.

As part of the NOP, the applicant seeks approval for a project that envisions from between fifteen to twenty-one overall stages. The schematics to date illustrate a build out of up to only fifteen stages. For the DEIR, any illustrations and/or schematics for the preferred project and alternatives should represent the full potential of what the applicant is currently seeking. Therefore, we would expect to see both options (fifteen and twenty-stages) detailed so the public is fully aware of potential impacts. We also suggest any illustrations accurately reflect the HCM as this was inaccurately portrayed during the NOP Scoping Meeting; the HCM is reflected by the entirety of the parcel of property designated, not simply the outline of the historic building.



II. Impacts to CBS Television City HCM #1167

Based on our review of the proposed project, we believe there will be multiple significant, adverse impacts to the CBS Television City historic resource. The overall massing, scale, height, and proximity of the new construction relative to the historic building is problematic. It overwhelms and obscures the historic CBS Television City building in multiple aspects. Specifically, we call out the massive, multi-story “bridge” structure proposed to be built directly on top and over the historic building. This approach for adding new additions and/or expanding the existing building is physically incompatible and contrary to preservation best practices and standards, including the *Secretary of the Interior’s Standards*.

The US Department of the Interior and National Park Service specifically state the following:

“The *Secretary of the Interior’s Standards for Rehabilitation* allow the construction of new additions if they do not destroy significant fabric, and if their design is compatible with the size, scale, color, material, and character of the property and the historic district if applicable. However, not all historic buildings can be enlarged in a manner that is consistent with the Standards, whether for reasons of size, siting, or location within a district. With regard to rooftop additions, the Guidelines for Rehabilitating Historic Buildings recommend that new rooftop additions be designed so that they are inconspicuous from the public right-of-way, are set back from the primary elevation of the building, and do not damage character-defining features of the historic building. Rooftop additions are almost never appropriate for buildings that are less than four stories high. Generally, rooftop additions should not be more than one story in height, and are more compatible on buildings that are adjacent to taller buildings or dense urban environments. Rooftop additions that do not meet these principles generally will not meet the Standards.”¹

Building on top of the existing historic resource is a core problem with the proposed project, as it does not follow the *Standards* and will jeopardize the continued eligibility of this designated historic landmark. Throughout our comments to date and multiple meetings with the applicant and their team, the Conservancy has repeatedly raised this issue. This problem is further complicated by the fact that a historic view shed must remain of the CBS Television City historic landmark from Beverly Boulevard. This aspect was negotiated as part of the HCM that was put in place in 2018, to ensure the public would always be able to view the historic building in the future if any new development was added to the site. It calls for a four-hundred-and-ten-foot view shed to remain substantially open and unimpeded by new development. As proposed, the view shed opening is maintained but not the view itself, given the historic building is substantially surrounded on all sides and above by new, multi-story new construction. This violation of the view shed again does not adhere to the *Standards* or the HCM.

The DEIR will need to fully address and resolve this issue, the current significant adverse impacts, and identify a range of preservation alternatives (more than a No Build alternative)

¹ National Park Service, US Department of the Interior, Interpreting the Secretary of the Interior’s Standards for Rehabilitation, ITS Number 36,



that are capable of meeting the desired project objectives. The Conservancy is confident that this can be fully accomplished, while still allowing for a substantial physical expansion of the current facility. We strongly encourage the applicant to reconsider some of the proposed office expansion so as to address this issue, by removing the structure currently proposed on top of the historic building, and reducing and moving the towers to the east and west further south to give the historic building room to “breath.”

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.”² 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.”³ 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.⁴ Reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”⁵ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁶

III. Conclusion

While we greatly applaud the applicant, Hackman Capital, for their retention and continued use of the historic CBS Television City, the proposed project, as currently envisioned, will add considerable new construction at the site and result in a significant adverse impact to the historic building. As proposed the project would construct new sound stages and office towers, to the west, south, and east of the historic building.

Where we are most concerned is the construction of a new multi-story building directly on top of the HCM-designated portion of the campus. With potential to dwarf the historic portion of CBS Television City, we believe this new construction to be fully incompatible with the historic resource and in violation of the *Standards*.

The Conservancy looks forward to continuing to meet with the applicant and work toward a solution that can ensure both expansion and preservation of the CBS Television City historic landmark.

²Public Resource Code, Sec. 21001 (b), (c).

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

⁴ Guideline § 15126.6(a).

⁵ *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁶ Public Resources Code § 21081.5.



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 should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Senior Director of Advocacy

cc: Office of Historic Resources
Cultural Heritage Commission
Councilmember Nithya Ramen

