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**Submitted electronically**

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**RE: Academy Museum of Motion Pictures Project Draft  
Environmental Impact Report, (ENV-2013-1531-EIR)**

Dear Ms. Ibarra:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Academy Museum of Motion Pictures Project (AMPAS). We applaud the Academy's commitment to rehabilitate the historic May Company Wilshire building ("Original Building") as part of the proposed project. Reactivating this building is important and will infuse new vitality into the historic Miracle Mile corridor. Throughout our ongoing conversations with the project development team the proposed project has evolved and continually been improved. While we still have some outstanding concerns, we believe that additional refinements can be made and measures implemented to address these to ensure the historic building is protected in the future as well as the integrity of its iconic design, materials and setting.

**I. Historic Significance of the May Company Building**

Completed in 1939 and subsequently expanded in 1946, the May Company Building at 6067 Wilshire Boulevard remains one of Los Angeles' most iconic structures. Designed by noted architects Albert C. Martin and Samuel Marx as the May Company's new Miracle Mile location, the building is significant for its Streamline Moderne architecture and its design that responded to the growing influence of the automobile on the retailing business. The building's corner detailing, with its gold-tiled cylinder (sometimes referred to as the "perfume bottle"), firmly established the May Company's striking presence at Wilshire and Fairfax to traveling motorists. The building's series of large showcase windows along Wilshire and Fairfax and a rear entrance adjacent to parking further catered to patrons arriving by automobile.



The building's exterior retains a high degree of integrity. The ground floor and corner detailing are clad in polished black granite, while the upper floors of the Wilshire and Fairfax facades are clad in panels of Texas shell limestone and contain ribbons of steel-frame windows. The showcase windows and streamlined canopy wrapping around the main facades are fashioned from copper. Remaining historic fabric on the interior primarily includes the fifth floor tea room, with its coved ceiling, mantle and sculptural wall details.

The May Company Wilshire building received a Determination of Eligibility for listing in the National Register of Historic Places in 1983 and is listed in the California Register of Historical Resources. In 1991, the original 1939 portion of the building was designated a Los Angeles Historic-Cultural Monument (HCM #566).

## **II. The Final EIR should address design refinements of the proposed project to further mitigate impacts on the Original Building**

### **a. The Tearoom**

In contrast to the highly intact exterior of the former May Company Building, the interior has very little historic fabric remaining. The Character-Defining Features Analysis in the Historic Resources section of the draft EIR notes that the Tearoom, which is located in the southern portion of the Penthouse, is intact and is considered one of the few contributing interior features to remain in the building. As described in Draft EIR, "the contributing Tearoom retains the floor plan, ceiling height, plaster wall finishes, heavily molded and coved plaster cornice, two black granite, Cordova shell stone and marble fireplace mantels (painted) with Streamline Moderne detailing and concave circular niche and decorative plaster urn over-mantel, door openings into kitchen and lobby, and steel Streamline Moderne multi-pane windows and doors on the south and west walls." (4.c.3-21)

As currently proposed, the Tearoom would be removed to make way for a reconfiguration and expansion of the Penthouse to the south. We are concerned that the intact Tearoom would be lost to make way for the expansion without further explanation or mitigation measures. It is unclear why the historic fabric of the Tearoom could not be retained and incorporated within and as part of the expanded volume of the Penthouse. We suggest additional information and analysis be provided to address this issue.

### **b. Cultural Heritage Commission review**

Because the Original Building is designated as Los Angeles Historic-Cultural Monument #566, we feel it is important that the City's Cultural Heritage Commission (CHC) be given the opportunity to review the project in a public hearing and provide comments in the form of a recommendation and vote. Proposed modifications to designated Historic-Cultural Monuments are routinely reviewed by the Cultural Heritage Commission and/or the City Architect. Therefore, the process of reviewing the proposed project and specific aspects such as signage in the future should include the Cultural Heritage Commission.



We understand that the James Goldstein Office (HCM #829), a landmarked office interior designed by master architect John Lautner (removed from its original Century City office building and rescued by the Los Angeles County Museum of Art), had been proposed for incorporation into the renovated May Company Building. We did not see mention of the Goldstein Office in the Draft EIR and request further information about the whereabouts and condition of this landmarked interior, and whether it is proposed for inclusion in the Original Building and as part of this project.

### **c. Preservation Plan**

The Materials Conservation and Preservation Plan will be an important guiding document for the rehabilitation and future maintenance of the Original Building. As stated in the Draft EIR, the Cladding of the Original Building is a significant character-defining feature and the Cladding panels are currently exhibiting a range of deterioration including limited cracking, spalling, and staining indicative of localized water damage and metal corrosion. While a goal of the Preservation Plan is to retain and improve the integrity of the primary facades of the Original Building and to avoid significant impacts associated with façade rehabilitation, some concerns remain unaddressed.

It is unclear whether any testing has been accomplished to determine the success of detaching the limestone cladding panels intact, or whether attempts at detaching might result in a high incidence of fractured panels. The proposed salvage of cladding panels from the 1946 addition would provide a set of identical panels that could be used as replacements for those exhibiting deterioration beyond repair on the Original Building, though it is unclear what percentage might be successfully detached intact for that purpose. The ability to access the original quarry for the purposes of creating new cladding panels if necessary is also notable.

However, priority should be placed on retaining as many of the cladding panels on the Original Building as possible, in keeping with the *Secretary of the Interiors Standards*. The Draft EIR notes that “temporary removal and replacement of the exterior Cladding” may be required to “to introduce a vapor barrier necessary to maintain humidity levels consistent with required museum conditions.”

Testing to determine the success of removing the Cladding panels should be conducted early on. If analysis is found to result in a large proportion of damaged panels, the project should seek alternatives other than the “temporary removal and replacement” of cladding to introduce a vapor barrier. Because little of the interior retains historic fabric, alternatives that could accomplish the desired climate control from the interior of the walls while leaving the exterior Cladding intact should be analyzed.

### **d. Clarification of latest design features/inconsistencies with renderings and descriptions provided in Draft EIR**

The Draft EIR appears to contain contradictory descriptions and illustrations of the project, making it difficult to ascertain the latest stage of the design. The Conservancy requests clarification with the project illustrations and once again stresses the need for up-to-date illustrations and congruity throughout the Draft EIR so that the project can be properly analyzed.



For instance, the Project Description states “circulation elements, including escalators, elevators and potentially stairs, would be accommodated within the Original Building in the area along the North façade where the 1946 Addition would be removed.” Figure 28 of the CEQA Impact Analysis section clearly depicts this interior stair configuration, and Figure 37 in the same document also appears to match the Project Description. However, Figure 2-6 in the Project Description depicts a prominent exterior staircase providing vertical circulation among floors. Figure 003 in the Conceptual Signage Plans in appendix H-3 also depicts this exterior stair configuration.

The Project Description states that “the Sphere’s shape and the planned use of a variety of façade treatments, including glass and metal, are intended to reduce its perceived mass and visual impact.” (2-13). At 165 feet in height, the Sphere will rise approximately 43 feet higher than the roof parapet of the Original Building, which is 87 feet in height. By contrast, Figure 30 in the CEQA Impact Analysis section depicts the Sphere as lower in height compared to the Original Building’s roof parapet. Additionally, while mostly obscured by an illustrated tree in Figure 30, the Sphere appears to be plainly visible to eastbound traffic on Wilshire and within the viewshed of the primary facades of the Original Building.

Design elements of the New Wing that remain a concern are the decorative vertical “spire” projections that rise above the level of the parapet of the Original Building. We believe these draw greater attention to the addition connector than necessary. These elements appear in Figure 2-6 in the Project Description, Figures 29, 37, 38 and 39 of the CEQA Impact Analysis section, and Figure 004 in Appendix H-5 containing the Academy Museum Conceptual Signage Plans. Yet in the rendering on the cover page of the Light and Glare Technical Report, the design is modified and does not include these decorative vertical projections, though the exterior stair circulation is still present. Clarification and a consistent set of drawings is recommended.

#### **e. Sign District and Conceptual Signage Plans**

The creation of a Sign District is a component of the proposed project, and several purposes and objectives are outlined in the Project Description of the Draft EIR. One of these objectives calls for ensuring that “signs are responsive to and integrated with the aesthetic character of the structures on which they are located, including reuse of the storefront windows on the Original Building, and are positioned in a manner that is compatible both architecturally and relative to the other signage on-site.” (2-25)

While the historic Original Building provides several opportunities for the display of new signage that is compatible with historical uses at the site, including the use of flag pole signs for the original eight flag poles and utilizing the historic display windows along the main facades for compatible displays, we have concerns with several of the proposed signage types that appear inconsistent with historical advertising or signage at this building. Again, we believe it is important for the Cultural Heritage Commission to have an opportunity to review and comment on the proposed Sign District, as part of the EIR process and in the future when additional signage is proposed.





**Banner Signs:** These signs are proposed to take the form of six supergraphic displays ranging from 46-51 feet in length and 12-40 feet in width that would be attached to the limestone cladding of the upper facades. Three signs of this type are depicted in the Conceptual Signage Plans: one located at the southeast corner of the Original Building at Wilshire Boulevard, and two located along the Fairfax Avenue elevation, at the northwest corner and directly north of the Corner Tower. We are concerned that signage of this size and scale will overwhelm the architecture of the building and the balanced design of the facades. In particular, the two banner signs proposed for the Fairfax elevation would cover a substantial amount of the façade when the removal of the 1946 addition is taken into account

**Identification Sign I-E-2 (Oscar silhouette):** This sign, proposed for placement on the Corner Tower, would measure 63 feet in length and 46 feet in width. While historic signage advertising the “May Company” in neon individual lettering was originally present on the black granite blades framing the Corner Tower, the gold mosaic tile clad cylindrical tower has never featured signage. It has always been the most prominent architectural feature of the building. While the analysis in the Standards and Design Guidelines Conformance section of the Draft EIR states that this proposed signage would be “installed in conformance with the Standards so as not to harm architectural materials such as the Tile or Cladding,” we are concerned that this signage would greatly detract and take away from the iconic tower’s original design. We suggest further clarification regarding what material the signage would be constructed from, and what its day and evening visibility would be.

**Digital Display Box Signs (historic display windows):** This signage would be located in the series of historic display windows along the ground floor of the Wilshire and Fairfax facades. While the reactivation of these historic display windows is appropriate for signage and interactive displays, we are concerned that the employment of too many of the display windows at any given time could overwhelm the architecture.

**Digital Display Box Signs (fourth floor windows):** This signage would be projected from sections of windows along the fourth floor of the building, where historic signage was never utilized. Two ribbons of windows along Wilshire and one ribbon along Fairfax are proposed to serve as “Display Box Signs.” It is unclear what kind of treatment is called for here and how this might distract from the aesthetics of the Original Building’s design.

Given our concerns about the maximization of signage on the Original Building, we question why so much signage has been proposed for the historic structure when opportunities exist to utilize the New Wing for advertising purposes. We note that some signage has been proposed for placement on the Sphere, but we encourage the project team to transfer more signage to that location. The Original Building should not be used for maximum signage placement in order that the Sphere be unobstructed for maximum architectural impact. The May Company Building is one of Los Angeles’ most iconic structures and its masterful design is achieved through bold forms, contrasting materials, and the spare use of decorative details. The introduction of too much signage in non-historic locations would significantly compromise the aesthetics of the historic building’s design.



### III. Conclusion

We appreciate the opportunity to comment on the Draft EIR and this important proposed project. When completed it will reuse the historic May Company Wilshire Building and activate it for a vibrant and exciting new use. We look forward to working together to further refine this project so that it may address our outstanding concerns regarding the Tearoom's preservation, appropriate signage and placement, material conservation of exterior cladding, and the details of the proposed connector structure between the Original Building and the new sphere.

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

The Los Angeles Conservancy is the largest local historic 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 County through advocacy and education.

Please feel free to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions.

Sincerely,



Adrian Scott Fine  
Director of Advocacy

cc: Office of Historic Resources, Cultural Heritage Commission, City of Los Angeles  
Council District 4

