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Sent Electronically

Jason McCrea
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Room 1350
Los Angeles, CA 90012
Email: jason.mccrea@lacity.org

RE: Draft Environmental Impact Report for the District NoHo Project, ENV-2019-7241-EIR

Dear Jason McCrea:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (EIR) for the District NoHo Project (Project). The proposed Project is a high-intensity, mixed-use, transit-oriented, and multiphase development on approximately 15.9-acres of land owned by the Los Angeles County Metropolitan Transportation Authority (Metro) at and including the terminus of Metro's B (Red) Line, G (Orange) Line (Project Site) as part of a joint development effort with Metro. The development includes market rate and affordable multi-family residential units, community-serving retail, and restaurant uses, and office space that is integrated with bicycle, bus, rail, and parking facilities.

Throughout the early stages of this proposed project, we have welcomed the opportunity to discuss the scope and potential impacts of this project with Metro consultants, and we thank them for meeting. The Conservancy however remains concerned by the Project's significant impacts to historic resources, namely the Lankershim Depot at the corner of Lankershim and South Chandler Boulevards. While we better understand the desire and intent for the relocation of this historic train structure, we are not fully convinced that it is indeed necessary to achieve the project objectives.

I. The Lankershim Depot is an important piece of Los Angeles's Transportation History

Constructed as a one-story railroad depot in 1895, the Lankershim Depot became a stop for the Pacific Electric Red Car line in 1911. As a Red Car



stop, the depot was in continuous use from 1911-1952 when the City of Los Angeles systematically dismantled its light rail system.

Despite the end of the streetcar era, the depot found a new life as Hendrick’s Building Supply until the Los Angeles County Metropolitan Transit Authority (Metro) purchased the site in 1993 to construct the Red Line subway. For nearly three decades following the Red Line’s completion, the Lankershim Depot’s fate remained uncertain.

In 2017, the depot once again found a new use when it reopened as a coffee shop. In 2018, the depot received a Los Angeles Conservancy Preservation Award as an exceptional adaptive reuse project. Since reopening, the coffee shop has become an important community hub and breathing new life into the corner.

II. The siting of the Lankershim Depot is important for its ability to convey its significance

The siting of the Lankershim Depot is an important character defining feature as it enables the building to convey its significance as a rail depot along historic rail lines. This siting relates to both its context as a rail depot and its relationship to the intersection of Lankershim and Chandler Boulevards as a Red Car stop.

As proposed, shifting the depot 45-feet to the west and 2.5-feet to the south to accommodate expansion and consolidation of transit services, specifically a new portal to the Metro North Hollywood Station would result in a significant and unavoidable impact to the historic resource. As stated in the Cultural Resources Technical Appendix prepared by Jenna Snow at Historic Preservation Consulting, such a move would physically and visually separate the Depot from its historic setting, materially altering in an adverse manner a characteristic of the historical resource that conveys its significance. The Conservancy seriously questions the eligibility of the Lankershim Depot as a historic resource after such a separation from its historic setting has occurred. We strongly believe that all projects dealing with historic resources must maintain their eligibility at project completion.

III. The Final EIR should fully analyze and incorporate existing historic resources

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.”¹ 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

¹Public Resource Code, Sec. 21001 (b), (c).



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

As discussed, the Project would have significant and unavoidable impacts to historic resources and could substantially deteriorate the Lankershim Depot’s ability to retain its eligibility. The City has identified six project alternatives including two no Project alternatives, one that incorporates development and the other a No Build option. Of the six, Alternative 5: Historic Preservation Alternative will have less than significant for all areas of potential impact. This Project Alternative would not incorporate new transit development in Block O West where the Depot is located, retaining the Lankershim Depot in its current location and avoid significant impacts. However, this Alternative would not meet three of the nine Project Objectives. These are:

- Promote and enhance transit ridership by consolidating and revitalizing the Metro transit center and providing enhancements to the G (Orange) Line terminus property, including an improved terminal and security office, Metro employee break room, other support structures, new Metro portal structures on the West and East sides of Lankershim, and the retention of the Historic Lankershim Depot.
- Improve Metro infrastructure in furtherance of Metro’s commitment to convert to an all-electric fleet by 2040.
- Support Metro’s regional planning efforts such as the Metro Vision 2028 Strategic Plan by improving pedestrian, bicycle, and transit facilities in North Hollywood.

While we recognize the need to meet these objectives, the Conservancy continues to believe there is a win-win outcome that may retain the Depot in place while accommodating new infrastructure that enhances the G (Orange) Line terminus, supports the future all-electric fleet, and creates a useable portal for transit riders to access the below ground light rail platforms.

IV. Conclusion

The Conservancy thanks the Project Team for previous meetings to discuss the proposed plan. We continue to see the potential for a win-win outcome and are dedicated to working with the Project Team to find a way to reduce impacts to the Depot to a less than significant effect.

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

³ Guideline § 15126.6(a).

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

⁵ Public Resources Code § 21081.5.



The Lankershim Depot was constructed in 1895 and later became a stop for the Pacific Electric Red Car line in 1911. As a Red Car stop, the depot was in continuous use from 1911-1952 when the City of Los Angeles systematically dismantled its light rail system.

For over a century the Depot has sat at the corner of Lankershim Boulevard and Chandler Boulevard. The siting of the depot at this location is integral to its history and ability to convey its significance.

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: Ken Bernstein, Office of Historic Resources

