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Submitted by email

Mr. Adam Villani
City of Los Angeles, Department of City Planning
6262 Van Nuys Boulevard, Rm. 351
Van Nuys, CA 91401
Email: adam.villani@lacity.org

**Re: Draft Environmental Impact Report for Paramount Pictures
Master Plan, ENV-2011-2460-EIR**

Dear Mr. Villani,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Paramount Pictures Master Plan project. The Conservancy has had numerous conversations with the project team, and we greatly value the thoughtful approach to integrating the site's collection of historic resources into the proposed master plan, including its significant structures, open spaces, and circulation patterns. Overall, we believe our discussions with the applicant are positive and moving in the right direction.

As outlined in the Draft EIR, the proposed project includes a range of mitigation measures designed to reduce significant impacts to historic resources, from the implementation of a preservation plan to the requirement that demolition permits be contingent upon known replacement projects. This is important, as mitigation and a solid preservation plan are necessary in order to address significant impacts.

Nonetheless, we still have a number of outstanding questions and concerns over the impact of the proposed project on the two potential historic districts and the individually eligible KCAL Building. In particular, we strongly recommend 1) the preparation of detailed standards to guide sensitive new construction; 2) the adoption of a clear design review process pertaining to work that may impact historic resources, and include the City's Office of Historic Resources in a sign-off capacity; and 3) the incorporation of an additional mitigation measure to require local designation of identified historic resources.



I. Historic significance of the Paramount Pictures Main Lot

As described in the Draft EIR, the Paramount Pictures Main Lot played a seminal role in the motion picture industry in Los Angeles, as well as the city's broader economic and cultural development. The site, which contains the historic Paramount Pictures and RKO Studios facilities, is a rare, intact example of a motion picture production campus that includes historic resources spanning the industry's twentieth century evolution, including the silent film era, the advent of sound, and the expansion of television and other media.¹

Located on the eastern portion of the project site, the potential Paramount Pictures Historic District is significant for its association with the "Major Studio Era" and is the longest continuously-operating major motion picture studio lot. The district reveals industry practices from Hollywood's "Golden Age," in which production, distribution, and exhibition were fully integrated. As a result, the facilities in the district reflect a diverse range of uses and building typologies, including administrative offices, pre-and-post-production facilities, stages, utility buildings, and actor support services. The buildings and structures were designed in a variety of architectural styles, and the district retains its distinctive historic street patterns and circulation paths.

Located on the western portion of the site, the potential RKO Studios Historic District is similarly significant for its association with the "Big Eight" motion picture studios and with the development of the television industry. Like its eastern counterpart, the district is distinguished by its original street grid and landscaping elements, which help unify the diverse range of architectural styles and building types.

In addition, the Draft EIR identifies the KCAL Building (5515 Melrose Avenue) as being an individually eligible historic resource. Constructed in 1935, the intact Streamline Moderne building is an excellent early example of a radio broadcasting facility in Hollywood. It was affiliated with the National Broadcasting Company (NBC), the first radio network in the country, and it would later be repurposed as a television broadcasting facility in the 1950s.

The Paramount Pictures Historic District and the RKO Studios Historic District, as well as the KCAL Building, have been determined eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and as local Historic-Cultural Monuments.

II. Updated Historic Resources Preservation Plan should be fully integrated into proposed Paramount Pictures Specific Plan

The Conservancy appreciates the preparation of a thoughtful Preservation Plan to guide the maintenance and rehabilitation of known historic resources on the project site in the future, and we emphasize the importance of using its recommendations as the foundation for the Specific Plan.

The document establishes a sound path for ensuring that identified historic resources are treated in a manner consistent with the *Secretary of the Interior's Standards for Rehabilitation*, and we concur with

¹ Historic Resources Group, *Paramount Pictures Historic Assessment Technical Report*, August 2015, 12.

the Draft EIR's finding that implementation of the proposed plan, with some additional modifications, would help reduce the impacts of the project to a less than significant level. We do, however, have some outstanding concerns over the methodology and proposed review process, and we strongly urge the City to address these issues in the Final EIR.

We believe that there are strong, recent precedents for guiding the implementation of specific plans with clear preservation components. The University of Southern California (USC) Development Plan and Specific Plan (ENV-2009-271-EIR) is an excellent model for a comprehensive, 20-year master plan that balances historic preservation with compatible infill construction. Like the Paramount Pictures Historic Resources Preservation Plan, USC's Adaptive Mitigation Management Approach (AMMA) identifies the contributing and non-contributing elements of the historic district on the project site, offers principles to guide rehabilitation and maintenance of the historic resources, and outlines additional guidelines for sensitive new construction within the district. The AMMA, however, also provides detailed procedures for project review that directs development to sites without historic resources while requiring additional environmental review when extensive alterations or demolition of a contributing element is proposed.

With review and enforcement from the City's Planning Department and, more specifically, the Office of Historic Resources, we believe that USC's methodical approach to managing a large collection of historic resources over the course of a 20-year master plan establishes a clear model for Paramount Pictures to follow as it proceeds with its own large-scale project. The Paramount Pictures Specific Plan should include precise language that outlines the role of the Office of Historic Resources in reviewing future proposals for any rehabilitation projects or new construction that is adjacent to contributing structures.

a. Incorporate clear guidelines for new construction in identified historic districts

In its current form, the preservation plan outlines certain recommendations to guide new construction on the Main Lot, including guidelines for scale, mass, height, fenestration, and building materials.

The Conservancy remains concerned, however, over the ambiguity of the impacts of proposed new construction on the two historic districts and the KCAL Building. Because the Draft EIR only states that new development would comply with the *Standards* and the preservation plan, as interpreted by a qualified third-party preservation consultant, the possibility of future impacts to occur remains high. To address this uncertainty, we believe that an appropriate solution would be for the Office of Historic Resources to review and concur with the recommendation of the consultant and not merely accept the reports for documentation and verification.

The National Park Service provides greater guidance in regards to the *Standards* and how to incorporate new construction, specifically stating “[I]ntroducing a new building or landscape feature that is out of scale or otherwise inappropriate to the setting’s historic character” is not recommended. Given this, we strongly recommend the preparation of additional guidelines for planning and designing new construction in order to reduce future impacts and provide greater clarity. Though the plan mentions that the historic setting – including landscaping, open space, and existing street patterns – will be considered,

the plan should identify more specific provisions for ensuring that these relationships and features are retained and sensitively incorporated into new development.

More explicit guidelines regulating the height and overall proportion of new construction are also needed. Though the preservation plan provides overarching recommendations for new construction throughout the project site, the current guidelines are largely open-ended and allow for broad interpretation. In addition to respecting the existing scale, height, and mass of the two historic districts, new structures should not include design elements that detract from or replicate the character-defining features of the district contributors. The plan should also provide greater specificity regarding appropriate building materials that are sensitive to the historic character of the project site.

b. Address potential impacts of proposed new development on KCAL Building

The KCAL Building would be retained and rehabilitated as part of the proposed project, which the Conservancy greatly appreciates, as it is important landmark for the city. We do, however, remain concerned over the possible adverse impact of the new construction proposed directly north of the building. According to the Conceptual Site Plan, a new structure (up to 15 stories and 240 feet in height) would be constructed directly behind the KCAL Building, greatly exceeding the 75-foot height limit established for this zone.

While the new construction would not directly alter or demolish any of the KCAL Building's original character-defining features, the proposed scale and proportion does not appear to be compatible with the historic building. The Draft EIR states that the new building would be cantilevered at its tallest point to provide additional separation and would extend from the parapet of the KCAL Building, providing fifteen to twenty feet of separation between the two structures. We understand this might consist of a glass "hyphen" structure, which has been successfully used in other examples where new construction is added to an existing historic building.

Nonetheless, our concern is primarily with the potential volume, scale, and massing of a large structure located directly behind the historic KCAL Building. We believe that the proposed tower has the potential to encroach upon and overwhelm the two-story historic building and strongly encourage the applicant to consider a range of options for a more sensitive development, including redistributing the proposed density to other appropriate locations on the project site. Because more than half of the 75-foot height limit zone fronting Melrose Avenue allows for exemptions, the indirect impacts on the KCAL Building and its integration into the site plan warrant further study in the Final EIR.

The potential adverse impact on the KCAL Building also underscores the importance of designating it as a Historic-Cultural Monument in order to ensure that any new construction is appropriately scaled and compatible with the historic building. We are attaching Exhibit A to illustrate reasons for our potential concerns and to share examples of other projects that we believe to be incompatible and result in significant impacts to historic resources.

c. Remove Hans Dreier Building, William S. Hart Office Building, and Josef Von Sternberg Building from development sites list

While the Conservancy recognizes that certain historic resources will be lost in order to accommodate new construction on the project site, we question the inclusion of the Hans Dreier Building (No. 226), the William S. Hart Office Building (No. 178), and the Josef Von Sternberg Building (No. 102) on the list of buildings to be demolished. These structures have been identified as contributors to the potential Paramount Pictures Historic District (Dreier) and RKO Studios Historic District (Hart and Von Sternberg), and the Hart and Dreier Buildings were included in the 1990 Memorandum of Understanding between the Hollywood Studios Preservation Coalition and Council District 13.

Based on the Conceptual Site Plan and discussions with the applicant, we understand that all three buildings are slated for removal in order to enhance circulation on the project site, in addition to the losses of other contributing resources such as Studios 19, 20, and 21 at the corner of Gower Street and Melrose Avenue.

d. Require Historic-Cultural Monument designation as additional mitigation measure

Given the significance of the potential Paramount Pictures Historic District, the RKO Historic District, and the KCAL Building, the Conservancy strongly urges the applicant to nominate the historic resources for local Historic-Cultural Monument (HCM) designation as an additional layer of mitigation to reduce impacts to a less than significant level.

As currently proposed, the project would demolish eighteen contributing structures in the Paramount Pictures Historic District and thirteen contributors in the RKO Studios Historic District, leaving them 62 percent and 70 percent intact, respectively. While, in general, preservation practice accepts that retaining 60 percent or more of a district's contributors will not compromise overall integrity and eligibility, both potential districts would closely approach that threshold as a result of the proposed project. Given the scale and scope of the project, we believe that additional safeguards are necessary to ensure the continued eligibility of both districts, as well as the KCAL Building.

Formal designation would enable the City's Cultural Heritage Commission and staff to review and comment on the project design and details for compliance with the *Secretary of the Interior's Standards for Rehabilitation*. Due to the timeline for implementing the proposed Master Plan, designation would also create a public process for any improvements to the historic resources in the future. Though the proposed Preservation Plan would require that a qualified historic preservation professional monitor any future work, local listing provides an additional layer of certainty and coordination with the City.

In light of the substantial role of the proposed historic districts and the KCAL Building in the development of the Hollywood entertainment industry, the Conservancy also encourages the applicant to consider options for more permanent protection, including conservation easements. An easement, which is a private agreement that could offer potential tax benefits, would ensure that the resources are sensitively preserved and maintained in perpetuity. Because they would not be subject to external pressures,

easements would offer community stakeholders long-term assurance over the future of the historic buildings.

III. Conclusion

The Conservancy greatly appreciates the applicant's willingness to engage in ongoing discussions concerning the proposed project and its potential impacts on historic resources, as well as their responsiveness to date. We believe that substantial progress has been made and that the proposed project is moving in the right direction.

A primary concern is the proposed implementation of the preservation plan as part of the overall Paramount Pictures Specific Plan. Because the Historic Assessment Technical Report indicates that impacts to historic resources will be less than significant only with mitigation and a preservation plan, we strongly urge the applicant and the City to incorporate a more thorough review process in concert with the Office of Historic Resources and to adopt additional guidelines and mitigation measures, as outlined above.

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.

Thank you for the opportunity to comment on this project. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,



Adrian Scott Fine
Director of Advocacy

Attachment: Exhibit A

cc: Council District 4
Council District 13
Office of Historic Resources, City of Los Angeles
Hollywood Heritage