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Submitted electronically

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Re: Notice of Preparation, Spring Street Hotel, ENV-2015-2356-EIR

Dear Mr. Huerta,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the proposed Spring Street Hotel project (631-635 S. Spring Street). The Conservancy has previously met with the applicant to discuss the proposed project, and we appreciate the opportunity to review the new development and its compatibility with the Spring Street Financial District and the Broadway Theatre and Commercial District, both listed in the National Register of Historic Places.

While progress is being made to ensure that the new construction is sensitive to its existing context, we have a number of outstanding concerns over the potentially significant impact that the project would have on two historic districts, as well as the cumulative impacts of current and future development. In the forthcoming Draft Environmental Impact Report (EIR), we urge the City to thoroughly study the potential adverse impacts to cultural resources and to propose meaningful mitigation measures to ensure that the integrity of the districts remains uncompromised.

I. The Draft EIR should evaluate a range of potential adverse impacts and incorporate sensitive design guidelines.

As currently proposed, the Spring Street Hotel project would construct a 28-story tower on a site containing a surface parking lot and a small commercial building. Though no historic resources are proposed for demolition or alteration, the project site is located in the Spring Street Financial District and abuts the Broadway Theater and Commercial District.

The Draft EIR should acknowledge and utilize *The Secretary of the Interior's Standards for Rehabilitation* as the benchmark for evaluating the compatibility of



the proposed new construction with its existing context and for establishing clear design guidelines. It should consider the appropriateness of the proposed scale, massing, color, and proportion of the new building, particularly in light of its mid-block location. Though the proposed development will impact existing spatial relationships and its neighborhood setting, the final design should be sensitive and deferential to the district's historic fabric, including the overall streetscape. The Draft EIR should also consider appropriate building materials, fenestration, regulating lines, and orientation to Spring Street in order to maintain and enhance the historic character of the district.

The National Park Service (NPS) 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. We request that the Draft EIR include detailed drawings to illustrate how the *Standards* might be applied to the proposed project, in line with the recommendations of the NPS. We also strongly encourage the preparation of sightline and visibility studies to evaluate the impact on views in the district, including views from Spring Street and Broadway, as well as a thorough shade and shadow analysis.

II. The Draft EIR should consider cumulative impacts of proposed new construction in the Historic Core.

The Conservancy appreciates the current progress towards a compatible design, but we remain concerned that the proposed project would set a significant precedent for new construction in Downtown’s historic districts. In addition to the visual impacts at the street and pedestrian level, the 28-story tower would greatly exceed the height of surrounding properties and introduce a new scale and set of proportions to the neighborhood. While new high-rise construction suits the context of other parts of Downtown, including South Park, we do not believe that projects of this scale are ultimately compatible with the existing character of the Historic Core.

We strongly urge the City to conduct a full analysis of cumulative impacts in the Draft EIR that examines and weighs the long-term effects of new construction at this scale on the integrity of the Spring Street Financial District and the Broadway Theatre and Commercial District. Because the Spring Street Hotel is one of several high-rise projects currently proposed for the neighborhood, its full impacts should be understood and mitigated in context. Furthermore, ongoing development pressure in Downtown underscores the need for clear guidelines for compatible infill construction that establish best practices and baseline standards for scale, massing, materials, and more.

III. Conclusion

The Conservancy strongly believes that a dynamic, yet sensitive new development can proceed at the site that respects and enhances the architectural identity of the Historic Core. In order to avoid setting a consequential precedent for new construction that could erode the integrity of two historic districts, the Draft EIR should methodically evaluate the full range of impacts and establish clear design guidelines for the proposed project.



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

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.

Sincerely,

Adrian Scott Fine

Adrian Scott Fine
Director of Advocacy

cc: Council District 14
Office of Historic Resources, Department of City Planning

