



Alejandro Huerta <alejandro.huerta@lacity.org>

---

## Crossroads Hollywood Project Case No: ENV – 2015-2026 - EIR Draft Environmental Impact Report Comments

1 message

---

**Art Deco** <artdecola.adsla@gmail.com>

Mon, Jul 24, 2017 at 11:31 PM

To: Alejandro.huerta@lacity.org

Cc: councilmember.ofarrell@lacity.org, cd4.issues@lacity.org, Chris Robertson <chris.robertson@lacity.org>, Adrian Fine <afine@laconservancy.org>, Hollywood Heritage <hollywood.heritage1980@gmail.com>, lambert.giessinger@lacity.org, Planning@lacity.org, mayor.garcetti@lacity.org, Celeste Hong <artdeco@adsla.org>

July 24, 2017

MAILED and EMAILED

Alejandro A. Huerta, Environmental Review Coordinator

Major Projects & Environmental Analysis

Dept of City Planning

City Hall, City of Los Angeles

200 N. Spring St Rm 750

Los Angeles Ca 90012

[Alejandro.huerta@lacity.org](mailto:Alejandro.huerta@lacity.org)

Re: **Crossroads Hollywood Project**

**Case No: ENV – 2015-2026 – EIR (SCH NO 2015101073)**

**Draft Environmental Impact Report**

**Comments**

Dear Mr Huerta,

My name is Margot Gerber, President of the Art Deco Society of Los Angeles (ADSLA). We are a 501(c)3 membership organization that works to celebrate and preserve the art and architecture of the Art Deco era. As part of our mission, we work to identify unique and noteworthy buildings of this period that we feel are worthy of preservation. To that purpose I am writing on behalf of the ADSLA to comment on the Draft EIR for the Crossroads Hollywood Project prepared by Eyestone Environmental dated May 2017 specifically as it relates to the demolition of various historic resources throughout the development and impacts to two existing LA Historic Cultural Monuments (LAHCM).

The Project demolishes all existing buildings on the proposed site, including a one story 1907 vernacular residence at 1547-49 McCadden, a one story 1910 Craftsman residence at 1542 McCadden, three 2 story 1939 Regency Revival courtyard apartments at 1535-55 Las Palmas, a 2 story 1923 commercial block at 6683 Sunset, a 2 story 1912 Craftsman duplex at 1606-08 Las Palmas, and the 1923-1947 Hollywood Reporter Building complex at 6713-15 Sunset. The Report identifies all of these structures as eligible for historic landmark status. By its own catalogue of historic assets, the Report indicates that the project will demolish eight structures that are prime examples of several periods of significance in the Hollywood core in one fell swoop. The scale of this loss is unprecedented and must be mitigated.

In addition, the project has significant impacts to Crossroads of the World (LAHCM 134). While the complex is not being demolished, it is being altered. One building (identified in the Report as Building 6 the “Early American Building”) is being reoriented and relocated. The setting will be irrevocably changed by altering the historic alignment of Las Palmas and with the addition of significant new construction being proposed immediately adjacent to the historic structures. While this will not cause Crossroads to lose its National Register or LAHCM designations, it does diminish the integrity of a significant designated landmark. We are also concerned that moving buildings around will result in a false sense of history on the site, even with the mitigation proposed, and could result in significant physical damage to the structures and historic materials. All of these impacts taken together are significant and while we are pleased to see that the project provides for rehabilitation of the Crossroads complex, we believe that this and the other mitigation measures proposed will not be enough to mitigate the cumulative effect of these impacts.

The Report also notes the presence of 6 historic resources, including 1618 Las Palmas (LAHCM 1114), immediately adjacent to the project in table IV.D-2. Taken together with those that are being demolished, the Report identifies 14 historic resources in immediate proximity to each other that will be affected by the project one way or the other. This is a rich assortment of structures representing several periods, styles and building types. It is critical to view these resources in total. They represent a community of historic structures that is reinforced by the historic context that each brings to the whole. The project would remove the heart of this group and thereby significantly diminish not only the whole but the individual buildings that remain. Similar impacts from nearby projects have or will slowly chip away at the remaining stock of historic structures in the Hollywood core area. The Report recognizes these cumulative impacts in section IV. D 4 and concludes that they are significant but “unavoidable” and offers no mitigation. This premise gives lip service to the value of 14 historic structures compared to the perceived importance of the project as it “unavoidably” demolishes 8 of them and significantly impacts the rest. This is unacceptable.

As you are aware, CEQA recognizes historic resources as part of the environment. Significant impacts to these resources must be mitigated to include alternatives to the project that would significantly reduce the effects of the impact. To that end, the Report identifies Alternative V - Historic Preservation Alternative that offers mitigation to the significant loss of historic structures by retaining all of them in place with the exception of the Crossroads Building 6. While we support the general approach of this Alternative, we have several concerns with regards to what is proposed and how it might ultimately be implemented if adopted and the project approved. Our specific concerns are:

### **6713-15 Sunset**

As you may be aware the ADSLA has begun the process to designate the Hollywood Reporter Building at 6715 Sunset as a LA Historic Cultural Monument. The findings of the DEIR Section IV.D Environmental Impact Analysis- Cultural Resource recognize the significance of this resource. The report cites, among other noteworthy features, that the building is historically significant for its association with publisher William Wilkerson and his Hollywood trade newspaper *The Hollywood Reporter*, that it is a significant example of Moderne architecture and was designed by noted architect Douglas Hannold. The Report also notes that the building is in good condition and retains its integrity, and the building appears to be eligible for the California Registry. Alternative V retains this building but provides no resources for rehabilitation or adaptive reuse. The Hollywood Reporter Building is an important piece of Hollywood history and we believe that any final approval of this project should include both the preservation and rehabilitation of the building.

### **1535-55 Las Palmas**

The project demolishes 84 units of existing rent-stabilized multi-family housing. These are contained in three 1939 Regency Revival courtyard apartment buildings on Las Palmas and Selma. The buildings are in excellent condition and retain a high degree of historic integrity. They were built during an important part of Hollywood history and few buildings of this style, type and historic integrity remain in the Core area. While the project promises to provide 84 “very low income” housing units to replace those lost, we think it makes little sense to demolish 84 existing units in historic buildings only to replace them in kind at a future date and it is certainly not a sustainable building practice. Alternative V retains these buildings and we believe that any final approval of this project should include their preservation.

### **Crossroads of the World (LAHCM 134)**

As stated above, the project relocates and reorients Building 6 of this complex and introduces two significant new structures directly adjacent to the historic ones. The project includes resources to rehabilitate the historic structures and

we consider this vital given the current state of the complex and the potential for damage as a result of the relocation of Building 6 and the construction of the project. Alternative V, while it reduces the impact of adjacent new construction, maintains the entire scope of work of the project at Crossroads (i.e. moving Building 6). Yet inexplicably, it deletes any resources for rehabilitation. This is unacceptable. We believe that any final approval of this project should include resources to rehabilitate the Crossroads of the World complex.

### **6683 Sunset**

The project demolishes this 1923 commercial block which, along with the realignment of Las Palmas, allows for the construction of a 77,000sf mixed use office/retail building with underground parking at the corner of Sunset and Las Palmas and a 60,000sf mixed use building to the north. Both buildings would be directly adjacent to the Crossroads HCM. Alternative V retains both the building at 6683 Sunset and the historic alignment of Las Palmas. This alternative also greatly scales back the new construction to approximately 20,000sf total in two buildings at similar locations to the project.

We support the approach of Alternative V as it relates to 6683 Sunset. This Alternative significantly reduces the scale of the adjacent new construction and the consequent impacts to the Crossroads HCM and it retains the historic alignment of Las Palmas. We believe that any final approval of this project should address these issues similarly.

-

### **1542, 1547-49 McCadden, 1606-08 Las Palmas**

These structures are craftsman and vernacular style single family and duplex buildings. They are excellent examples and retain historic integrity. Alternative V retains these buildings in place. While we believe that maintaining these structures in their current locations is the preferred outcome, we also recognize that they can be preserved by relocating them to alternate sites. We believe that both methods are acceptable and any final approval of this project should include their preservation.

### **1618 Las Palmas (LAHCM 1114)**

This building was nominated by the ADSLA as LAHCM 1114 in 2016. It is directly adjacent to Parcel D of the project and the proposed 6 story building D1 on this site. On page IV.D-44 the Report states that "Construction of building D1 would not result in any physical impact to the Art Deco office building" but on page IV.D-45 it recognizes the potential of physical impacts to this building during construction and offers mitigation measure D-6 and D-7. So the Report should be amended to reflect that Building D1 has a physical impact to 1618 Las Palmas.

The Report also states that the project will alter the setting and surroundings of 1618 Las Palmas by constructing building D1 on "an adjacent surface parking lot". As listed on table IV.D-3 and elsewhere in the Report the adjacent property is occupied by a 1912 craftsman duplex that the project will demolish. The Report further states that the historic setting for 1618 Las Palmas has been altered through successive demolition of historic neighboring buildings. This is a completely circular argument. As a result, the Report suggests that there is no longer a historic setting for 1618 Las Palmas and offers no mitigation for the impact of demolishing the last adjacent historic property and replacing it with a 6 story building. These impacts must be looked at as a whole. The size and scale of building D1 both physically threatens 1618 Las Palmas and negatively impacts its historic setting. Any ultimate approval of this project must better address these issues.

Unfortunately, without the adoption of the mitigating affects of Alternative V and other measures, the project as proposed contains significant negative impacts to the historic core of Hollywood that are unprecedented and unacceptable. Given the scale of the threat to historic resources outlined above, we urge the Department of Building and Safety to impose a demolition moratorium immediately for all of these structures until full entitlement of the project is obtained and implement the "scorched earth" ordinance if this moratorium is violated.

The ADSLA believes in working together with building owners, elected officials, and other stakeholders so that we can develop a strategy that both preserves historic resources and provides the maximum return to the building owner. We believe that a successful Crossroads Project will both preserve and celebrate the wonderful historic buildings that are found on this site.

We look forward to working with the Developers of The Crossroads Hollywood as this project evolves further.

Sincerely,

Margot Gerber

Cc: Council Office 13<sup>th</sup> District  
Council Office 4<sup>th</sup> District  
Lambert Giessinger, LA Office of Historic Resources  
Hollywood Heritage  
Los Angeles Conservancy

--

Margot Gerber  
President  
Art Deco Society of Los Angeles  
Preserve, Protect, Cherish  
[Facebook](#)  
[Instagram](#)  
[Twitter](#)  
[www.adsla.org](http://www.adsla.org)

---

 **Crossroads\_DEIR\_Response\_Art\_Deco\_Society.pdf**  
204K



July 21, 2017  
MAILED and EMAILED

Alejandro A. Huerta, Environmental Review Coordinator  
Major Projects & Environmental Analysis  
Dept of City Planning  
City Hall, City of Los Angeles  
200 N. Spring St Rm 750  
Los Angeles Ca 90012  
Alejandro.huerta@lacity.org

### Board of Directors

Margot Gerber  
*President*

Celeste Hong  
*Vice President*

Kathy Shoemaker  
*Secretary*

Kathy Ebenhack  
*Treasurer*

Marc Chevalier  
Randy Chong  
Rachel Ogletree  
Annie Laskey  
Eric Lynxwiler  
Karenlin Marsak  
Nicole Marsak  
Pauline O'Conner

**Art Deco Society of  
Los Angeles**  
P.O. Box 972  
Hollywood, CA 90078

Tel: 323.659-3326  
artdeco@adsla.org

**Facebook:**  
Art Deco Society of Los  
Angeles  
**Twitter & Instagram:**  
@ArtDeco\_LA

Re: **Crossroads Hollywood Project**  
**Case No: ENV – 2015-2026 – EIR (SCH NO 2015101073)**  
**Draft Environmental Impact Report**  
**Comments**

Dear Mr Huerta,

My name is Margot Gerber, President of the Art Deco Society of Los Angeles (ADSLA). We are a 501(c)3 membership organization that works to celebrate and preserve the art and architecture of the Art Deco era. As part of our mission, we work to identify unique and noteworthy buildings of this period that we feel are worthy of preservation. To that purpose I am writing on behalf of the ADSLA to comment on the Draft EIR for the Crossroads Hollywood Project prepared by Eyestone Environmental dated May 2017 specifically as it relates to the demolition of various historic resources throughout the development and impacts to two existing LA Historic Cultural Monuments (LAHCM).

The Project demolishes all existing buildings on the proposed site, including a one story 1907 vernacular residence at 1547-49 McCadden, a one story 1910 Craftsman residence at 1542 McCadden, three 2 story 1939 Regency Revival courtyard apartments at 1535-55 Las Palmas, a 2 story 1923 commercial block at 6683 Sunset, a 2 story 1912 Craftsman duplex at 1606-08 Las Palmas, and the 1923-1947 Hollywood Reporter Building complex at 6713-15 Sunset. The Report identifies all of these structures as eligible for historic landmark status. By its own catalogue of historic assets, the Report indicates that the project will demolish eight structures that are prime examples of several periods of significance in the Hollywood core in one fell swoop. The scale of this loss is unprecedented and must be mitigated.

In addition, the project has significant impacts to Crossroads of the World (LAHCM 134). While the complex is not being demolished, it is being altered. One building

(identified in the Report as Building 6 the “Early American Building”) is being reoriented and relocated. The setting will be irrevocably changed by altering the historic alignment of Las Palmas and with the addition of significant new construction being proposed immediately adjacent to the historic structures. While this will not cause Crossroads to lose its National Register or LAHCM designations, it does diminish the integrity of a significant designated landmark. We are also concerned that moving buildings around will result in a false sense of history on the site, even with the mitigation proposed, and could result in significant physical damage to the structures and historic materials. All of these impacts taken together are significant and while we are pleased to see that the project provides for rehabilitation of the Crossroads complex, we believe that this and the other mitigation measures proposed will not be enough to mitigate the cumulative effect of these impacts.

The Report also notes the presence of 6 historic resources, including 1618 Las Palmas (LAHCM 1114), immediately adjacent to the project in table IV.D-2. Taken together with those that are being demolished, the Report identifies 14 historic resources in immediate proximity to each other that will be affected by the project one way or the other. This is a rich assortment of structures representing several periods, styles and building types. It is critical to view these resources in total. They represent a community of historic structures that is reinforced by the historic context that each brings to the whole. The project would remove the heart of this group and thereby significantly diminish not only the whole but the individual buildings that remain. Similar impacts from nearby projects have or will slowly chip away at the remaining stock of historic structures in the Hollywood core area. The Report recognizes these cumulative impacts in section IV. D 4 and concludes that they are significant but “unavoidable” and offers no mitigation. This premise gives lip service to the value of 14 historic structures compared to the perceived importance of the project as it “unavoidably” demolishes 8 of them and significantly impacts the rest. This is unacceptable.

As you are aware, CEQA recognizes historic resources as part of the environment. Significant impacts to these resources must be mitigated to include alternatives to the project that would significantly reduce the effects of the impact. To that end, the Report identifies Alternative V - Historic Preservation Alternative that offers mitigation to the significant loss of historic structures by retaining all of them in place with the exception of the Crossroads Building 6. While we support the general approach of this Alternative, we have several concerns with regards to what is proposed and how it might ultimately be implemented if adopted and the project approved. Our specific concerns are:

#### **6713-15 Sunset**

As you may be aware the ADSLA has begun the process to designate the Hollywood Reporter Building at 6715 Sunset as a LA Historic Cultural Monument. The findings of the DEIR Section IV.D Environmental Impact Analysis- Cultural Resource recognize the significance of this resource. The report cites, among other noteworthy features, that the building is historically significant for its association with publisher William Wilkerson and his Hollywood trade newspaper *The Hollywood Reporter*, that it is a significant example of Moderne architecture and was designed by noted architect Douglas Hannold. The Report also notes that the building is in good condition and retains its integrity, and the building appears to be eligible for the California Registry. Alternative V retains this building but provides no resources for rehabilitation or adaptive reuse. The Hollywood Reporter Building is an important piece of Hollywood history and we believe that any final approval of this project should include both the preservation and rehabilitation of the building.

### **1535-55 Las Palmas**

The project demolishes 84 units of existing rent-stabilized multi-family housing. These are contained in three 1939 Regency Revival courtyard apartment buildings on Las Palmas and Selma. The buildings are in excellent condition and retain a high degree of historic integrity. They were built during an important part of Hollywood history and few buildings of this style, type and historic integrity remain in the Core area. While the project promises to provide 84 “very low income” housing units to replace those lost, we think it makes little sense to demolish 84 existing units in historic buildings only to replace them in kind at a future date and it is certainly not a sustainable building practice. Alternative V retains these buildings and we believe that any final approval of this project should include their preservation.

### **Crossroads of the World (LAHCM 134)**

As stated above, the project relocates and reorients Building 6 of this complex and introduces two significant new structures directly adjacent to the historic ones. The project includes resources to rehabilitate the historic structures and we consider this vital given the current state of the complex and the potential for damage as a result of the relocation of Building 6 and the construction of the project. Alternative V, while it reduces the impact of adjacent new construction, maintains the entire scope of work of the project at Crossroads (i.e. moving Building 6). Yet inexplicably, it deletes any resources for rehabilitation. This is unacceptable. We believe that any final approval of this project should include resources to rehabilitate the Crossroads of the World complex.

### **6683 Sunset**

The project demolishes this 1923 commercial block which, along with the realignment of Las Palmas, allows for the construction of a 77,000sf mixed use office/retail building with underground parking at the corner of Sunset and Las Palmas and a 60,000sf mixed use building to the north. Both buildings would be directly adjacent to the Crossroads HCM. Alternative V retains both the building at 6683 Sunset and the historic alignment of Las Palmas. This alternative also greatly scales back the new construction to approximately 20,000sf total in two buildings at similar locations to the project.

We support the approach of Alternative V as it relates to 6683 Sunset. This Alternative significantly reduces the scale of the adjacent new construction and the consequent impacts to the Crossroads HCM and it retains the historic alignment of Las Palmas. We believe that any final approval of this project should address these issues similarly.

### **1542, 1547-49 McCadden, 1606-08 Las Palmas**

These structures are craftsman and vernacular style single family and duplex buildings. They are excellent examples and retain historic integrity. Alternative V retains these buildings in place. While we believe that maintaining these structures in their current locations is the preferred outcome, we also recognize that they can be preserved by relocating them to alternate sites. We believe that both methods are acceptable and any final approval of this project should include their preservation.

### **1618 Las Palmas (LAHCM 1114)**

This building was nominated by the ADSLA as LAHCM 1114 in 2016. It is directly adjacent to Parcel D of the project and the proposed 6 story building D1 on this site. On page IV.D-44 the Report states that “Construction of building D1 would not result in any physical impact to the Art Deco office building” but on page IV.D-45 it recognizes the potential of physical impacts to this building during construction and offers mitigation measure D-6 and D-7. So the Report should be amended to reflect that Building D1 has a physical impact to 1618 Las Palmas.

The Report also states that the project will alter the setting and surroundings of 1618 Las Palmas by constructing building D1 on “an adjacent surface parking lot”. As listed on table IV.D-3 and elsewhere in the Report the adjacent property is occupied by a 1912 craftsman duplex that the project will demolish. The Report further states that the historic setting for 1618 Las Palmas has been altered through successive demolition of historic neighboring buildings. This is a completely circular argument. As a result, the Report suggests that there is no longer a historic setting for 1618 Las Palmas and offers no mitigation for the impact of demolishing the last adjacent historic property and replacing it with a 6 story building. These impacts must be looked at as a whole. The size and scale of building D1 both physically threatens 1618 Las Palmas and negatively impacts its historic setting. Any ultimate approval of this project must better address these issues.

Unfortunately, without the adoption of the mitigating effects of Alternative V and other measures, the project as proposed contains significant negative impacts to the historic core of Hollywood that are unprecedented and unacceptable. Given the scale of the threat to historic resources outlined above, we urge the Department of Building and Safety to impose a demolition moratorium immediately for all of these structures until full entitlement of the project is obtained and implement the “scorched earth” ordinance if this moratorium is violated.

The ADSLA believes in working together with building owners, elected officials, and other stakeholders so that we can develop a strategy that both preserves historic resources and provides the maximum return to the building owner. We believe that a successful Crossroads Project will both preserve and celebrate the wonderful historic buildings that are found on this site.

We look forward to working with the Developers of The Crossroads Hollywood as this project evolves further.

Sincerely,

A handwritten signature in black ink that reads "Margot Gerber". The signature is written in a cursive, flowing style.

Margot Gerber

Cc: Council Office 13<sup>th</sup> District  
Council Office 4<sup>th</sup> District  
Lambert Giessinger, LA Office of Historic Resources  
Hollywood Heritage  
Los Angeles Conservancy