



Alan Como <alan.como@lacity.org>

6220 Yucca Project Draft EIR Comments

Erik Van Breene <vanbreene@laconservancy.org>
To: "alan.como@lacity.org" <alan.como@lacity.org>

Mon, Jun 8, 2020 at 5:08 PM

Dear Mr. Como,

Please find the Los Angeles Conservancy's comment letter for the [6220 Yucca](#) Project attached to this email.

Best,

Erik

Erik Van Breene

Preservation Coordinator

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June 8, 2020

Sent Electronically

Mr. Alan Como
Los Angeles City Planning
221 N. Figueroa Street Room 1350
Los Angeles, CA 90012
Email: alan.como@lacity.org

RE: 6220 Yucca Street, ENV-2014-4706-EIR

Dear Mr. Como:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the 6220 Yucca Project. The Conservancy believes this project will significantly impact the California Register listed Vista del Mar / San Carlos Historic District. The current project proposes to demolish two residences within the district's boundaries and to construct two buildings.

Building One is a mixed-use tower, that incorporates residential units, hotel units, and commercial space. The tower will rise 255 feet tall, well above the one and two-story residences of the historic district. Building Two, located within the historic district, is an all residential building with a total of thirteen units. Building two comprises three residential stories atop a two-story parking podium

1. The project will result in the cumulative loss of 31% of the historic district, this is a significant impact to the district.

The Vista del Mar/ San Carlos Historic district, identified in 1984, is a California Register of Historical Resources listed district. At the time of listing, the district comprised sixteen parcels. The district is representative of early Hollywood development and holds a period of significance of 1910-1923. The district forms an L-shape running south from Yucca Street along Vista Del Mar Avenue and west from Gower Street along Carlos Avenue. The district's L-shape is a significant example of the Hollywood's transition from agricultural land to a developed commercial and residential center of Los Angeles.



Since the district's listing, three of the sixteen original parcels have been razed, causing a cumulative loss of contributors at 18%. If the proposed project moves forward as planned, with the two additional parcels to be demolished cumulative loss to the district will be 31%. As noted in the Draft EIR, 1776 Vista del Mar Avenue was misclassified in the past because of alterations that fell outside the period of significance. Excluding this property, the cumulative loss of contributors since listing will be 25%.

Allowing for such a high cumulative loss sets a dangerous precedent for future projects among Hollywood's California Register historic districts. These districts include Afton Square, Ivar Hill, and Selma-Le Baig. Historic resources within Hollywood's former Community Redevelopment Area (CRA), especially the regions historic districts, are experiencing heightened development pressures. As new development encroaches into historic districts, losses of resources will ultimately render them non-eligible for listing in for national, state, and local designation.

2. Proposed Project does not include an alternative for no build within the HPOZ boundaries

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 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

The proposed project offers five project alternatives in the Draft EIR. However, only the "No Project/No Build Alternative" explores no demolition within the historic district alternative. Because of the project's encroachment into the district's boundaries and is the nexus with this significant impact, the applicant must include an additional alternative.

Such an alternative would include rehabilitation of the existing buildings with combined new construction on the vacant corner parcel. Any new construction at this location should mirror with the prevailing building height and reflect the district's character defining features. The northern portion of Vista del Mar Avenue acts as an important gateway into the district. When turning off of Yucca Street, one can immediately sense the unique character of the street. Therefore, the threatened buildings shall remain in place to retain the district's sense of place.

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

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.



3. Conclusion

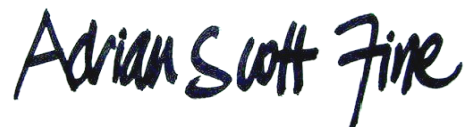
In conclusion, the Conservancy believes the demolition of 1765 and 1771 Vista del Mar Avenue is a significant impact to the historic resource. The razing of the two residences will leave 69% of the Vista del Mar/Carlos remaining. Because the district is so limited in size, each property holds a significant amount of weight. To reduce impacts on historic resources, the applicant must consider alternatives that include rehabilitation of 1765 and 1771 Vista del Mar Avenue and appropriately scaled and designed new construction. Such an alternative may also include new construction on the vacant corner lot as a means to reach residential unit goals.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 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 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
Director of Advocacy

