

DRAFT LETTER TO CD13 and PLUM

May 17, 2016

Hon. Jose Juizar, Chair
Hon. Marqueece Harris-Dawson, Vice Chair
Hon. Mitchell Englander
Hon. Gil Cedillo
Hon. Felipe Fuentes
C/o Sharon Dickinson, Legislative Assistant Planning and Land Use Management Committee

Cc: City Planning Commission, Office of Historic Resources, Los Angeles Conservancy,
and Hollywood Heritage

RE: CF 11-1705, CPC-2015-3059-CA, Citywide Sign Code Amendment and Los Angeles Historic-Cultural Monuments (HCMs) Community Impact Statement and Report Requests

Dear PLUM Committee Members,

We are the owners of the Historic Broadway Hollywood Building located at Hollywood and Vine, LA HCM No. 664. On April 19, 2016, the attached letter was submitted by CD13 to the PLUM committee at a public hearing requesting that digital display signs be allowed on Historic Façades and Rooftops on designated Historic-Cultural Monuments in a Sign District. PLUM has decided to reconsider this, despite the City Planning Commissions actions at the October 22, 2015 that disapproved this same request. Since you are still considering this proposed amendment, we are concerned about the impacts to our historic building located within the Hollywood Signage Supplemental Use District. The owners of the Broadway Hollywood Historic Building have not been contacted by any city representative to discuss or disclose the potential impacts that this amendment would have on our historic building. We have two requests:

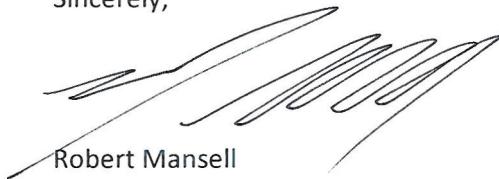
1) We request that prior to approving this type of amendment, a full impact study be conducted to publically vet and disclose the illumination and aesthetic impacts that this proposed amendment would have on historic buildings, especially in areas where there are concentrations of historic buildings. A quick analysis of Hollywood and Vine suggests that there is a significant concentration of HCMs. There are six HCMs located within a one block radius of the intersection of Hollywood and Vine. This suggests that there would be a significant impact should digital displays be allowed on facades and rooftops as suggested by CD13. This study is necessary as the Hollywood SUD has a categorical CEQA exemption, and only requires a permit compliance review, which does not necessarily require any consideration of cumulative impacts.

List of six HCMs near the intersection of Hollywood Boulevard and Vine Street:

- 1 193 Hollywood Pantages Theater
- 2 1088 Hollywood Equitable Building
- 3 666 Taft Building and Neon Sign
- 4 664 Broadway Department Store and Neon Sign
- 5 857 Capitol Records Building and Rooftop Sign
- 6 665 Hollywood Plaza Hotel and Neon Sign

2) We request that the PLUM committee ask the Office of Historic Resources to report to PLUM and state its position at the next public meeting on this recommendation as it relates to all HCMs within existing SUDs in Los Angeles. We request that OHR respond to the CD 13 request, as restated by PLUM in a April 14th report request, to “create relief provisions for certain deviations from the sign regulations.” Our building underwent an adaptive re-use development by Kor Realty Group from 2006-2009. In 2008, the City, with input from OHR, issued a new off-site “sign parcel” right to KOR, adhering to the Secretary of Interior’s Standards for the design, and limiting the new sign to an exposed “neon style sign” under findings in CPC file No. APCC-2006-8742-SPE-DI-SPP. However, this sign use right was never transferred to the next building owner. Kor retained these rights under the name of 1645 Vine Real Estate, LLC. *This resulted in a “sign parcel” right given to a developer that will generate revenue for KOR, and will NEVER contribute to the “self-sustaining” needs of our Historic Building as suggested it might in the letter submitted by CD13.* This type of zone amendment needs further scrutiny by the City to include a development condition that permanently tethers sign revenue generated by giving these types of use and development rights directly to the repair or maintenance of the historic building or historic sign. Otherwise there is an opportunity for a developer to execute a one-time transfer, as already accomplished by Kor, that will NOT sustain the long term viability of a historic resource.

Sincerely,



Robert Mansell
Board Member
Broadway Hollywood Homeowners Association