

DEPARTMENT OF  
CITY PLANNING

OFFICE OF HISTORIC RESOURCES  
221 N. FIGUEROA STREET, SUITE 1350  
LOS ANGELES, CA 90012-2639

CULTURAL HERITAGE COMMISSION

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VICE PRESIDENT

PILAR BUELNA  
DIANE KANNER  
BARRY A. MILOFSKY

COMMISSION OFFICE  
(213) 978-1300

CITY OF LOS ANGELES  
CALIFORNIA



ERIC GARCETTI  
MAYOR

EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
(213) 978-1271

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DIRECTOR

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June 14, 2021

Los Angeles City Council  
c/o Office of the City Clerk  
City Hall, Room 395  
Los Angeles, CA 90012

Attention: PLUM Committee

Dear Honorable Members:

**HOWARD HUGHES HEADQUARTERS; 7000 WEST ROMAINE STREET; 930-956 NORTH SYCAMORE AVENUE; 931-953 NORTH ORANGE DRIVE; CHC-2020-5220-HCM; ENV-2020-5221-CE; CD-4**

At its meeting of **June 3, 2021**, the Cultural Heritage Commission took the actions below to include the Howard Hughes Headquarters in the list of Historic-Cultural Monuments, subject to adoption by the City Council:

1. **Determined** that the proposed designation is categorically exempt from the California Environmental Quality Act (CEQA), pursuant to Article 19, Section 15308, Class 8 and Article 19, Section 15331, Class 31 of the State CEQA Guidelines;
2. **Determined** that the property conforms with the definition of a Monument pursuant to Section 22.171.7 of the Los Angeles Administrative Code;
3. **Recommended** that the City Council consider the Howard Hughes Headquarters for inclusion in the list of Historic-Cultural Monuments; and
4. **Adopted** the attached Findings as amended by the Commission.

The Commission vote was as follows:

Moved: Kennard  
Seconded: Kanner  
Ayes: Barron, Buelna, Milofsky

**Vote: 5 – 0**

  
James K. Williams, Commission Executive Assistant II  
Cultural Heritage Commission

The Cultural Heritage Commission would appreciate your inclusion of the subject property to the list of Historic-Cultural Monuments.

**Time for Council to Act:** The Commission action is hereby transmitted to the City Council for consideration. Pursuant to Section 22.171.10(f) of the Los Angeles Administrative Code, the Council may approve or disapprove in whole or in part an application or initiation for a proposed designation of a Monument. The Council shall act in 90-days of the public hearing held before the Commission on the proposed designation. The City Council may unilaterally extend the 90-day time limit to act for a maximum of 15 days for good cause. With written consent of the owner, the time for the City Council to act may be extended by up to an additional 60 days. If the Council does not act on the application or initiation within this specified time limit, the application or initiation to designate a Monument shall be deemed to have been denied.

Enclosure: Amended Findings, Staff Report, Mailing List

**HOWARD HUGHES HEADQUARTERS**  
7000 West Romaine Street; 931-953 North Orange Drive; 930-956 North Sycamore Avenue  
**CHC-2020-5220-HCM**  
**ENV-2020-5221-CE**

**FINDINGS**

(Adopted by the Cultural Heritage Commission on June 3, 2021)

- The Howard Hughes Headquarters “exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community” as an excellent and rare example of a 1930s industrial building in the entertainment industry support services area of Hollywood.
- The Howard Hughes Headquarters “is associated with the lives of historic personages important to national, state, city, or local history” as the headquarters of entrepreneur Howard Hughes’ business empire from 1930 to 1976.
- The Howard Hughes Headquarters “embodies the distinctive characteristics of a style, type, period, or method of construction” as an excellent example of the Art Deco architectural style applied to an industrial building in Hollywood.

**DISCUSSION OF FINDINGS**

The Howard Hughes Headquarters meets three of the Historic-Cultural Monument criteria.

The subject property “exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community” as an excellent and rare example of a 1930s industrial building in the entertainment industry support services area of Hollywood. The motion picture industry has played a significant role in the economic and cultural development of Los Angeles, and studio support services are essential assets to the region. For as long as the entertainment industry has existed, so, too, has the necessity for supplies and services which support its activities and operations. By the late 1920s, motion picture support services, such as those housed at the Howard Hughes Headquarters building, operated almost exclusively out of Hollywood, and operations continued to flourish throughout the 1930s and into the 1940s. Originally serving as a color film manufacturing plant, the subject property provided a vital service to the film industry and stands to reflect the history of the entertainment industry in Hollywood.

The Howard Hughes Headquarters also “is associated with the lives of historic personages important to national, state, city, or local history” as the headquarters of entrepreneur and filmmaker Howard Hughes’ business empire from 1930 to 1976. Born into wealth, Howard Hughes rose to become a successful business magnate, record-setting pilot, investor, and practitioner within the worlds of aviation, filmmaking, real estate, and biomedical research. Although Hughes himself usually worked from one of his many houses or hotels, the subject property contained offices for many of his personal staff and was his West Coast base of operations for over 40 years. By the mid-1950s, the subject property became a central part of his personal and professional life; its vaults stored negatives of his films, as well as his personal possessions, memorabilia, and archives.

Furthermore, the subject property “embodies the distinctive characteristics of a style, type, period, or method of construction” as an excellent example of the Art Deco architectural style applied to an industrial building in Hollywood. The Howard Hughes Headquarters reflects the execution of the Art Deco architectural style at the height of its popularity. The building’s smooth concrete wall cladding, flat roof with stepped and flat parapets, vertical elements including piers and towers, and vertically oriented fenestration patterns are all reflective of the style. Other distinguishing features include the



multi-lite, steel-sash casement and double-hung windows and the geometric and floral decorative elements.

Despite some alterations, the subject property retains a high level of integrity of location, design, setting, materials, workmanship, feeling, and association to convey its significance.

### **CALIFORNIA ENVIRONMENTAL QUALITY ACT ("CEQA") FINDINGS**

State of California CEQA Guidelines, Article 19, Section 15308, Class 8 *"consists of actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment."*

State of California CEQA Guidelines Article 19, Section 15331, Class 31 *"consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic buildings."*

The designation of the Howard Hughes Headquarters Building as an Historic-Cultural Monument in accordance with Chapter 9, Article 1, of The City of Los Angeles Administrative Code ("LAAC") will ensure that future construction activities involving the subject property are regulated in accordance with Section 22.171.14 of the LAAC. The purpose of the designation is to prevent significant impacts to a Historic-Cultural Monument through the application of the standards set forth in the LAAC. Without the regulation imposed by way of the pending designation, the historic significance and integrity of the subject property could be lost through incompatible alterations and new construction and the demolition of an irreplaceable historic site/open space. The Secretary of the Interior's Standards for Rehabilitation are expressly incorporated into the LAAC and provide standards concerning the historically appropriate construction activities which will ensure the continued preservation of the subject property.

The City of Los Angeles has determined based on the whole of the administrative record, that substantial evidence supports that the Project is exempt from CEQA pursuant to CEQA Guidelines Section Article 19, Section 15308, Class 8 and Class 31, and none of the exceptions to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies. The project was found to be exempt based on the following:

The use of Categorical Exemption Class 8 in connection with the proposed designation is consistent with the goals of maintaining, restoring, enhancing, and protecting the environment through the imposition of regulations designed to prevent the degradation of Historic-Cultural Monuments.

The use of Categorical Exemption Class 31 in connection with the proposed designation is consistent with the goals relating to the preservation, rehabilitation, restoration and reconstruction of historic buildings and sites in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Categorical Exemption ENV-2020-5221-CE was prepared on April 9, 2021.

## **BACKGROUND**

A previous Historic-Cultural Monument nomination was deemed complete on June 21, 2018, under case number CHC-2018-3614-HCM. The initial hearing for the nomination, scheduled for July 19, 2018, was continued to September 6, 2018, at which time the nomination was withdrawn by the applicant prior to the Cultural Heritage Commission acting.

On September 3, 2020, the Director of Planning determined that the application for the proposed designation of the subject property as an Historic-Cultural Monument was complete. On October 1, 2020, the Cultural Heritage Commission voted to take the property under consideration. On November 3, 2020, due to concerns related to the pandemic, the property owner requested a time extension pursuant to Los Angeles Administrative Code Section 22.171.10. On April 8, 2021, a subcommittee of the Commission consisting of Commissioners Kanner and Kennard conducted an in-person site inspection of the property, accompanied by staff from the Office of Historic Resources. The original expiration date of December 15, 2020 is tolled, and a revised date will be determined pursuant to *the Mayor's March 21, 2020 Public Order Under City of Los Angeles Emergency Authority re: Tolling of Deadlines Prescribed in the Municipal Code and April 17, 2020 Public Order Under City of Los Angeles Emergency Authority re: Tolling HCIDLA Deadlines and Revising Expiration of Emergency Orders*. The time to act on this item has been tolled for the duration of the local emergency period. Please note that other State law provisions may also apply.