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**Re: 7445 Sunset Boulevard (Gelson's Market) Project Case No. ZA-2016-0950 (CU)(CUB)(SPR)  
CEQA No. ENV-2016-951-MND**

Hollywood Heritage, an historic preservation organization devoted to preserving and protecting Hollywood's built environment, is sending this letter on behalf of our members, particularly those in the adjacent neighborhood, regarding the proposed development at 7445 Sunset Boulevard (the **Gelson's Market Project**). The Gelson's Market Project is covered by **Planning Case No. ZA-2016-0950** and **CEQA No. ENV-2016-951-MND**. It received a positive Letter of Determination from the City of Los Angeles on August 30, 2017. We believe the appeal is valid and that the City should conduct further analysis.

From its inception, Hollywood Heritage has had a number of concerns related to the proposed project's impact on the historic built environment surrounding the project site. This site is one of the last remnants in the city of a major historic transportation feature—the Pacific Electric line. This letter outlines each of these concerns in detail. We hope that the points raised contribute to an ongoing discussion regarding the proposal's appropriateness.

**Concern 1: The proposed project is adjacent to two Historic Preservation Ordinance Zones (HPOZs)**

The proposed project site is located less than half a block southeast of the Sunset Square HPOZ and less than two blocks northeast of the Spaulding Square HPOZ. Both of these HPOZs are neighborhoods comprised of one-story single-family homes, many of which antedate 1925. The Gelson's Market Project proposal made no mention of its proximity to the Sunset Square HPOZ—a low-density, family-oriented neighborhood from original Hollywood—or its potential impact on both HPOZs' historic contexts. The history of both historic neighborhoods is intrinsically tied to Gardner Junction. The Pacific Electric route was instrumental in their development, as it provided convenient transportation to the rest of the city and downtown Hollywood.

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**Concern 2: The proposed project is located at the historic Gardner Junction**

The proposed project site lies directly on Gardner Junction, a significant component of the historic Pacific Electric Red Car Trolley line through Hollywood. Gardner Junction, where Sunset Boulevard and N Gardner Street meet, was one of the major points along the Red Car Trolley line's diagonal journey southwest from Hollywood and Highland down to Fairfax and Santa Monica (the latter known as Crescent Junction). In fact, one of the character-defining features of the Spaulding Square HPOZ is the continued orientation of some of its structures along this diagonal trolley route. SurveyLA has developed a context for understanding the significance of Pacific Electric and related suburban growth. Further analysis is needed to assess the role of Gardner Junction and Pacific Electric in Hollywood. See *attached photographs for context of this historic landscape feature*.

A major intersection along this historic route, the immediate vicinity of Gardner Junction retains significant and character-defining physical features associated with its significance. As a first example, the project site itself is where the Railway Realty and Investment Company of Los Angeles relocated in 1914. The original structures occupying this site may be the only intact references to Hollywood's portion of the Red Car Trolley network, which shaped the growth of the Los Angeles region over the first half of the 20th century. These buildings, while altered, have served the neighborhood for decades. The pattern in which they are situated on the block preserves their context and historic feeling. The Gardner Junction site is pivotal to the understanding of the entire community (school, adjacent apartments, residential neighborhoods, and commercial on Sunset Boulevard).

As a second example, the sidewalk extension for Gardner Junction's original "Tot Tunnel" (a pedestrian underpass) also remains adjacent to the proposed project site. This sidewalk extension is a clear reference to Gardner Junction's historic significance as an intersection along the trolley line. It also provides needed space for pedestrians in the area, which the Gelson's Market Project would unquestionably reduce.

**Concern 3: The proposed project ignores the successful adaptive reuse of other structures around historic Gardner Junction**

Many of the buildings lying along the western portion of Sunset Boulevard are still original one- and two-story structures, reused to fit evolving needs but still preserving the historic context of the built environment. Current uses on the proposed project site are themselves examples of adaptive reuse, having housed a number of small businesses over the previous decades. Adaptive reuse of original structures is not just economically and environmentally sensible; it helps preserve the historic context of Gardner Junction. The proposed project would eliminate all character-defining features at 7445 Sunset Boulevard (including significant street and right of way patterns). In addition, its design in no way integrates well with surrounding original structures, violating the Secretary of the Interior Standards for infill development in historic neighborhoods.

**Concern 4: The proposed project does not comply with the "D" limitations currently imposed on the site parcel**

The project site parcel has a zone of “C4-1D”. The “D” limitation limits Floor Area Ratio (FAR) to 1:1. It also stipulates that new development of the site should have lower height, density, and

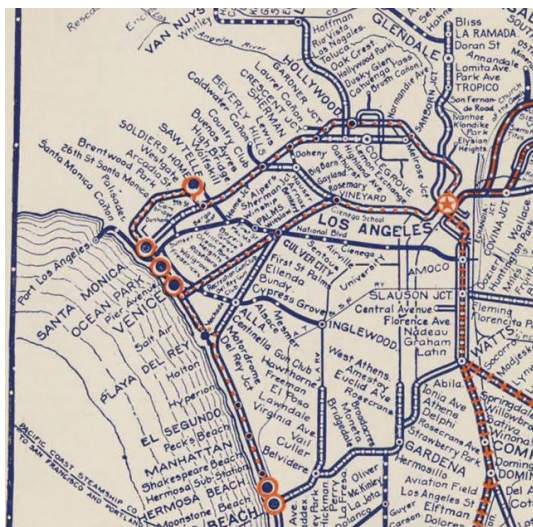
*intensity*. These “D” limitations serve to protect residential neighborhoods from the impact of commercial or other large-scale development. The proposed project does not comply with the existing “D” limitations for the site parcel—especially intensity of use—and thereby negatively affects the surrounding residential neighborhoods.

## Conclusion

Hollywood Heritage strongly believes the above facts warrant a more robust environmental review of the proposed project. The use of a Mitigated Negative Declaration (MND) to assess this proposed project’s environmental impact violates CEQA. Hollywood Heritage therefore requests an Environmental Impact Report (EIR) so that the proposed project’s impact on the surrounding built environment’s historic context is clear.

Please let us know if you require any additional information and how we may assist the City of Los Angeles in this matter.

Sincerely, Richard Adkins, President, Hollywood Heritage, Inc.



*Pacific Electric map from ca. 1940, with Gardner Junction stop visible in top portion, sitting along the “Balloon Route”*

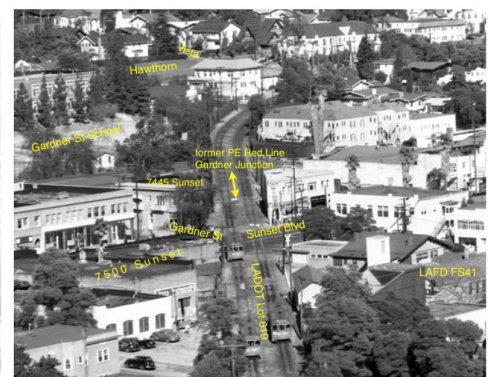
*Pacific Electric map from 1907, with Gardner Junction stop (spelled “GARDINER JCT”) visible in top portion—the map clearly shows Gardner Junction at the start of the diagonal*



*1923—view of Gardner Junction looking north, with diagonal trolley tracks visible in top-right section of the photograph*



*1924—view of Gardner Junction, the Elementary School, and trolley line*



*1950s—view of trolley line going through Gardner Junction, with some landmarks labeled*