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**Submitted Electronically**

Jason McCrea  
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**RE: Draft Environmental Impact Report for the Mirabel  
Transit Priority Project**

Dear Mr. McCrea:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (EIR) for the Mirabel Transit Priority Project. The Conservancy supports efforts to add new density and housing where possible, especially when setting aside some units as affordable in an area close to transit. As the California Environmental Quality Act (CEQA) calls for, we also press for project alternatives that can achieve this goal without causing any harm or destruction to historic places. New development does not always need to come at the expense of historic resources; rather it can and should work cohesively through an integration approach. We believe adaptive reuse is readily achievable in this Project, and can complement the proposed new, mixed income housing, and infill construction.

We are pleased to see some of our comments submitted in response to the Notice of Preparation addressed in the Draft EIR. The most notable change is the evaluation of the Sontag Drug Building as an individually eligible resource as well as contributor to the Miracle Mile Historic District.

**Prioritizing Parking Over Preservation and Housing**

We believe there is a critical flaw in the current Draft EIR and its failure to identify viable alternatives to such a large project. Only two alternatives were identified, a no project alternative and a preservation alternative that also significantly downsizes the project. There does not appear to be a valid



reason as to why the preservation alternative would occupy the same footprint and maintain approximately the same street frontage yet have 120 fewer units.

We request that the City and project applicant share the rationale for only studying essentially one preservation alternative. From our understanding of this, the alternative was structured in a way to fail in meeting essential project goals and objectives. What were other preservation alternatives considered and/or rejected and not studied further?

The alternatives also do not contemplate a project with reduced parking, which is not required to be provided on-site pursuant to AB 2097. Many of the identified project impacts are due to the construction of three levels of subterranean parking, including the potential demolition of the Sontag Drug Building, as well as noise and vibration impact during construction. These impacts could be avoided or greatly lessened by simply reducing the subterranean extraction to one-or-two stories.

Given this is being processed as a Transit Priority Project with associated streamlining, and the fact that the Wilshire Subway extension appears on track to open in 2025, we suggest a reduced parking alternative be seriously studied and considered. The proposed project is over-parked and contains more parking than necessary to serve the proposed project. Miracle Mile is already a walkable and pedestrian oriented neighborhood with many nearby amenities, and therefore we suggest a 1:1 parking space to unit ratio might be more appropriate, economical, and sustainable, as opposed to 1.37:1 in the proposed project or 1.78:1 in Alternative 2. We believe that some reduction in parking could allow the Sontag Drug Building to be preserved in whole while still allowing for a large number of units and on-site affordable units to be built.

### **Integrity of the Miracle Mile Historic District**

Despite the methodology used to determine the boundaries of the Miracle Mile Historic District, the Conservancy contends that the District as a whole would be materially impaired through the proposed project as currently envisioned. According to the original 1983 district determination, three contributing properties would be demolished or substantially altered through this undertaking. 5405-5411 Wilshire Boulevard (the Santa Inez Co.) and 5413-5415 (the A&P Food Palace) have been combined into a larger commercial project, however each storefront still reads as independent and still maintains original Streamline Moderne ornament. For the purposes of CEQA, we expect each original storefront to continue to be counted as individual properties in the district. The Santa Inez Co. and the A&P Food Palace, though altered, still appear as contributing properties to the Miracle Mile Historic District.

Given the number of the demolitions or substantial alterations since the district was identified, and the proposed substantial alteration of the Sontag Drug Building, the district would only contain 11 contributors of the original 20 identified properties after this project's completion. This would equate to 55% of the properties being contributors to the district, while also creating a large hole in the district. There would be no remaining contributors for two blocks on the north side of Wilshire Boulevard, from Dunsmuir Avenue to Cloverdale Avenue.



In the alternate district boundaries presented by Historic Resources Group – which we do not fully support – there is still a similar issue. 11 of 19 properties would be contributors, or 58%, and the same hole exists in the district. This is a very low mix of contributing to noncontributing properties in a historic district, and below the 60% threshold rule of thumb that usually determines eligibility.

The introduction of a large, high-rise building and multi-story parking podium further impacts this district. We believe the proposed work (saving only two facades) on the Sontag Building, plus the demolition of two more contributing properties would materially impair the district as whole. In the identified alternative where the Sontag building is preserved, further mitigation measures should still be implemented to prevent the loss of district coherence on the north side of Wilshire Boulevard, and to counteract the impact on the tow other contributing structures.

### **Unresolved Design Issues**

Two of the stated project goals suggest in part that the project intends to “Create a pedestrian friendly environment” and “Develop an iconic, architecturally-compelling vertical neighborhood.” While these objectives are commendable, the proposed design of a three story parking podium does not comply. Furthermore, the design is in direct violation of Standards included in the Miracle Mile Community Design Overlay District (CDO). The two standards in question are:

- Standard 2a: Parking should be located underground where possible.
- Standard 2b: Parking structures should be compatible with the main building through a consistency in building material, color and design.

We suggest some of these can be addressed through the CEQA process in a way that better meets the project goals as well as resolves pending design issues and plan incompatibility. We also think the three-level parking podium can be wrapped to better engage Wilshire Boulevard – there are two excellent examples within the Miracle Mile Historic District that could provide inspiration. The Wilshire Tower at 5500-5522 Wilshire Boulevard and the Dominguez-Wilshire Building at 5410 Wilshire Boulevard are two-story commercial blocks with attached towers. Unlike the proposed project, they both contain fenestration at the second floor in a way that further activates Wilshire Boulevard and provides an active frontage. We strongly suggest the three-story podium should be revised to include units at the second and third stories to better meet the goals of the project and the CDO.

Finally, we believe more historic fabric from the project site can and should be salvaged as a mitigation measure. We support the full retention and preservation of the Sontag Drug Building. The Conservancy also urges that the façades of the Santa Inez Co. at 5405-5411 Wilshire Boulevard and the A&P Food Palace at 5413-5415 Wilshire Boulevard be preserved as well. We see these Streamline Moderne architectural elements as fairly easy to integrate into the new development, and would help break up the bulky and monotonous parking podium that is proposed with more human-scaled elements.



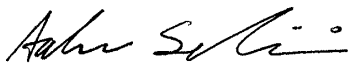
## Conclusion

The Conservancy supports adding housing and density, and we believe that is possible here without causing harm to the historic Miracle Mile Historic District and the Sontag Drug Building. We also believe there is a greater win-win outcome possible that pairs more meaningful preservation with new infill development than currently proposed. We would like to see a project emerge that better respects the intent of the Miracle Mile Community Design Overlay District and provides more human-scaled, pedestrian-first design. Finally, we urge this Transit Priority Project to put housing, sustainability, and urban design first, including the critical role historic preservation plays in all three, rather than simply focusing on parking and vehicular access.

### About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 member households 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.

Sincerely,



Andrew Salimian  
Director of Advocacy

cc: Councilmember Yaroslavsky, Council District 5  
Miracle Mile Residential Association  
City of Los Angeles, Department of Planning, Office of Historic Resources

