

4. ENVIRONMENTAL IMPACT ANALYSIS

C. CULTURAL RESOURCES

2 HISTORICAL RESOURCES

1. INTRODUCTION

This section evaluates potential Project impacts on historical resources and is based on the analysis and conclusions presented in the *Historical Resources Assessment Report* (“Assessment Report”) prepared for the Project by PCR Services Corporation, which is included in Appendix C-3 of this Draft EIR. Project-related impacts on archaeological and paleontological resources are evaluated in Section 4.C.1, Archaeological Resources, of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

The Project Site is located at 8150 W. Sunset Boulevard in the Hollywood community of the City of Los Angeles, at the foot of the Hollywood Hills, approximately seven miles northwest of Downtown. The approximately 2.56-acre Project Site contains two commercial structures and other improvements and is located on Assessor parcels 5554-007-014 and 5554-007-015. The Project Site is located within the block bounded by Sunset Boulevard on the north, Havenhurst Drive on the west, Crescent Heights Boulevard on the east, and multi-family residential uses within the City of West Hollywood on the south. The Project Site is situated at the western terminus of the Hollywood Community of the City of Los Angeles, and, therefore, the site functions as a part of the western gateway to the Sunset Strip. The project vicinity is highly urbanized and densely developed. The Project Site, with frontage on Sunset Boulevard, lies in the more active regional center of Hollywood with its mixed-use blend of commercial, restaurant, bars, studio/production, office, entertainment, and high density residential uses.

There are four major improvements on the Project Site, constructed in 1959-1960, 1961-62, 1972, and 1987. The Lytton Savings and Loan Association (“Lytton Savings”) building, designed by architect Kurt Meyer, was initially developed on the Project Site between 1959 and 1962. The first phase of construction (1959-1960) included a two-story bank building (“Bank”) used as Lytton Savings Hollywood home branch with a Modern landscaped plaza (“Plaza”) and integrated art. Between 1961 and 1962, an addition by Kurt Meyer was constructed for a museum, the Lytton Center of the Visual Arts (“Lytton Center”), abutting the rear south façade of the Bank’s basement (substantially altered). Built on a steeply graded site, the Lytton Center had a separate south entrance (altered) while a ramp provided access to parking on the roof of the museum (extant). The period of significance associated with the Lytton Savings Hollywood property is from 1959 through 1969, from the time the Lytton Savings Hollywood home branch was designed and constructed in 1959-1960, including the 1961-62 Lytton Center addition, and ending with the bankruptcy of Lytton Savings in 1968 and closure of the Lytton Center in 1969. After Lytton Savings went bankrupt in 1968, the Project Site changed ownership and subsequent tenant improvements resulted in alterations to the Bank, removal of the Plaza, and a one-story office addition, designed in 1972 by Daniel Dworsky, was built abutting the south elevation of the Lytton Center, blocking the primary elevation of the former museum. In 1987, construction

began on the two-story retail building located partially above the 1972 office addition and a new underground garage, located in the southern portion of the Project Site. A detailed description and evaluation of Lytton Savings is provided in the Assessment Report included in Appendix C-3.

(1) Historical Background

(a) Bank Building Property Type: Mid-Century Modern Banks (1950s and 1960s)

The extant Bank, completed in 1960, is an eclectic example of California Mid-Century Modern architecture reflecting influences of New Formalism in its glass walls, travertine cladding and concrete columns, and Googie architecture in its zigzag folded plate roof.

During the postwar era, the economy had recovered from depression and war, and a nationwide period of growth and stability created a sudden increase for access to credit and other banking needs. During the 1950s and 1960s, the banking industry experienced intense growth with older banks expanding and new banks being created. Many of the new banks were Savings & Loans (“S & Ls”), which were focused on short-term commercial lending and were in a highly-competitive mass-marketed industry, enthusiastically selling new products with convenience and efficiency. S & Ls competed with one another through marketing their strength and stability architecturally. As a result of competition, architects incorporated retail design into the design of S & Ls to create a warm, friendly customer-service driven environment; interiors became open and warm with floor to ceiling windows and large elaborate exterior signs advertised the S & L.

While early classical and later Art Deco and Moderne style architecture had been used by banks during the first half of the twentieth century, during the post-World War II era Modernism in Architecture emerged as the dominant idiom for commercial architecture. Mid-Century Modern design used sleek, simplified geometry and asymmetrical, intersecting angular planes of masonry volumes and glass curtain walls, locked together by a flat planar roof. Designers embraced the optimistic spirit of the time, experimenting with the newest technologies and materials in building, such as concrete and aluminum, and incorporating futuristic elements. Under the Mid-Century Modern design umbrella were a number of stylistic influences including Eclectic, International, New Formalist, Googie, California Modern, and Neo-Expressionism. S & Ls sought after talented architects to create an identifiable architectural brand. Kurt Meyer designed for Lytton Savings and Loan; C.M. Deasy for Lincoln S & L; Austin, Field, and Fry for First Federal S & L; Allison and Roble for North Hollywood Federal S & L; Young and Remington for Harbor S & L; W. A. Sarmiento for Bank Building & Equipment Corporation; Millard Sheets for Home S & L; Ladd & Kelsey for Belmont Savings Bank; Skidmore, Owings & Merrill for Great Western Savings; and Edward Durell Stone for Home Federal Savings.¹ An in depth discussion of the Mid-Century Modern, New Formalist Modern, and Neo-Expressionism styles is included in Historic Context, sub-section 5, of the Assessment Report.

(b) Bart Lytton (1912-1969)

Bart Lytton was the president and founder of Lytton Savings, which during the post-World War II era helped to fuel the economic boom that made California the capital of the homebuilding industry. Lytton Savings was the fifth largest savings and loan association in the United States in 1963, however, by 1968 Lytton Savings had gone bankrupt after ten years of operation. Within California’s unique Savings and Loan industry, there

¹ *Inventory of the Julius Shulman Photography Archive, 1935-2009. Collection Number 2004.R.10. Getty Research Institute.*
<http://www.you-are-here.com/architect/>

were two promoters who played the biggest role in their success, S. Mark Taper, Chairman of First Charter Financial Corporation, the nation's biggest publicly held savings and loan holding company, and Howard Ahmanson, who headed Home Savings & Loan, the biggest in the United States. The economic contribution of Lytton Savings as compared to Home Savings and American Savings is insignificant.

Bart Lytton was also an avid collector of paintings and sculpture and established one of the first corporate art programs in the Western United States. As a patron of the LACMA with a gallery named in his honor and as an early promoter of Los Angeles historic preservation for his efforts to save Irving Gill's Dodge House, Bart Lytton was a strong believer in corporate support for the artist. Lytton constructed a museum to the rear of his Hollywood bank headquarters, the Lytton Center, which housed an important permanent exhibit of pre-cinematic artifacts, changing exhibitions, and an auditorium. Bart Lytton was specifically interested in California contemporary artists and supported this group through frequent exhibitions and patronage. His extensive Modern art collection was displayed at all of his Lytton Savings branches. While Bart Lytton is an important social figure, his most important contribution was to the local arts movement and not to the history of the Savings and Loan industry.

(c) Lytton Savings Home Branch Building, Constructed 1959-1960 (Project Site)

The Garden of Alla was constructed in 1918 as a residence for the silent-film actress Alla Nazimova and would later become a hotel for the stars and was renamed the "Garden of Allah" in 1930 after the ownership changed. In 1959, the Garden of Allah Hotel was demolished to make way for the Lytton Savings Headquarters and Home Branch.² Constructed for an estimated five million dollars between 1959 and 1960, the Bank housed the Lytton Savings head office, as well as the executive offices of Lytton Financial Corporation.³ The architect was Kurt Meyer of Hagman and Meyer, A.I.A., the interior designer was Adele Faulkner, A.S.I.D, and the contractor was the William Simpson Construction Company, which worked closely with Bart Lytton to achieve a total design for the site and building. There were a number of artworks integrated into the interior design of the Bank, including a *dalle de verre Screen* by Roger Darricarrere (extant), in addition to art integrated into the exterior gardens, including David Green's *The Family* (extant). Biographies of Adele Faulkner, Roger Darricarrere, and David Green are included in the Historic Context of the Assessment Report. The focal point of the Bank's design was the folded plate concrete roof. To the east of the Bank was a landscaped plaza with gardens, shade trees, a reflecting pool, benches, and a pavilion. Julius Shulman photographed the completed Home Branch in June 1960 for Lytton Savings' public relations campaign, and the Bank was featured in *The Architectural Digest*. Every aspect of the interior was overseen by Adele Faulkner.

The Home Branch underwent alterations after the property changed ownership after the collapse of Lytton Savings in 1968. In 1987, a one-story electrical station (25 feet by 43 feet) was constructed in front of the west elevation of the Bank at the southeast corner of Sunset Boulevard and Havenhurst Drive in a private

² Los Angeles Department of Building and Safety, Permits LA46016-LA46027, November 2, 1959, Application to Demolish Garden of Allah Hotel Apartment Buildings.

³ Los Angeles Department of Building and Safety, Permits LA46335, November 4, 1959, Application to Construct Commercial bank and Parking. 27,000 sf Including Basement and 2 Stories.

parking area for bank executives. In 1987, the Plaza at the northeast corner of the lot was graded for parking.⁴ Additional alterations are described in the Historic Context of the Assessment Report.

(d) Lytton Center of the Visual Arts, Constructed 1961-62 (Project Site)

Between 1961 and 1962, an addition to the Bank was constructed to house the Lytton Center which operated between 1962 and 1969.⁵ The Lytton Center was designed by architect Kurt W. Meyer, interior designer Adele Faulkner, and structural engineer Johnson & Neilson, and was constructed by William Simpson Construction Company. The Modern style Lytton Center was constructed below ground level, adjoining the basement of the rear (south elevation) of the Home Branch, and had a parking deck on top of the roof.⁶ The primary entrance to the Lytton Center was located on the south elevation. A car ramp with a pedestrian stair was located on the west side of the addition and there were also two secondary pedestrian stairs that lead to the rooftop parking lot located on Havenhurst Drive and the southeast corner of the rear addition.⁷ The Lytton Center had a modern auditorium, permanent exhibit about the history of film, and areas for temporary exhibits. The Lytton Center promoted the careers of contemporary California artists, educated Angelinos, and was a cultural center on the Sunset Strip where many prominent social and world figures gathered. The Lytton Center was one of the first institutions to focus on emerging California art and artists, among the exhibited California artists were Bruce Conner, Robert Cremean, Claire Falkenstein, William T. Wiley, and Jack Zajac. The Lytton Center was also one of the first to showcase California women artists. The Lytton Center was most likely one of the earliest corporate art programs in the country with a changing series of thematic exhibitions, lectures, and other activities organized by professional staff and open to the general public for free.

After Bart Lytton's empire crumbled in 1968, Equitable savings occupied the property and operated the Lytton Center. Shortly after Equitable S & L retained ownership of the property in 1968, the Lytton Center was closed on January 31, 1969. In 1972, Great Western S & L constructed a one-story office addition, designed by Daniel L. Dworsky, directly adjoining the south elevation of the museum that effectively altered the Lytton Center and in addition to other alterations during the 1970s and 1980s that substantially altered the Lytton Center for a health club and self-storage facility. In 1987, the two-story retail building was constructed in the southern portion of the Project Site.

(e) Kurt Werner Meyer, Architect (1922-Present)

Born in Zurich, Switzerland on June 3, 1922, Kurt W. Meyer received his Bachelor of Architecture from Swiss Institute of Technology in 1946. After graduation he traveled around Europe visiting Paris, Brittany, Loire Valley, Brussels, and Amsterdam, and then moved with his wife to Harrisburg, Pennsylvania in 1948. In 1949, he left Pennsylvania in search of new opportunities and arrived in Los Angeles, California. Two weeks after moving to Los Angeles, he accepted a position at the Bechtel Corporation, Los Angeles. In 1955, he became a licensed architect and started a new job at Kistner, Wright & Wright. Between 1955 and 1957,

⁴ *Los Angeles Department of Building and Safety Permit Number LA80864, November 12, 1987, Grading of the area east of the bank and north of the rear building.*

⁵ *Los Angeles Department of Building and Safety, Permits LA83695, March 17, 1961, Application to Construct Addition (172' x 100' - 1 story, height 15').*

⁶ *"Exhibit Area Part of Building Addition." Los Angeles Times (October 15, 1961): 115.*

⁷ *Los Angeles Department of Building and Safety Permit Number LA87996, May 11, 1961, Application to Add Retaining Wall, Stairs and Landings to Office Building Addition at the Rear (Southern) Lot Line.*

he was partner of Cox, Hagman & Meyer and between 1957 and 1963 he was Principal of Hagman & Meyer. He opened his own firm, Kurt Meyer and Associates, in 1963. One of his first commissions was Death Valley High School in 1959. However, it was winning the commission for the Home Branch circa 1959 that would first define his career. Kurt Meyer formed a relationship with Bart Lytton and would eventually design four other banks for Lytton Savings. His work for Lytton Savings would lead to approximately twenty other commissions for S & L banks; he also designed many banks for Mark Taper who owned American S & L.⁸

Kurt Meyer designed three bank buildings for Lytton Savings in Southern California: the Mid-Century Modern style Home Branch and Lytton Center, 8150 Sunset Boulevard, Hollywood (constructed 1959-1961); the New Formalist style Pomona Branch, 300 Pomona Mall West, Pomona (constructed 1965); and the New Formalist style Canoga Park Branch, 6601 Topanga Canyon Boulevard, Canoga Park (constructed 1966). In addition, he designed a temporary Mid-Century Modern style Lytton Savings bank on Wilshire and Hobart that is now demolished. The Home Branch was one of Kurt Meyer's first architectural works where he experimented with new reinforced concrete technology on a large-scale project and was featured in the spring 1961 issue of the *Architectural Digest*. While it may have been important in the development of Kurt Meyer's career in winning future commissions for Lytton Savings, the Project Site was not innovative or influential in the transformation of bank design as a building type or form of architecture. Meyer further refined his designs using concrete technology in the succeeding Lytton branches. The Pomona and Canoga Park branches express the classical ideals of New Formalist architecture in their overall design, form, materials, and reverence of the classical concept/scheme and were described as "temples" by David Gebhard and Robert Winter. The Canoga Park branch was featured in the January 1964 issue of *Arts & Architecture* and also won an honor award from the Precast Concrete Institute.⁹

Kurt Meyer's design for S & Ls falls within the larger context of the history of the Bank Building property type in Southern California. Among other more prominent architects working for larger more influential S & Ls during this period were Millard Sheets and W.A. Sarmiento. Their work created an identifiable and unique architectural brand for the S & L industry to visually set them apart and attract new customers. In terms of his architectural progression, Meyer's Lytton Savings Home Branch building constructed in 1959-60 was an eclectic Mid-Century Modern building, which was a springboard for his career, while the latter two banks he would design for Lytton in Canoga Park and Pomona were distinctive, masterful examples of New Formalist architecture.

(2) Identified Historical Resources in the Project Vicinity

In the Project vicinity (an approximately 0.25-mile radius), there are eight previously identified individual historical resources located within the Study Area that could be indirectly affected by the Project as the result of alteration of their immediate surroundings, which are summarized below. The Study Area may therefore be described as follows:

⁸ Oral Interview with Pamela Deuel-Meyer, interviewed by Amanda Kainer, PCR Services. February 4, 2014.

"Kurt Werner Meyer Life Chronology." Compiled by Kurt Meyer and Pamela Deuel-Meyer.

Hilda Birshmeier, PSY.D. "Los Angeles: Swiss Explorer and Architect Kurt Meyer." *Swiss Review*. No. 5. October 2007.

⁹ "Lytton Savings, Pomona," *Arts & Architecture* v. 81 (January 1964): 14-15.

- The area occupied by properties that flank the corridor that extends westward from the subject site along W. Sunset Boulevard to the southerly bend in the Boulevard and includes 8210 W. Sunset Boulevard to the south and the Chateau Marmont to the north;
- The area occupied by properties that flank the corridor the extends eastward from the subject site along W. Sunset Boulevard to the eastern side of N. Laurel Avenue;
- The area occupied by properties that flank the intersections of streets north of W. Sunset Boulevard, between Selma Avenue and N. Laurel Avenue;
- The area occupied by properties that are located within viewing range of the subject site along Havenhurst Drive and N. Crescent Heights Boulevard located north of Fountain Avenue and south of Sunset Boulevard

A description of all of the historic resources in the vicinity is included in the Assessment Report in Appendix C-3 of this Draft EIR.

There is one historical resource which is listed on the National Register and as a Los Angeles Historic Cultural Monument in the Project vicinity:

- Andalusia Apartments (1926), 1471-1475 Havenhurst Drive; Historic Cultural Monument Number 435 designated on May 16, 1989 and listed on the National Register on August 81, 2003 (CRHR Status Code 1D, NPS-Number 03000775); located to the immediate southwest of the Project Site; direct views of the Project Site.

There is one historical resource which is listed on the National Register and as a West Hollywood Landmark in the Project vicinity:

- Colonial House (1930), 1416 Havenhurst Drive (P-Number 19-176851); individual property listed on the National Register on April 15, 1982 (CRHR Status Code 1S, NPS-Number 82002190) and City of West Hollywood Landmark; located to the immediate south of the Project Site; direct views of the Project Site.

There is one historical resource which is listed on the National Register and included in West Hollywood's Courtyard Thematic District in the Project vicinity:

- The Rhonda Apartments (1927), 1400 Havenhurst Drive (P-Number 19-176746), individual property listed on the National Register on February 28, 1985 (CRHR Status Code 1S, NPS-Number 85000356) and contributor to City of West Hollywood's Courtyard Thematic District; located to the south of the Project Site; indirect views of the Project Site.

There are two historical resources which are listed as Los Angeles Historic-Cultural Monuments in the Project vicinity:

- Chateau Marmont (1926), 8215-8221 West Sunset Boulevard; Los Angeles Historic Cultural Monument Number 151 designated on March 24, 1976; located to the northwest of the Project Site; direct views of the Project Site.

- Stahl House (1959), 1635 Woods Drive; Los Angeles Historic Cultural Monument Number 370 designated on November 9, 1999; located to the northwest of the Project Site; distant views of the Project Site.

There are two historical resources listed as West Hollywood Landmarks in the Project vicinity:

- The Granville (1930), 1424 N. Crescent Heights Boulevard; City of West Hollywood Landmark; located on the east side of Crescent Heights Boulevard to the southeast of the Project Site; direct views of the Project Site.
- The Savoy Plaza (1929), 1360 North Crescent Heights Boulevard; City of West Hollywood Landmark; located on the east side of Crescent Heights Boulevard to the southeast of the Project Site; indirect views of the Project Site.

There is one historical resource included in West Hollywood's Courtyard Thematic District in the Project vicinity:

- The Tuscany (1929), 1400 North Crescent Heights Boulevard; contributor to City of West Hollywood's Courtyard Thematic District; located on the east side of Crescent Heights Boulevard to the southeast of the Project Site; indirect views of the Project Site.

(3) Historical Resources Identified within the Project Site

The Project Site has not been previously evaluated.

(a) Statement of Significance

The current architectural description and significance evaluation of the Project Site is included in the Assessment Report in Appendix C-3 in this Draft EIR. Under the local criterion for architecture, the Project Site has been conservatively determined eligible as an early example in Southern California of the Mid-Century Modern Bank building type and as an early example of Kurt Meyer's work that may have been instrumental in his success as a S & L architect for Lytton Savings and American Savings, as discussed below. Therefore, the Assessment Report found the Project Site eligible for designation as a local Historic Cultural Monument. The Project Site was found ineligible for the National and California Registers.

Between 1959 and 1962, Lytton Savings constructed a Bank, Plaza, and Lytton Center on the Project Site. The Bank was constructed between 1959 and 1960. Between 1961 and 1962, a rear addition for the Lytton Center was constructed at a lower grade than the bank, abutting the rear of the Bank's basement. The period of significance associated with the Lytton Savings Hollywood property is from 1959 through 1969, from the time the Bank was constructed in 1959 through the closure of the Lytton Center in 1969. Historical themes discussed above that are associated with the Lytton Savings Hollywood property include the following: Post-World War II Transformation 1955 – Present, the Bank Building Property Type, Savings and Loan Industry, Integration of Art and Bank Design, Bart Lytton (1912-1969), Kurt Werner Meyer, Architect (1922-Present), Adele Faulkner-Quinn, Interior Designer (1911-2000), Integrated Art Components, Dalle de Verre, Roger Darricarrere, Artist (1912 - 1983), and David Green (1908-2000).

(i) Association With Historical Events

The following national, state, and local historical significance criteria relate to the property's association with any events that have made a significant contribution to the broad patterns of our history and cultural heritage:

National Register Criterion A: Is associated with events that have made a significant contribution to the broad patterns of our history.

California Register Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Los Angeles Historic Cultural Monument Criterion: The proposed site, building, or structure reflects or exemplifies the broad cultural, political, economic, or social history of the nation, state, or City (community).

The Lytton Savings Hollywood property constructed between 1959 and 1962 was comprised of three components: the Bank, the Plaza, and the Lytton Center. By 1963, Lytton Savings was the fifth largest savings and loan association in the United States. However, Lytton Savings played only a minor role in the development of the savings and loan during the early 1960s. By 1968 Lytton Savings was bankrupt and the economic contribution of Lytton Savings in relation to Home Savings and American Savings is insignificant. Therefore, the Lytton Savings does not appear to have made a significant contribution to economic history.

Furthermore, even though the Bank is extant, the removal of the rear auto teller and canopy, removal of the Plaza, removal of the interior design and integrated art components, construction of the electrical station in front of the west elevation, and the replacement and infill of glazing and fenestration on the ground floor has altered the original design which has compromised its historical associations with Los Angeles automobile culture on Sunset Boulevard. The southeast corner glazing and the auto teller bay was infilled and painted white, as a result there is no illusion of the cantilever floating over the glazed first-floor. Along with key features that originally conveyed the property's historical association with automobile culture, the original design concept and program of Meyer and Faulkner has been essentially lost. The Bank was designed as a showcase of Modern art and design to attract modern customers, communicating forward thinking and accessibility and giving Lytton Savings a distinctive brand. The front entrance of the Bank on the east elevation originally had a Plaza with a sculpture garden, domed concrete pavilion and reflecting pool (later removed and paved over). Modern art was integrated into the exterior plaza and gardens as well as the interior of the Bank (two art works remain extant), which featured the work of interior designer Adele Faulkner (later removed). Between 1961 and 1962, an addition by Kurt Meyer was constructed for a museum, the Lytton Center, abutting the rear south façade of the Bank's basement (substantially altered). Built on a steeply graded site, the Lytton Center had a separate south entrance (altered) while a ramp provided access to parking on the roof of the museum (extant). The period of significance associated with the Lytton Savings Hollywood property is from 1959 through 1969, from the time the Bank was designed and constructed in 1959-1960, including the 1961-62 Lytton Center addition, and ending with the bankruptcy of Lytton Savings in 1968 and closure of the Lytton Center in 1969. After Lytton Savings went bankrupt in 1968, the Project Site changed ownership and subsequent tenant improvements resulted in alterations to the Bank, removal of the Plaza, and an office addition designed in 1972 by Daniel Dworsky was

built abutting the south elevation of the former Lytton Center, blocking the primary elevation of the former museum.

The Lytton Center was important for its contribution to arts and culture in Los Angeles during its eight years of operation. But, the Lytton Center is substantially altered, its collections have been removed, and it is structurally no longer an identifiable feature of the site and is obscured from view by the 1972 office addition. The Modern art collections are no longer associated with the Bank with the exception of two works, David Green's *The Family* sculptural group and Roger Darricarrere's stained glass *Screen*.

The original design of the Lytton Savings Hollywood property has lost its integrity because of the construction of the 1972 office addition and 1987 retail building; removal of the museum use, landscape plaza, and automobile accessibility features; and alterations to the total integrated design of the Home Branch. Furthermore, the spaces and features of the Lytton Center, such as the museum entrance, lobby, galleries, and auditorium, are not extant as they were substantially altered for a health club and self-storage facility during the 1970s and 1980s.

As a result of these alterations, the Lytton Savings Hollywood property does not retain enough integrity of design, materials, workmanship, setting or feeling to exemplify its association with any events that have made a significant contribution to the broad patterns of our economic or cultural history. Therefore, the Project Site does not appear eligible for the National Register under Criterion A, the California Register under Criterion 1, or the local register.

(ii) Association With Historic Personages

The following national, state, and local historical significance criteria relate to the property's association with the productive lives of persons important in our past:

National Register Criterion B: Is associated with the lives of persons significant in our past.

California Register Criterion 2: Is associated with the lives of persons important in our past.

Los Angeles Historic Cultural Monument Criterion: The proposed site, building, or structure is identified with historic personages or with important events in the main currents of national, state, or local history.

The Project Site is associated Bart Lytton, who was the president and founder of Lytton Savings, which during the post-World War II era helped to fuel the economic boom that made California the capital of the homebuilding industry; Lytton Savings was the fifth largest savings and loan association in the United States, however, by 1968 Lytton Savings had gone bankrupt after ten years of operation. Lytton Savings and the Hollywood Home Branch did not play a significant role in the development of the S & L industry in California or Los Angeles. The economic contribution of Lytton Savings as compared to Home Savings and American Savings is insignificant. While Bart Lytton is an important social figure, his most important contribution was to the local arts movement and not to the history of the Savings and Loan industry.

Bart Lytton was significant for his patronage of art and the development of the Lytton Center on the Project Site. As a patron of the LACMA with a gallery named in his honor and as an early promoter of Los Angeles historic preservation for his efforts to save Irving Gill's Dodge House, Bart Lytton was a strong believer in corporate support for the artist. Lytton constructed a museum to the rear of his Hollywood bank headquarters, the Lytton Center, which housed an important permanent exhibit of pre-cinematic artifacts, changing exhibitions, and an auditorium. Bart Lytton was specifically interested in California contemporary artists and supported this group through frequent exhibitions and patronage. His extensive Modern art collection was displayed at all of his Lytton Savings branches. However, as discussed above the Lytton Center is highly altered and does not retain integrity. Overall, the entire Lytton Savings Hollywood property, including the Bank, Lytton Center, and landscape, does not retain integrity of design, materials, workmanship, setting, feeling or association.

As a result, the Project Site is unidentifiable with historic personages or with important events. Therefore, the Project Site does not appear to satisfy National Register Criterion B, California Register Criterion 2, or the local register for eligibility related to a historic personage or event.

(iii) Architectural Characteristics

The following national, state, and local historical significance criteria relate to the property's distinguishing architectural characteristics, or importance as a work of a notable master builder, designer or architect:

National Register Criterion C: Embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

California Register Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

Los Angeles Historic Cultural Monument Criterion: The proposed site, building, or structure embodies certain distinguishing architectural characteristics of an architectural-type specimen, inherently valuable for a study of a period style or method of construction; or the proposed site, building, or structure is a notable work of a master builder, designer, or architect whose individual genius influenced his age.

The former Lytton Savings Hollywood property located at 8150 West Sunset Boulevard fails to meet the requirements for listing under National Register Criterion C. The property does not meet California Criterion 3. The property conservatively meets the local criteria for its architecture. There are four major improvements on the Project Site constructed in 1959-1960, 1961-62, 1972, and 1987. Lytton Savings constructed their Home Branch, Bank with Plaza and Integrated Art between 1959 and 1960 in the northwest corner of the lot fronting Sunset Boulevard to the north. The Bank completed in 1960 (extant) is an eclectic example of California Mid-Century Modern architecture reflecting influences of New Formalism in its glass walls, travertine cladding and concrete columns, and Googie architecture in its zigzag folded plate roof. The Home Branch was designed as a showcase of Modern art and design to attract modern customers, communicating forward thinking and accessibility. The front entrance of the Bank on the east elevation originally had a Plaza with a sculpture garden, domed concrete pavilion and reflecting pool (later removed

and paved over). Modern art was integrated into the exterior plaza and gardens as well as the interior of the Bank (two art works remain extant), which featured the work of interior designer Adele Faulkner (later removed). Between 1961 and 1962, an addition by Kurt Meyer was constructed for a museum, the Lytton Center, abutting the rear south façade of the Bank's basement (substantially altered). Built on a steeply graded site, the Lytton Center had a separate south entrance (altered) while a ramp provided access to parking on the roof of the museum (extant). The period of significance associated with the Lytton Savings Hollywood property is from 1959 through 1969, from the time the Bank was designed and constructed in 1959-1960, including the 1961-62 Lytton Center addition, and ending with the bankruptcy of Lytton Savings in 1968 and closure of the Lytton Center in 1969. After Lytton Savings went bankrupt in 1968, the Project Site changed ownership and subsequent tenant improvements resulted in alterations to the Bank, removal of the Plaza, and an office addition designed in 1972 by Daniel Dworsky was built abutting the south elevation of the Lytton Center, blocking the primary elevation of the former museum.

As originally completed in 1960, the design of the Bank was strategically conceived as a modern multi-media showcase for Modern art, architecture and interior design which related directly to its Sunset Boulevard context with a drive-up teller (removed) and ample parking, and a distinctive folded plate concrete roof (extant). Substantial alterations including removal and alteration of original features, materials and finishes and construction of the 1972 office addition and 1987 retail building have resulted in substantial material changes to the Project Site such that it no longer conveys the original program and design concepts of Kurt Meyer and Adele Faulkner. The Bank's glazing and fenestration has been replaced, the auto teller was removed, some of the original materials and finishes on both exterior and interior are altered, and the interior design and integrated art was removed and the interiors renovated. As it exists today, all that remains is the Bank architecture (altered), two nearly intact works of art in situ, and the Lytton Center structure (substantially altered). Due to the removal and alteration of the majority of the design features and art collection, the Project Site as a whole no longer conveys the entirety of Kurt Meyer's and Adele Faulkner's original program and design concept, and the integrity of the Home Branch with Bank and Plaza and Lytton Center has been seriously compromised. Therefore, the subject property does not meet the threshold of eligibility for listing in either the National Register or the California Register.

The extant Bank building, however, has sufficient integrity of design for consideration as a potential historical resource at the local level. The Bank exterior retains the rectangular plan and massing, cantilevered second floor finished in travertine veneer squares, concrete piers supporting folded concrete roof, repetition of first floor window and door bays (windows and doors have been replaced and some bays were infilled), Bouquet Canyon stone accent wall on primary elevation, and planting area in front of primary elevation with David Green's sculpture *The Family*. And the Bank interior retains the open central plan with a full-height lobby with views of the underside of the folded plate roof, 2nd floor perimeter walkway or balcony with a modern balustrade, Roger Darricarrere's *dalle de verre* stained glass *Screen*, and northeast corner floating concrete stair.

Regarding its architecture, the Bank is an eclectic Mid-Century Modern S & L building with Modern New Formalist style and Googie elements. Unfortunately, the important related automobile-associated context on Sunset Boulevard from the 1960s is substantially eroded and lost. The folded zigzag concrete roof, parking lot, and drive-up teller were originally designed to cater to the Googie car culture along Sunset Boulevard in the immediate vicinity. While the folded concrete roof may have been one of the largest at its time of construction, it did not influence concrete building technology or start a new design trend. The zigzag roof is a common stylistic motif found in Mid-Century Modern architecture throughout the region, state, and nation.

While it may have been important in the development of Kurt Meyer's career in winning future commissions for Lytton Savings, the Project Site was not innovative or influential in the transformation of bank design as a building type or form of architecture. The Bank does embody some of the distinctive characteristics of the Mid-Century Modern style and prefabricated concrete methods of construction and is the work of a notable architect or builder, but does not presently possess high artistic value due to the loss of integrity. The original total design including integrated art works, interior design, and an associated landscape and Plaza once possessed high artistic value, however, these elements have been removed and only two art works remain in situ, Roger Darricarrere's *Screen* and David Green *The Family*. The associated Lytton Center is no longer an identifiable feature of the property due to the removal of its museum use and collections and substantial alterations to the structure that have rendered it nearly unrecognizable.

The Bank is an early example of Kurt Meyer's work and may have been instrumental in his success as a S & L architect for Lytton Savings and American Savings and Loan. The Bank may also be an early example in Southern California of the Mid-Century Modern bank building type, and the Bank's structure with its large folded-plate concrete roof can be considered an example of Modern prefabricated concrete construction. However, the Bank is not a well-recognized work of Kurt Meyer who is better known for the New Formalist-style Lytton S & L Pomona Branch (1965), and the Canoga Park Branch (1966) which was featured in *Arts & Architecture* and won an honor award from the Precast Concrete Institute. The Pomona and Canoga Park and branches express the classical ideals of New Formalist architecture in their overall design, form, materials, and reverence of the classical concept/scheme and were described as "temples" by David Gebhard and Robert Winter.

The Project Site does not meet the above criterion at the national or state level for the reasons discussed above. However, the Bank building has enough integrity of design as it retains the majority of its exterior character-defining features and some interior character-defining features and spaces to conservatively meet the local criterion for its Mid-Century Modern bank architecture. The Bank appears to be an early example in Southern California of the Mid-Century Modern Bank building type, and is an early example of Kurt Meyer's work that may have been instrumental in his success as a S & L architect for Lytton Savings and American Savings.

(iv) Contributions to History or Prehistory

The following national, state, and local historical significance criteria relate to the property's ability to yield information important to history or prehistory:

National Register Criterion D. It yields, or may be likely to yield, information important in prehistory or history.

California Register Criterion 4. Has yielded, or may be likely to yield, information important in prehistory or history.

The Project Site is not likely to yield any information important to prehistory or history. Therefore, the Project Site does not meet the above criterion at the national or state level.

(b) Conclusion

The Project Site is found ineligible under national and state criteria and is conservatively determined eligible under local criteria for its architecture. Therefore, the Project Site is a historical resource under CEQA. As originally completed in 1960, the design of the Bank was strategically conceived as a Modern multi-media showcase for Modern art, architecture and interior design which related directly to its Sunset Boulevard context with a drive-up teller (removed) and ample parking, and a distinctive folded plate concrete roof (extant). Substantial alterations to the original program and design concepts of Kurt Meyer and Adele Faulkner have compromised the integrity of the architecture, Modern landscape and integrated art of the original project. The associated Lytton Center is no longer an identifiable feature of the property due to removal of the museum use and substantial alterations that have rendered the museum nearly unrecognizable. Today, the Bank building alone remains as an altered example of a Mid-Century Modern Bank, a relatively common building type in Southern California. The Bank is as an early example of Kurt Meyer's work which may have been instrumental in his success as an S & L architect for Lytton Savings and American Savings. The Bank may also be an early example in Southern California of the Mid-Century Modern Bank building type, and the Bank's structure with its large folded-plate concrete roof can be considered an example of Modern prefabricated concrete construction. The Bank on the Project Site does not appear eligible for listing in the National Register or the California Register due to alteration and removal of distinguishing architecture, design, art and landscape features. However, the Bank has sufficient integrity of design for consideration as a potential historical resource at the local level.

The two art works on the Project Site are eligible as contributors because the primary resource, the Bank, is eligible. However, they are not eligible individually because they are works of fine art and do not meet any of the above criteria. Per the California Art Preservation Act, the two existing integrated artworks on the Project Site including Roger Darricarrere's *Screen* and David Green's *The Family* are of recognized quality.

(c) Character-Defining Features Analysis

(i) Contributing Exterior Features

- Rectangular massing and plan
- A cantilevered second floor finished with travertine veneer squares extending past the east and west elevations (A Chase Bank blue band has been applied to the bottom of the travertine panels on the second floor of the north and east elevations. Some of the panels appear to be of a different quality and replaced.)
- Folded plate concrete roof with plastic coating and soffit
- False clerestory windows (Enamel Glass) below folded plate roof
- Seven slender, rectangular concrete piers with white precast facing supporting the folded concrete plate roof dividing the north and south elevations into six bays
- Bouquet Canyon stone accent wall on primary (north) elevation
- Repetition of window and door bays on north, south and east elevations (However, all doors and windows have been replaced and some bays have been infilled)
- Three architectural concrete ground floor bays on the Western Side of the South Elevation (They were originally white, and have been repainted black)

- Mechanical area contained by a decorative concrete block wall and decorative metal gate in front of east elevation
- Planting area in-front of Primary (North) Elevation, includes David Green's *The Family* (the top of the sculpture is damaged)
- Automobile ramp and pedestrian stairs and railing to the parking deck on top of Lytton Center
- Stairway and planting area along west portion of lot

(ii) Contributing Interior Features and Spaces

- Open central plan with a full-height lobby with views of the underside of the folded plate roof
- 2nd floor perimeter walkway or balcony with a modern balustrade
- Roger Darricarrere's *dalle de verre* stained glass *Screen*
- Northeast corner floating concrete stair (Schiefer stone strong floor, walnut and aluminum railing, plate glass panels below the railing, concrete steps with an abrasive finish, stone veneer wall)
- Drinking fountain and metal louver on the north wall of the lobby
- Railing in the employee south stairway

(d) Setting

Since the original construction of the Lytton Savings Hollywood property between 1959 and 1962, the total design including the interior and exterior architecture of the Bank, Lytton Center, integrated artwork, and Plaza with reflecting pools, pavilion, paved areas, and plants have been altered and all together lost. After ownership of the property changed, the museum use was removed, the 1972 office addition was constructed, the Plaza was graded, and the two-story retail building was added. Constructed during the era of automobile culture, the property was designed for automobile convenience as the property had an auto teller and ample parking near the Lytton Center and Bank. The auto teller with automobile driveway and original parking lot design have been removed. Furthermore, the eye catching public Plaza with attractive pavilion and reflecting pool which once invited patrons arriving by car as well as on foot has been graded for an expanded parking lot. The setting and design of the property from its period of significance (1959-1969) is altered and only the Bank remains. In addition, the Plush Pup located to the west of the Project Site once mimicked the Bank's folded concrete plate roof, but the Plush Pup is now substantially altered. Furthermore, Lautner's "Googies" coffee shop is gone from the opposite corner at Sunset Boulevard and Crescent Heights Boulevard, replaced by urban infill. The commercial buildings along north side of Sunset Boulevard are substantially altered 1940s-1970s buildings with recent infill.

b. Regulatory Framework

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, and in certain instances, protection of historic resources. Additionally, states and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities.

(1) Federal Level

(a) National Register of Historic Places

The National Register was established by the National Historic Preservation Act of 1966 (“NHPA”) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”¹⁰ The National Register recognizes properties that are significant at the national, state, and/or local levels.

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

- A. It is associated with events that have made a significant contribution to the broad patterns of our history;
- B. It is associated with the lives of persons significant in our past;
- C. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;
- D. It yields, or may be likely to yield, information important in prehistory or history.¹¹

Districts, sites, buildings, structures, and objects that are 50 years in age must meet one or more of the above criteria and retain integrity (this is, convey their significance) to be eligible for listing. Under the National Register, a property can be significant not only for the way it was originally constructed, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.¹² Within the concept of integrity, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity: Location, Design, Setting, Materials, Workmanship, Feeling, and Association.

To retain historic integrity, a property will always possess most of the aspects and depending upon its significance, retention of specific aspects of integrity may be paramount for a property to convey its significance.¹³ Determining which of these aspects are most important to a particular property requires knowing why, where, and when a property is significant.¹⁴ For properties that are considered significant

¹⁰ 36 CFR Section 60.2.

¹¹ “Guidelines for Completing National Register Forms,” in *National Register Bulletin 16, U.S. Department of Interior, National Park Service, September 30, 1986. This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the NRHP.*

¹² *National Register Bulletin 15, p. 19.*

¹³ *The National Register defines a property as an “area of land containing a single historic resource or a group of resources, and constituting a single entry in the National Register of Historic Places.” A “Historic Property” is defined as “any prehistoric or historic district, site, building, structure, or object at the time it attained historic significance. Glossary of National Register Terms, http://www.nps.gov/nr/publications/bulletins/nrb16a/nrb16a_appendix_IV.htm, accessed June 1, 2013.*

¹⁴ *National Register Bulletin 15, p. 44.*

under National Register Criteria A and B, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (“*National Register Bulletin 15*”) explains, “a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).”¹⁵ In assessing the integrity of properties that are considered significant under National Register Criterion C, *National Register Bulletin 15* states, “a property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.”¹⁶

(2) State Level

(a) California Register of Historical Resources

The California Office of Historic Preservation (“OHP”), as an office of the California Department of Parks and Recreation (“DPR”), implements the policies of the NHPA on a Statewide level. The OHP also carries out the duties as set forth in the California Public Resources Code (“PRC”) and maintains the State’s Historic Resources Inventory (“HRI”) and the California Register. The State Historic Preservation Officer (“SHPO”) is an appointed official who implements historic preservation programs within the State’s jurisdictions. Also implemented at the State level, CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historical resources.

The California Register was created by Assembly Bill 2881 which was signed into law on September 27, 1992. The California Register is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”¹⁷ The criteria for eligibility for the California Register are based upon National Register criteria.¹⁸ Certain resources are determined by the statute to be automatically included in the California Register by operation of law, including California properties formally determined eligible for, or listed in, the National Register.¹⁹

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally Determined Eligible for the National Register;

¹⁵ “A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property’s historic character. . . Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register.” *Ibid*, p. 46.

¹⁶ “A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.” *Ibid*.

¹⁷ PRC Section 5024.1(a).

¹⁸ PRC Section 5024.1(b).

¹⁹ PRC Section 5024.1(d).

- California Registered Historical Landmarks from No. 770 onward;
- Those Points of Historical Interest (“PHI”) that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.²⁰

Other resources which may be nominated to the California Register include:

- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance ratings of Category 1 through 5;
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a Historic Resources Overlay Zone (“HPOZ”).²¹

To be eligible for the California Register, a historic resource must be significant at the local, State, or national level, under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Additionally, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of seven aspects of integrity similar to the National Register, location, design, setting, materials, workmanship, feeling, and association. Also like the National Register, it must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance. It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.²²

²⁰ *Ibid.*

²¹ *PRC Section 5024.1(e)*

²² *Codified in California Code of Regulations, Title 14, Chapter 11.5, Section 4852(c) which can be accessed on the internet at <http://ohp.parks.ca.gov>*

(3) Local Level

(a) City of Los Angeles

The City enacted a Cultural Heritage Ordinance in April 1962 which defines City Monuments. According to the Ordinance, City Monuments are sites, buildings, or structures of particular historic or cultural significance to the City in which the broad cultural, political, or social history of the nation, state, or City is reflected or exemplified, including sites and buildings associated with important personages or which embody certain distinguishing architectural characteristics and are associated with a notable architect. These City Monuments are regulated by the City's Cultural Heritage Commission and the City Council.

(b) Los Angeles Cultural Heritage Ordinance

The Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Chapter 9, Division 22, Article 1, Section 22.171.7) establishes criteria for designating local historic resources as City Monuments. A City Monument is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, such as historic structures or sites:

- In which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified;
- Which are identified with historic personages or with important events in the main currents of national, State or local history;
- Which embody the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or
- Which are a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

A proposed resource may be eligible for designation if it meets at least one of the criteria above.

When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the Cultural Heritage Commission and the staff of the Office of Historic Resources often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a "master" architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the City or had a role in the development or history of Los Angeles?
- Has the building retained "integrity"? Does it still convey its historic significance through the retention of its original design and materials?
- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?

- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?²³

With regard to integrity, the seven aspects of integrity of the National Register and California Register are the same and the threshold of integrity for individual eligibility is similar. However, the threshold of integrity for HPOZs is lower; a contributing structure in an HPOZ is a building that was constructed during the predominant period of development in the neighborhood and that has retained most of its historic features.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis in this section of the Draft EIR is summarized from the Assessment Report in Appendix C-3 which was conducted by PCR Services personnel who meet and exceed the Secretary of the Interior's Professional Qualification Standards in history, architectural history, and historic architecture. The key steps taken in completing the Assessment Report which serves as the basis for this section of the Draft EIR are listed below.

- A review of the existing buildings within the Project Site.
- A review of any previous evaluations of Project Site properties through historic survey or other official action.
- Analysis and evaluation of any potential historic resources within a 0.25 mile radius of the Project Site.
- Review of the required consideration of historic resources under CEQA.
- The following documents related to the Project Site's development were consulted:
 - Historic permits for properties within the Project Site
 - Sanborn Fire Insurance maps
 - Historic photographs, aerial photos, local histories, and historical architectural journals and newspaper articles
 - California State Historic Resources Inventory for Los Angeles County

b. Thresholds of Significance

The thresholds for determining the significance of environmental effects on historical resources are derived from the State *CEQA Guidelines* as defined in Section 15064.5 and the *LA CEQA Thresholds Guide*.

According to the State *CEQA Guidelines*, a project involves a "substantial adverse change" in the significance of the resource when one or more of the following occurs:

²³ *What Makes a Resource Historically Significant?* City of LA Office of Historic Preservation, <http://preservation.lacity.org/commission/what-makes-resource-historically-significant>, accessed July 7, 2013.

- Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- The significance of a historical resource is materially impaired when a project:
 - A. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historical Resources; or
 - B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
 - C. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on a significant resource if it would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State *CEQA Guidelines* when one or more of the following occurs:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (“Standards”); or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.²⁴

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource. The Standards were developed as a means to evaluate and approve work for federal grants for historic buildings and then for the federal rehabilitation tax credit (see 36 Code of Federal Regulations (“CFR”) Section 67.7). Similarly, the Los Angeles Cultural Heritage Ordinance provides that compliance with the Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to City Monuments (see Los Angeles Administrative Code Section 22.171.14.a.1). Therefore, the Standards are used for regulatory approvals for designated resources but not for resource evaluations. Similarly, CEQA recognizes the value of the Standards by using them to demonstrate that a project may be approved without an EIR. In effect, CEQA

²⁴ *L.A. CEQA Thresholds Guide, Section D.3. Historical Resources, City of Los Angeles, 2006, p. D.3-1.*

has a “safe harbor” by providing either a categorical exemption or a negative declaration for a project which meets the Standards (see State *CEQA Guidelines* Section 15331 and 15064.5(b)(3)).

Based on the above considerations, the factors listed in the *L.A. CEQA Thresholds Guide* have been reviewed and refined to address both the State and City guidelines. As such, the Project would have a significant impact on historic resources, if:

- HIST-1** The Project would demolish, destroy, relocate, or alter a historical resource such that eligibility for listing on a register of historical resources would be lost (i.e., no longer eligible for listing as a historic resource); or
- HIST-2** The Project would reduce the integrity or significance of important resources on the Project Site or in the vicinity.

c. Project Characteristics

As described in Chapter 2.0, Project Description, of this Draft EIR, the Project includes the demolition of the existing commercial buildings and the construction of a mixed-use residential and retail project. The Project would consist of two buildings over a single podium structure with various elements ranging in height from two stories to 16 stories in height as measured from the intersection of Sunset and Crescent Heights Boulevards (approximately 42 feet above the ground elevation at the intersection of Sunset and Crescent Heights Boulevards for the North Building, increasing to approximately 108 feet for the nine-story portion and approximately 191 feet for the 16-story portion of the South Building; the overall building height is approximately 216 feet as measured from the low point of the site along Havenhurst Drive to the top of the South Building). The North Building, which would be built along Sunset Boulevard, would include two levels with a rooftop terrace containing exclusively commercial uses. The South Building would contain commercial uses on the first two levels, residential uses on levels three through 15, and a rooftop restaurant/lounge on the top level.

The Project would include 111,339 square feet of commercial retail and restaurant uses within three lower levels (one subterranean) and one rooftop level, 249 apartment units, including 28 affordable housing units, within the twelve upper levels representing 222,564 gross square feet of residential space. The Project would also provide a new, 9,134-square-foot public space at the northeast corner of the site (this area is, and would continue to be, owned by the City, although the Applicant would be required to improve and maintain the area), a 34,050-square-foot central public plaza at the site interior, public rooftop deck/garden areas along Sunset Boulevard, a private pool and pool deck area for residents, as well as other resident-only amenities totaling approximately 6,900 square feet that would include a residential lobby, resident recreation room, fitness center, business center, changing rooms, and library. Parking for all proposed uses would be provided on-site via a seven-level (three subterranean and semi-subterranean levels) parking structure housed within the podium structure that includes 849 total parking spaces (295 for residential uses and 554 for commercial retail and restaurant uses). The total development would include up to 333,903 square feet of commercial and residential space with a maximum floor-area ratio (FAR) of 3:1.

Section 2.0, Project Description, of this Draft EIR provides a detailed discussion of the Project's characteristics. It also includes photographs of the existing Project Site conditions and it includes graphic exhibits that show the Project's Site design, with Site Plans and illustrative renderings of the Project's

appearance from a variety of view points and elevations. Further, Section 4.A, Aesthetics/Visual Resources, includes a series of photo-simulation views of the Project Site that show the proposed new Project buildings from a variety of vantage points.

Implementation of the Project would require the demolition and removal of the Bank building in order to construct subterranean parking levels, the proposed supermarket, and commercial retail and restaurant uses within the western portion of the North Building. However, two extant pieces of art associated with the Lytton Savings Hollywood home branch, including a sculpture (David Green's *The Family*) and a stained glass piece (Roger Darricarrere's *Screen*), would be incorporated into the Project design or preserved at an off-site location in accordance with CEQA.

d. Project Impacts

Threshold HIST-1: The Project would result in a significant impact on historical resources if it would demolish, destroy, relocate, or alter a historical resource such that eligibility for listing on a register of historical resources would be lost (i.e., no longer eligible for listing as a historic resource).

Impact Statement HIST-1: *The Project would demolish the Bank such that it would be rendered ineligible for the National Register, California Register, or as a City Monument. Therefore, Project impacts on the Bank structure would be significant and unavoidable.*

The Project Site is found ineligible under national and state criteria and is conservatively determined eligible under local criteria for its architecture, as discussed above. As originally completed in 1960, the design of the Bank was strategically conceived as a Modern multi-media showcase for Modern art, architecture and interior design which related directly to its Sunset Boulevard context with a drive-up teller (removed) and ample parking, and a distinctive folded plate concrete roof (extant). The Bank is an early example of Kurt Meyer's work which may have been instrumental in his success as a S & L architect for Lytton Savings and American Savings. The Bank may also be an early example in Southern California of the Mid-Century Modern Bank building type, and the Bank's structure with its large folded-plate concrete roof can be considered an example of Modern prefabricated concrete construction. The Bank has sufficient integrity of design and retains primary character-defining exterior features, such as the rectangular plan and massing, slender concrete columns supporting the concrete plate folded roof, false clerestory windows underneath the roof, cantilevered second-floor covered with travertine veneer, the repetition of first-floor door and window bays, and the interior open central plan with a full-height lobby with views of the underside of the folded plate roof. The Project proposes to demolish the Bank to construct a two-story commercial/retail building with roof garden at the northwest corner of the Project Site. The overall Project Site will be redeveloped with a mixed-use residential and retail project. Therefore, the demolition of the Bank would have significant and unavoidable impacts on historical resources on the Project Site.

With regard to artwork within the Bank building, and as further described in Chapter 2.0 Project Description of this Draft EIR, pursuant to the California Art Preservation Act, the two existing integrated artworks on the Project Site, Roger Darricarrere's *Screen* and David Green's *The Family*, are of recognized quality. These pieces would be either incorporated into the Project design on-site or relocated to an off-site location for preservation in accordance with CEQA. The families of the artists would be notified of the extant artworks and every attempt would be made to relocate the artwork. A relocation plan would be prepared by a qualified professional conservator and implemented in accordance with nationally recognized conservation

guidelines including the Code of Ethics and the Guidelines for Practice of the American Institute for Conservation of Historic and Artistic Works. As the Project would result in the on- or off-site preservation of these two artworks, impacts associated with these artworks, that are contributing features to the Bank, would be less than significant.

Threshold HIST-2: The Project would result in a significant impact on historical resources if it would reduce the integrity or significance of important resources on the Project Site or in the vicinity.

Impact Statement HIST-2: *Direct impacts of new construction on historic resources within the Project Site would be significant and unavoidable due to the demolition of the Bank. Indirect impacts would be less than significant as the Project would not reduce the integrity or significance of important historical resources in the Project vicinity.*

(1) Direct Impacts

As previously described under Threshold HIST-1, the Project would involve demolition of the Bank, which would constitute a significant unavoidable impact on historical resources.

As the Project would result in the on- or off-site preservation of the two artworks, impacts associated with these artworks would be less than significant.

(2) Indirect Impacts

Indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity and significance of historical resources within the Project vicinity.

The Project would not result in significant indirect impacts to known historical resources within the immediate vicinity of the Project Site. As discussed in the Assessment Report, the Project would have no impact on the five historical resources in the Project vicinity which have limited distant and direct views of the Project. As analyzed in the Assessment Report, the Project would conform to Standards 9 and 10 with regard to potential impacts of new construction in the environment of a historical resource. While the Project will introduce improvements that are larger in scale and massing than the existing conditions, the Project is designed to be set back from the street adjacent properties to protect spatial relationships that are important for experiencing the character and design of nearby historical resources. The Project would not destroy spatial relationships that characterize the settings and environment of identified historic resources within the immediate Project vicinity including Andalusia Apartments, Colonial House, Ronda Apartments, Chateau Marmont, The Granville, The Tuscany, The Savoy Plaza, or the Stahl House. The demolition of the Garden of Allah for the construction of Lytton Savings Home Branch in 1959, the Lytton Center in 1961-62, the 1972 office addition, and 1987 retail building substantially altered the historic setting in the Project vicinity. Likewise, the 1950s and 1960s automobile-oriented commercial development along the Sunset Strip, along with commercial high rise buildings, significantly altered the historic setting during the latter half of the 20th Century to the present. Therefore, construction of the Project would not materially impact the historic settings and environment of identified historic resources within the Project vicinity which has been eroded considerably. While the scale and location of the Project would change the existing setting, this change would be comparable to the existing scale and massing of improvements/developments on the southeast corner of Sunset and Crescent Heights Boulevards and further east on Sunset Boulevard.

In accordance with CEQA Thresholds, the Project would not materially impair the immediate surroundings and significance of historical resources in the Project vicinity to a degree that would be considered substantial. In relation to the Los Angeles CEQA Thresholds, the Project would not cause a substantial adverse change in the significance of historical resources in the Project vicinity. The Project would be differentiated from the surrounding built environment and would be generally compatible with the historic materials, features, and massing of the adjacent buildings to protect the integrity of the properties in the surrounding environment. While the size, scale and proportion of the Project is substantially larger than existing conditions on the Project site, the Project would be set back from the street and adjacent properties and there would be no significant visual change in the public experience of the historical resources and construction of the Project would not negatively impact the character of the historical resources or their surrounding setting. Therefore, under CEQA, the Project would have no adverse indirect impacts on historical resources.

The Project would have no impact on eight historical resources located within the Study Area with limited distant or direct views of the Project including:

- The Andalusia Apartments (1926), 1471-1475 Havenhurst Drive, located to the immediate south of the Project, would have direct views of the Project. When Andalusia Apartments was built in 1926, the surrounding setting was primarily period revival single and multi-family residential. However, after the Garden of Allah was demolished in 1959 for the redevelopment of the Project Site, the new construction substantially altered the historic setting of Andalusia Apartments; therefore, construction of the Project on the same site would not materially impact the historic setting of Andalusia Apartments. While the size, scale, and proportion of the Project is substantially larger than existing conditions on the Project site, the Project would be set back from the street and adjacent properties and there would be no significant visual change of the public experience of the Andalusia Apartments on Havenhurst Drive and construction of the Project would not negatively impact the character of the historical resource or its surrounding setting.
- Colonial House (1930), 1416 Havenhurst Drive, is located to the south of the Project site and has direct views of the Project Site. One property separates Colonial House from the Project Site to the north, a Modern two-story apartment located at 1426 Havenhurst Drive, built in 1961. The historic setting of the Colonial House was compromised with the redevelopment of the Project Site beginning in 1959. While the distinctive profile of Colonial house as seen looking north on Havenhurst Drive is currently viewed against the sky, after Project completion the distinctive profile of Colonial house would be viewed against the tower of the new construction. However, this change in character of view would not detract from the historical or architectural significance of Colonial House, and therefore, the Project would not materially impair significance of the Colonial House as a historical resource.
- Ronda Apartments (1927), 1400 Havenhurst Drive, is located to the south of the Project site and has indirect views of the Project Site. The view of the Project Site is blocked by the seven-story Colonial House located on the adjacent parcel to the north of the four-story Ronda Apartments. The historic setting of the Ronda Apartments was compromised with the redevelopment of the Project Site beginning in 1959. Therefore, the new construction on the Project Site would not materially impact the historic setting which has eroded considerably and the significance of the Granville would not be materially impaired.

- Chateau Marmont (1926), 8215-8221 West Sunset Boulevard; is located to the northwest of the Project Site and has direct views of the Project Site. Alla Nazimova's house, which subsequently became the the Garden of Allah, was situated to the southeast on the Project Site. The demolition of the Garden of Allah for the redevelopment of the property beginning in 1959 substantially altered the historic setting of Chateau Marmont. Likewise, the development of 1950s and 1960s automobile-oriented commercial development along the Sunset Strip and Mid-century Modern commercial high rise buildings to the southwest significantly altered the historic setting of Chateau Marmont, not to mention the subsequent commercial infill built during the latter half of the 20th Century to the present. Therefore, construction of the new construction on the Project Site would not materially impact the historic setting which has eroded considerably. The distinctive architecture of the Chateau Marmont is currently experienced looking west and east along Sunset Boulevard and looking north from the intersections at Havenhurst Drive and Crescent Heights Boulevard. After Project completion, the Chateau Marmont would remain a highly visible visual landmark in the Project vicinity and no important views of this historical landmark would be obscured by the Project. The development of the Project would not alter the surroundings of the Chateau Marmont in a manner that would materially impair its significance as a historical resource.
- The Granville (1930), 1424 N. Crescent Heights Boulevard, is located on the east side of Crescent Heights Boulevard to the southeast of the Project Site and has direct views of the Project Site. The historic setting of the Granville has been eroded with the demolition of the Garden of Allah in 1959 and the development of Sunset Boulevard in response to automobile culture during the 1950s and 1960s. Therefore, the new construction on the Project Site would not materially impact the historic setting which has eroded considerably and the significance of the Granville would not be materially impaired.
- The Tuscany (1929), 1400 North Crescent Heights Boulevard, is located on the east side of Crescent Heights Boulevard to the southeast of the Project Site and has indirect and distant views of the Project Site. The historic setting of the Tuscany has been eroded with the demolition of the Garden of Allah in 1959 and the development of Sunset Boulevard in response to automobile culture during the 1950s and 1960s. Therefore, the new construction on the Project Site would not materially impact the historic setting which has eroded considerably and the significance of the Tuscany would not be materially impaired.
- The Savoy Plaza (1929), 1360 North Crescent Heights Boulevard, is located on the east side of Crescent Heights Boulevard to the southeast of the Project Site and has indirect and distant views of the Project Site. The historic setting of the Savoy Plaza has been eroded with the demolition of the Garden of Allah in 1959 and the development of Sunset Boulevard in response to automobile culture during the 1950s and 1960s. Therefore, the new construction on the Project Site would not materially impact the historic setting which has eroded considerably and the significance of the Savoy Plaza would not be materially impaired.
- The Stahl House (1959), 1635 Woods Drive, is located to the northwest of the Project Site and has distant views of the Project Site. The Project Site is likely to be visible from the southern aspects of the Stahl House. Given the distance (approximately .25 mile) and steep topography between the historical resource and the Project Site, the extent to which views of the Project may be experienced is considered to be minor. Therefore, the Project would not materially impair the immediate surroundings and significance of the historical resource to a degree that would be considered substantial.

Additionally, the remaining twenty-one historical resources identified through the records search (included in the Assessment Report in Appendix C-3 of this Draft EIR) are located outside of the visual viewshed or Indirect Impacts Study Area. These historical resources do not have direct views of the Project Site and are not located within the visual viewshed. Furthermore, the majority of these historical resources were constructed during the 1920s and 1930s when the surrounding setting was primarily period revival single and multi-family residential and Sunset Boulevard was primarily one- and two-story commercial improvements. Alla Nazimova's house, the Spanish Colonial Revival style Garden of Alla, was constructed on the Project Site in 1918. The demolition of the Garden of Allah for the construction of Lytton Savings Home Branch in 1959, the Lytton Center in 1961-62, the office addition of 1972, and the retail building in 1987 previously compromised the historic setting of the Project Site. Likewise the development of 1950s and 1960s automobile-oriented commercial development along the Sunset Strip and Mid-century Modern commercial high rise buildings to the southwest further changed the character of the surrounding setting, not to mention the subsequent commercial infill built during the latter half of the 20th Century to the present. There is nothing left of the former Garden of Alla buildings and grounds left on the project site, and the integrity of the associated historic period setting surrounding the project site has been substantially altered. Therefore, the demolition of the mid-twentieth-century resources on the Project Site would not materially impact the historic setting of early twentieth-century resources identified through the records search because the setting of these resources has already been compromised, and because existing mid- and late-twentieth century development on the project site and in the vicinity does not contribute to the eligibility of these earlier resources. Therefore, in accordance with CEQA Thresholds, the Project would not materially impair the immediate surroundings and significance of any surrounding early twentieth-century historical resources to a degree that would be considered substantial.

Furthermore, there are three historical resources located just outside of the ¼-mile radius of the Project Site and are described on pages 92 and 93 of the Assessment Report (Appendix C-3 of this Draft EIR). Because these historical resources are located at a distance outside of the visual viewshed and do not have direct views of the Project Site, the Project would not materially impair the immediate surroundings and significance of these historical resources to a degree that would be considered substantial.

e. Cumulative Impacts

Chapter 3.0, General Description of Environmental Setting, of this Draft EIR provides a list of projects that are planned or under construction in the Project area. The cumulative impacts of the Related Projects would be focused on the Sunset Boulevard corridor. Of the 38 sites, five may have historic resources, none of which are identified as historical resources. The related projects are identified in **Table 4, Historical Resources Affected by Pending, Approved, and Recently Constructed Projects**, included in the Assessment Report. Of these five projects, there are two projects that will be affecting Modern buildings, 8490 Sunset Boulevard and 9040 Sunset Boulevard, neither of which have been identified as eligible or listed historical resources, therefore, the Project analyzed in conjunction with the Related Projects would result in no cumulatively considerable impacts on historical resources. Furthermore, other related projects are not within the community or neighborhood characterizing the Project Site and the cumulative impacts of these other related projects on historical resources would not be cumulatively considerable.

4. MITIGATION MEASURES

Direct impacts to historical resources under the Project are considered significant and unavoidable, therefore, mitigation measures are provided to reduce, but not eliminate, impacts to historical resources.

There are four mitigation measures described in the Assessment Report: Recordation, Demolition Monitoring and Salvage, Relocation of Bank, and Relocation of Artwork.

Mitigation Measure HIST-1: Recordation. Prior to demolition and rehabilitation, the project applicant shall prepare a Historic American Buildings Survey (HABS) Level II documentation for the Bank and remaining historic property setting, including the parking lot ramp to the former rooftop of the Lytton Center, the staircase and planter from the former Lytton Center on the west side of the Project Site, landscape along the primary Bank elevation, Bouquet Canyon stone wall extending from the primary Bank elevation to the corner of Sunset Boulevard and Havenhurst Drive, and patio in front of the west Bank elevation. The HABS document shall be prepared by a qualified architectural historian, historic architect, or historic preservation professional who satisfies the *Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture*, pursuant to 36 CFR 61. This document shall record the history of the property and architecture, as well as important events or other significant contributions to the patterns and trends of history with which the property is associated, as appropriate. The property's physical condition, both historic and current, shall be documented through site plans; historic maps and photographs; original as-built drawings; large format photographs; and written data. The building exteriors, representative interior spaces, character-defining features, as well as the property setting and contextual views shall be documented. Field photographs and notes shall also be included. All documentation components shall be completed in accordance with the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation* (HABS standards). The HABS documentation shall be submitted to the National Park Service for transmittal to the Library of Congress, and archival copies shall be sent to the City of Los Angeles Office of Historic Resources and Los Angeles Public Library.

Mitigation Measure HIST-2: Relocation of Two Art Works. Pursuant to CEQA and the California Art Preservation Act, the two existing integrated artworks on the Project Site including Roger Darricarrere's *Screen* and David Green's *The Family* are of recognized quality and shall be relocated and incorporated into the Project design or preserved at an off-site location. The families of the artists shall be notified of the extant artworks and every attempt shall be made to relocate the artworks to an appropriate setting. A relocation plan would be prepared by a qualified professional conservator and implemented in accordance with nationally recognized conservation guidelines including the Code of Ethics and the Guidelines for Practice of the American Institute for Conservation of Historic and Artistic Works.

Mitigation Measure HIST-3: Relocation of Bank. Since retention of the Bank is not feasible for implementation and development of the Project, a feasibility study, subject to City review and approval, shall be prepared weighing the costs, advantages, and disadvantages of relocation. If the study concludes it is feasible to relocate the Bank, the structure's availability shall be advertised in historic preservation websites for a period of not less than thirty (30) days by the Applicant. Any such relocation efforts shall be undertaken in accordance with a Relocation and Rehabilitation Plan prepared by the party taking possession of the structure to be moved. The Relocation and Rehabilitation Plan shall be developed in conjunction with a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualifications Standards for History, Architectural History, or Architecture,

pursuant to 36 CFR 61. The Plan shall include relocation methodology recommended by the National Park Service, which are outlined in the booklet entitled "Moving Historic Buildings," by John Obed Curtis (1979). Upon relocation of the structure to the new site, any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work performed in conjunction with the relocation of the building shall be undertaken 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 Properties*. The Relocation and Rehabilitation Plan shall be reviewed and approved by the City of Los Angeles Office of Historic Resources prior to its implementation. In addition, a plaque describing the date of the move and the original location shall be placed in a visible location on of the Bank. Relocation shall not take place until the Bank is first recorded pursuant to Mitigation Measure HIST-1: Recordation.

If after three (3) months it is evident that no party is interested in purchasing the Bank per the mitigation measure stipulated above, then Mitigation Measures HIST-1 and HIST-2 would be required to document and salvage the important history and architecture of the Bank.

Mitigation Measure HIST-4: Demolition Monitoring and Salvage. The project applicant shall retain a qualified architectural historian to conduct construction monitoring during demolition. Any important historic fabric associated with the period of significance from 1959-1969, shall be fully recorded in photographic images and written manuscript notes. Prior to the commencement of demolition, significant material such as the concrete-folded plate roof shall be inventoried and evaluated for potential salvage, analysis, and interpretation. A qualified architectural historian or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for Architectural History, pursuant to 36 CFR 61, shall prepare the necessary written and illustrated documentation in a construction monitoring and salvage report. This document shall record the history of the Bank's reinforced concrete construction methods during the period of significance as well as document its present physical condition through site plans; historic maps and photographs; sketch maps; digital photography; and written data and text. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and for Archaeological Documentation for above ground structures. The completed documentation shall be placed on file at the South Central Coastal Information Center, California State University, Fullerton, CA; and the City of Los Angeles Public Library. Findings shall be incorporated into the HABS report (see Mitigation Measure HIST-1 above).

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project as proposed would demolish the Bank, which has conservatively been determined eligible as a Los Angeles Historic-Cultural Monument. While Mitigation Measure HIST-1, Recordation; HIST-2, Relocation of Two Artworks; and HIST-4, Demolition Monitoring and Salvage, would reduce impacts, even with implementation of these mitigation measures the impact would remain significant and unavoidable. Mitigation Measure HIST-3, Relocation of Bank, involves a study to investigate the feasibility of relocation, and in the event relocation is determined feasible, and an interested party is found to relocate the Bank, it provides that it be carried out pursuant to a Rehabilitation and Relocation Plan. In the event relocation

occurs, it would remove the Bank from its original location and context, and would have the potential to substantially impair the building through the relocation process. Nonetheless, if the Bank were to be relocated to a compatible location and rehabilitated in conformance with the Standards, impacts on historical resources would be reduced to a less than significant level. However, because relocation may be infeasible, and an interested party may not be found to relocate the Bank, it is conservatively concluded that impacts due to demolition of the Bank would remain significant and unavoidable after implementation of mitigation measures.

The Project is designed to be set back from the street adjacent properties to protect spatial relationships that are important for experiencing the character and design of nearby historical resources. The Project would not destroy spatial relationships that characterize the settings and environment of identified historic resources within the immediate Project vicinity, and construction of the Project would not materially impact the historic settings and environment of any identified historic resources within the vicinity. The Project analyzed in conjunction with the approximately 38 Related Projects in the study area including eight in proximity along or near Sunset Boulevard would result in no cumulatively considerable impacts on historical resources. Furthermore, other related projects are not within the community or neighborhood characterizing the Project Site and the cumulative impacts of these other related projects on historical resources would not be cumulatively considerable. Nonetheless, the mitigation measures provided above would reduce the Project's less than significant contribution to cumulative impacts on historic resources.

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