

Appendix C

Historic Report

**Headley/Handley House
3003 Runyon Canyon
Los Angeles, California**

Historical Resource Report



Prepared by:



October 2016



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Attachment A: Conceptual Renderings

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EXECUTIVE SUMMARY

3003 Runyon Canyon Road is an irregular, 4.74-acre lot comprising a hill of multiple elevations. The lot contains one single-family residence known as the Headley/Handley House. The Headley/Handley House was designated a Los Angeles Historic-Cultural Monument (HCM) #563 on July 14, 1992; therefore, the Headley/Handley House is a "historical resource" pursuant to the California Environmental Quality Act (CEQA) and subject to the provisions of the City of Los Angeles Historic Preservation Ordinance.

The property owner proposes to construct a new 11,284 square foot residence on the western side of the lot. The Headley/Handley House is located on the opposing or eastern facing side of the lot. The project does not propose any physical modifications to the Headley/Handley House; however, the owner of the project site is applying to have the existing historic residence reclassified as a "guest house" as part of the project.

Since the proposed project would be constructed on a site that contains a historical resource, the project has the potential to impact the historical resource if the new residence is not designed in a manner that is compatible with the historic character of the existing residence. Projects that may affect historical resources are considered mitigated to a level of less than significant if they comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the *Secretary's Standards for Rehabilitation*. The *Secretary's Standards* were issued by the National Park Service, but are also used by state and local jurisdictions throughout the country, including the City of Los Angeles, to determine the appropriateness of alterations to historical resources, especially those that are designated HCMs. GPA Consulting (GPA) was retained to assist the applicant in conforming to the *Secretary's Standards*, and therefore complying with CEQA.

The proposed project, as designed, minimizes any potential impacts on the Headley/Handley House. Therefore, the project as designed would not cause a substantial adverse change in the significance of the historic property and would therefore not require any measures to minimize or mitigate any significant impacts on the historical resource.

1. INTRODUCTION

1.1 Purpose and Qualifications

The purpose of this report is to determine and set forth whether or not the construction of a new primary residence (proposed project) at 3003 Runyon Canyon Road would impact historical resources. The proposed project involves the construction of a new 11,284 square foot residence on the west-facing bluff (below the bluff line) of a 4.74-acre lot (the project site) that contains one single-family residence known as the Headley/Handley House (existing historic residence), as well as a free-standing carport and a swimming pool. The project site is located within Runyon Canyon on the eastern side of Inspiration Point within an undeveloped area of the Hollywood Community Plan Area (see Figures 1 and 2 below).

The Headley/Handley House, the existing historic residence on the project site, was designed by architect Lloyd Wright and initially constructed in 1945. The existing historic residence was designated a Los Angeles Historic-Cultural Monument (HCM) #563 on July 14, 1992; therefore, the project site includes a "historical resource" pursuant to the California Environmental Quality Act (CEQA) and subject to the provisions of the City of Los Angeles Historic Preservation Ordinance.

The project site owner and proposed project design team worked with GPA Consulting to develop the design of the proposed project so that the scale, design, location, and materials of the proposed new residence would not impact the setting or historical significance of the existing Headley/Handley House. Projects that may affect historical resources are considered mitigated to a level of less than significant if they conform to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards). Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the *Secretary's Standards*.

The design collaboration work was conducted by Andrea Galvin. Ms. Galvin and Allison M. Lyons were responsible for the preparation of this report. They both fulfill the qualifications for historic preservation professionals outlined in Title 36 of the Code of Federal Regulations, Part 61. Their résumés are attached in Attachment B.

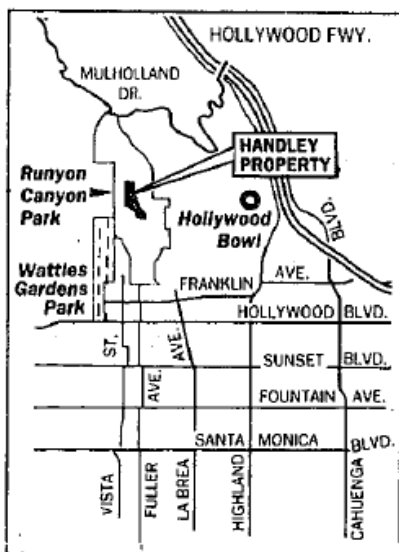


Figure 1: Project location, noted as Handley Property (source: Los Angeles Times)

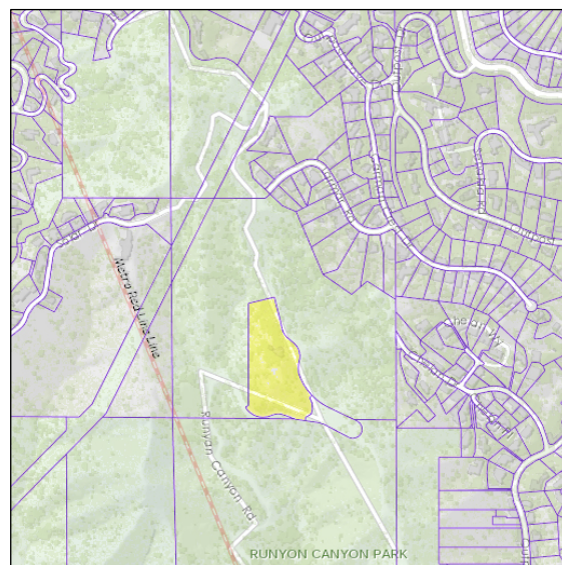


Figure 2: Project location, parcel shaded in yellow (base map: LA County GIS Viewer)

1.2 Methodology

In preparing this report, the following tasks were performed:

1. Conducted a field inspection of the project site and surrounding area to determine the scope of the study. The study area was identified as the parcel containing the existing historic residence, ancillary buildings and structures, as well as the site of the proposed project. During the field inspection, GPA photographed the project site from all angles, including views to and from the Headley/Handley House.
2. Obtained and reviewed the building permits and records on file at the City of Los Angeles Department of City Planning.
3. Conducted archival research on the history of the building. Sources consulted included historic aerial photographs, books, and newspapers.
4. Reviewed and analyzed the conceptual renderings and related documents for compliance with the *Secretary's Standards* (see Attachment A for conceptual renderings). The *Secretary's Standards* are accompanied by Guidelines for four types of treatments for historic buildings: preservation, rehabilitation, restoration, and reconstruction. Rehabilitation was selected as the appropriate treatment for the project.
5. Communicated with the proposed project design team on several occasions to share information and discuss the application of the *Secretary's Standards* to the proposed project. GPA worked with the project designer to ensure that the proposed project was sited and designed in such a manner as not to impact the setting of the Headley/Handley House. GPA and the project designer also collaborated to ensure that the design and materials utilized on the proposed project would be distinguishable but compatible with the historic character of the Headley-Handley house and its immediate surroundings (See Section 4. Project Impacts).

2. REGULATORY FRAMEWORK

Generally, a lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register of Historical Resources (California Register). The California Register is modeled after the National Register of Historic Places (National Register). Furthermore, a property is presumed to be historically significant if it is listed in a local register of historic resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the project site is not historically or culturally significant.¹ As a property listed on the local register of historic resources, the project site is a historical resource pursuant to CEQA.² The National Register, California Register, and local designation programs are discussed below.

¹ Public Resources Code Section 5024.1 and 14 CCR Sections 4850 & 15064.5(a)(2).

² The Headley/Handley House was designated a Los Angeles Historic-Cultural Monument (HCM) #563 on July 14, 1992.

2.1 National Register of Historic Places

The National Register is "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."³

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the project site is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria: ⁴

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody 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; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

Physical Integrity

According to *National Register Bulletin #15*, "to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity." Integrity is defined in *National Register Bulletin #15* as "the ability of a property to convey its significance."⁵ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials.

Context

To be eligible for listing in the National Register, a property must also be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear."⁶ A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

³ Title 36 Code of Federal Regulations Part 60.2.

⁴ Title 36 Code of Federal Regulations Part 60.4.

⁵ *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, (Washington D.C.: National Park Service, 2002), 44-45.

⁶ *National Register Bulletin #15*, 7.

2.2 California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.⁷

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

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.⁸

For properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Historical resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.⁹

⁷ Public Resources Code Section 5024.1 (a).

⁸ Public Resources Code Section 5024.1 (d).

⁹ Public Resources Code Section 4852.

The California Register may also include properties identified during historical resource surveys. However, the survey must meet all of the following criteria:¹⁰

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [SOHP] procedures and requirements;
3. The resource is evaluated and determined by the office [SOHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

2.3 City of Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et. seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments. The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The four criteria for Monument designation are stated below:

- The proposed Monument reflects the broad cultural, economic, or social history of the nation, state or community; or
- The proposed Monument is identified with historic personages or with important events in the main currents of national, state or local history; or
- The proposed Monument embodies the characteristics of an architectural type specimen inherently valuable for a study of a period, style or method of construction;
- The proposed Monument is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.¹¹

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as Monuments.

¹⁰ Public Resources Code Section 5024.1.

¹¹ Los Angeles Administrative Code Section 22.171.7.

3. ENVIRONMENTAL SETTING

3.1 Description of Project Site

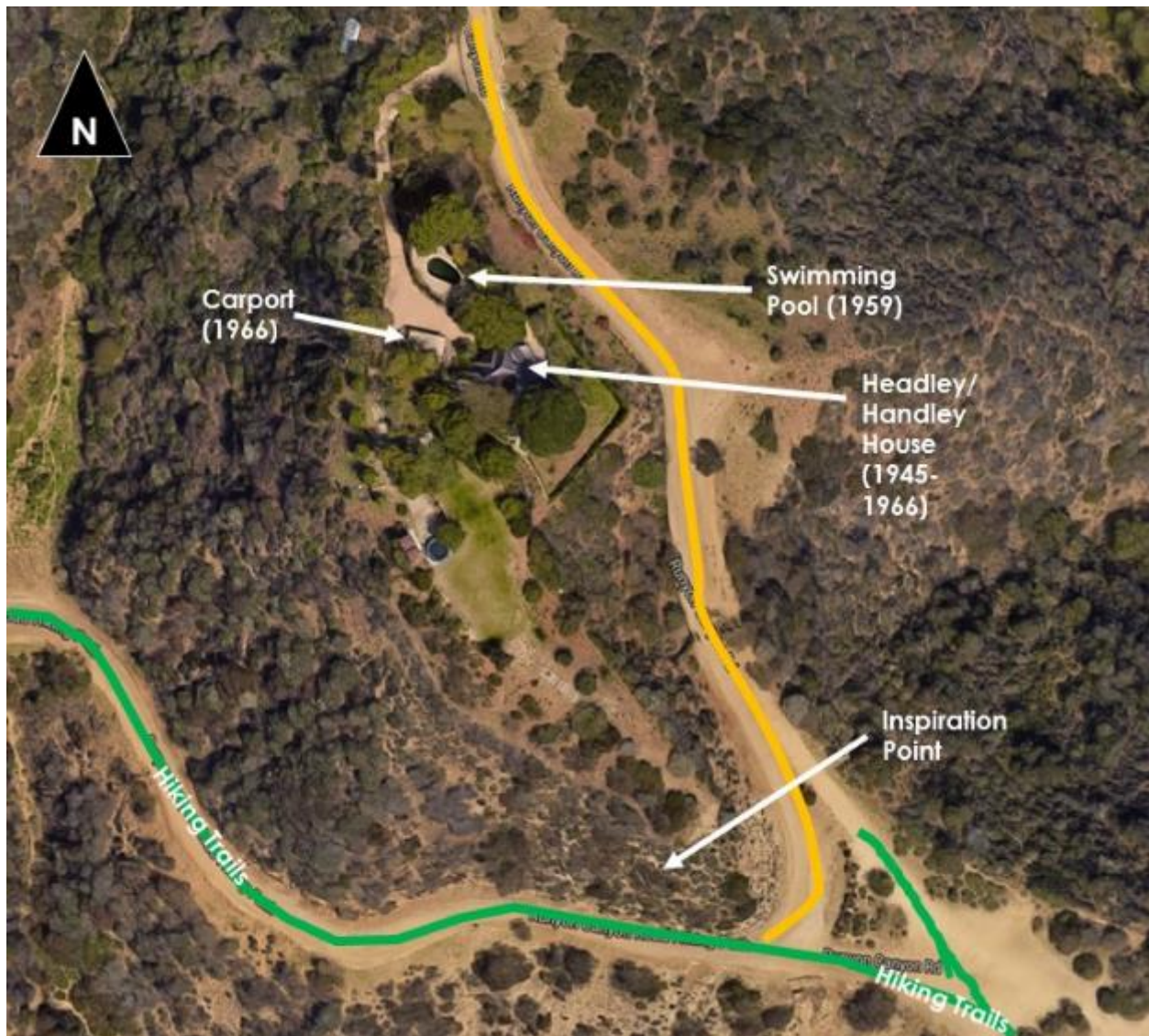


Figure 3: project site (base map: Google, 2016)

The project site is a parcel located at 3003 Runyon Canyon Road (Assessor's Parcel Number: 5572-024-006). This parcel is surrounded by Runyon Canyon Park, a northern face of the Santa Monica Mountains located north of the Hollywood area of Los Angeles. Runyon Canyon Park is a natural park with hiking trails winding through hillside elevations. The project site is a privately held, irregularly shaped 4.74-acre lot encompassing a hill. The southeastern face of the hill projects over the intersection of Runyon Canyon Road and two hiking paths, Runyon Canyon Road Hiking Path and Inspiration Point Hiking Trail (See Figure 3). This southeastern projection is known as Inspiration Point. Vehicular access to the project site is obtained only through a private driveway from Runyon Canyon Road, to the northeast of the project site. Surrounding hiking trails and Runyon Canyon Park are open to the public.

The parcel is characterized by relatively steep and irregular hillside topography. Various native and non-native shrubs and trees grow on the parcel. A narrow asphalt driveway leads upward along the northwesterly slope of the project site hill from a gated entry to the property along Runyon Canyon Road. The driveway continues upslope toward a graded pad area at the highest point of the hill. All built features are constructed at varying elevations in response to the uneven grading of the hillside. A swimming pool is located roughly at the north of the parcel. The Headley/Handley House is located in the center-east of the parcel, at an elevation approximately 18 feet lower than the graded pad at the top of the parcel. The house is nestled into the hillside and sited so that it is not visible from most of the hiking trails (See Figure 9). A carport is located to the west of the house. A flat, graded lawn covers the southern portion of the hill, extending to the edge of Inspiration Point. A staircase of wooden logs leads from the southeastern edge of the lawn to the intersection of Runyon Canyon Road and two hiking paths, Runyon Canyon Road Hiking Path and Inspiration Point Hiking Trail.

The Headley/Handley House is a two-story building set into the hillside and constructed of concrete with fieldstone and horizontal wood lap cladding and a steeply pitched pyramidal hipped shingle roof. The house has an irregular plan of rectangular masses radiating outwards from a central fireplace. There are multiple entrances of fully glazed paired and single casement and sliding doors. Fenestration is irregular, comprising fixed and sliding aluminum and vinyl frame windows. The roof, of shake shingles over wood framing, nearly reaches to the ground on the western elevation of the building. Second story projections feature clipped gables over hipped roofs. The style is best described as organic. (See Figures 4-8)

The Headley/Handley House was initially constructed in 1945 to designs by architect Lloyd Wright. The house was originally a storage, garage, and stable structure. It was first altered in 1949, when it was converted into habitable space and a bay window was added by owner George W. Headley. No architect was listed on the permit for the 1949 alterations. Owner Alan Handley added the swimming pool in 1959. In 1966, Handley hired original architect Lloyd Wright to design several additions to the house. The alterations included an addition extending the main living room and a new bedroom wing with fieldstone siding. A terrace was constructed south of the house, connected to the house by a stone stairway. Wright also designed the carport, a trellis-like structure, and a retaining wall in 1966. Alterations since 1966 include changes to the fenestration and the replacement of original wood shake roof with a fireproof material.¹²



Figure 4: Headley/Handley House, northwest elevation (GPA, Dec. 2014)



Figure 5: Headley/Handley House, southeast elevation (GPA, Dec. 2014)

¹² City of Los Angeles Department of Building and Safety, various dates.



Figure 6: Headley/Handley House, northwest elevation (GPA, Dec. 2014)



Figure 7: Headley/Handley House, southeast elevation (GPA, Dec. 2014)



Figure 8: Headley/Handley House, driveway and carport, view facing south (GPA, Dec. 2014)



Figure 9: Headley/Handley House from Runyon Canyon Road, view facing northwest (GPA, Dec. 2014)

3.2 History of Project Site

The project site is located in the middle of Runyon Canyon Park, formerly a large estate comprising 160 acres of the Hollywood Hills. The estate passed through numerous owners before A&P supermarket heir George Huntington Hartford II purchased the property in 1942. Hartford lived in a mansion at the base of the canyon. In 1945, he deeded a ridgeline parcel to his friend and adviser George W. Headley, the first owner of the Headley/Handley House.

Hartford aspired to develop his estate into a hillside resort.¹³ In 1947, Hartford commissioned renowned architect Frank Lloyd Wright and his son Lloyd Wright, who had offices in Hollywood just south of Runyon Canyon, to develop the estate into the Huntington Hartford Play Resort and Cottage Hotel. Over the next year, multiple projects were planned for the estate lands, including a group of cottages, a mansion for Hartford, a sports club and play resort center (Figure 10), and stables. A second scheme for a hotel property of cottages was developed in January 1948. None of the five projects was realized. In August 1947, nearly 600 residents held a meeting to

¹³ Tina Barseghian, "Hillside Home Riles Residents," *Los Angeles Independent*, March 22, 1995.

oppose the development of a hotel on the property.¹⁴ After abandoning plans for a hotel, Hartford commissioned Lloyd Wright to design and build a pool and pavilion overlooking Hollywood on the estate in 1954 (no longer extant). He attempted to give all of his Runyon Canyon property to the City of Los Angeles for use as park in 1964, but the City rejected his offer and he sold the property.¹⁵ The City purchased the property later, in 1984, from subsequent owners and the estate became Runyon Canyon Park.



Figure 10: One of several unbuilt conceptual designs by Frank Lloyd Wright for the Huntington Hartford Play Resort and Cottage Hotel (<http://hollywoodwalker.blogspot.com>).

Hartford's advisor and friend George W. Headley had less ambitious plans for his parcel in the center of the estate. He commissioned Lloyd Wright to design a house in 1945. A multiuse storage, garage, and stable structure was constructed in 1945, but Headley ran out of funds before construction could begin on the main residence. In 1949, Headley converted the existing structure into living quarters.

Television and theater producer and director Alan Handley purchased the property and Headley's modest residence in 1951.¹⁶ Handley made several changes to the existing residence and grounds, hiring Lloyd Wright to design additional living space and a carport in 1966. The

¹⁴ Gregory Paul Williams, *The Story of Hollywood: An Illustrated History* (Place of Publication Not Identified: BL Press LLC, 2005), 284.

¹⁵ "Wright Studies: Huntington Hartford Cottage Group Center, Scheme #2, Hollywood, CA (1948 Project)," *The Wright Library* (2015, Accessed September 26, 2016), <<http://www.steinerag.com/flw/Artifact%20Pages/PhRtHartford.htm>>

¹⁶ John D. Markman, "Panel Unexpectedly Rejects Hilltop Home," *Los Angeles Times*, April 21, 1995.

Headley/Handley House was the only private property within the Runyon Canyon Park after the City of Los Angeles purchased the Hartford's Runyon Canyon estate (133 acres) in 1984.¹⁷ Handley lived on the property with his sons until his death in 1990.¹⁸ The City of Los Angeles declined to purchase the property to incorporate it into the surrounding park, and the parcel remains privately owned today.

Of the many commissions the Wrights designed for Runyon Canyon, the Headley/Handley House was one of only two actually constructed and the only one still extant. The Pool Pavilion designed by Lloyd Wright for Hartford was constructed in 1954 and burned in 1972.

3.3 Significance of the Headley/Handley House

The Headley/Handley House is designated a City of Los Angeles Historic-Cultural Monument (HCM) for its architectural significance as an excellent example of organic architecture. Designed by Lloyd Wright, the Headley/Handley House embodies the distinctive characteristics of organic architecture with walls growing from the site's natural buff-colored stone and a "roofline echoing the shape of the surrounding hills."¹⁹ Lloyd Wright designed two phases of the Headley/Handley House: the original storage, garage, and stable structure for George Headley in 1945 and additions to convert the building into a three-bedroom house for Alan Handley in 1966.

Architect Frank Lloyd Wright, Jr., known as Lloyd Wright, was the son of preeminent master architect Frank Lloyd Wright. Lloyd Wright was born in 1890 and grew up in Illinois and Wisconsin. He began his career with a focus on landscape design and architecture. He came to California in 1911 with the landscape design firm Olmsted and Olmsted to work on the 1915 Pan-Pacific Exposition. Lloyd Wright remained in Southern California for the rest of his life. His architectural designs are distinguished by bold, soaring forms; unusual colors and materials; careful siting; and, demonstrating the influence of his early professional work, integration between the building and the landscape. His well-known works include the Wayfarer's Chapel (Rancho Palos Verdes, 1951) and the first two shells of the Hollywood Bowl (1927, 1928). Lloyd Wright died in 1978.²⁰

At the time of its designation as an HCM, the Headley/Handley House as it had evolved over time was determined to be an excellent example of the organic style. The organic style of architecture is a modern style that evolved in the second half of the twentieth century. The style is a rejection of the orthogonal composition and rigidity of industrial materials common in Mid-Century Modern designs. The organic style is "based on the coalescence of the built environment with nature, allowing the design to respond to the natural environment rather than impose on it."²¹ This response takes the form of natural shapes and non-rectilinear geometries, allowing the natural environment and manmade materials to create one unit rather than contrast.²²

¹⁷ Dean Murphy, "Canyon Land Too Steep for City," *Los Angeles Times*, July 26, 1990.

¹⁸ "Alan Handley, Television Director, 77," *New York Times*, January 11, 1990.

¹⁹ "Letter," *Historic-Cultural Monument File: Headley/Handley House* (City of Los Angeles, Department of City Planning, Office of Historic Resources).

²⁰ "Lloyd Wright," *Los Angeles Conservancy* (Accessed September 26, 2016), <<https://www.laconservancy.org/architects/lloyd-wright>>

²¹ Virginia Savage McAlester, *A Field Guide to American Houses* (New York: Alfred A. Knopf, 2013), 656.

²² McAlester, 655.

The Headley/Handley House embodies the distinctive characteristics of the organic style through:

- Fieldstone cladding and paving with coloring that blends into surrounding canyon landscape
- Siting on multiple levels so that the building is “nestled” into the hillside rather than imposed on top of the hill
- Minimal visibility of the building
- An asymmetrical roof form with steep slope that responds to the elevation changes of the natural landscape
- Natural finishes, such as wood lap siding and a shingle roof

4. PROJECT IMPACTS

4.1 Determining the Significance of Impacts on Historical Resources

The State CEQA Guidelines set the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5(b), which states:

A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Title 14 California Code of Regulations Section 15064.5(b)(1) further clarifies “substantial adverse change” as follows:

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.

Title 14 California Code of Regulations Section 15064.5(b)(1) in turn explains that a historical resource is “materially impaired” when a project:

Demolishes or materially alters in an adverse manner those physical characteristics that convey its significance and that justify its inclusion in or eligibility for inclusion in the California Register, local register, or its identification in a historic resources survey.

The following factors are set forth in the City of Los Angeles' “L.A. CEQA Thresholds Guide,” which states that a project would normally have a significant impact on a historical resource if it would result in a substantial adverse change in the significance of the historical resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) 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; or

- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

As such, the test for determining whether or not a proposed project will have a significant impact on an identified historical resource is whether or not the project will alter, in an adverse manner, the physical integrity of the historical resource such that it would no longer be eligible for listing in the National or California Registers or other landmark programs such as the list of Los Angeles Historic-Cultural Monuments. Integrity is the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the project site's period of significance. Historic integrity is the composite of seven qualities: location, design, setting, materials, workmanship, feeling, and association.²³ To determine the effect of a proposed project on the integrity of historical resources, the analysis reviews the proposed project for consistency with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards).

4.2 Secretary of the Interior's Standards

Projects that may affect historical resources are considered to be mitigated to a level of less than significant if they are consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards).²⁴ Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the *Secretary's Standards*.²⁵ The *Secretary's Standards* were issued by the National Park Service. The *Secretary's Standards* are accompanied by Guidelines for four types of treatments for historical resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most common treatment is rehabilitation and is the treatment that applies to the proposed Project. The definition of rehabilitation assumes that at least some repair or alteration of the historic building will be needed in order to provide for an efficient contemporary use; however, these repairs and alterations must not damage or destroy materials, features, or finishes that are important in defining the building's historic character.

The *Secretary's Standards* for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

²³ *National Register Bulletin* #15, 4.

²⁴ 14 CCR Section 15126.4(b).

²⁵ 14 CCR Section 155331.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the project site. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the project site and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

It is important to note that the *Secretary's Standards* are not intended to be prescriptive, but instead provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, nor is it necessary to comply with every Standard to achieve compliance.

4.3 Project Description

The proposed project includes construction of a new 11,284 square foot residence (new primary residence) on the western side of the hill comprising the parcel. The existing historical residence is located on the opposing or eastern facing side of the hill. The proposed project does not propose any physical modifications or demolition to the existing historic residence; however, the owner of the project site is applying to have the existing historic residence reclassified as a "guest house" as part of the proposed project. The new primary residence would become the primary building on site.

Please see Attachment A for conceptual renderings of the proposed project.

4.4 Analysis of Project Impacts

Following is an assessment of how the project conforms to the *Secretary's Standards*:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

The Headley/Handley House will continue to be used as a residence; although its classification will change from a primary residence to the guesthouse, its use as a residence will not change.



This change in classification will not change the historical resource's site or environment. The proposed project complies with Standard 1.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

The proposed project would not physically impact the Headley/Handley House. The proposed project will not remove or alter the existing historic materials, spaces, or features. The proposed project complies with Standard 2.

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

There are no changes proposed to the existing historic residence on the project site; therefore, the Headley/Handley House will continue to portray its historic significance and historical development. There will be no conjectural features added to the existing historic residence. The proposed project includes the addition of a new residence on the project site; however, the new residence will be sited on the opposite side of the bluff from the Headley/Handley House and will not be visible from the existing historic residence. Therefore, there will be no changes to the setting of the Headley/Handley House. The new residence is designed in a style that is clearly distinguishable from Lloyd Wright's design for the Headley/Handley House. The design of the new residence will not create a false sense of historical development on the project site. The proposed project complies with Standard 3.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

The proposed project does not include any physical changes to the existing historic residence; therefore, Standard 4 is not applicable to the proposed project.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

No physical changes are proposed for the existing historic residence. All of the existing features, finishes, and examples of craftsmanship in the Headley/Handley House will be preserved. Further, the proposed materials on the new residence have been selected to be consistent with the historic stone materials and natural landscape features of the Headley/Handley House to complement the materials and craftsmanship of the existing historic residence. The proposed project complies with Standard 5.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

The proposed project does not include any physical changes to the existing historic residence; therefore, Standard 6 is not applicable to the proposed project.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

The proposed project does not include any physical changes to the existing historic residence; therefore, Standard 7 is not applicable to the proposed project.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

There are no known archaeological resources on the project site; however, should any artifacts be identified during the construction of the proposed project, the project site owner will notify a qualified archaeologist to recover and document such artifacts. Standard 8 is not applicable to the proposed project at this time.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the project site. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the project site and its environment.

The proposed project includes the construction of a new 11,284 square foot residence (proposed new residence) on the western face of Inspiration Point, a bluff on a 4.74-acre property. The location of the proposed project is on the opposite side of the bluff from the existing historic residence on the project site. This location was chosen to preserve the historic setting of the existing historic residence.

The setting of the proposed new residence minimizes the impact of the larger scale of the proposed new residence on the historic setting of the existing historic residence. Although the scale of the proposed new residence is larger than the existing historic residence, the majority of the proposed new residence is sited physically within the bluff (buried) so that the only face of the proposed new residence that will be visible is the western elevation. The proposed new residence was designed below the bluff line so the new construction will not be visible from the existing historic residence. Additionally, only the western elevation of the proposed new residence will be visible from the public right of way.

The proposed new residence has been designed with many elements of the organic style, the style of the existing historic residence. The proposed new residence has been designed with a landscaped roof. Walkways and landscaping surrounding the proposed project are designed to blend into the natural landscape of the bluff, maintaining the tradition of the organic style at the project site and minimizing visibility of the proposed new residence. The proposed new residence has been designed in a modern design with curvilinear rooflines to blend with the natural topography, which is distinct from the steeply pitched roof of the historic residence. The proposed new residence has been designed with compatible colors and materials that are similar to the natural stone of the existing historic residence.

The proposed project is both distinguishable and compatible with the existing historic residence. The proposed project complies with Standard 9.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.



The proposed project is not physically connected to the existing historic residence and will have no impact on the integrity of setting for the existing historic residence. The removal of the proposed project would have no impact on the historic setting of the Headley/Handley House. The proposed project complies with Standard 10.

5. CONCLUSION

The proposed project does not propose to demolish, relocate, or physically alter the Headley/Handley House; therefore, the proposed project will not have a direct impact on any historical resources.

However, since the proposed project proposes to add a 11,284 square foot residence (proposed new residence) on the same parcel as the Headley/Handley House, a parcel that historically has been sparsely developed and maintained with open views, the proposed project has the potential to impact the integrity of the historical resource's setting. To minimize impacts, the proposed project is designed in a manner that minimizes visual effects on the project site and is consistent with the *Secretary of the Interior's Standards for Rehabilitation*.

The proposed project has been designed in a manner sensitive to the existing historic residence. The proposed siting, location, materials, and colors of the new residence are compatible with the existing historic residence. The proposed project will not diminish the integrity of the existing setting of the Headley/Handley House. The proposed project, as designed, already minimizes any potential impacts on the historic property. Therefore, the proposed project would not cause a substantial adverse change in the significance of the historic property and would therefore not require any measures to minimize or mitigate any significant impacts on the historical resource.

6. SOURCES

California Code of Regulations, California Office of Administrative Law, State of California Government.

City of Los Angeles Department of Building and Safety Permit Records, various dates.

Code of Federal Regulations, Title 36: Parks, Forests, and Public Property. Office of the Federal Register, National Archives and Records Administration, United States Government.

Los Angeles Times, various dates.

McAlester, Virginia Savage. *A Field Guide to American Houses*. New York: Alfred A. Knopf, 2013.

National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation. Washington D.C.: National Park Service, 2002,

National Register Bulletin #16: How to Complete the National Register Registration Form. Washington D.C.: National Park Service, 1997.

National Register Preservation Brief #17: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character. Washington, D.C.: National Park Service, 1988.

New York Times, various dates.

Williams, Gregory Paul. *The Story of Hollywood: An Illustrated History*. Place of Publication Not Identified: BL Press LLC, 2005.

Attachment A – Conceptual Renderings



Rendering 1: Site Plan of proposed new residence (bottom); the existing Headley/Handley House is located at top left (grey area).
(Source: Amean Ayoub Design Studio)



Rendering 2: View of the existing Headley/Handley House at left from the driveway, looking south. The proposed new residence would be on the right (west side of bluff) and sunken into the hillside as shown.
(Source: Amean Ayoub Design Studio)



Rendering 3: View of North Elevation, Headley/Handley House at top left and proposed new house on right from opposing bluff.
(Source: Amean Ayoub Design Studio)

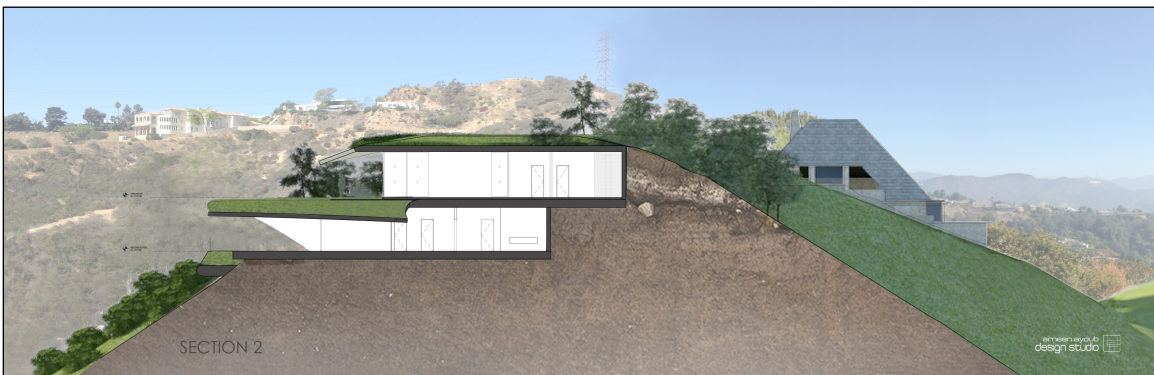


Rendering 4: View of East Elevation, Headley/Handley House top center. The proposed new residence would not be visible from the east, as it is sunken into the bluff on the west side (behind) the existing residence.
(Source: Amean Ayoub Design Studio)



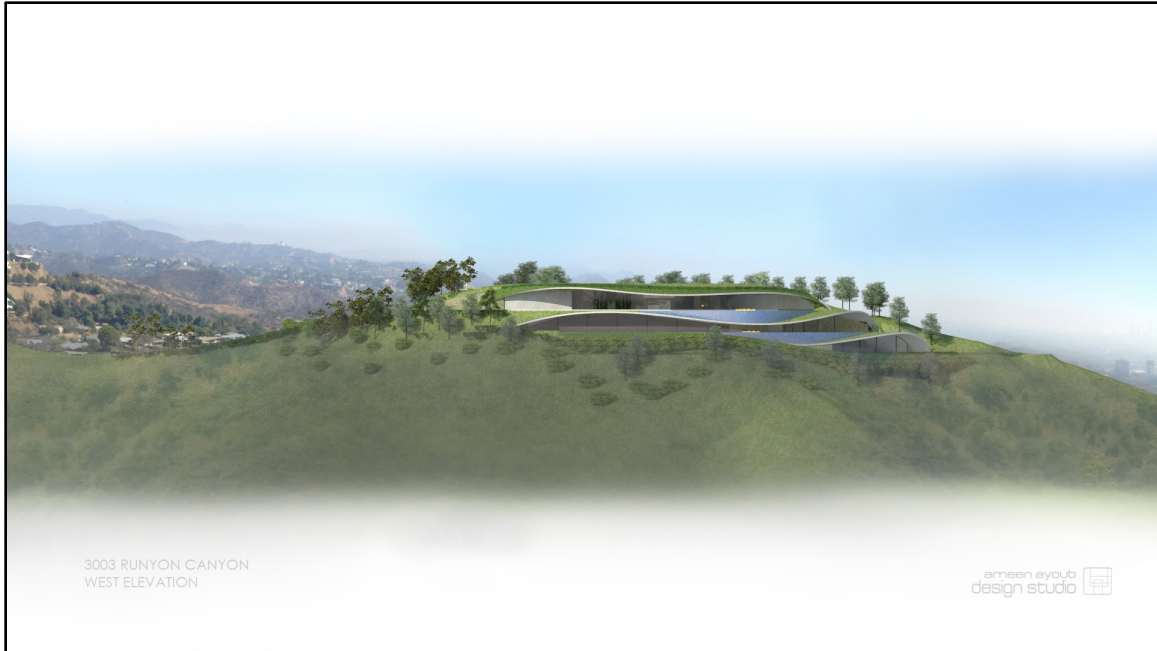
Rendering 5: View of South Elevation of the proposed new residence; existing Headley/Handley House is on the right (east side of bluff). (Note: this is an elevated view- a hiker or pedestrian would not see the two residences side by side like this, but would see just the hillside from below).

(Source: Amean Ayoub Design Studio)



Rendering 6: Section view of the proposed new residence (left) and the existing Headley/Handley House at right, showing how the new residence will be sunken into the hillside.

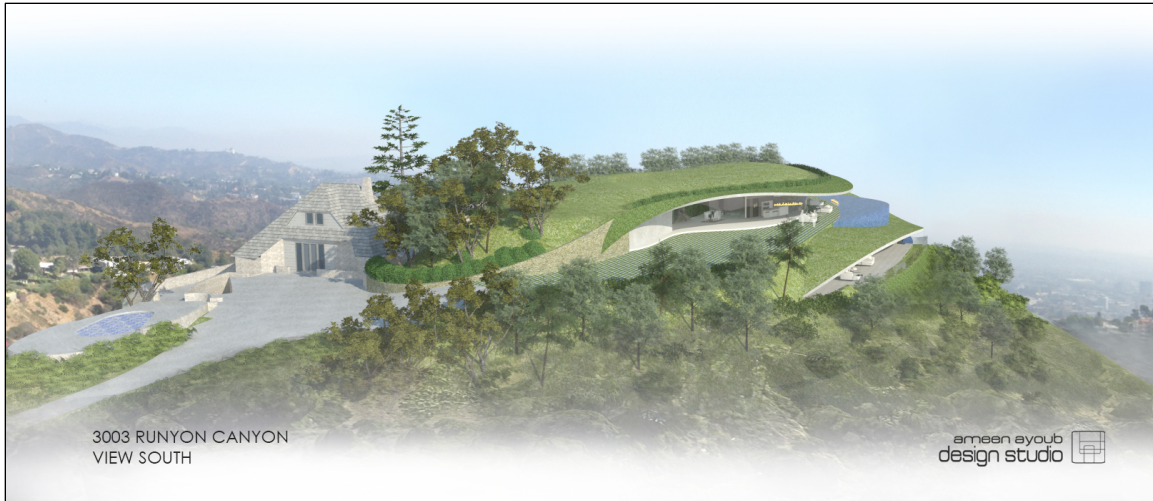
(Source: Amean Ayoub Design Studio)



Rendering 7: View of West Elevation of the proposed new residence. The existing Headley/Handley House is not visible from the west (opposite side of bluff). (Source: Ameen Ayoub Design Studio)



Rendering 8: Detail view of West Elevation of the proposed new residence showing how it is sunken into the hillside, looking north. The existing Headley/Handley house is not visible as it is on the opposing side of the bluff. (Source: Ameen Ayoub Design Studio)



Rendering 9: Bird's eye view looking south towards North Elevation, Headley/Handley House at left. (Note that this is an elevated view for illustrative purposes but this would not be experienced from a pedestrian's view.)
(Source: Ameen Ayoub Design Studio)

Attachment B – Résumés



ANDREA GALVIN is the President and Principal Architectural Historian of GPA. She has been professionally involved in the research and documentation of historic districts, sites, buildings, and structures since 1995. Her past experience includes working for the California Department of Parks and Recreation conducting architectural surveys of historic buildings and structures, the California Department of Transportation working on CEQA and Section 106 compliance, and the California Office of Historic Preservation reviewing projects for Section 106 and Secretary of the Interior's Standards compliance. As such, Andrea has a deep understanding of the environmental review process as it relates to historic resources and a close working relationship with decision-makers. Her past projects have included:

assisting the City of Yorba Linda in developing a historic preservation program; managing a large-scale historic resource survey for the widening of the I-710 from Los Angeles to Long Beach; and preparing Section 106 and CEQA compliance reports for several historic bridge projects. Many of Andrea's projects have involved coordinating with a number of local, state, and federal agencies as well as conducting public outreach with stakeholder groups. She has conducted training on a wide variety of topics at conferences and workshops throughout California, and is an active member of several state and national preservation organizations.

Educational Background:

- M.S., Historic Preservation, University of Pennsylvania, 1999
- Certificate, Preservation Planning, Istanbul Technical University, Turkey, 1998
- B.S., Environmental Design, University of California, Davis, 1994

Professional Experience:

- GPA Consulting, President and Principal Architectural Historian, 2003-present
- California Office of Historic Preservation, Assoc. Architectural Historian, 2002-04
- Caltrans, District 7, Los Angeles, Assoc. Architectural Historian, 1999-01/ Headquarters, Sacramento, 2001-04
- California Department of Parks and Recreation, Cultural Resource Specialist, 1995-1999

Qualifications:

- Meets the Secretary of the Interior's Professional Qualifications Standards for architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Attachment A.

Professional Activities:

- California Preservation Foundation Board Member, 2013-Present
- National Trust for Historic Preservation
- Los Angeles Conservancy

Selected Projects:

- Historic Resources Element, Yorba Linda, 2012
- Historic Preservation Planning, Long Beach, 2012
- South County Detention Facility CEQA Compliance, Tulare County, 2014
- Mineral King Road Bridge Section 106, Tulare County, 2014
- 11th Street/MacArthur Drive Intersection Section 106, Tracy, 2012
- 6th Street Viaduct Mitigation, Los Angeles, 2013-15
- North Spring Street Viaduct Section 106, Los Angeles, 2011-13
- Historic Resource Survey and Context Statement, Non-Residential Properties, Whittier, 2014
- Historic Resource Survey and Context Statement, La Habra, 2011
- Schroeder Hall CEQA Historical Resource Report and Section 106, Long Beach, 2011
- Avenue 26 Bridge Seismic Retrofit, Los Angeles, 2012
- 1st Street Bridge over Glendale Blvd, Los Angeles, 2012
- SR 12/26 Valley Springs, Calaveras County, 2010
- California Avenue Street Improvements, Long Beach, 2011



ALLISON M. LYONS is an Associate Architectural Historian at GPA. She has been involved in the field of historic preservation since 2007. At GPA, Allison carries out historic context statements, National Register nominations, HABS/HAER documentation, and CEQA historical resource evaluations. Prior to joining GPA in 2015, Allison's projects included fieldwork and documentation for several phases of SurveyLA. She is a member of alumni board of Graduate School of Architecture, Planning, and Preservation at Columbia University. Allison is proficient in Geographic Information Systems (ArcGIS).

Educational Background:

- MS, Historic Preservation, Columbia University, 2010
- BA, European Studies, Scripps College, 2006

Professional Experience:

- GPA Consulting, Associate Architectural Historian, 2015-Present
- Chattel Inc., Architectural Historian, 2013-2015
- Architectural Resources Group, Architectural Historian, 2010-2013
- Mellon Graduate Fellowship in Primary Sources, Columbia University, 2009-2010
- Advisory Council on Historic Preservation, Section 106 Essentials Course, 2010

Qualifications:

- Meets the Secretary of the Interior's Professional Qualifications Standards for architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Attachment A.

Organizations:

- Urban Land Institute, Young Leader's Group
- Graduate School of Architecture, Planning, and Preservation Alumni Board

Selected Projects:

- Elks Lodge, Los Angeles, Part I Federal Investment Tax Credit application, 2016
- Great Wall of Los Angeles, Los Angeles, National Register Nomination, 2016
- West Hollywood Commercial Survey, Historic Context Statement and Resource Survey, 2016
- High Speed Rail, Los Angeles, Section 106 Report, 2016
- Neill Lehr Cadillac dealership/ Reseda Showroom, Northridge, CEQA Historical Resource Evaluation Report, 2016
- City of Hope specific plan EIR, Duarte, CEQA Historical Resource Evaluation Report, 2016
- SurveyLA Jewish Historic Context Statement, Los Angeles, Historic Context Statement, 2016
- Western and Franklin, Los Angeles, CEQA Historical Resource Evaluation Report, 2016
- Vista Irrigation District, historic resource evaluations of reservoirs E2 and F, CEQA Historical Resource Evaluation Report, 2015
- City of Fremont postwar historic context statement, Fremont, Historic Context Statements and Resource Survey, 2015
- East San Fernando transit corridor B forms, Los Angeles, Section 106 Report, 2015
- La Loma Bridge, HAER-like documentation, Pasadena, 2015
- National Chicano Moratorium March National Register Nominations, Los Angeles, 2015
- SurveyLA Period Revival Historic Context, Los Angeles, 2015 Sunkist Building, Los Angeles, Design Collaboration and CEQA Historical Resource Evaluation Report, 2015
- Mills Act, City of Los Angeles, Application Review and Inspections, 2013-2015
- 954 5th Street, Santa Monica, Design Collaboration and CEQA Historical Resource Evaluation Report, 2015
- Haddon Hall, Los Angeles, Historic-Cultural Monument Application, 2015