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**Submitted electronically**

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October 9, 2014

**RE: Section 106 Review for the William Mead Homes and Mar Vista Gardens and Windows Replacement Project, Los Angeles, CA**

Dear Dr. Manford:

I am writing on behalf of the Los Angeles Conservancy regarding the proposed windows replacement project for both the William Mead Homes and Mar Vista Gardens. As an interested party to the Section 106 process, we are deeply concerned about this project and the undertaking as it will result in an adverse effect on two significant garden apartment developments. Both William Mead Homes (1942) and Mar Vista Gardens (1954) have been determined eligible for listing in the National Register of Historic Places (NRHP). The William Mead Homes are also listed in the California Historic Resources Inventory.<sup>1</sup>

The Conservancy has previously commented on this proposed project, in a letter, email and in meetings with the Housing Authority of the City of Los Angeles (HACLA). This includes a March 1, 2013 meeting with HACLA representatives including Debra Amenson, Ramin Kianfar and Darrell Robinson. We followed-up this meeting with an email (attached) sent on March 13, 2013. The Conservancy also submitted comments in a letter to Commissioner Margarita Garr and the HACLA commission on August 15, 2013. In this letter (attached) we expressed our concerns with the proposed undertaking, provided resources, and urged HACLA to instead pursue a window repair and rehabilitation project. We further stated then



and do so again now that rehabilitation rather than replacement would adhere to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

The windows of garden apartments are especially important, as they are often the primary character-defining element of the buildings. Based on our experience with other projects and standard protocols for repairing and retrofitting steel-frame casement windows, we strongly believe this approach is the most cost effective and sustainable long-term.

Garden apartments are special and anyone who has lived in one will tell you this. They were designed around the needs of people and to ensure a connection between the landscape and home. The Conservancy has a long involvement with historic garden apartments including the William Mead Homes and Mar Vista Gardens, having worked for many years to ensure preservation for these extraordinarily unique communities. In October 2012, through the work of the Architectural Resources Group (ARG), we produced the historic context statement, *Garden Apartments of Los Angeles*. In this report both the William Mead Homes and Mar Vista Gardens were identified as important examples of garden apartment developments, specifically of those built for public housing purposes.

We believe Greater Los Angeles has the second largest concentration of garden apartments in the nation, with more than forty examples. Yet, threats to this type of property remain a growing concern, from demolition to irreversible alterations. By our accounts, fifteen publicly-owned garden apartment developments have already been demolished, making the William Mead Homes and Mar Vista Gardens even more important as rare, intact examples.

Lincoln Place (1950) in Venice and Chase Knolls (1949) in Sherman Oaks illustrate the threats to these places. Once planned for demolition, they are both now preservation success stories. Each retains important character defining elements, including their original windows. In the past year more than 5,000 original wood windows were repaired at Lincoln Place and all of the steel-frame casement windows at Chase Knolls remain intact and were recently repainted. In each of these examples, garden apartments continue to provide a high quality of life for the dweller. We believe the same can be accomplished for the William Mead Homes and Mar Vista Gardens.

On November 1, the Conservancy will offer the “We Heart Garden Apartments” citywide tour with a focus on three garden apartment examples, including Chase Knolls (1948), Lincoln Place (1951), and the Village Green/Originally Baldwin Hills Village (1941). We anticipate more than 600 people participating and experiencing first-hand the qualities offered in garden apartment living.

**Conclusion:**

Given the nature of the adverse effect associated with the proposed project, and the action jeopardizing the continued eligibility of the William Mead Homes and Mar Vista Gardens, the Conservancy believes further consultation needs to occur through the Section 106 Review. We have concerns about the accuracy



of cost estimates provided as part of the Window Survey and Analysis Report regarding the rehabilitation and repair of the steel-frame casement windows. Therefore we do not agree with the draft Standard Mitigation Measures Agreement (SMMA) and object to proceeding with this step at this time.

**About the Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles through advocacy and education. We have worked successfully with many public agencies, including the City of Los Angeles Bureau of Engineering and recently the Port of Los Angeles, to find “win-win” solutions that meet the agencies’ goals while protecting their historic resources. We hope to do the same with HACLA.

Please feel free to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions.

Sincerely,



Adrian Scott Fine  
Director of Advocacy

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<sup>1</sup> August 6, 2014 letter from ICF International to Los Angeles Conservancy, Christopher J. Hetzel

cc: Ken Bernstein, Office of Historic Resources, City of Los Angeles  
Lambert M. Giessinger, Office of Historic Resources, City of Los Angeles  
Lucinda Woodward, California Office of Historic Preservation  
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