January 20, 2015

RE: Draft Environmental Impact Report, 8150 Sunset Boulevard Mixed-Use Project

Dear Srimal Hewawitharana:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 8150 Sunset Boulevard Mixed-Use Project.

The Conservancy, along with our Modern Committee and Hollywood Heritage, have recognized the Lytton Savings and current Chase Bank building as being historic and warranting preservation. We strongly believe there is a viable opportunity to retain and integrate this building as part of the proposed redevelopment of this site. While we oppose plans for demolition, the Conservancy appreciates the conversations to date with the applicant and project team to consider alternatives and we are hopeful this ultimately leads to a preservation outcome.

I. The EIR should identify Lytton Savings as eligible for both local and California Register designation

As stated in our Notice of Preparation (NOP) comments, the Conservancy strongly considers Lytton Savings to be significant both locally and on the regional level as an example that is illustrative of American bank design and architecture during the postwar era. Savings and loans were in high demand in the postwar years as they financed the massive residential development boom. Their growth, along with the growth of the region, translated to the need for increased office space. As such it is one of Los Angeles’ earliest remaining examples of this transformative shift in postwar-era bank design.
Postwar prosperity changed the banking industry forever, as “the middle class and its spending power were finally recognized.”1 We believe the Lytton Savings bank building played a significant role in this process and is eligible locally but also for the California Register. It appears to meet both criteria 1 and 3 for its association with postwar changes in bank architecture and the industry transformation, and its innovative use of materials, integrated art program, and high level of craftsmanship. The DEIR fails to justify why Lytton Savings is not California Register eligible. At one point the DEIR states that by 1963 Lytton Savings was the fifth largest savings and loan association in the United States but then claims it “played only a minor role in the development of the savings and loan during the early 1960s.” While Lytton Savings later went bankrupt in 1968 the Conservancy believes the building represents a significant contribution to the savings and loan industry and history and more than sufficiently meets California Register criteria.

Furthermore, many of the primary character-defining features of the Lytton Savings bank building are intact. While there were subsequent changes to the overall site and the adjacent Lytton Center, the Conservancy disagrees with the DEIR findings that the integrity of the building is so compromised to only warrant its eligibility at the local level. Overall we recommend the Final Environmental Impact Report (FEIR) revaluate this aspect to assess Lytton Savings’ eligibility for California Register listing.

II. The FEIR should further evaluate and select a preservation alternative to eliminate a significant impact on a cultural resource

As the proposed project currently stands, there will be a significant impact to Lytton Savings and a cultural resource. In our NOP comments we urged the City to mandate consideration of a range of potentially feasible preservation alternatives to demolition in the DEIR. In addition to the required No Project/No Build Alternative, seven alternatives were provided and analyzed at varying levels.

While different from one another, Alternatives Five and Six are the primary alternatives that call for the preservation of the Lytton Savings bank building and its integration into the overall project. Based on our review, we believe Alternatives Five and Six appear to have the greatest ability to achieve this outcome while still allowing for an economically viable project at the site to proceed.

The “Alternative Five: Bank Preservation Alternative” calls for an increase in residential units (from 249 to 291 units) with a substantial decrease (from 111,339 sq. ft. to 62,231 sq. ft.) in overall commercial square footage. All but the Lytton Savings bank building would be redeveloped on the site with new construction ranging from two to sixteen stories in height. The “Alternative 6: Reduced Height and Bank Preservation Alternative” is very similar in overall scope but caps the height of the new construction to twelve and fourteen stories overall. Both alternatives offer similar building heights and setbacks as the

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Project but appear to provide for more variation in overall building massing and, most importantly, a preservation solution for the Lytton Savings bank building. It is worth noting that this approximates the original intent and vision for the 1960s redevelopment of this site where a twelve-story office tower was planned for the rear of the site yet never built.

Both Alternatives Five and Six call for the retention of the Lytton Savings bank building and plans for its commercial use in conformance with the Secretary of the Interior’s Standards for Rehabilitation (Standards). We believe this is an appropriate plan for reuse but have questions regarding some of the proposed alterations outlined within the DEIR.

The building’s three-level interior is divided into a full-height banking floor inside the Sunset Boulevard entrance, which receives natural light from the clerestories and expansive glazing along the ground floor, and two upper levels of office and administrative spaces located beyond the banking floor. As proposed, this double-height interior atrium space would be enclosed with a new floor, we believe to accommodate more leasible space. Near the front of the building the floating concrete staircase would be potentially rotated 180 degrees. No explanation is provided as to why this might be required or if this can be done while still maintaining original fabric and materials. Further, the dalle de verre (faceted glass) and concrete screen designed by acclaimed artist-craftsman Roger Darricarrere is slated for relocation, either within the building, onsite, or to another site altogether. This is one of Lytton Savings’ most distinctive elements. The eight-foot by fifty-foot screen, which is significant as Darricarrere’s first commercial commission, is illuminated internally and serves both as an integrated component of abstract art and to separate the ground level public area from that containing the executive offices.

While it is stated that these alterations will comply with the Standards, the Conservancy is concerned and would like additional details provided within the FEIR that discuss the purpose and need for these changes and an updated assessment on eligibility. The DEIR goes into great length about previous alterations and brings up some existing problems with integrity. Cummulatively more alterations, especially those that affect significant character-defining features, may jeopardize the continued eligibility of Lytton Savings as an historical resource.

### III. Designate Lytton Savings as an Historic-Cultural Monument (HCM) as an additional safeguard and to ensure it meets Standards

With either Alternative Five or Six, it seems appropriate that the city’s Cultural Heritage Commission review and comment on the ultimate design of new elements that directly affect the Lytton Savings bank building. We highly recommend that the applicant seek Historic-Cultural Monument (HCM) status. This review should occur prior to any issuance of building permits for all phases of development to ensure final details of design, siting, cladding materials, and other elements of compatibility are adequately considered.
IV. Conclusion

The Conservancy appreciates the efforts of the applicant and project team to consider a range of viable preservation alternatives as we oppose the demolition of the Lytton Savings bank building. We strongly believe either Alternative Five or Sx have the capability of meeting the stated project objectives while also reducing a significant impact on a cultural resource. We have some questions regarding the proposed alterations to the historic building and ask that these be addressed in the FEIR. At this time we strongly urge the City as the lead agency and the applicant to select one of these preservation alternatives as the preferred project.

Thank you for the opportunity to comment on the DEIR for the 8150 Sunset Boulevard Mixed-Use Project. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

About the Conservancy
The Los Angeles Conservancy is the largest local historic preservation organization in the United States, established in 1978 to preserve and revitalize the significant architectural and cultural heritage of Los Angeles through advocacy and education. The Conservancy’s all-volunteer Modern Committee has been at the forefront of preserving mid-century architecture since its inception in 1984.

Sincerely,

Adrian Scott Fine
Director of Advocacy

cc: City Councilmember Tom LaBonge, Council District 4
Hollywood Heritage
Hollywood Hills West Neighborhood Council