

March 2, 2015

Submitted by email

Ms. Jennifer Karmels
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Re: Proposed Mitigated Negative Declaration for 531-533 South Broadway, ENV-2014-3168-MND

Dear Ms. Karmels,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the proposed Mitigated Negative Declaration (MND) for the project at 531-533 South Broadway. The Conservancy was dismayed to learn in August 2011 that portions of the marble façade of the historic building at 533 South Broadway had been removed without any proper permits. We have since worked closely with the office of City Councilmember José Huizar, Bringing Back Broadway, and Downtown stakeholders to identify an appropriate preservation treatment for this particular building and to formulate policy recommendations to address the illegal demolition or alteration of historic structures in Los Angeles.

We believe that the proposed mitigation measures, including the construction monitoring by a qualified historic preservation consultant, would ensure that the building does not sustain any additional damage as a result of the project. To ensure this building retains its contributing status to the National Register-listed Broadway Theater and Commercial District, we urge the applicant and City to submit additional documentation to the California Office of Historic Preservation and the National Park Service to amend and update the nomination.

I. Background and historic significance

Originally constructed in 1930 to house Lerner's, a women's apparel store, the building at 533 South Broadway is listed in the National Register of



Historic Places as a contributing property to the Broadway Theater and Commercial District. Engineer Philip Barker designed the building in the Art Deco style. The two-story building was characterized by cast stone cladding and was organized into three bays, featuring an expansive recessed balcony with boldly colored tile details flanked by two slim bronze-framed windows with stylized floral stone details.

The next tenant, Grayson's department store, modified the building around 1944, installing a new Moderne façade that concealed the original stone surface. The new, windowless façade was clad in book matched marble panels and featured a prominent *intaglio*, an incised carving unusual in an architectural setting, of a classical maiden.

In August 2011, the building's previous owner removed portions of the second-story marble façade, including the intaglio, without any permits, effectively destroying the historic façade. Due to the illegal nature of the action, the City issued a stop work order.

II. Proposed mitigation measures will ensure that property remains a contributor to a National Register Historic District

The Conservancy has been involved in conversations over how to address the illegal demolition activity at 533 South Broadway since 2011. Due to the irreversible damage to the Moderne façade and studies indicating that the original stone façade is intact beneath the surface, we concur with the decision to remove the remaining portions of the marble cladding and to restore the earlier 1930 façade.

We strongly support the requirement to retain a qualified historic preservation architect to guide and monitor construction as it proceeds and to ensure that the project, including any modifications to the original storefront, meets the *Secretary of the Interior's Standards for Rehabilitation*. We are concerned that, without the appropriate supervision and safeguard measures, construction activity could cause further damage to the historic façade. We would be happy to work with the applicant to identify qualified professionals with the requisite conservation experience. With these mitigation measures in place, the proposed project would not affect the building's status as a contributor to the Broadway Theater and Commercial District.

Because the project would modify the building's appearance as described in the National Register nomination, the City and applicant should also submit updated documentation to the National Park Service and California Office of Historic Preservation indicating that 533 South Broadway remains a contributing property to the Broadway Theater and Commercial District.

About the Los Angeles 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 County through advocacy and education.

Thank you for the opportunity to comment of this project. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

Adrian Scott Fine

Adrian Scott Fine
Director of Advocacy

cc: Council District 14
Bringing Back Broadway
Office of Historic Resources, City of Los Angeles
Art Deco Society of Los Angeles

