



April 23, 2007

By facsimile and mail

Mr. W. Ono Ujor, City Planner
Community Redevelopment Agency of Los Angeles
354 South Spring Street, Suite 700
Los Angeles, CA 90013
Fax: (213) 687-9546

Re: Lankershim Lofts Mixed Use Project – Initial Study and Mitigated Negative Declaration

Dear Mr. Ujor:

On behalf of the Los Angeles Conservancy, we submit these comments on the historic significance of the former Commonwealth Savings & Loan Building (also known as Allstate Savings, now Citibank) at 5077 Lankershim Boulevard and the need for a full environmental impact report prior to the approval of any project that would adversely impact the building. Built in 1961, the Commonwealth Building is an excellent example of mid-twentieth century commercial architecture in Los Angeles and one of the finest modern buildings in the San Fernando Valley, marking the influence of the savings and loan industry on the area's rapid development after the war. With the Conservancy's forthcoming nomination of the building for designation as a Los Angeles Historic-Cultural Monument, the CRA should reject the Mitigated Negative Declaration's finding that the project will have "no impact" on historical resources and require preparation of an environmental impact report.

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with almost 7,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles. Formed in 1984, the Conservancy's volunteer Modern Committee works diligently and successfully to raise awareness about Los Angeles' unique collection of significant modern structures. The Conservancy has long recognized the significance of Commonwealth Savings & Loan, having featured the building on its first tour of the San Fernando Valley in 2000 (*How Modern Was My Valley*, November 4, 2000), which showcased the area's wealth of post-war architecture to preservationists from around the country attending the National Trust Conference in Los Angeles.

- I. **Substantial evidence supports a fair argument that the project will cause a substantial adverse change to a historical resource, requiring preparation of an environmental impact report**

Courts often refer to the EIR as "the heart" of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range

of alternatives that reduce those impacts.¹ Based on the objective analyses in the EIR, CEQA requires public agencies to deny approval of a project with significant adverse impacts when there are feasible alternatives or mitigation measures that can substantially lessen such effects.²

“Since the preparation of an EIR is the key to environmental protection under CEQA,” an EIR is required “whenever it can be fairly argued on the basis of substantial evidence that the project may have significant environmental impact.”³ The “fair argument” test “establishes a *low threshold* for initial preparation of an EIR, which reflects a *preference for resolving doubts in favor of environmental review*.”⁴ Evidence supporting a fair argument of a significant environmental impact will trigger an EIR even if the record contains contrary evidence.⁵ As applied to the proposed project, even if the MND’s unsupported finding of “no impact” on historical resources were accepted on faith alone, an EIR is nonetheless required given substantial new evidence in the record establishing the significance of the Commonwealth Building.

A. Based on its architectural and cultural significance, the Commonwealth Savings & Loan Building qualifies as a “historical resource” under CEQA

As detailed in the attached nomination, the Commonwealth Savings & Loan Building appears to meet two of the four criteria for designation as a Los Angeles Historic-Cultural Monument, including strong associations with “the broad cultural, political, economic or social history of the nation, state or community” and “distinguishing characteristics of an architectural-type specimen,” and is also likely eligible for listing in the California Register of Historic Resources.

Distinguished by its complex and intelligent design, the Commonwealth Building was one of the San Fernando Valley’s first tall buildings, indicative of the area’s burgeoning growth and increasing economic importance during the years following World War II. The unusual site plan, prominent signage, glass elevator and viewing lounge successfully merged architecture with the building’s symbolic relationship to the historic development of the Valley, making it unique among its peers. As the headquarters of a Valley-based savings and loan institution, the building reflects that industry’s dominant role in the post-war residential development that continues to define the Valley’s suburban character.

Built in 1961, Commonwealth Savings & Loan was among the first tall buildings constructed in the San Fernando Valley after World War II (Los Angeles Federal Savings & Loan was completed in 1960 and North Hollywood Federal Savings & Loan was completed, like Commonwealth, in 1961). Among these three buildings, the Commonwealth’s design uniquely allowed clients to experience the Valley’s development first-hand with a ride up the then-rare glass elevator and a visit to the sixth floor viewing lounge. These features were clearly intended to allow the excitement of the Valley’s growth to be shared with the public at the same time that Commonwealth offered its services and trumpeted its role in that development.

¹ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41 (italics added).

³ *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75 (emphasis added); see also *Architectural Heritage Association v. County of Monterey* (2004) 122 Cal.App.4th 1095. “Substantial evidence” includes “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” Inaccurate information and unsubstantiated opinion are not substantial evidence. PRC §21082.2(c); Guidelines §15384.

⁴ *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th at 703.

⁵ *League for Protection of Oakland’s Historic Resources v. City of Oakland* (1997) 52 Cal.App.4th 896, 904-05; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 310.

The Commonwealth Building is an excellent example of mid-twentieth-century commercial architecture in Los Angeles and one of the finest modern buildings in the San Fernando Valley. *San Jose Mercury News* architectural critic and noted author Alan Hess, a leading expert on post-war architecture, lauds the Commonwealth Building's "unique architectural character" and "varied and sculptural" design qualities, comparing it to W.A. Sarmiento's Glendale Federal Savings & Loan Building in Glendale (1959), which has been determined eligible for the California Register of Historic Resources.⁶ Hess also featured the Commonwealth in his 2004 book, *Googie Redux* (Chronicle Books, San Francisco).⁷

B. The MND's conclusion that the project will have "no impact" on historical resources is not supported by substantial evidence

The MND's conclusion that the project will have "no impact" on historical resources is based on a deeply flawed Cultural Resource Report, replete with fundamental errors of fact and unsupported conclusions.⁸ Most remarkably, the report misidentifies the architect as "Gerald M. Pense," rather than Gerald A. Bense, a fact easily confirmed through several readily available sources.⁹

In the section entitled "Assessment of Integrity/Significance," which considers the applicability of federal, state, and local designation criteria, almost every finding of "no significance" is based on unsupported assertions that betray an absence of research, such as "the building could not be associated with any significant contribution to the broad patterns of our history" and "the development of the property as a corporate entity was typical for the area and not representative of any outstanding event or pattern." (pp. 23-24) Despite the report's certitude, these conclusory statements are not supported by evidence in the text of the report or its reference section.

The report's evaluation of architectural significance is similarly dismissive and unsubstantiated, describing the Commonwealth Building as "relatively generic" and "one of many similar buildings of this general design scattered throughout the City of Los Angeles..." (p. 24) Unsupported blanket statements are repeated regularly in the four pages devoted to assessing the building's significance, without any indication of the field against which Commonwealth Building is being compared. As noted above, Commonwealth Savings & Loan is one of the finest modern-style post-war buildings in the San Fernando Valley, comparing favorably to several noted contemporaneous works in the Los Angeles area, including W.A. Sarmiento's 1959 headquarters for Glendale Federal Savings.

II. Conclusion

⁶ Letter from Alan Hess to CRA/LA, April 23, 2007.

⁷ In *Googie Redux*, Hess describes the Commonwealth Building (Allstate Savings) as a "highly articulated high-rise that uses Googie aesthetics by articulating and exaggerating well-scaled functional elements. Like W.A. Sarmiento's Glendale Federal Savings, it uses stair towers, sunscreens, ground-floor lobbies, and rooftop signs as sculptural elements—a successful alternative to the minimalist glass-box high-rise." *Id.* at p.207.

⁸ "A Cultural Resources Overview and Architectural Evaluation of 5077 and 5047 Lankershim Blvd. in the North Hollywood Area of the City of Los Angeles, California," prepared by McKenna et al. (Feb. 20, 2007).

⁹ Bense designed at least fourteen buildings for various savings and loan institutions, including an earlier headquarters for Commonwealth built in 1952. His other projects reflect the full range of postwar building types, including shopping centers, office buildings, supermarkets, schools and residences. Several of his known works are of a design caliber that suggests he is an architect worthy of further study, though our assessment of the Commonwealth's importance is made only on the building's intrinsic merits rather than on those of its architect.

A key policy under CEQA is the lead agency's duty to "take all action necessary to provide the people of this state with... historic environmental qualities... and preserve for future generations... examples of major periods of California history."¹⁰ Indeed, CEQA review has proven to be one of the most effective tools that we have to stanch the erosion of our cultural heritage. It can prevent irreversible losses through careful consideration of alternatives that achieve most of the project objectives while avoiding significant impacts on the environment. With regard to the Commonwealth Building, there is ample opportunity for development on the garage portion of the site, as well as adjacent parcels under the same ownership, that could successfully incorporate the historic building into the project. We urge CRA to reject the proposed MND and require preparation an EIR for this project, as clearly mandated under CEQA.

Thank you for the opportunity to comment on the Initial Study and Mitigated Negative Declaration for the Lankershim Lofts Mixed Use Project. Please feel free to contact me at (213) 430-4211 or jplatt@laconservancy.org should you have any questions.

Sincerely,

Jay Platt
Preservation Advocate

¹⁰ PRC §21001 (b), (c).