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**Submitted electronically**

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October 15, 2013

**RE: Notice of Preparation, 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 Notice of Preparation (NOP) for the 8150 Sunset Boulevard Mixed-Use Project, including the proposed demolition of the historic Lytton Center and current Chase Bank building. Based on its architectural significance, the Conservancy believes the Lytton Center building qualifies as a historical resource and should be treated as such through the EIR process. As there will be a significant impact to a cultural resource, we urge the city to mandate consideration of a range of potentially feasible preservation alternatives to demolition in the Draft Environmental Impact Report (DEIR).

**I. The EIR should acknowledge Lytton Center as an “historical resource” under CEQA**

The Lytton Center typifies the national banking trends in the postwar years. Lytton Savings, like Home Savings, California Federal, Great Western, and others, was a savings and loan financial institution that grew after World War II as an alternative to traditional banks.

With its dramatic, folded plate concrete roof and glass-walled banking floor, the former Lytton Center was a striking departure from traditional bank design when it opened in 1960. As financial institutions nationwide analyzed the need for progressive banking methods following World War II, architects responded by radically reinventing the bank’s form. Lytton Center typified these national postwar banking trends through its modern architectural design, transparency, and integrated art component, and is one of Los Angeles’ earliest remaining examples of this transformative shift in postwar-era bank design.

Company president Bart Lytton, an enthusiastic supporter of the arts, selected architect Kurt W. Meyer of the firm Hagman & Meyer, along with interior designer Adele Faulkner. Meyer’s design is unabashedly modern, utilizing contrasting building materials and modernist forms. The building’s folded plate concrete roof, supported by slender vertical piers, caps a glass-walled façade of clerestories and ground-floor glazing offset by a mid-level band of book-matched, polished



travertine that wraps around the building's front and sides. Bouquet Canyon stone provides a contrasting texture on first floor walls flanking the central, glass-walled façade.

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. The more prominent of postwar-era bank buildings popularized the integration of abstract art components in the 1960s. At Lytton Center, the banking floor contains a monumental *dalle de verre* (faceted glass) and concrete screen designed by acclaimed artist-craftsman Roger Darricarrere, who was one of the first practitioners of this type of stained glass technique in the United States. The 8 foot by 50 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. Darricarrere later designed the monumental skylight for the now-demolished 1965 Columbia Savings Building on the Miracle Mile.

Following Lytton Center's completion in 1960, a commercial phase of development commenced at the rear of the site with the construction of a retail plaza, though a 12-story office tower proposed to rise above the plaza shops was never built. Lytton Center later operated as a branch of Great Western Savings and more recently as Washington Mutual before being acquired by Chase.

#### **A. Lytton Center in the context of postwar bank design**

The Conservancy considers Lytton Center to be significant on the regional level as a monumental example of the transformative changes in American bank architecture during the postwar era, reflecting a paradigm shift in bank design. The bank building appears eligible for the California Register under criteria 1 and 3, both for its association with postwar changes in bank architecture and its innovative use of materials, integrated art program, and high level of craftsmanship.

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. Lytton Savings constructed Lytton Center as a new home office, reflecting its modernity in the modern architectural design, transparency, and integrated art component. It is one of Los Angeles' earliest remaining examples of this transformative shift in postwar-era bank design.

The banks as a building type underwent an incredible transformation during this period of unprecedented growth, as financial institutions nationwide analyzed the need for progressive banking methods and architects responded by radically reinventing the bank's form. The magnitude of this trend for American society, and for banking and architecture specifically, prompted the journal *Architectural Record* to publish a set of articles on the subject in its "Building Types Study" series in 1945. The articles noted that, "perhaps in no field of activity have changed methods of work caused such a striking change in building needs as in the old conservative field of banking."<sup>1</sup>

Traditionally, American banks adhered to architectural models inspired by Classical precedents. Los Angeles examples that reflect this heritage include the Farmers and Merchants Bank Building (1904), located at 401 South Main Street, and the Federal Bank Building (1910), located at 2201 North Broadway. From the 19<sup>th</sup> century through the 1920s, Classical-inspired architecture was commonly adopted for banks to convey stability and the image of a financially sound institution. At the same time, banking legislation had been busy "creating a market for government bonds, facilities for the re-discount of commercial

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<sup>1</sup> "Banks." *Architectural Record*. March, 1945.



paper, and mobilizing the productive capital of the nation.”<sup>2</sup> Inside these temples of commerce, however, bank design and layout did not specifically cater to the individual as a consumer.

Postwar prosperity changed the banking industry forever, as “the middle class and its spending power were finally recognized.”<sup>3</sup> When wartime building restrictions were lifted in 1947, modernism expressed in both building materials and building designs prevailed among banks, which sought a bright new future as they overhauled their design to meet the changing needs of postwar society. Several design features became commonplace, including facades featuring expanses of glass to allow passersby to see inside and spacious interior banking rooms with open tellers’ counters.<sup>4</sup> *Architectural Forum* summarized the reasons behind the new look of American bank buildings:

*Banks used to sell security. But now, with their deposits federally insured, they are selling service. Today’s bankers are an aggressive new breed of financial merchandisers, replacing the stiff old banking types of yesteryear, and they are out to lure ever passing pedestrian into opening a special checking account.*<sup>5</sup>

As noted by architectural historian Charles Belfoure, “by the late 1950s and early 1960s, bank design seemed to go in two distinct directions: rectangular glass boxes such as those of Mies van der Rohe, or more plastic forms executed in poured concrete and favored by the other modern master of the period, LeCorbusier.”<sup>6</sup> Architect Craig Ellwood’s South Bay Bank (1958), located at 1800 South Sepulveda Boulevard in Manhattan Beach, exemplifies this transparent school of postwar bank design, while architect Charles Deaton’s Wyoming National Bank (1962), in Casper, Wyoming, exemplified the sculptural school.<sup>7</sup>

Lytton Center remains a significant example of postwar-era bank design in Los Angeles. Other notable postwar-era bank structures by Meyer’s architecture firm, which became Kurt Meyer and Associates in 1963, include the Pomona regional office of Lytton Savings (1964) and the New Formalist style Financial Savings Building in Culver City (1966). His Brutalist style Liberty Savings Building in West Los Angeles (1966), which is a seven-story office tower, is significant for its use of concrete.

## **II. The DEIR should acknowledge a significant impact to a cultural resource and provide a range of preservation alternatives**

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.”<sup>8</sup> To this end, CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”<sup>9</sup>

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<sup>2</sup> Smith, Perry Coke, AIA. “What Bankers Want of Their Buildings.” *Architectural Record*. March, 1945.

<sup>3</sup> Belfoure, Charles. *Monuments to Money: The Architecture of American Banks*. Jefferson, NC: McFarland, 2005: 245.

<sup>4</sup> Belfoure, 245.

<sup>5</sup> Belfoure, 250.

<sup>6</sup> Belfoure, 257.

<sup>7</sup> “Sculptural Approach to a National Bank.” *Architectural Record*, Vol. 137. No. 6. June, 1965: 197.

<sup>8</sup> Public Resources Code §21001 (b), (c).

<sup>9</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.



Courts often refer to the EIR as “the heart” of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts.<sup>10</sup> The CEQA Guidelines require a range of alternatives to be considered in the EIR that would feasibly attain most of basic project objectives but would avoid or “substantially lessen” the project’s significant adverse environmental effects. The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.<sup>11</sup>

To ensure fair consideration of preservation alternatives, the DEIR should first assess the feasibility of the proposed project in terms of current zoning limits, the capacity of existing infrastructure, cumulative impacts (including of historic resources), and sustainability goals. At minimum, the DEIR should include at least one alternative that retains the Lytton Center and complies with the *Secretary of the Interior’s Standards for Rehabilitation* while maintaining the Lytton Center’s eligibility as an historic resource.

### III. Conclusion

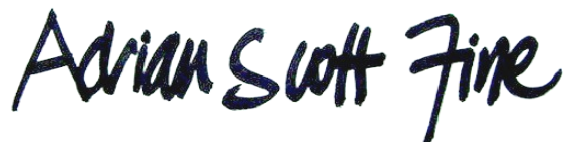
We believe that creative reuse options exist for the historic Lytton Building and that it can be integrated successfully into a larger development project. The proposed project should consider adapting the bank building for commercial retail use and incorporating it into the full project as a distinctive anchor of the community.

Thank you for the opportunity to comment on the NOP for the 8150 Sunset Boulevard Mixed-Use Project. We urge the city to require thoughtful and thorough consideration of preservation alternatives that would retain Lytton Center and incorporate it into the larger project. Please feel free to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto: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

<sup>10</sup> *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.4<sup>th</sup> 1112, 1123.

<sup>11</sup> PRC §§ 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4<sup>th</sup> 165, 185.

