

C. CULTURAL RESOURCES

The analysis in this section incorporates information contained in the Executive Summary of the HABS Report entitled "Historic American Building Survey: Glendon Manor" prepared by Jeanette McKenna et. al., June 18, 2001 (signed August 27, 2001), and included in Appendix C of this EIR. In addition, this section incorporates the findings of the State Historical Resources Commission with regard to Glendon Manor¹; and reports on the physical condition of Glendon Manor, which are provided by the Applicant's Project engineers. These reports and findings are included in **Appendix C** of this EIR.

Existing Conditions

Regulatory Background and Purpose of the Analysis

Significant historical resources include those designated or eligible for designation in the National Register of Historic Places (National Register); the California Register of Historical Resources (California Register) or other state program; as a City of Los Angeles Historic Cultural Monument; or in a City of Los Angeles Historic Preservation Overlay Zone (HPOZ). Historical resources may also include resources listed in the State Historic Resources Inventory as significant at the local level or higher and those evaluated as potentially significant in a survey or other professional evaluation.

Agencies with jurisdiction over historical resources include the National Park Service (NPS), the California Office of Historic Preservation (OHP), and the City of Los Angeles. The NPS maintains the National Register. Criteria for listing in the National Register include association with events, persons, history, or prehistory or embodiment of distinctive characteristics. These criteria are based on context (theme, place, and time), integrity (location, design, setting, materials, workmanship, feeling, and association), and, if a recent resource, exceptional importance. OHP implements state preservation law and is responsible for maintaining the California Register. The California Register uses the National Register criteria for listing resources significant at the national, state, or local level.

Within the City of Los Angeles, the Cultural Heritage Commission (CHC) is responsible for designating resources as Historic Cultural Monuments. Monuments that meet criteria similar to those for the National Register are designated and protected. The City may recognize structures or sites as City Historic Cultural Monuments and may also designate HPOZs to areas that meet certain criteria to preserve existing historical resources and to ensure that new development is compatible with the larger historic area.

The Westwood Village Specific Plan designates certain buildings as significant cultural resources. Design requirements for structures built adjacent to these historic buildings are included in the Specific Plan.

The focus of this section is to determine the impacts as a result of the Proposed Project on the Glendon Manor apartment building (Glendon Manor). Glendon Manor is a 42-unit apartment building located on the southern border of the Project site at 1070 Glendon Avenue. Although the building has not been formally listed on the California Register, it has been determined to be eligible for listing by the State Historical Resources Commission, and is therefore analyzed as a significant historic resource for purposes of this EIR. Other structures on the site that were either

¹ State Historical Resources Commission Findings, California Register of Historical Resources, Glendon Manor, 1070 Glendon Avenue, Los Angeles, Los Angeles County, November 1998.

demolished (the commercial building that was on the southwest corner of Weyburn Avenue and Glendon Avenue) or are proposed for demolition (the Mann Plaza motion picture theater on the west side of Glendon Avenue), have not been designated or considered historically significant.

A thorough document search and architectural field survey of the building was conducted during April and May 2001 by McKenna et. al., the Applicant's historical consultant. Original plans and specifications detailing the architectural, structural, electrical, mechanical and plumbing systems are unavailable because of the age of the structure (1929). The detailed description of the architectural elements contained in this Section was furnished by the firm of McKenna et. al. based on the field survey data.² The Applicant's engineers individually surveyed Glendon Manor to determine the structural integrity of the building and the building's mechanical systems.

Westwood Village Historical Background

The Proposed Projects site in Westwood Village was originally part of the 4,400-acre Rancho San Jose de Buenos Ayres.³ The ranch property went through multiple ownerships, beginning with Don Alanis in 1820, then Don Jose Maximo Alanis in 1843.⁴ Under Alanis' ownership the land was ranched, whereas previously it had been unutilized, except for a single adobe residence. The next owner was Don Benjamin (Benito) Wilson, who purchased the property in 1858 and continued ranching. Wilson, one of the earliest settlers in the region, owned a large portion of land in the San Gabriel Valley as well. Wilson is also known for having laid out the trail up the Sierra Madre to Wilson's Peak. He was elected County Clerk in 1850, and also served as Indian Agent for Southern California.

Wilson sold the Rancho San Jose de Buenos Aires in 1884 for \$10 per acre to John Wolfskill, brother of William Wolfskill, both early American Era settlers that acquired a considerable amount of land throughout Southern California. The Wolfskills trace their family history to Germany, where the family held military title under Frederick the Great. Upon his death, the land was left in the control of the Wolfskill heirs, only to be sold in 1919, still unimproved, to Arthur Letts, the founder of the Broadway Department Store chain (and shareholder in Bullock's). Letts was a wealthy businessman who, with numerous business partners and associates, had big plans for the Rancho.

Except for a thin veneer of civilization, the land was still largely in its natural state in 1919, with live oaks scattered across the chaparral-covered hills and sycamores in the canyons. Common fauna of the rancho included, long-eared jackrabbits, lizards and black-tailed deer that frequented the stream that flowed from Stone Canyon.

The idea of creating a college town in this area was first raised by Edward A. Dickson, a friend of Letts who worked closely with him. Letts, who had once served as a trustee of the Los Angeles State Normal School, seemed to be interested in Dickson's idea, but died shortly after the proposal was made to him. Following Letts' death, Dickson sought out Dr. Erwin Janns and Harold Janns, the executors of Letts' Estate, who were receptive to the idea. Dickson's vision for "creating a college town – at the center of which would gradually develop one of the great universities in the country" – was to materialize on the so-called "Letts" or "Beverly" site, later renamed Westwood. In initial

² Research and field work conducted and/or overseen by Jeanette McKenna of McKenna et. al., April and May, 2001.

³ United States Government records identify the Rancho as consisting of 4,438.69 acres in Los Angeles County, February 1843.

⁴ Official Mexican Era Land Grant of 4,438.69 acres.

talks, the Janns brothers agreed to make available 200 acres for a campus and to lay out a college-town plan, with the university in the center and plenty of land surrounding it to build "an ideal college town - complete with [a] business section, student housing, and [a] restricted residential area."

The choicest of the rolling hill lands were subdivided into estates ranging in size from three-quarters of an acre and up, and named Holmby Hills in memory of the birthplace of Arthur Letts in England. The men to whom Arthur Letts delegated in his will the responsibility of carrying out his wishes endeavored to transform the old Rancho to a modern suburban development linking Hollywood and Beverly Hills to Santa Monica and the sea.

In 1923, plans went forward for the area of Westwood lying north of Wilshire Boulevard. At this time, the Regents of the University of California at Los Angeles were seeking a location to establish a college in the area. All subdividing operations were suspended by the Janns organization until a site selection was made available. Engineers from the University worked with seasoned personnel of the Janns Investment Company in planning streets, boulevards and landscaping that would harmonize with the planned community of Westwood Village. Janns engineers also laid out the necessary residential and income development areas as well as fraternity and sorority rows to provide for future housing needs of students and faculty.

Ground was broken for the University of California on September 21, 1927, and the University opened its doors for students in the fall of 1929. Westwood Village, Westwood Hills and Holmby Hills were developed concurrently to coincide with the complete master plan. Careful attention and consideration was given to residential, income (rental) residential, business and industrial zones, so that a proper balance of development would result. Special areas were set aside to provide for location of churches, schools, fraternities and clubs.

Glendon Manor Background

The tract map that created the Glendon Manor parcel was filed in December of 1927 by representatives of the Janss Investment Company (Edwin and Harold Janss) and the Holmby Corporation (Arthur Letts, Jr. and Dora L. Akin). The building was designed by Heath Wharton. Construction was undertaken in 1929 by Bernard P. Rand (Rand Construction).

Glendon Manor was completed on August 15, 1929, coinciding with the opening of the University of California, Los Angeles campus. The University of California Regents had a policy of identifying acceptable or approved housing off-campus for students. In the Westwood area, a number of approved residences were listed; Glendon Manor was not among them. Glendon Manor provided bachelor and one-bedroom apartments with small kitchens and private baths. These rooms were not designed for family living, but provided housing for single individuals or couples. Because the Regents did not approve this residence, the occupants were not students, but may have served the University in the capacity of teachers, staff, support staff, or employees of businesses in Westwood Village.

Glendon Manor Exterior

The State Historic Resources Commission findings described Glendon Manor as follows:

"Glendon Manor is a rectangular four-story Mediterranean-style building, housing 42 individual apartments and boasting a five-story corner tower. The tower has a number of notable ornamental elements, including a tripartite bank of round-headed windows, a row of triple-pierced vents,

asymmetrical fenestration (generally French windows with elaborate sills), a string course, and a pedimented surround on a corner window with a triangular keystone; it wraps around to a similar light on the south elevation. Planar walls are stucco on the facade, which is erected above the street one-half story, and the main block of the four-bay front is projected slightly forward and capped by a forward porch, side-gable, red tile roof finished by two short chimneys with ornamental caps. Four alternatively recessed and projecting sections clad in brick from the remaining rear and side portions of the building. Windows on the front elevation have wrought-iron balconies with the exception of windows flanking the fire escape at the second-story; these have pierced screens at the balcony level.”⁵

A comparison of historical photographs and a color rendition of the building created at the time of its design indicates that the exterior of the building has undergone some alteration. Two windows on the facade at the ground level and one at the second story of the north elevation have been closed in and stuccoed over. Additionally, the original front door has been replaced by a storefront-type entry door. Some additional minor maintenance for fire safety correction ordinance work, parapet construction, and waterproofing were also performed over the years.

The setting of Glendon Manor has changed significantly since its period of significance between 1929 and 1940. During the pre-World War II period, with which the early development of Westwood Village is generally associated, the area retained the scale and character of residential and commercial development envisioned by Janss Investment Company. This original character was compromised during the period of growth in the 1950's and 60's, when substantial new high-rise commercial and residential development occurred in Westwood Village. Perhaps the most significant change occurred in 1963 with the construction of the 22-story, 225-foot tall Westwood Center office high-rise (the Westwood Center, or Arden building, formerly known as Monte's) immediately adjacent to Glendon Manor to the south. The office high-rise replaced the existing two-story, garden-style Old Monterey Apartments.

Glendon Manor Interior

The Cultural Resources Report notes that, as described in the original building permit, the building is a four-story, 98-room structure designed to provide 41 residential units. There are currently ten units on each floor, with the janitor's apartment and a rooftop (penthouse) apartment bringing the total to 42 units. The janitor's apartment was not one of the original 41 residential units.

A central hallway provides access to the ten units on each of the four residential floors. The building floor plan provides six unique unit designs that are symmetrically located on each floor. Short hallways lead to the Glendon Avenue frontage and access to the fire escape(s). Fire doors have been placed within the main hallways and fire protection systems have been added to the building (circa 1970s). As noted above, the main entrance has been replaced to accommodate a modern glass storefront door. The walls of the foyer appear to have been modified to accommodate mailboxes inside the main entrance. There is a central hallway in the basement that leads to the various utility rooms (e.g. laundry, water heaters, electrical and telephone panels) and to the janitor's apartment.

A single, relatively small elevator services Floors 1 through 4 (not the basement or roof). Large enough to carry two persons, this elevator is accessed from the main hallway and is still operable. Two sets of stairs serve the four residential floors, with one staircase extending to the basement and

⁵ Reference

the other accessing the roof. All staircases are uniform, exhibiting wood railings, dowels, etc. Stairway railings are located on each floor.

The majority of the building has wood flooring. The main entrance has a concrete foundation with marble tiles. Walls and ceilings are lathe and plaster with some variations between squared corners and rounded corners. The foyer is lined with marble panels and the ceiling is shaped plaster panels with floral patterns. Some rooms show evidence of water damage.

Interior doorways, including the apartment unit doors and fire doors, are located within the hallways. The fire doors divide the building into three "compartments." The western compartment includes the western stairwell and the two apartments adjacent to the stairs at each floor; the eastern compartment includes the eastern stairwell and the two apartments facing the stairwell at each floor; the central compartment includes the remaining six apartments per floor. The elevator is also located in the central portion of the building.

The apartment unit doors are fire doors on metal frames. The interior apartment doors are solid wood doors. Some of the original glass doorknobs have been replaced with, modern knobs. Closet doors include both hanging and slider styles. Flooring in the apartment units is largely wood, except in the kitchen areas (where linoleum is used) and in the bathrooms (where tile is used.) Some baths exhibit tiled walls - some original and some modern replacements.

The windows are a combination of sash, casement, and French door. The sash windows are of various sizes from standard to smaller bathroom windows and, in some cases, specifically sized to accommodate tight spaces. The casement windows are located on the basement floor only - a semi-subterranean basement with exposed windows in a dugout access. The French windows are restricted to the Glendon Avenue frontage except in the tower, where the French windows are on both the western and southern elevations.

Decorative features and trim are restricted to rounded ceiling corners, built-in dressers, cabinetry (in the kitchens and baths), arches between rooms (some square, some rounded), and uniform trim around doorways, etc. Some of the apartments have remodeled kitchens and baths. Some apartment kitchens contain the original fixtures, including built-in "ice boxes" and ironing board closets. There are built-in medicine cabinets and vanities in some apartments.

The hardware within the apartments varies. Virtually all cover plates for sockets and switches have been removed and replaced with modern, plastic cover plates. There are a number of original doorknobs and the greater majority of the window hardware is present. Many cover plates and lock mechanisms have been removed from the doors, while other original elements remain. There are few curtain rod fixtures that appear to be replacements from the original. Many light fixtures have been removed or damaged. The wrought iron railings on the balconies are present and in good condition. The majority of the fixtures within the building have been removed or damaged. Those associated with the sash and French windows appear to be the least impacted and the most intact.

Status of Glendon Manor as a Historic Resource

Glendon Manor is not listed on the National Register, the California Register, nor is it listed as a City Historic Cultural Monument, identified as a contributor to a City Historic Preservation Overlay Zone or designated as a significant cultural resource in the Specific Plan. However, the California Office of Historic Preservation formally determined that the building is eligible for listing on the California Register, and the State Historic Resources Commission adopted written

findings to that effect on April 23, 1999. Actual listing cannot occur without the concurrence of the property owner. Listing at the time of the eligibility findings did not occur due to the objections of the former property owner and the City of Los Angeles – the local government with land-use authority over the building.

Structural Condition of Glendon Manor

Although not required, the Project Applicant investigated the condition and structural integrity of Glendon Manor to determine what improvements, if any, would be required to meet current building, energy and life safety codes. These reports compare the building's structure to current requirements and codes to give a frame of reference for determining the overall condition of the building. They also give a general indication of how the building would be affected if the upgrades were made. The reports resulted from analyses prepared by the Project architect, engineers reviewing seismic issues, the building's mechanical system and the building's electrical system. The respective firms are Von Tilburg, Banvard, Soderbergh, Group M Engineers; EPE, and Consulting Electrical Engineering Inc. These reports are attached in Appendix C.⁶

The architect has identified the potential need for egress improvements, fire doors, disabled accessibility improvements, and energy and vapor barrier improvements (such as insulation and thermally efficient windows). Vapor barrier improvements reduce moisture damage that can weaken building materials and eventually threaten structural integrity.

Group M Engineers' preliminary seismic report, based on a visual walk through, found diagonal shear cracking around window openings, indicative of internal structural weakening, and moisture damage in parts of the building. Group M notes that some seismic retrofit work was done on each floor on the north, south and east face of the building, as evidenced by steel plates/bolts and by areas on walls indicating either repair work or filling. Although further investigation and calculations would be necessary to determine the exact amount of seismic retrofit work that was done, Group M believes that the seismic improvements have been performed to correct only the most severe deficiencies that would lead total building failure or collapse. The building in its present condition does not meet the current building code requirements. Group M notes that the Project building construction type (unreinforced masonry) and building shape (an "H"-shaped floor plan) are vulnerable to seismic events. The report also notes that repeated exposure to seismic events can continue to weaken structures over time. Group M concludes that Glendon Manor would require substantial rehabilitation to meet current seismic retrofit building code provisions and ensure that basic life safety is adequately addressed. Recommended improvements required for code compliance include structural system improvements, exterior element bracing (parapets, chimneys and other nonstructural elements) and proper connections between vertical and horizontal elements. EPE Engineers' preliminary engineering assessment is an evaluation of the building's mechanical systems based on a field survey of the property. The building currently has no mechanical air conditioning or cooling system. Individual gas mounted heaters in each apartment unit provide heat; however none of the wall heaters currently appears to be operable. According to EPE Engineers, building "envelope deficiencies" include the use of single-glazed, wood sash windows,

⁶ Letter report dated August 6, 2001 from Roger Wolf, AIA, of Van Tilburg, Banvard & Soderbergh to Greg Smith of The Casden Company regarding architectural codes; Preliminary Report of Seismic Study dated July 16, 2001 from Jitu Mehta of Group M. Engineers, Inc. regarding seismic issues, Letter report dated July 18, 2001 from Emery Pali of Emery Pali Engineering (EPE) to Gregory D. Smith of The Casden Company regarding mechanical systems; and Letter report dated June 22, 2001 from Zacharias Vorgias of Consulting Electrical Engineering, Inc. to Greg Smith of The Casden Company, regarding electrical systems.

the lack of roof or wall insulation and moisture barriers, and the lack of adequate caulking around door and window openings. EPE Engineers recommend that original faucets (which are known to contain lead that leaches into the water supply) should be replaced, along with the boiler (which should have a new energy efficient unit), all hot water piping (which should include insulation per Title 24 requirements) and all cold water piping. Current code would require replacement of all fixtures with new energy efficient fixtures.

Consulting Electrical Engineering, Inc. reviewed the Project electrical system based on a field survey. The study found that Glendon Manor utilizes fuses that are no longer used today. The system is undersized per current National Electric Code (NEC) standards and cannot be upgraded because of the age and configuration of the system. All public areas are under-lit and do not meet current NEC emergency lighting requirements. In addition, Consulting Electrical Engineering advises that the current fire alarm system does not meet code and there is no low-voltage smoke detection system. Wiring is not grounded for safety. The apartments are not designed for modern appliances, including microwaves, dishwashers, garbage disposals and exhaust fans. Convenience power appears to be inadequate to service devices that were not available at the time the building was built but are common in today's apartment units, such as hair dryers, televisions and VCRs. The mechanical systems report recommends a complete new electrical system and wiring to meet NEC design and construction criteria (see report for specifications).

Adjacent Historic Structures

As noted, the Westwood Village Specific Plan regulates the construction of structures that are adjacent to historic buildings mapped in the Specific Plan. Glendon Manor is not recognized as historic in the Specific Plan; however there are several buildings adjacent to the Project that are recognized as historic resources in the Specific Plan, Adjacent historic resources referenced in the plan⁷ are #21 the Moustache Café building to the south (1071-73 Glendon Avenue,) and four historic buildings on Westwood Boulevard. These four buildings are referenced in the Specific Plan as: #31 Brite/Hunter's Books-Original Bullock's Department Store (now The Gap/UCLA Extension) at 1000-10 Westwood Boulevard, #34 Tower Records/Chanin's/Burtons (now solely Tower Records) at 1030 Westwood Boulevard; #37 The Limited/Jay's Jewelers (now Victoria's Secret) at 1046 Westwood Boulevard, and #38 Yesterday's (now vacant) at 1056 Westwood Boulevard. The Project has been designed to comply with the Specific Plan requirements pertaining to projects adjacent to cultural resources. These requirements and the method of compliance are described below, in Project Impacts.

Definition of Significant Historic Resources Under CEQA

CEQA Guidelines Section 15064.5 (a) provides guidance regarding the determination of significance of impacts to historical resources. As stated, "historical resources" shall include the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4850 et seq.).
2. A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

⁷ Westwood Village Specific Plan, Figure 2 and Table 1.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

Generally, a resource that is not otherwise listed shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852) including the following (*emphasized notes added*):

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (*California Register Criterion 1*);
2. Is associated with the lives of persons important in our past (*California Register Criterion 2*);
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values (*California Register Criterion 3*); or
4. Has yielded, or may be likely to yield, information important in prehistory or history (*California Register Criterion 4*).⁸

The State Historic Resources Commission⁹ found Glendon Manor to be eligible for listing in the California Register based on its significance under two of the four criteria:

"Glendon Manor is significant under California Register criterion 1 for its association with the development of Westwood Village as a planned community specifically designed to serve the University of California at Los Angeles when it was moved from its urban location to this then-suburban setting. An early example of multi-unit residential space amid commercial, entertainment, and recreational uses, Glendon Manor is evidence of a forward-looking planning concept, the "new town" or planned "village" designed to support an important civic institution. Glendon Manor was one of the earliest of the Village's buildings and, apparently, the first apartment building serving the new planned community. Various support materials indicate that within the Village itself (the predominantly commercial town center) this is the only remaining residential building from this early period. Glendon Manor has significant historical value as one of the few remaining resources associated with the original development of Westwood Village."

"Glendon Manor is also significant under California Register criterion 3 for its embodiment of a period revival style, Mediterranean Revival – a style the Janss Company mandated for many of Westwood Village's buildings. Although Mediterranean Revival architecture was by no means unusual in Los Angeles, Janss made the style an integral part of its development and thus the building conveys

⁸ The Guidelines [15064.5 (a)(3)(D)(4)] go on to say that "The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1."

⁹ See April 23, 1999 findings, California State Parks, Office of Historic Preservation, with cover letter dated April 26, 1999 from Daniel Abeyta, Acting State Historic Preservation Officer.

architectural significance by documenting the Janss Company's choice of a historic architectural style for its carefully crafted community. Glendon Manor also has its own significant character-defining features that have made it a village landmark. It gains additional significance as an important contributing element to the Janss village architectural composition."

The Commission did not find Glendon Manor significant under criteria 2 or 4. Specifically, the findings noted that Glendon Manor is not significant under California Register Criterion 2, because although Glendon Manor is located on land once owned by various individuals with historical significance, a local individual that owned his own construction firm actually constructed the Manor. Bernard P. Rand (owner/builder) is not recognized on the level necessary to meet the minimum requirements of Criterion 2. The Commission also found that Glendon Manor is not a significant resource under Criterion 4 because it has not yielded and is not likely to yield important historical information recognized on the level necessary to meet the minimum requirements of Criterion 4.

Threshold of Significance

The LA CEQA Thresholds Guide states that a project would normally have a significant impact on Historic Resources if it would result in a substantial adverse change in the significance of an historical resource. The Threshold Guide further states that a substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

To further define the significance threshold for this Project, state requirements reflected in the following text from CEQA Guidelines Section 15064.5 (b) provides guidance on the determination of significance of impact to significant historic resources and serves as the second part of the threshold of significance:

"A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

The significance of an historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the

requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.”

The third part of the threshold (below) addresses potential impacts to the Westwood Village Specific Plan as it pertains to culturally significant resources identified therein:

The Project would have a significant impact on Westwood Village Specific Plan-identified cultural resources if the Project design failed to meet the requirements of the Specific Plan with regard to development adjacent to Specific Plan-identified cultural resources.

Project Impacts

Glendon Manor

The Proposed Project will result in the demolition of Glendon Manor. Under the Findings adopted by the State Historic Resources Commission above, Glendon Manor is considered as a historic resource for purposes of CEQA review. Demolition of this building would cause a substantial adverse change in the significance of this historic resource, and therefore, the Proposed Project will result in a significant impact.

Adjacent Specific Plan Culturally Significant Resources

The Project has been designed to comply with the Westwood Village Specific Plan requirements pertaining to adjacent cultural resources. Section 8.A.4 of the Specific Plan applies to buildings exceeding a height of 40 feet and includes several provisions for the protection of cultural resources. The Specific Plan states, in Section 8.A.4.a., d., and e, that:

- a. If adjacent to a cultural resource, the project will be compatible in scale with that cultural resource.
- d. That portion of a building (including roofs and roof structures but excluding towers) which exceeds the highest elevation of any adjacent cultural resources must be stepped back at a 45 degree angle from the permitted height along the frontage.
- e. The cornice lines of new buildings must meet the cornice line of any abutting cultural resource.

The Project as a whole is compatible in scale with development along Westwood Boulevard. Though somewhat taller than the adjacent culturally significant structures, the style and relative height of the Project does not appear out of scale or character with adjacent culturally significant resources mapped in the Specific Plan. Figure V.A1-10 is a photo-simulation of the Proposed Project in context with adjacent culturally significant structures to the south. The vantage point for this figure is the intersection of Glendon Avenue and Kinross Avenue south of the Project. As shown, the Project does not appear to rise much above the Moustache Café (adjacent to the Project) and the Westwood Brewing Company (#22, 1097 Glendon Avenue, not adjacent to the Project but located down the street). The detailing on the Project buildings, such as windows and balconies, appear to be on a similar scale with the existing culturally significant structures. Similarly, Figure V.A1-11 is a photo-simulation of the Proposed Project in context with the culturally significant structures to

the west. The building in the right foreground of the photo is the culturally significant Gap Building (#31). As shown, the Project would be of similar scale as this culturally significant building and would not appear to rise substantially above it. The Project therefore complies with 8.A.4.a of the Specific Plan with regard to cornice lines.

The southern portion of the Project on the west side of Glendon Avenue, adjacent to the cultural Moustache Café, is physically stepped back from the culturally significant building on the upper residential stories as required by Specific Plan Section 8.A.4.d.¹⁰ The Project structures were designed with a straight-line wall on the western-most side of the Project, because the buffer of the alley between the Project and the adjacent culturally significant structures satisfies the 45-degree angle set-back requirement. In other words, the presence of the alley between the Project and the cultural structure means that the buildings are not directly adjacent. When an imaginary line is drawn at a 45-degree angle from the top of the cultural building, the Project falls within the acceptable buildable area, per the Specific Plan requirement. Therefore, the Proposed Project meets this requirement, and is consistent with 8.A.4.d of the Specific Plan.

With regard to the Specific Plan's third provision for projects adjacent to culturally significant buildings, the cornice lines on the southern end of the Project abutting the Moustache Café match those of the Moustache Café. While the Project is also adjacent to the cultural buildings to the west of the Project, which front on Westwood Boulevard, there is an alley between the buildings and the Project. The Project does not therefore "abut" or touch those buildings. Thus, the Project is consistent with 8.A.4.e of the Specific Plan.

The Project is thus consistent with all three of the Specific Plan provisions pertaining to development adjacent to culturally significant resources. Therefore, no impact would occur with regard to Specific Plan-designated resources.

Mitigation Measures

Mitigation Measures Recommended in the Cultural Resources Report

The following mitigation measures are based upon the recommendations McKenna et. al. Below each measure, in italicized text, is a discussion of which are included in the Project.

- A. Preservation of a cultural resource is always the preferred option. Therefore, McKenna et. al. recommends that the Project Applicant consider a redesign of the current Project to avoid removal of Glendon Manor and the restoration of the structure for full occupancy.
- B. If Glendon Manor is removed, in accordance with general procedures, the minimal level of recordation of removal of the structure would be documentation of the building by way of an American Building Survey (HABS) report. Prior to the issuance of a demolition permit, the Applicant shall cause to be prepared a documentation survey of the property and building in accordance with the HABS standards. The HABS report shall include "scaled" building plans and archival quality photographs of the building. The document package shall be archived at an appropriate location to be determined by the City, in order to provide a permanent written and photographic record of the building for historic purposes.
- C. In addition, it is recommended that copies of the HABS report be sent for curation to: the South Central Coast Information Center at Cal State Fullerton and the University of California, Los Angeles, Central Library.

¹⁰ A full set of architectural plans for the project is on file with the City of Los Angeles.

- D. It is recommended that the Project incorporate design elements of the original Glendon Manor (and Janss Development Company guidelines) into the Proposed Project.
- E. Salvage elements of the building for incorporation into the new buildings, such as the coved ceiling design, ceiling tile designs, French windows, etc.
- F. Incorporate historic names into the redevelopment of the Project to maintain connection with the historic use for the property (e.g., Glendon Manor, etc.)
- G. Salvage elements of the building for renovation of other historic resources in the general area of Southern California as a whole (in this case cabinets, doors, wall fixtures, kitchen and bathroom fixtures, tile work, fire escapes, etc.). Professional companies specializing in the salvaging of such elements can be contacted and permitted to provide bids for the salvage operation(s).
- H. Additional photographic documentation of the salvage operations and systematic removal of the structure to fulfill the record of the building design and construction materials. In addition, potentially significant artifacts or other data and construction materials. A qualified historic preservation professional shall be present on-site during demolition to ensure appropriate removal and handling of historic interior and exterior building elements for potential re-use.

Mitigation Measures to be Included in the Project

Measures B, C, G and H (above) will be included in the Project, as mitigation measures 1-4, below:

1. If Glendon Manor is removed, in accordance with general procedures, the minimal level of recordation of removal of the structure would be documentation of the building by way of an American Building Survey (HABS) report. Prior to the issuance of a demolition permit, the Applicant shall cause to be prepared a documentation survey of the property and building in accordance with the HABS standards. The HABS report shall include "scaled" building plans and archival quality photographs of the building. The document package shall be archived at an appropriate location to be determined by the City, in order to provide a permanent written and photographic record of the building for historic purposes.
2. In addition, it is recommended that copies of the HABS report be sent for curation to: the South Central Coast Information Center at Cal State Fullerton and the University of California, Los Angeles, Central Library.
3. Salvage elements of the building for renovation of other historic resources in the general area of Southern California as a whole (in this case cabinets, doors, wall fixtures, kitchen and bathroom fixtures, tile work, fire escapes, etc.). Professional companies specializing in the salvaging of such elements can be contacted and permitted to provide bids for the salvage operation(s).
4. Additional photographic documentation of the salvage operations and systematic removal of the structure to fulfill the record of the building design and construction materials. In addition, potentially significant artifacts or other data and construction materials. A qualified historic preservation professional shall be present on-site during demolition to ensure appropriate removal and handling of historic interior and exterior building elements for potential re-use.

Mitigation Measures Not to be Included in the Project

The mitigation measures that were recommended in the Cultural Resources Report but are not included in the Project are measures A, D, E and F. The reasons why these measures are not included are explained as follows:

Measure A, which would preserve Glendon Manor, is not included. The Project is designed as a unified development in a design and style that is promoted by the Specific Plan, and the Project has specific objectives (see Section III., Project Description Section). Preserving Glendon Manor would not result in a unified design over the entire Project site, allowing the Applicant to meet all of the Project objectives. Further, restoration of Glendon Manor would require major improvements, based upon the Applicant's technical engineering reports.

Measure D, which would incorporate design elements from the original Glendon Manor and Janns Development Company guidelines, is not included. This measure would not be in keeping with the Proposed Project design, which is in a Mediterranean (Spanish Colonial Revival) style supported in the Specific Plan, and would not be in keeping with the concept of a unified development.

Measure E, which would salvage elements of Glendon Manor and incorporate them into the Project, is not included. The Project is being designed as a unified Project and the salvage materials 1) are not compatible with the Project design 2) are not available in large enough quantities and 3) many of the materials will not meet current code requirements.

Measure F, which would incorporate historic names into the Project, is not included. The Project is a unified development that does not include new streets or other separate elements that be feasibly named after Glendon Manor. It is noted that the street the runs through the Project site is already named Glendon Avenue, and this name is not proposed to be changed.

Significant Project Impacts After Mitigation

The Project will have a significant impact on Glendon Manor, which is considered a historic resource for purposes of CEQA review, even after the application of Project mitigation measures.. Therefore, a Statement of Overriding Considerations will be necessary following certification of the EIR.

Cumulative Impacts

The related projects in the Westwood area are not known to have significant historic resource impacts. The only project on the cumulative project that is considered to have potential historic value is the Harvard-Westlake Middle School Improvement Project, located in Bel Air. The Harvard-Westlake project's historic impact would not be related to the Proposed Project's impact, since the proposed Project's removal of Glendon Manor is significant expressly for its association with the development of Westwood Village. Harvard-Westlake school, based upon draft information available to the lead agency, is not known to have any common association with Glendon Manor. Therefore, the two projects do not contribute to a cumulative historic impact. No significant cumulative impacts would occur.