

Memorandum

To: Stephanie Reich, City of Santa Monica Date: 10/05/2020
From: Jan Ostashay, Principal OAC
Re: PEER REVIEW ASSESSMENT: 818 Grant Street – Designation Application (Landmark)

Overview

At the request of the City of Santa Monica Planning & Community Development Department, City Planning Division, Ostashay & Associates Consulting (OAC) conducted a peer review of the City Landmark designation application assessment prepared by GPA Consulting¹ for the property located at 818 Grant Street, Santa Monica. The following information is provided to you for your information and use.

This peer review addresses the adequacy of the GPA prepared landmark application for the subject property. Our review in performing the peer review included an assessment of the designation application and conclusionary findings; site visit of the property; and additional data collection and research of building permits, Sanborn fire insurance maps, historic aerial photographs, prior survey assessments of the site and area, and the collection and review of other primary and secondary sources. A review for accuracy, clarity and understanding, and validity of the information provided in the application narrative was also conducted as part of the peer review.

Introduction

Generally, peer reviews of historic resources assessment reports are conducted to reassure lead agencies requesting the assessments that the identification and evaluation efforts performed are adequate, that the eligibility determinations made are logical and well supported, and that the document will, if necessary, facilitate environmental compliance under the provisions of CEQA. Review of historic resources documents for quality control is an essential part of the environmental planning process.

As a primer, historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, evaluation, designation, and in certain instances, protection of historic resources. States and local jurisdictions play active roles in the identification, recordation, landmarking, and protection of such resources within their communities.

¹ Audrey von Ahrens, GPA Consulting. "City of Santa Monica – City Planning Division, Designation Application (Landmark), 818 Grant Street, Santa Monica, CA 90405," submittal date May 14, 2020.

The National Historic Preservation Act of 1966, as amended, promulgated standardized practices and guidelines for identifying, evaluating, and documenting historic properties (Secretary of the Interior’s Standards and Guidelines [Preservation Planning, Identification, and Evaluation]). The State Office of Historic Preservation (OHP) and most local government agencies in California, particularly those agencies qualified as Certified Local Governments (CLGs), recognize these practices and guidelines and recommend their use in order to maintain objectivity and consistency in the preparation of historic preservation documents and survey assessments.

Peer Review Assessment

OAC has peer reviewed the GPA prepared landmark application related to the property located at 818 Grant Street for overall adequacy and the property’s potential local landmark eligibility. General comments on the application and assessment findings are as follows:

Designation Application (Landmark)

The City designation application completed for the subject property is in support of formally listing the building a Santa Monica Landmark. The submitted application narrative provides responses to the specific statement questions listed in the “Background Information” section of the application in the form of “attachments.” Hence, this application is not a full historic landmark assessment report and should not be considered or reviewed as such. Nonetheless, the responses provided in the application should be well-researched, factual and accurate, and based on relatable contextual themes to justly support consideration of the property as an eligible Santa Monica Landmark. The following peer review comments align with the narrative responses given to the specific statement questions listed in the “Background Information” section of the submitted application form.

- *Description of site or structure, note any major alterations and dates of alterations*

The description of site or structure, note any major alterations and dates of alterations statement is presented under Attachment A in the GPA application.

In considering the narrative of this section of the application, much of the property’s architectural description is adequately written, though it does reference some features incorrectly (flush eaves, punched windows, etc.) or vaguely (window type and material), or omits reference to some notable features of the improvement (i.e. door hardware, original wood windows casings and sills versus window frames set within original openings, etc.). For understanding integrity, it is important that the narrative fully differentiate what features are original and what are replacements/non-original elements. In addition, it would be very useful to identify the building’s side, front, and rear elevations (besides identifying them only by direction). Such elevations should also be identified in the narrative as either primary or second elevations.

- *Statement of architectural significance*

The “statement of architectural significance” field is discussed under Attachment B in the application.

Under this section of the “property information” narrative, the subject property was found to be eligible for City landmark under Criterion 4, as an excellent example of a 1920s Spanish Colonial Revival style courtyard apartment, and under Criterion 1, as an example of the social, economic and architectural history of the City (SMMC 9.56.100(A)).

Much of the information provided in this section of the application narrative appear to have been surmised from the findings on the property from the 2018 citywide historic resources inventory update survey. While the 2018 survey update did identify the 818 Grant Street as a potential City landmark further research, specific contextual development, and evaluation of integrity, property type comparison, and significance criteria is necessary in order to fully and defensibly support the findings presented in the application.

At this time, the property appears to be a very good, but ubiquitous example of a pre-World War II era courtyard apartment and its Spanish Colonial Revival stylistic features appear typical (despite some altered features) of the period and idiom. While the property may ultimately satisfy the City's landmark criteria associated with architecture, the statement of architectural significance as currently drafted lacks sufficient relevant context and justification to support this finding. Property types that are ubiquitous, like the subject property, are typically significant for representing a trend or pattern of development as part of a greater whole, and rarely convey that history alone. If the subject property is to be individually identified within the context of the City or neighborhood as a rare and unique property type designed in the Spanish Colonial Revival style a justifiable argument needs to be made that associates it directly with a specific major event or trend in history (i.e. early multi-family residential development in the Sunset Park neighborhood) or as a rare remaining example of housing in an area of the city that underwent major changes during later development (comparative analysis). Factual information as to how the property meets the criteria, how it specifically contributed to the areas of significance identified (themes), and the ways it was important to the history of its locality needs to be further investigated, assessed, and provided in the application narrative.

The subject property has been previously identified on a number of occasions through survey efforts conducted by the City of Santa Monica. It was first identified under the 1994 Phase 3 historic resources inventory survey process as a contributor to a potential district in the Sunset Park neighborhood. At the time, it was assigned an OHP status code of 5D1 (contributor to a potential local district pursuant to the Santa Monica ordinance) for being a contributor to a thematic "Apartment Courts" grouping. The property was identified in later survey updates conducted in 2003 and 2010 as a contributor to the potential "Apartment Courts" district and was assigned a status code of 5D3 (OHP status code ratings changed in 2003). As part of the 2018 historic resources inventory survey update, the property was re-identified and noted as being potentially eligible for listing as a Santa Monica Landmark because of it being a distinctive property type: 1920s courtyard apartment housing in the Sunset Park neighborhood of the city. In consideration of these prior survey findings, the subject property has the initial potential for landmarking, though a thorough development of context, analysis of historical integrity, and responsive application of the significance criteria is necessary to confirm or discount these previous primarily findings.

The finding of the property satisfying Landmark Criterion 1, also discussed under the "statement of architectural significance" section of the application, lacks sufficient supportive evidence and a justifiable assessed narrative. Its findings are singularly based on a summarized paragraph from the 2018 historic resources inventory update survey. As Criterion 1 typically assesses a property's historical significance (versus architectural significance) it is best to provide this information and evaluation under the "statement of historic importance." Therefore, it is recommended to revise, clarify, expand and relocate this particular narrative to the applicable statement field on the application.

The character-defining features for the property are also itemized under the “statement of architectural significance” section of the application. Every historic property has its own identity and its own distinguishing character. A property’s form and detailing are important in defining its visual historic character and significance. It is a property’s tangible features or elements that embody its significance for association with specific historical events or trends; distinctive architecture; and, as applicable, important personages. It is those tangible elements that are considered “character-defining features” and should be retained and preserved. According to National Park Service *Brief 17- Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character*, character-defining features include the overall shape of a property (building, structure, etc.), its materials, craftsmanship, decorative details, architectural style, and the various aspects of its site and immediate environment (spatial relationships, form, configuration, orientation, location, etc.). The overall visual aspects and close range visual aspects of a property should be identified and prioritized accordingly based on its historical significance and the significance criteria it satisfies. As currently listed in the application material, the character-defining features for the 818 Grant Street property need to be reviewed, clarified and refined, made relevant in association with the property’s historical significance, supplemented, and accurately accounted for prior to further landmark consideration.

- *Statement of historic importance*

The statement of historic importance field is identified as not applicable (N/A) in the landmark application. As for this statement’s relevance to the subject property, see the comments in the above paragraphs.

- *Person(s) of historic importance*

The person(s) of historic importance statement field is noted as not applicable (N/A) in the landmark application. Though there was little research and discussion on the early owners and occupants of the property, it is assumed that none of the individuals identified and discussed in the application are considered as persons of historic importance. Though this may be case, one should never assume in a historic evaluation assessment. Upon conducting additional research on the property as part of the peer review process, it is confirmed that the Langdons and the other property owners and occupants of the subject property were not identified as persons of historical importance in local, state or national history.

Just as a historical reference point, however, the original owners of the property were Mr. and Mrs. Harley C. Langdon of Santa Monica. Mrs. Harley (Ada Gertrude) Langdon was the daughter of the Wallace B. Huyck, builder of the subject property. Though the Langdons lived at the 818 Grant Street property upon its completion (only for a few years), prior to the building of the apartment court they resided with her parents (Mr. and Mrs. W.B. Huyck). Throughout much of the 1920s, 1930s, and 1940s, Harley Curtis Longdon was a vocational teacher at some of the local public schools in Santa Monica. According to census records and voter’s registration information, A.G. Harley was a housewife.

- *Statement of other significance*

The statement of other significance field was identified as not applicable (N/A) in the landmark application. As no other significance associated with the subject property was identified as part of the

addition research conducted during the peer review process, therefore, the “not-applicable” notation is adequate.

- *Bibliography*

The citation of references and supporting documents included in the GPA prepared landmark application is limited, though not unexpected based on the limited contextual history provided in the application narrative. Such materials are included in the application as Attachment C (bibliography), Attachment D (photographs), and Attachment E (building permits). Interestingly, the application does not include any supporting historical references, such as Sanborn Maps, other relevant historical maps (as applicable), historical aerial photographs (as available), city directory research into past occupants of the property, location map, parcel map, property legal description (county assessor information), etc. These types of ephemeral material are typically included in landmark assessment reports and designation applications to further support the historical narrative and help to determine significance findings and evaluations.

Conclusion

In reviewing the GPA prepared landmark application the material presented lacks sufficient evidence and compelling arguments to currently support the designation of the 818 Grant Street property as a City Landmark under Santa Monica Landmarks Criterion 1 as an example of the social, economic, and architectural history of the City, and Criterion 4 as an excellent example of a 1920s courtyard apartment (SMMC 9.56.100(A)). The associated narrative statements in the designation application are deficient in applicable contextual themed development and analysis, integrity evaluation, application of significance criteria, and the identification of relevant character-defining features. As currently prepared, the submitted landmark application does not fully justify the landmarking of the subject property; therefore, the property does not appear to currently satisfy any of the City’s Landmark criteria. It is recommended that the application be returned to the applicant in order to revise, correct, and expand the current application narrative in consideration of the comments provide herein this memo.

ATTACHMENT A:

*“City of Santa Monica – City Planning Division, Designation Application (Landmark)
818 Grant Street, Santa Monica, CA 90405
(prepared by GPA Consulting, submitted date May 14, 2020)*

[UNDER SEPARATE COVER]