Ostashay & Associates
CONSULTING

P.O. Box 542
Long Beach, CA
562.500.9451
HISTORICS@AOL.COM

Memorandum

To: Stephanie Reich, City of Santa Monica Date: 10/05/2020

From: Jan Ostashay, Principal OAC

Re: PEER REVIEW ASSESSMENT: 305 San Vicente Boulevard – 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 Consulting[1] for the property located at 305 San Vicente Boulevard, 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.

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[1] *Audrey von Ahrens, GPA Consulting. "City of Santa Monica – City Planning Division, Designation Application (Landmark), 305 San Vicente Boulevard, Santa Monica, CA 90402," submittal date April 27, 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 305 San Vicente Boulevard 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 response to this statement is presented as Attachment A of the GPA application. In reviewing Attachment A, the provided descriptive narrative of the structure is adequate though there are some references and statements that need further clarifying and elaboration. For ease of understanding the narrative and as standardized practice it is highly recommended that the labeling of the building's elevations use true directional compass points - north, south, east, and west and identify its primary and secondary elevations. Identifying the building's side, front, and rear elevations (besides identifying them only by direction or primary) would also help to further discern the property on its parcel.

The discussion regarding prior alterations made to the property is limited and defers the reader to the building permits provided in the application as Attachment E. As part of the description narrative there should be a discussion that clearly identifies and explains what changes have been made to the building and where. Such a narrative provides a continuum of its evolutionary building history. The cosmetic and structural damage sustained from the 1994 Northridge earthquake, for instance, should be addressed and explained as part of the architectural and integrity narrative. Reference that the building is in overall good condition is also not clarified or differentiated in terms of integrity or physical condition. This aspect of the property's history is not currently provided in the description narrative and should be further expanded and explained.

In general, it is recommended that the description narrative, particularly the alteration history, be reviewed and verified; thoroughly researched; clarified and corrected, as necessary; and further expanded and explained as part of the narrative for this portion of the application.

- *Statement of architectural significance*

The response to the "statement of architectural significance" is presented as Attachment B in the application. In reviewing Attachment B, the narrative provides biographical information on architect Samuel Reisbord, a summary of his known work in Southern California, and concludes that the subject property is eligible for City landmark listing under Criterion 5, as a representative work of notable architect Sam Reisbord (SMMC 9.56.100(A)(5).

However, upon reviewing the application's statement of architectural significance, there is question as to identifying Samuel Reisbord as a notable architect within the city. The claim that Reisbord had a prolific career is also questionable as the supporting primary and secondary sources collected as part of the peer review process indicates instead that he had a very diverse and long career that stretched around the globe. His professional portfolio locally included the design of at least seven (7) known apartment buildings in Santa Monica that spanned three decades (1950s, 1960s, 1970s).[2] However, the landmark application states that the 305 San Vicente Boulevard property is one of only two known apartment buildings in Santa Monica designed by Reisbord. His early Modern work outside the local community from the late 1940s with designer Alvin Lustig was noted in *Arts & Architecture* magazine and *Architectural Forum,* but none of his later work appears to have been recognized in any professional publications or given any type of notable award by his peers. Typically, to be identified as a notable or "master" figure in a field (architect, builder, designer, engineer, landscape architect, craftsman artist, etc.), the person is generally recognized because of his or her consummate skill whose work is distinguishable from others by its characteristic style and quality. Depending on the sphere of geographic influence a notable person may be recognized locally for their quality of design and skill or on a broader scale at the state or national levels (think Frank Lloyd Wright). At this time, there is no analysis or discussion as to how Reisbord, whose office was located in Los Angeles, was accomplished in his field and made contributions to architecture or the architectural heritage of the local community or elsewhere. There is also no comparative evaluation of the seven known local resources designed by Reisbord to determine if they should be considered significant or representative works by the architect. In any case, because of insufficient evidence, lack of thorough research, and erroneously cited information provided in the landmark application as well as from counter-evidence discovered during the peer review process, the architect Samuel Reisbord does not appear to qualify as a notable designer or architect. In addition, there is currently no conclusive information to claim that the subject property should be considered a significant or representative work in amongst itself. Therefore, the 305 San Vicente Boulevard property does not appear to satisfy the City's Landmark Criterion 5 for being a significant or representative example of the work of a notable builder, designer, or architect. As the property does not qualify for Santa Monica Landmark recognition, the identification of character-defining features itemized in the application becomes irrelevant.

- *Statement of historic importance*

The statement of historic importance field is identified as not applicable (N/A) in the landmark application. Therefore, a peer review of this section of the application was not conducted.

[2] *Samuel Reisbord Papers, Architecture and Design Collection. Art, Design & Architecture Museum; University of California, Santa Barbara.*

- *Person(s) of historic importance*

The person(s) of historic importance statement field is noted as not applicable (N/A) in the landmark application. Therefore, a peer review of this section of the application was not conducted.

- *Statement of other significance*

The statement of other significance field was identified as not applicable (N/A) in the landmark application. Therefore, a peer review of this section of the application was not conducted.

- *Bibliography*

The bibliography information is presented as Attachment C in the application. 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. The application also includes photographs of the subject property (Attachment D) and all of the property's building permits (Attachment E).

Interestingly, the application does not include any supporting historical references, newspaper or magazine articles, historical photographs, or other relevant primary and secondary sources to further support the historical narrative and fully justify the significance finding of the property under Santa Monica Landmark Criterion 5 (a significant or a representative example of the work or product of a notable builder, designer, or architect).

Conclusion

In reviewing the GPA prepared landmark application the material presented lacks sufficient evidence and clear persuasive arguments to currently support the landmark designation of the 305 San Vicente Boulevard property. Because of inadequate evidence, lack of thorough research, and erroneously cited information provided in the landmark application as well as from counter-evidence discovered during the peer review process, the architect Samuel Reisbord does not appear to qualify as a notable designer or architect under the City's historic preservation ordinance (SMMC 9.56 Landmarks and Historic Districts) and the subject property does not appear to be a significant or representative example of work completed by a notable architect or designer. Therefore, the property does not satisfy Santa Monica Landmark Criterion 5 (SMMC 9.56.100(A) for which it is currently under consideration.

ATTACHMENT A:

"City of Santa Monica – City Planning Division, Designation Application (Landmark)
305 San Vicente Boulevard, Santa Monica, CA 90402
(prepared by GPA Consulting, submitted date April 27, 2020)

[UNDER SEPARATE COVER]