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October 13, 2020

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, CA 90012

Attention: PLUM Committee

Dear Honorable Members:

SCHOOL OF EYE EDUCATION; 1554-1560 SOUTH ST. ANDREWS PLACE; 2351-2371 WEST VENICE BOULEVARD; CHC-2020-3290-HCM; ENV-2020-3291-CE; CD-10

At its meeting of **September 3, 2020**, the Cultural Heritage Commission took the actions below to include the School of Eye Education in the list of Historic-Cultural Monuments, subject to adoption by the City Council:

1. **Determined** that the proposed designation is categorically exempt from the California Environmental Quality Act (CEQA), pursuant to Article 19, Section 15308, Class 8 and Article 19, Section 15331, Class 31 of the State CEQA Guidelines;
2. **Determined** that the property conforms with the definition of a Monument pursuant to Section 22.171.7 of the Los Angeles Administrative Code;
3. **Recommended** that the City Council consider the School of Eye Education for inclusion in the list of Historic-Cultural Monuments; and
4. **Adopted** the attached amended Findings.

The Commission vote was as follows:

Moved: Kanner
Seconded: Kennard
Ayes: Barron, Milofsky
Absent: Buelna

Vote: 4 – 0


James K. Williams, Commission Executive Assistant II
Cultural Heritage Commission

The Cultural Heritage Commission would appreciate your inclusion of the subject property to the list of Historic-Cultural Monuments.

Time for Council to Act: The Commission action is hereby transmitted to the City Council for consideration. Pursuant to Section 22.171.10(f) of the Los Angeles Administrative Code, the Council may approve or disapprove in whole or in part an application or initiation for a proposed designation of a Monument. The Council shall act in 90-days of the public hearing held before the Commission on the proposed designation. The City Council may unilaterally extend the 90-day time limit to act for a maximum of 15 days for good cause. With written consent of the owner, the time for the City Council to act may be extended by up to an additional 60 days. If the Council does not act on the application or initiation within this specified time limit, the application or initiation to designate a Monument shall be deemed to have been denied.

Enclosure: Amended Findings, Staff Report, Mailing List

SCHOOL OF EYE EDUCATION
1554-1560 South St. Andrews Place; 2351-2371 West Venice Boulevard
CHC-2020-3290-HCM
ENV-2020-3291-CE

FINDINGS

(As Amended by the Cultural Heritage Commission on September 3, 2020)

- The School of Eye Education is “associated with the lives of historic personages important to national, state, or local history” for its affiliation with Margaret Darst Corbett, an influential practitioner of the Bates Method utilized as an alternative therapy aimed at improving eyesight.
- The School of Eye Education “embodies the distinctive characteristics of a style, type, period, or method of construction” as an excellent example of a courtyard apartment building designed in the Streamline Moderne architectural style.

DISCUSSION OF FINDINGS

The School of Eye Education meets two of the Historic-Cultural Monument criteria.

The subject property is “associated with the lives of historic personages important to national, state, or local history” for its affiliation with Margaret Darst Corbett, an influential practitioner of the Bates Method utilized as an alternative therapy aimed at improving eyesight. Corbett started the School of Eye Education at the subject property to teach the Bates Method in 1936 and continued to practice and reside at the subject property until her death in 1962. Over the course of her career, Corbett trained hundreds of teachers at multiple School of Eye Education branches across the United States, adapted and modernized the Bates Method for a regular spot on early Los Angeles television programming, contracted with the government to help improve the eyesight of pilots and soldiers training for World War II and the Korean War, and authored multiple books on the Bates Method. Despite Corbett being arrested for practicing medicine without a license and other attempts by ophthalmologists and optometrists to ban the use of the Bates Method, this alternative therapy, as taught by Corbett, is still practiced today in conjunction with the use of her books.

The subject property also “embodies the distinctive characteristics of a style, type, period, or method of construction” as an excellent example of a courtyard apartment building designed in the Streamline Moderne architectural style. The U-shaped plan, landscaped central courtyard, and individual units that open directly onto the courtyard, as exhibited by the subject property, are characteristic of 1930s courtyard apartment typology. In addition, the subject property displays the hallmarks of the Streamline Moderne architectural style, including a horizontal orientation, rounded corners, and a flat roof. Other distinctive features include the incised stringcourse, unadorned wall surfaces, and multi-lite steel casement and ribbon windows.

Despite some exterior and interior alterations, the subject property retains a high level of integrity of location, materials, design, setting, workmanship, feeling, and association to convey its significance.

The applicant argues that the subject property also “exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community” for its association with the School of Eye Education, Margaret Darst Corbett’s clinic that disseminated the Bates Method of vision therapy; however, the Commission does not find that the property

meets this criterion. Corbett's practice, while interesting and unconventional, was not significantly influential on the world of medicine nor the cultural, economic, or social history of Los Angeles.

While the applicant claims that the subject property is also significant for its affiliation with Dr. William Horatio Bates, Emily Amanda Bates, Aldous Huxley, and Dr. Humphrey Osmond, the Commission is unable to make this finding. Emily Bates and Dr. Humphrey Osmond do not appear to rise to the level of historic personages. Moreover, while Dr. William Bates may be an historic personage, and Aldous Huxley is undeniably an historic personage, their association with the subject property is tenuous. Mrs. Corbett was a pupil of Dr. William Bates; he passed away in 1931, prior to the construction of the subject property, and there is no direct link between him and the School of Eye Education. Furthermore, Huxley was a client of Margaret Darst Corbett's in 1939 and later wrote a book on his experience with the Bates Method, *The Art of Seeing* (1942). However, he notably practiced the method at his private estate in northern Los Angeles County, and his connection to the property at 1554 South St. Andrews Place is not strong enough to convey any significance.

Additionally, the applicant argues that the subject property "represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age" as a work of architect Earl D. Stonerod. However, Stonerod does not appear to rise to the level of being a master architect. While Stonerod worked in the offices of master architects Myron Hunt and Walker & Eisen, his independent practice did not gather critical acclaim for his later residential designs.

CALIFORNIA ENVIRONMENTAL QUALITY ACT ("CEQA") FINDINGS

State of California CEQA Guidelines, Article 19, Section 15308, Class 8 "*consists of actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment.*"

State of California CEQA Guidelines Article 19, Section 15331, Class 31 "*consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic buildings.*"

The designation of the School of Eye Education as an Historic-Cultural Monument in accordance with Chapter 9, Article 1, of The City of Los Angeles Administrative Code ("LAAC") will ensure that future construction activities involving the subject property are regulated in accordance with Section 22.171.14 of the LAAC. The purpose of the designation is to prevent significant impacts to a Historic-Cultural Monument through the application of the standards set forth in the LAAC. Without the regulation imposed by way of the pending designation, the historic significance and integrity of the subject property could be lost through incompatible alterations and new construction and the demolition of an irreplaceable historic site/open space. The Secretary of the Interior's Standards for Rehabilitation are expressly incorporated into the LAAC and provide standards concerning the historically appropriate construction activities which will ensure the continued preservation of the subject property.

The City of Los Angeles has determined based on the whole of the administrative record, that substantial evidence supports that the Project is exempt from CEQA pursuant to CEQA Guidelines Section Article 19, Section 15308, Class 8 and Class 31, and none of the exceptions to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies. The project was found to be exempt based on the following:

The use of Categorical Exemption Class 8 in connection with the proposed designation is consistent with the goals of maintaining, restoring, enhancing, and protecting the environment through the imposition of regulations designed to prevent the degradation of Historic-Cultural Monuments.

The use of Categorical Exemption Class 31 in connection with the proposed designation is consistent with the goals relating to the preservation, rehabilitation, restoration and reconstruction of historic buildings and sites in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Categorical Exemption ENV-2020-3291-CE was prepared on July 31, 2020.