

Appendix C

Cultural Resources Appendix

Appendix C.1

Historic Report

222 W. 2nd Street Project

Los Angeles, California

Historical Resource Report



Prepared by:



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TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1. INTRODUCTION	1
1.1 Purpose and Qualifications	1
1.2 Methodology.....	2
2. REGULATORY FRAMEWORK.....	3
2.1 National Register of Historic Places	3
2.2 California Register of Historical Resources	4
2.3 Los Angeles Cultural Heritage Ordinance	6
3. ENVIRONMENTAL SETTING	7
3.1 Description of the Project Site and Study Area	7
3.2 Historical Resources in the Project Study Area.....	8
4. PROJECT IMPACTS.....	12
4.1 Determining the Significance of Impacts on Historical Resources	12
4.2 Secretary of the Interior's Standards.....	13
4.3 Project Description	14
4.4 Analysis of Project Impacts	15
5. CONCLUSIONS	26
6. SOURCES	27
 APPENDIX A – Résumé	
 APPENEDIX B - Conceptual Plans	

EXECUTIVE SUMMARY

The purpose of this report was to determine if a proposed project (the Project) in the Central City Community Plan Area of the City of Los Angeles would directly or indirectly impact any historical resources subject to the California Environmental Quality Act (CEQA). The Project involves the construction of a 30-story mixed-use building on the south side of W. 2nd Street between S. Broadway and S. Spring Street (Project site). The Project site includes a five-story parking structure and an area that was until recently used as a surface parking lot. The surface parking lot area of the Project site—where the 30-story mixed-use building would be constructed—is currently being used by the Los Angeles County Metropolitan Transportation Authority (Metro) for the construction of a subterranean rail transit station for Metro's Regional Connector Transit Project. GPA Consulting (GPA) was retained to identify historical resources in the vicinity of the Project site, to assess any potential impacts the Project may have on the identified historical resources, and to recommend appropriate mitigation measures, if warranted.

Although there are no known or potential historical resources on the Project site, there are seven historical resources in the vicinity. The Los Angeles Times-Plant Complex (Times-Plant Complex), consisting of the Los Angeles Times Building and the Plant Building, is located on the northeast corner of the block immediately north of the Project site; the Times-Plant Complex was previously determined eligible for listing in the National Register of Historic Places (National Register) and is listed in the California Register of Historical Resources (California Register). The Mirror Building, located immediately north of the Project site across W. 2nd Street adjacent and south of the Times-Plant Complex, was previously determined eligible for listing in the National Register and is listed in the California Register. The Executive Building, located on the northwest corner of the block immediately north of the Project site, was identified as appearing eligible for listing in the California Register as well as for local listing through survey evaluation. The Higgins Building, located on the northeast corner of the block immediately east of the Project site, is designated as a City of Los Angeles Historic-Cultural Monument (HCM). The Douglas Building, located on the southeast corner within the same block as the Project site, is also designated as a HCM. The Irvine-Byrne Building, located immediately southwest of the Project site across S. Broadway, is listed in the National and California Registers as a contributor to the Broadway Theater and Commercial District and is designated as a HCM. The Victor Clothing Company Building, located within the same block as the Project site to the immediate south, is listed in the National and California Registers as a contributor to the Broadway Theater and Commercial District.

The threshold for determining significant impacts on historical resources in the State CEQA Guidelines is whether a proposed project would cause a substantial adverse change, which is defined as demolition, destruction, relocation, or alteration of the resource or its immediate vicinity such that the significance of the historical resource is materially impaired. The Project would have no direct impacts on historical resources, as it does not involve the demolition, destruction, relocation, or alteration of any historical resources. GPA analyzed the potential indirect impacts on the identified historical resources and concluded that the Project would have no impact under the CEQA Guidelines. The Times-Plant Complex, the Executive Building, the Higgins Building, and the Irvine-Byrne Building would not be affected by the Project, due to the physical and visual separation between these historical resources and the new building. Although the new building would introduce a new visual element to the vicinity of the Mirror Building, the Douglas Building, and Victor Clothing Company Building, they would continue to be eligible for listing as historical resources as defined by CEQA. No mitigation measures are required or recommended.

1. INTRODUCTION

1.1 Purpose and Qualifications

The purpose of this report is to analyze whether a proposed development project (the Project) would impact any historical resources. The Project site involves the parcels located on W. 2nd Street between S. Spring Street and S. Broadway in the Center City/Historic Core area within the Central City Community Plan Area of the City of Los Angeles (see Figure 1 below).¹ The Project site consists of a former surface parking lot where a new Metro subterranean rail transit station is being constructed and a five-story parking structure constructed in 1988. It includes the following addresses and assessors' parcel numbers:

- 200 - 210 S. Broadway, 5149-008-087, 5149-008-088
- 232-238 W. 2nd Street and 201 S. Spring Street, 5149-008-089, 5149-008-907, 5149-008-908
- 213 S. Spring Street, 5149-008-029

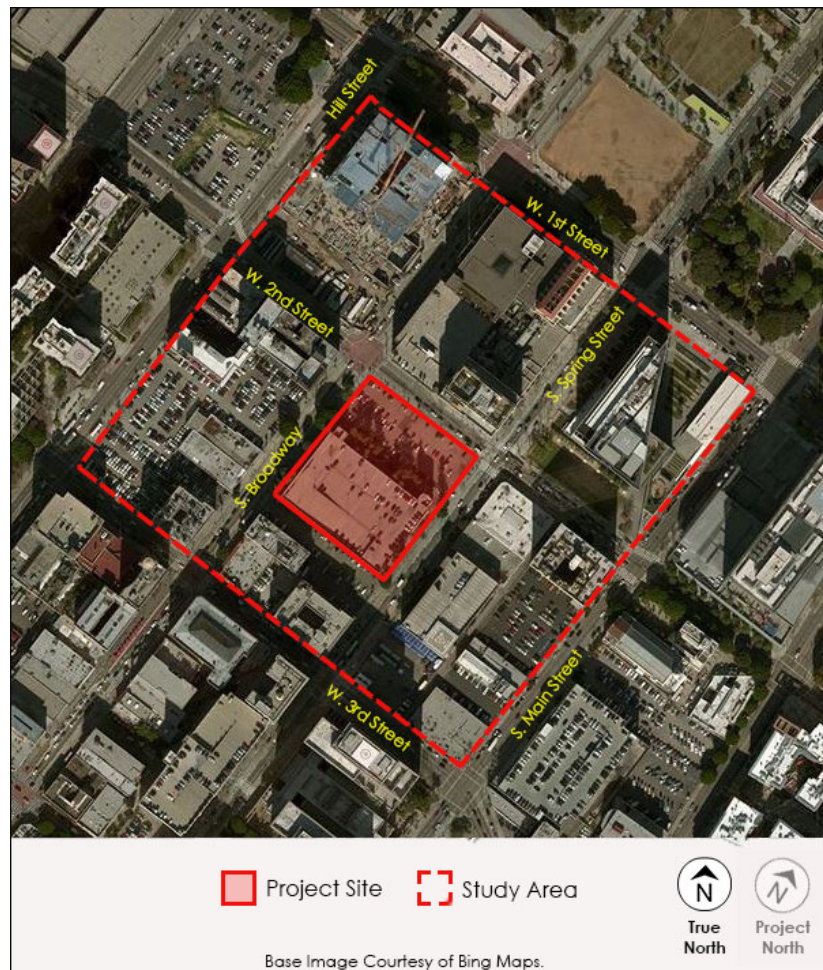


Figure 1
Location of Project Site and Study Area
(Base Map Courtesy Bing Maps 2017)

¹ Note that compass directions used in this report are based upon Project North rather than True North.

GPA Consulting (GPA) was retained to identify historical resources in the vicinity of the Project site, to assess any potential impacts the Project may have on the identified historical resources, and to recommend appropriate mitigation measures, as warranted, for compliance with CEQA. Teresa Grimes was responsible for the preparation of this report. She fulfills the qualifications for historic preservation professionals outlined in Title 36 of the Code of Federal Regulations, Part 61. Her résumé is attached in Appendix A.

1.2 Methodology

To identify potential historical resources and assess potential impacts from the Project, GPA performed the following tasks:

1. Conducted a field inspection of the Project site and vicinity to determine what areas might be impacted by the Project and to identify any known or potential historical resources. For the purposes of this report, the study area was identified as the Project site and a one-block radius (see Figure 1 above). This radius was established to account for indirect impacts on historical resources in the vicinity. Historical resources beyond this radius were not included in the study area because the Project would have no potential to indirectly impact these resources.
2. Requested a records search from the South Central Coastal Information Center to determine whether or not the Project site contains any properties that are currently listed as landmarks under national, state, or local programs and whether or not any properties have been previously identified or evaluated as historical resources.

GPA also consulted the Los Angeles Historic Resources Inventory website, HistoricPlacesLA.org, to determine if any historical resources were located within the study area. The seven buildings listed below were included in the search results for the study area. A description of these buildings and their evaluations can be found in Section 3.3 of this report. Please note that these seven buildings are in the study area, but are not a part of the Project.

1. Times-Plant Complex, 202 W. 1st Street and 121 S. Spring Street
2. Mirror Building, 145 S. Spring Street
3. Executive Building, 100 S. Broadway
4. Higgins Building, 108 W. 2nd Street
5. Douglas Building, 257 S. Spring Street
6. Irvine-Byrne Building, 301 W. 3rd Street and 249-259 S. Broadway
7. Victor Clothing Company Building, 242 S. Broadway

The parking structure on the Project site and the other buildings in the study area were excluded from further consideration as potential historical resources due to a lack of age, architectural character, and/or physical integrity – in addition to the fact that none are currently listed as landmarks at the local, state, or national levels and are not included as significant in any historic resource surveys of Downtown including SurveyLA, the citywide historical resources survey of Los Angeles.²

² Managed by the Department of City Planning's Office of Historic Resources, SurveyLA included a series of field surveys, conducted from 2010-2017, to identify and document potentially significant historic resources throughout the City of Los Angeles.

3. Reviewed and analyzed the plans and related documents to determine if the Project would have an indirect impact on the identified historical resources as defined by CEQA (see Appendix B for a copy of the Project plan set).

2. REGULATORY FRAMEWORK

Generally, a lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register of Historical Resources (California Register). The California Register is modeled after the National Register of Historic Places (National Register). Furthermore, a property is presumed to be historically significant if it is listed in a local register of historical resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant.³ The National Register, California Register, and local designation programs are discussed below.

2.1 National Register of Historic Places

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."⁴

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:⁵

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is

Angeles. Although the surveys identified and evaluated resources that may be eligible for designation, the surveys did not result in any actual designations.

³ Public Resources Code Section 5024.1 and 14 California Code of Regulations Sections 4850 & 15064.5(a)(2).

⁴ Title 36 Code of Federal Regulations Part 60.2.

⁵ Title 36 Code of Federal Regulations Part 60.4.

made clear."⁶ A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as "the ability of a property to convey its significance."⁷ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

2.2 California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.⁸

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.⁹

Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or

⁶ *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation* (Washington D.C.: National Park Service, Department of the Interior, 1997), 7-8.

⁷ *Ibid*, 44-45.

⁸ Public Resources Code Section 5024.1 (a).

⁹ Public Resources Code Section 5024.1 (d).

3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.¹⁰

The California Register may also include properties identified during historic resources surveys. However, the survey must meet all of the following criteria:¹¹

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [SOHP] procedures and requirements;
3. The resource is evaluated and determined by the office [SOHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

SOHP Survey Methodology

The evaluation instructions and classification system prescribed by the SOHP in its *Instructions for Recording Historical Resources* provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historic resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.

¹⁰ Public Resources Code Section 4852.

¹¹ Public Resources Code Section 5024.1.

5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

The specific Status Codes referred to in this report are as follows:

- 1D** Contributor to a district or multiple resource property listed in the National Register by the Keeper. Listed in the California Register.
- 2S2** Individual property determined eligible for the National Register by a consensus through Section 106 process. Listed in the California Register.
- 3CS** Appears eligible for the California Register as an individual property through survey evaluation.
- 5S1** Individual property that is listed or designated locally.
- 5S3** Appears to be individually eligible for local listing or designation through survey evaluation.

2.3 Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. The four criteria for HCM designation are stated below:

- The proposed HCM reflects the broad cultural, economic, or social history of the nation, state or community; or
- The proposed HCM is identified with historic personages or with important events in the main currents of national, state or local history; or
- The proposed HCM embodies the characteristics of an architectural type specimen inherently valuable for a study of a period, style or method of construction;
- The proposed HCM is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.¹²

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs.

¹² Los Angeles Administrative Code Section 22.171.7.

3. ENVIRONMENTAL SETTING

3.1 Description of the Project Site and Study Area

The Project site is located in the Central City Community Plan Area, one of the 35 Community Plans that comprise the Land Use Element of the City's General Plan, on the south side of W. 2nd Street between S. Broadway and S. Spring Street in a neighborhood known as the Historic Core (see Figure 1, above). It is located between the Civic Center and Times-Mirror Square to the north as well as the Broadway Theater and Commercial District (Historic District) to the south.¹³ Times-Mirror Square and the northern tip of the Historic District are within the study area for this Project site. The boundary of the Historic District is shown in Figure 3 below. The Project site is not located within the boundary of the Historic District. The topography of the Project site is generally flat. W. 2nd Street and S. Broadway are busy four-lane commercial thoroughfares with two-way traffic, while S. Spring Street is a two-lane commercial thoroughfare with one-way traffic traveling south. The surrounding parcels primarily consist of mid-rise commercial and residential buildings and several surface parking lots. This development varies in construction date between the late 1800s and 2000s. There are also a few more recently developed high- and low-rise buildings in the vicinity notably the eleven-story Los Angeles Police Department Headquarters at 100 W. 1st Street east across Spring Street from the Times-Plant Complex and the new ten-story Federal Courthouse at 350 W. 1st Street west across Broadway from the Executive Building; both within the study area.

This report assesses the Project's potential impact on seven historical resources within the study area for the Project: the Times-Plant Complex, the Mirror Building, the Executive Building, the Higgins Building, the Douglas Building, the Irvine-Byrne Building, and the Victor Clothing Company Building. The following Section 3.3 describes these resources in detail. Historical resources are defined as properties that are designated under national, state, or local landmark or historic district programs. In addition, for the purposes of this report, and in order to provide a conservative analysis of the Project's potential impacts, individual properties and districts that have been identified as eligible for designation through the SurveyLA process are presumed to be historical resources.¹⁴ These properties and districts were not researched or evaluated on an intensive-level by GPA to independently determine their eligibility as historical resources. Instead, this report merely incorporates SurveyLA's findings regarding the eligibility of these resources.



Figure 2
Photograph of Project Site, looking southeast
(GPA)

¹³ The Broadway Theater and Commercial District is listed in the National Register. This historic district and its boundaries (see Figure 3) differ from the Broadway Theater and Entertainment Community Design Overlay District, which is one of many Community Design Overlay (CDO) districts adopted by the City of Los Angeles. CDO districts are intended in part to assure that development complies with the design guidelines and standards of the district, to promote the distinctive character, stability, and visual quality of the district, and to protect areas of cultural interest. For more information on compliance with the CDO, please see the Land Use section of the EIR report.

¹⁴ State CEQA Guidelines Section 15064.5.

3.2 Historical Resources in the Project Study Area

Although there are no historical resources present on the Project site, there are seven historical resources within the study area (see Figure 3 below). The new building would be within the same block as two historical resources, the Douglas Building and Victor Clothing Company Building, but separated by an existing five-story parking structure to remain on the Project site and surface parking lots. Additionally, the new building would be directly across 2nd Street from one historical resource, across S. Broadway from another historical resource, and adjacent to blocks containing three outward-facing historical resources; all seven are pictured and described below.

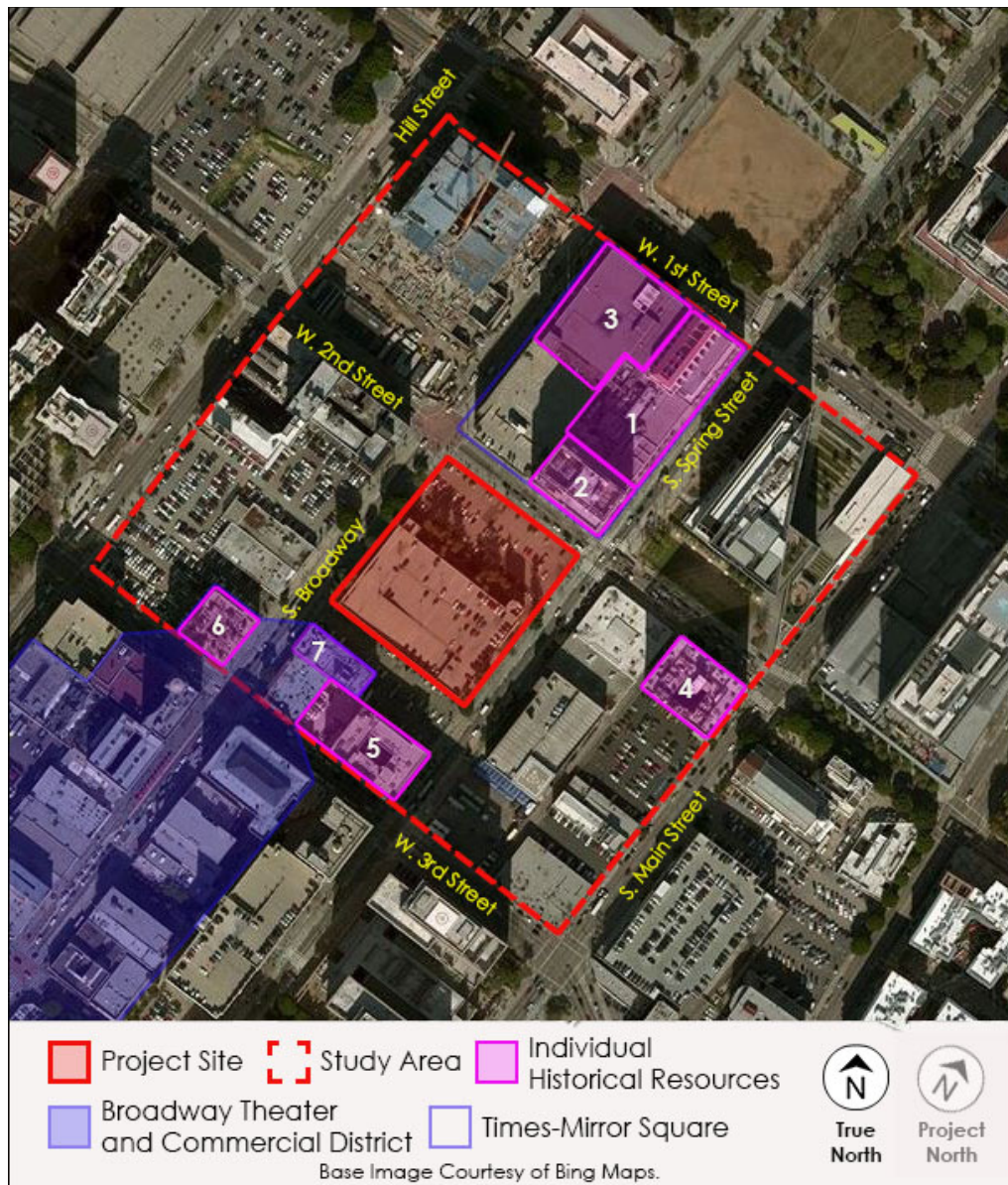


Figure 3
Historical Resources within Study Area
(Base Map Courtesy of Bing Maps 2017)

1. Times-Plant Complex (aka Los Angeles Times Building and Plant Building), 202 W. 1st Street and 121 S. Spring Street (Status Code 2S2)



The Times-Plant Complex consists of the Los Angeles Times Building and the Plant Building. It is located within the northeast corner of Times-Mirror Square on the southwest corner of W. 1st Street and S. Spring Street, on the block immediately north of the Project site. The complex is 'L' shaped in plan with its façade (north) oriented toward W. 1st Street. The Times Building was constructed in 1935 as the new headquarters of the Times Mirror Company, owner of the *Los Angeles Times* (originally the *Los Angeles Daily Times* and

the *Los Angeles Weekly Mirror*). The new headquarters replaced one of the paper's prior buildings, which was bombed by labor union sympathizers in 1910. The Plant Building was constructed between 1935 and 1948 in conjunction with the Times Building. Both buildings were designed by the same architect, Gordon B. Kaufmann in the Public Works Administration (P.W.A.) Moderne style. The exterior of the Times Building has a reinforced steel and concrete structure clad with marble on the base and limestone on the upper floors. It is organized vertically by symmetrical bays consisting of fixed metal-sash windows divided by bronze spandrels and stepped-down massing from approximately eight stories at its tallest, central tower to six stories, and then four stories at its east and west extents. The façade (east) of the Plant Building has a reinforced steel and concrete structure clad with marble on the base and limestone on the upper floors. The Plant Building is organized horizontally by four stories with storefronts identical to the Times Building on the first story, a decorative band of sunbursts matching the one on the Times Building along the second story, and continuous bands of fixed metal windows with prismatic glass block transoms on the third and fourth stories. In 1978, a portion of Times-Mirror Square was evaluated through the Section 106 process and determined eligible for the National Register.¹⁵ For the purposes of this report, the Times and Plant buildings are considered an eligible joint historical resource known as the Times-Plant Complex



2. Mirror Building, 145 S. Spring Street (Status Code 2S2)

The Mirror Building is located within the southeast corner of Times-Mirror Square at the northwest corner of S. Spring Street and W. 2nd Street. The Project site is located south of this historical resource, across W. 2nd Street. The building is rectangular in plan with its facade (east) oriented toward S. Spring Street. The ten-story building was constructed in 1948 as the offices for a new afternoon paper called the *Los Angeles Mirror*. The new building also housed a mail room, press room, television offices, rental offices, and equipment storage rooms for the paper.¹⁶ The building was designed by Rowland H.

¹⁵ Roger Hatheway and John Chase, "L.A. Times Complex," Historic Resources Inventory Form (June 1978).

¹⁶ No Author, "New Building for Los Angeles Times Ready in Fall," *Architectural Record*, June 1948, 32-1.

Crawford, a former employee of Gordon B. Kaufmann in the Late Moderne style with influences of W.P.A. Moderne. The steel frame structure is clad with Indiana limestone and granite. The central portion of the facade is organized vertically by seven bays that extend to a parapet higher than the side portions, which carry horizontal bands of ribbon windows around the side elevations. This property was determined eligible for listing in the National Register by consensus in 2009 through the Section 106 process and was automatically listed in the California Register.

3. Executive Building, 100 S. Broadway (Status Codes 3CS, 5S3)



The Executive Building is located within the northwest corner of Times-Mirror Square on the southeast corner of W. 1st Street and S. Broadway, on the block immediately north of the Project site. The building is rectangular in plan with its facade (north) oriented toward W. 1st Street. The six-story building was constructed between 1970 and 1973 immediately west of the Times Building to house executive offices for the *Los Angeles Times*. By this time, the paper had turned into a world-class, award-winning newspaper, and as the *Times* staff grew, so did its real estate

holdings.¹⁷ The building was designed by William L. Pereira & Associates in the International style. The steel frame structure is clad with a combination of Norwegian granite and metal coated with a bronze silicon copolymer finish. The building's massing consists of large horizontal boxes that consist of bands of fixed windows and are supported by granite-clad vertical boxes. The arrangement of boxes creates a deep recess at street level which features landscaping. In 2016, SurveyLA identified this property as appearing eligible for listing in the California Register as well as for local listing or designation for its association with the growth and evolution of the *Los Angeles Times* and with the career of Otis Chandler, publisher of the *Los Angeles Times*, but noted that the building was not of exceptional importance.



4. Higgins Building, 108 W. 2nd Street (Status Code 5S1)

The Higgins Building is located on the southwest corner of W. 2nd Street and S. Main Street, on the northeast corner of the block immediately east of the Project site. The building is rectangular in plan with its facade (north) oriented toward W. 2nd Street. The ten-story building was constructed in 1910 as "one of the city's first electric power generating systems and housed such groups as the Women's Progressive League, Association of

¹⁷ Jonathan Kandell, "Otis Chandler, Publisher Who Transformed *Los Angeles Times*, Dies at 78," *The New York Times*, accessed February 23, 2017
<http://www.nytimes.com/2006/02/28/obituaries/28chandler.html?ex=1298782800&en=418b087af329012c&ei=5090&r=0>

Liquor Dealers, and the law office of Clarence Darrow."¹⁸ In 1977, the final commercial tenant vacated the building, and the property remained vacant until 2003, when its use was converted to commercial businesses on the ground-floor with multi-family residential units on the upper floors.¹⁹ The building was designed by A.L. Haley in the Beaux Arts style with influences of Greek Revival. The reinforced concrete structure is organized horizontally with the lower floors clad with stucco and terra cotta Greek Revival-inspired ornament, the middle floors clad with stucco, and the upper floors differentiated by Greek Revival-inspired ornament and topped by a metal cornice. This property was designated in 1988 as HCM #403.

5. Douglas Building, 257 S. Spring Street (Status Code 5S1)



The Douglas Building is located on the northwest corner of S. Spring Street and W. 3rd Street, within the same block as the Project site, and is accompanied by a surface parking lot on the western portion of the property. The building is rectangular in plan with a central courtyard and its building entry facade (east) oriented toward S. Spring Street. The five-story building was constructed in 1899 through a commission by the estate of T.D. Stimson, "a lumber baron whose real estate investments contributed to the development of downtown Los Angeles" in the late nineteenth and early twentieth centuries.²⁰ The building was designed by the Reid Brothers in the Neoclassical style. The reinforced concrete structure is organized

horizontally with the first floor clad with terra cotta and the upper floors clad with brick. The second and fifth floors have terra cotta ornament, and the building is topped by an ornate terra cotta cornice. This property was designated in 2009 as HCM #966.



6. Irvine-Byrne Building, 301 W. 3rd Street and 248-259 S. Broadway (Status Codes 1D, 5S1)

The Irvine-Byrne Building is located within the Broadway Theater and Commercial District on the northwest corner of W. 3rd Street and S. Broadway. The Project site is located northeast of this historical resource, across S. Broadway. The building is rectangular in plan with a central courtyard and its building entry facade (east) oriented toward Broadway. The five-story building was constructed in 1894 as the Irvine Block.²¹ When James W. Byrne purchased the building in 1905, it became the Byrne

¹⁸ "Higgins Building," HistoricPlacesLA, accessed February 23, 2017, <http://www.historicplacesla.org/reports/010fbd5b-d1f2-41d3-8628-6bbb627390e4>.

¹⁹ Ibid.

²⁰ "Douglas Building," HistoricPlacesLA, accessed February 23, 2017, <http://www.historicplacesla.org/reports/5eff5174-be3a-4171-a689-2127d6a5a171>.

²¹ Teresa Grimes, "Broadway Theater & Commercial District (Boundary Increase)," National Register of Historic Places Continuation Sheet, 2002, 8-1.

Building.²² The building was designed by Sumner Hunt in the Beaux Arts style with influences of Italian Renaissance Revival. Willis Polk, a noted San Francisco architect, was hired to perform repairs on the building in 1911. The reinforced concrete structure is organized horizontally with the first floor clad with stucco, the middle floors clad with brick and decorated by fluted Corinthian pilasters separating bays and scrolls above arched windows, and the upper floor clad with brick and topped by a cornice differentiated with ornate terra cotta detailing. This property was designated in 1991 as HCM #544 and is listed in the National and California Registers as a contributor to the Broadway Theater and Commercial District.

7. Victor Clothing Company Building, 242 S. Broadway (Status Code 1D)



The Victor Clothing Company Building is located within the Broadway Theater and Commercial District on the east side of S. Broadway between W. 2nd Street and W. 3rd Street, within the same block as the Project site. The building is rectangular in plan with its facade (west) oriented toward S. Broadway. The five-story building was constructed in 1914 for Mr. and Mrs. J.F. Hosfield of Monrovia.²³ Typical of other commercial buildings in the Historic District, it has retail spaces on the first floor, corresponding mezzanines above for storage, and loft spaces on the upper floors. The building was designed by (Robert F.) Train & (Robert E.) Williams with elements of the Beaux Arts and Eclectic styles. The reinforced concrete structure is organized horizontally with the first floor clad with terra cotta tiles, the upper floors clad with brick, and the cornice differentiated with ornate terra cotta detailing. This property is listed in the National and California Registers as a contributor to the Broadway Theater and Commercial District.

4. PROJECT IMPACTS

4.1 Determining the Significance of Impacts on Historical Resources

The State CEQA Guidelines set the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5(b), which states:

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.

Title 14 California Code of Regulations Section 15064.5(b)(1) further clarifies “substantial adverse change” as follows:

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.

²² Ibid.

²³ Ibid.

Title 14 California Code of Regulations Section 15064.5(b)(2) in turn explains that a historical resource is "materially impaired" when a project:

Demolishes or materially alters in an adverse manner those physical characteristics that convey its significance and that justify its inclusion in or eligibility for inclusion in the California Register, local register, or its identification in a historic resources survey.

The following factors are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant impact on a historical resource if it would result in a substantial adverse change in the significance of the historical resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant 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.

As such, the test for determining whether or not a proposed project will have a significant impact on an identified historical resource is whether or not the project will alter in an adverse manner the physical integrity of the historical resource such that it would no longer be eligible for listing in the National or California Registers or other landmark programs such as the list of HCMs.

4.2 Secretary of the Interior's Standards

Projects that may affect historical resources are considered mitigated to a level of less than significant if they are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards).²⁴ Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Standards.²⁵ The Standards were issued by the National Park Service, and are accompanied by Guidelines for four types of treatments for historical resources: Preservation, Rehabilitation, Restoration, and Reconstruction. Though none of the four treatments as a whole applies specifically to new construction in the vicinity of historical resources, Standards #9 and #10 of the Standards for Rehabilitation provides relevant guidance for such projects.

The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

²⁴ 14 CCR Section 15126.4(b).

²⁵ 14 CCR Section 155331.

3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

It is important to note that the Standards are not intended to be prescriptive, but instead provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, nor is it necessary to comply with every Standard to achieve compliance.

4.3 Project Description

The Applicant proposes to demolish a surface parking lot and construct a 30-story, 449 feet in height mixed-use tower comprised of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial retail floor area, and 534,044 square feet of office uses.²⁶ The 2.71-acre Project site would also house the Metro Regional Connector 2nd Street/Broadway rail station and portal, currently under construction. Based on a total of 688,301 square feet of floor area (including the Metro portal), the Project site would have an FAR of 5.82:1. The Project's improvements would replace the previous surface parking lot located on the northern portion of the Project site. The existing five-story parking structure located on the

²⁶ The building's height would measure 435 feet at the highest roofline and 449 feet at the top of the highest parapet, which would be set back from the roofline.

southern portion of the Project site would remain to provide automobile and long-term bicycle parking for the Project. Modifications to the parking structure would involve interior improvements such as restriping and would not include any structural changes.

4.4 Analysis of Project Impacts

The proposed Project would have no direct impacts on historical resources. There are no historical resources on the Project site and no historical resources would be demolished, destroyed, relocated, or altered as a result of the Project. Therefore, this report only analyzes the indirect impacts the Project may have on the historical resources in the vicinity. Indirect impacts or secondary effects are reasonably foreseeable and caused by a project, but occur at a different time or place.²⁷ The seven historical resources in the study area are on parcels within a one-block radius of the Project site, including the Times-Plant Complex, the Mirror Building, the Executive Building, the Higgins Building, the Douglas Building, the Irvine-Byrne Building, and the Victor Clothing Company Building. As explained above in Section 3.2, the Irvine-Byrne Building and the Victor Clothing Company Building represent the northernmost boundary of the Broadway Theater and Commercial District.

As described in Section 3.2 above, the Douglas Building and the Victor Clothing Company Building are located within the same block as the Project site – immediately south and separated by surface parking lots. The Mirror Building is located across W. 2nd Street to the north, the Irvine-Byrne Building is located across S. Broadway to the west, the Times-Plant Complex and the Executive Building are located within the adjacent block to the north facing away from the Project site, and the Higgins Building is located within the adjacent block to the east facing away from the Project site. In the dense urban setting of Downtown Los Angeles, the construction of new buildings across the street from historic buildings is not uncommon, and new development has already occurred in proximity to these historical resources. The Irvine-Byrne Building as well as the Times-Plant Complex, the Executive Building, and the Higgins Building would not be affected by the new building, due to the significant physical and visual separation between these historical resources and the Project site. The Mirror Building, the Douglas Building, and the Victor Clothing Company Building are located closest to the Project site, and therefore would be more susceptible to indirect impacts. However, as more fully described below, the new building would not affect the physical integrity or historic significance of these three historical resources. As such, the Project would have no indirect impacts on the historical resources in the vicinity.

In determining indirect impacts of adjacent new construction on individual resources such as the Mirror Building, the Douglas Building, and the Victor Clothing Company Building, the central question is whether the new building would affect the physical integrity of or otherwise materially impair the historic building to the degree that it would no longer qualify as a historical resource. Such an effect would only occur if the Mirror Building, the Douglas Building, or the Victor Clothing Company Building no longer retained sufficient integrity to convey its significance. According to *National Register Bulletin #15*, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. The only relevant aspect with respect to the impact of a new building on a historic building is setting. Setting refers to the character of the place in which the property played its historical role.

²⁷ 14 CCR Section 15358 (a)(2)

To consider the importance of setting for the Mirror Building, the Douglas Building, and the Victor Clothing Company Building, *National Register Bulletin #15*, the *Los Angeles Citywide Historic Context Statement*, and the National Register Nomination for the Broadway Theater and Commercial District were referenced, respectively. Part VIII of *National Register Bulletin #15* addresses the assessment of integrity in properties in addition to naming the seven aspects of integrity. In determining the relevant aspects of integrity to a specific property, the bulletin recommends testing “whether a historical contemporary would recognize the property as it exists today” if a property is associated with an important event, historical pattern, or person(s). It recommends retention of design, workmanship, and materials if a property embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master architect – with less emphasis on location, setting, feeling, and association. And, if a property yields or may yield information important in history or prehistory, Bulletin #15 states that “setting and feeling may not have direct bearing on the property’s ability to yield important information,” and that evaluation “should focus primarily on the location, design materials, and perhaps workmanship.” The *Los Angeles Citywide Historic Context Statement* prepared by the Office of Historic Resources is organized into nine broad contexts, and establishes eligibility standards for associated property types. The Douglas Building is eligible in the Architecture and Engineering Context under the Late 19th and Early 20th Century Architecture Theme. For buildings to be eligible under this context and theme, they should retain integrity of design, workmanship, feeling, setting, and materials. The significance of the Broadway Theater and Commercial District is based on the “variety and quality of architecture on Broadway” that evinces “its important place in the regional economy in the first decades of the twentieth century” and that represents “some of the most prominent architects working in Los Angeles.”²⁸ The Broadway Theater and Commercial District contains several important examples of “movie palaces and retail and commercial architecture within the dense urban area.”²⁹ This reference from the Historic District’s nomination imparts the importance of setting when determining whether a building is a contributor or not. However, the Mirror Building did not retain integrity of setting when it was determined eligible for listing in the National Register by consensus in 2009 through the Section 106 process and was automatically listed in the California Register. In 1973, the low- and mid-rise commercial buildings on the west half of the block were demolished and replaced with the Executive Building and parking structure. Likewise, the Douglas Building did not retain integrity of setting when it was designated as a HCM in 2009, nor did the Victory Clothing Company Building when it was determined eligible for listing in the National and California Registers as a contributor to the Broadway Theater and Commercial District in 2002. These historical resources were constructed at a time when the area was densely developed with a mixture of low- and mid-rise residential, commercial, and institutional buildings (see Figures 4 & 5). By 1950, Downtown Los Angeles was accommodating the automobile, and approximately half of the subject block had been dedicated to parking (see Figures 6 & 7). By the time these two historical resources were designated and listed, respectively, the low- to mid-rise buildings that remained on the northern portion of the block had been demolished and redeveloped as surface parking lots (see Figures 8-13).

²⁸ Grimes, “Broadway Theater & Commercial District (Boundary Increase),” 8-1.

²⁹ Ibid.

Figures 4-13: Mirror Building, Douglas Building, and Victor Clothing Company Building sites are marked with pink. The Project site is marked with red.

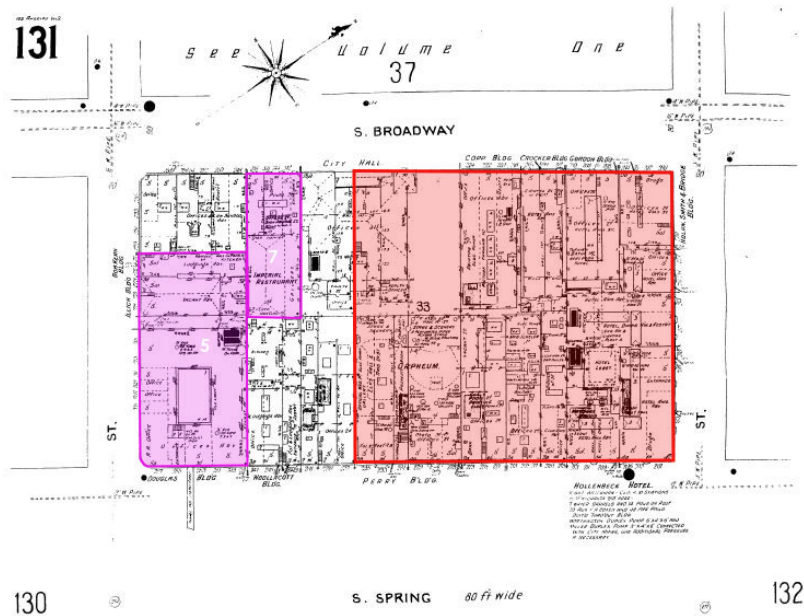


Figure 4
1906 Sanborn map, Volume 2, Sheet 131.
(Sanborn Fire Insurance Company)

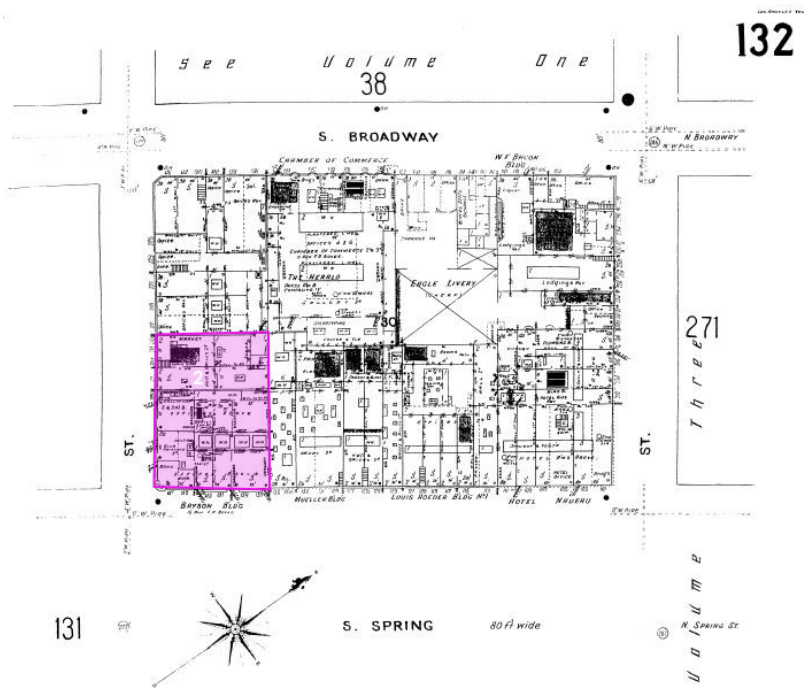


Figure 5
1906 Sanborn map, Volume 2, Sheet 132.
(Sanborn Fire Insurance Company)

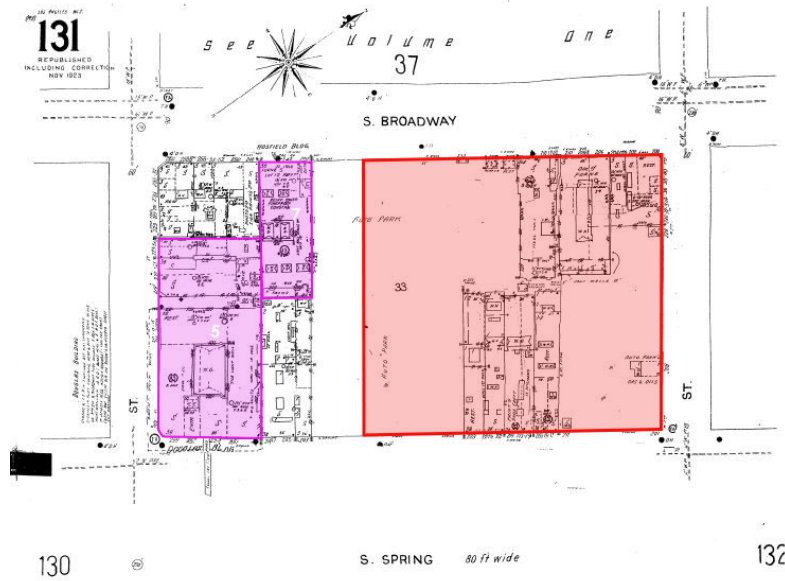


Figure 6
1950 Sanborn map, Volume 2, Sheet 131.
(Sanborn Fire Insurance Company)

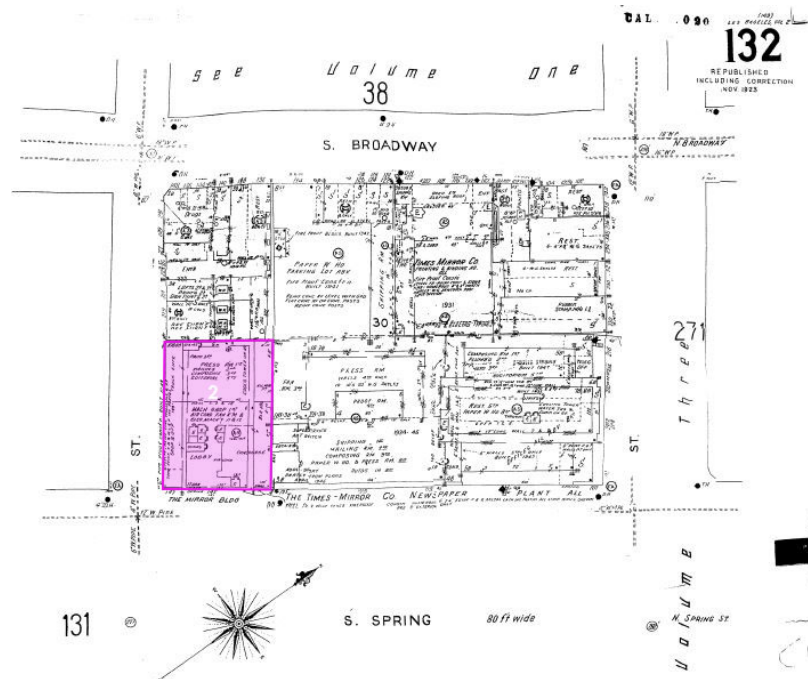


Figure 7
1950 Sanborn map, Volume 2, Sheet 131.
(Sanborn Fire Insurance Company)



Figure 8
1964 Historic Aerial
(HistoricAerials.com)



Figure 9
1972 Historic Aerial
(HistoricAerials.com)



Figure 10
1980 Historic Aerial
(HistoricAerials.com)



Figure 11
1994 Historic Aerial
(HistoricAerials.com)



Figure 12
2003 Historic Aerial
(HistoricAerials.com)



Figure 13
2009 Historic Aerial
(HistoricAerials.com)

Furthermore, as described above in the Project Description, the existing five-story parking structure located on the southwestern portion of the Project site would remain as is. This would retain the setting immediately northeast of the two subject historical resources. Thus, there would be no indirect impact on the Douglas Building and the Victor Clothing Company Building as historical resources. They would not be materially impaired by the Project because they would continue to be eligible for listing as historical resources defined by CEQA.



Figure 14

Photograph looking northwest toward Project Site with Douglas Building on the left
(GPA)



Figure 15

Photograph looking northeast toward Project Site with Victor Clothing Company Building on the right
(GPA)



Figure 16

Photograph looking west across the surface parking lots that separate the existing parking garage to remain on the Project Site (right) from the Douglas Building and Victor Clothing Company Building (left) (GPA)



Figure 17

Photograph looking southwest across Project Site toward high-rise buildings (GPA)



Figure 18

Artistic rendering of the south and west elevations of the proposed building from Broadway.
(Gensler)

Projects that comply with the Standards are considered mitigated to a less than significant level. As the Project does not involve the preservation, rehabilitation, restoration, or reconstruction of a historic building, the Standards are not directly applicable. To that end, Rehabilitation Standards #9 and #10 are relevant but not determinative in analyzing the potential impact of a new construction on a historic building. Rehabilitation Standards #9 and #10 primarily address additions to historic buildings or new construction within the boundaries of a historic property or district, which is not the case with the Project. Nevertheless, to be conservative, the Project's compliance with Standards #9 and #10 is discussed below.

Compliance with Standard #9

The Standard states: "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials,

features, size, scale and proportion, and massing to protect the integrity of the property and its environment."

The new building would be located directly across W. 2nd Street from the Mirror Building and north of the Douglas Building and the Victor Clothing Company Building within the same block, separated by the existing parking garage to remain within the Project site, and a small surface parking lot. The Mirror Building, the Douglas Building, and the Victor Clothing Company Building are not a part of the Project, thus the new building would not destroy historic materials, features, and spatial relationships that characterize the property. Thus, the spatial relationship between the Mirror Building, the Douglas Building, and the Victor Clothing Company Building and its immediate environment would remain intact. In addition, the relationship between the Victor Clothing Company Building and other contributing buildings in the Broadway Theater and Commercial District would remain unchanged. In terms of the broad surroundings, it has been noted above that the integrity of setting for the two subject historical resources has already been lost, but it was lost prior to their designation and listing, respectively. While the Mirror Building is 10 stories in height, and the Douglas Building and the Victor Clothing Company Building are each 5 stories in height, the new building would be 30 stories in height. While the new building's size and scale would be different than that of the historic buildings, these historical resources do not abut the Project site, making the difference in height less noticeable. And, the new building would be compatible with the size and scale of the other high-rise buildings that began to characterize Downtown Los Angeles beginning in the 1980s. At present the Historic Core has a higher concentration of 12-story buildings; however, as the Central City Community Plan states, although "neighborhoods and districts were originally defined with specific boundaries as defined in the Downtown Strategic Plan, ... over time the boundaries have blurred as land uses changed and overlapped with adjoining uses."³⁰ West of Hill Street, two blocks away from the Project site, buildings begin rising to 20 stories.



Figure 19
Artistic renderings of the elevations for the proposed building
(Gensler)

The new building would be differentiated from the historic buildings by its contemporary design and materials. The new building was designed "as a series of stacked volumes of varying sizes, with shifting footprints and alternating types of curtain walls, capped by a bronze 'crown'."³¹ The

³⁰ *Central City Community Plan*, City of Los Angeles Department of City Planning, 2009.

³¹ "222 West 2nd Project," Project Description, prepared by Eyestone Environmental, January 2017, A-7.

height and massing of the building is gradually oriented away from S. Broadway and toward S. Spring Street – to a degree, reflecting the height and massing of Mirror Building directly north of the Project site across W. 2nd Street. Furthermore, the volumes that make up the proposed Project do not exceed eight stories in height and are as short as four stories, each shifting in set back – almost as if it were an asymmetrical, vertical composition of mid-rise buildings. Thus, the design of the new building is responsive to the height and massing of the buildings that surround it. Primary façade materials for the new building would include “glass and various types of metal panels such as anodized aluminum, stainless steel, or bronze,” bringing lightness to its height and massing.³² While the new building’s materials and features cannot necessarily be characterized as compatible with the historic buildings, this is less important for related new construction – especially when they are not adjoining. Using complementary materials is more important for additions to a historic building, or where there is an established architectural style and palette of materials, such as within a historic district. Neither is the case in this instance. Although the new building would not strictly comply with this particular aspect of Standard #9, it would not reduce the integrity or significance of the nearby historical resources, which is the City’s CEQA threshold for an adverse impact.

In conclusion, the Project complies with Standard #9 to the extent appropriate for this area of Downtown Los Angeles.

Compliance with Standard #10

The Standard states: “New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.”

The Project complies with Standard #10. The new building is sufficiently separated from the Mirror Building by W. 2nd Street and from the Douglas Building and the Victory Clothing Company Building by two parcels spanning the width of the block that serve as surface parking lots. If the new building were removed in the future, the adjacent historical resources would not be materially affected. The essential form and integrity of the historical resources and their environment would be unimpaired.

5. CONCLUSIONS

The Project would have no direct impacts on historical resources. There are no historical resources on the Project site and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Project. Indirect impacts on historical resources were also analyzed. The Project would have no indirect impacts on the historical resources near the Project site. Although the Project would introduce a new visual element to the area, the new building would be physically separated from the Douglas Building and the Victor Clothing Company Building by a parking garage and surface parking lots and from the Times-Plant Complex, the Mirror Building, the Executive Building, the Higgins Building, and the Irvine-Byrne Building by W. 2nd Street, S. Spring Street, and S. Broadway. The new building would be located directly across the street from the Mirror Building and north of the Douglas Building and Victor Clothing Company Building. However, the Project would not result in a substantial adverse change to the immediate surroundings of these historical resources to the degree their eligibility as resources would be materially impaired. As the Irvine-Byrne Building and Victory Clothing

³² “222 West 2nd Project,” A-11.

Company Building are the two northernmost contributors in the Broadway Theater and Commercial District, it stands to reason that the Project would also have no indirect impact on the Historic District for the same reasons it has no indirect impact on the two contributors. The historic buildings that are individually significant as well as the Historic District would continue to be eligible for listing as historical resources defined by CEQA. No mitigation is required or recommended.

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Appendix A - Résumé



TERESA GRIMES is a Principal Architectural Historian at GPA. She has over 25 years of experience in the field of historic preservation in the private, public, and non-profit sectors. Teresa is widely recognized as an expert in the identification and evaluation of historical resources having successfully prepared dozens of landmark and historic district applications for a wide variety of property types. Her many projects have included historic context statements for Riverside, Calabasas, Glendale, and Carmel-by-the-Sea, and historic resource surveys in Riverside, Whittier, Calabasas, Pasadena, Whittier, and Los Angeles. Teresa has also completed numerous environmental compliance documents involving major

landmarks; examples include the United Artist Theater, Cinerama Dome, Dodger Stadium, Los Angeles Sports Arena, Beverly Hills Post Office, and Baldwin Hills Shopping Center.

Educational Background:

- M.A., Architecture, University of California, Los Angeles, 1992
- B.A., Political Science, University of California, Los Angeles, 1986

Professional Experience:

- GPA Consulting, Principal Architectural Historian, 2009-Present
- Christopher A. Joseph & Associates, Senior Architectural Historian, 2006-2009
- Teresa Grimes/Historic Preservation, Principal, 1999-2005, 1993-1994, 1991-1992
- Historic Resources Group, Project Manager/Architectural Historian, 1994-1998
- Getty Conservation Institute, Research Associate, 1992-1993
- Los Angeles Conservancy, Preservation Officer, 1988-1991

Qualifications:

- Meets the Secretary of the Interior's Professional Qualifications Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.

Professional Activities:

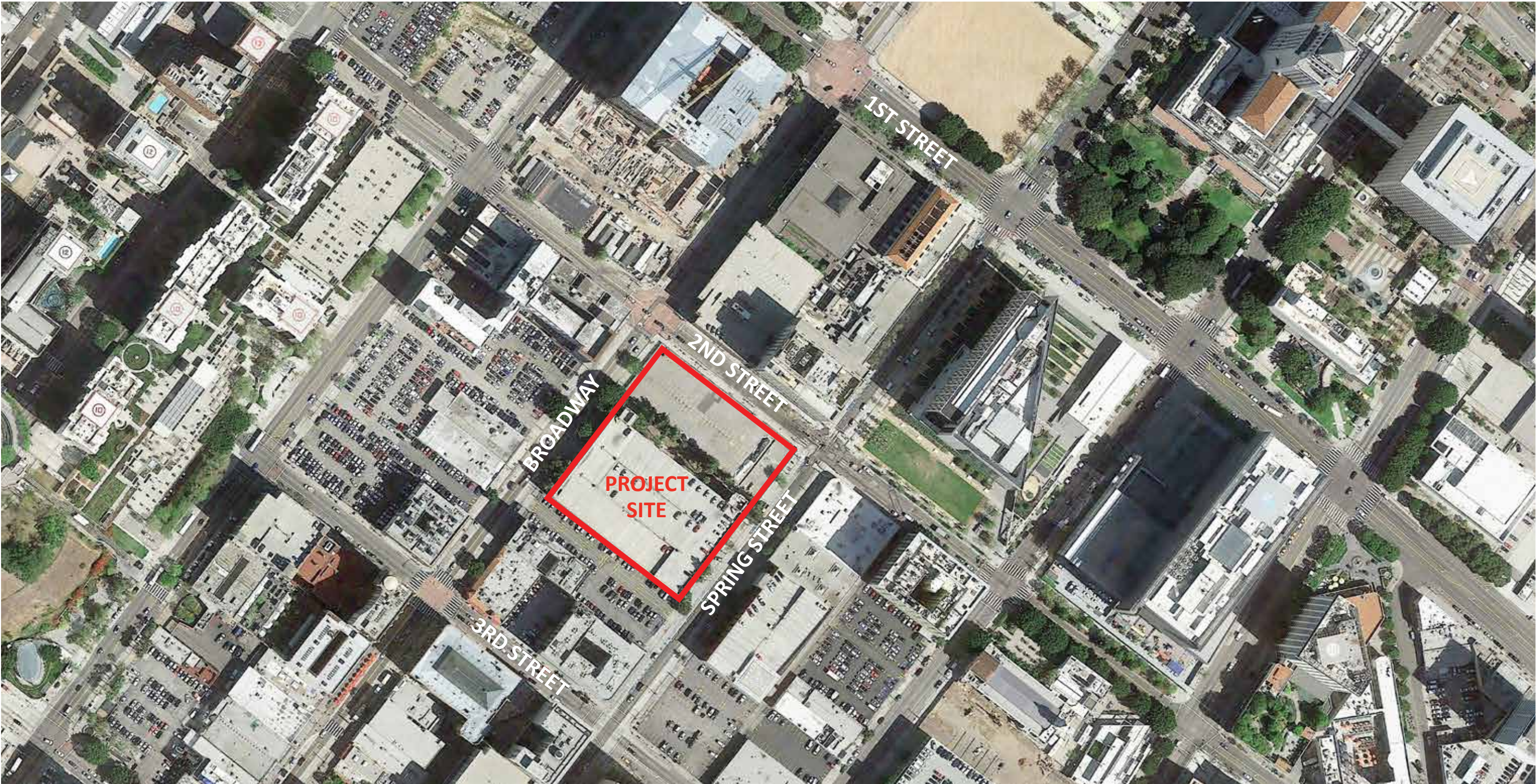
- Pasadena Heritage Board Member, 2008-2012
- Highland Park Heritage Trust, Board Member, 1996-1998
- West Hollywood Cultural Heritage Advisory Board, 1990-1994

Selected Projects:

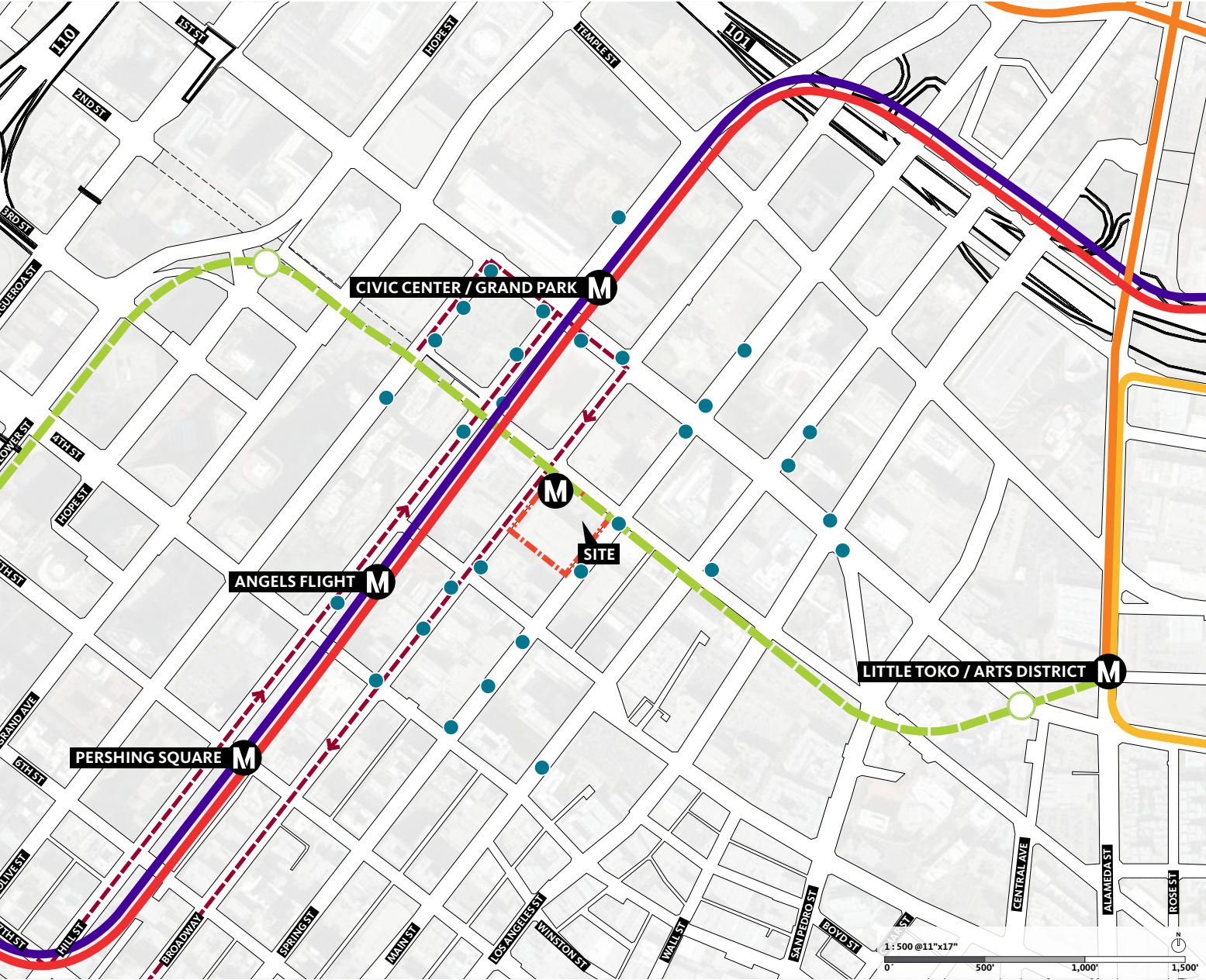
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Appendix B - Conceptual Plans



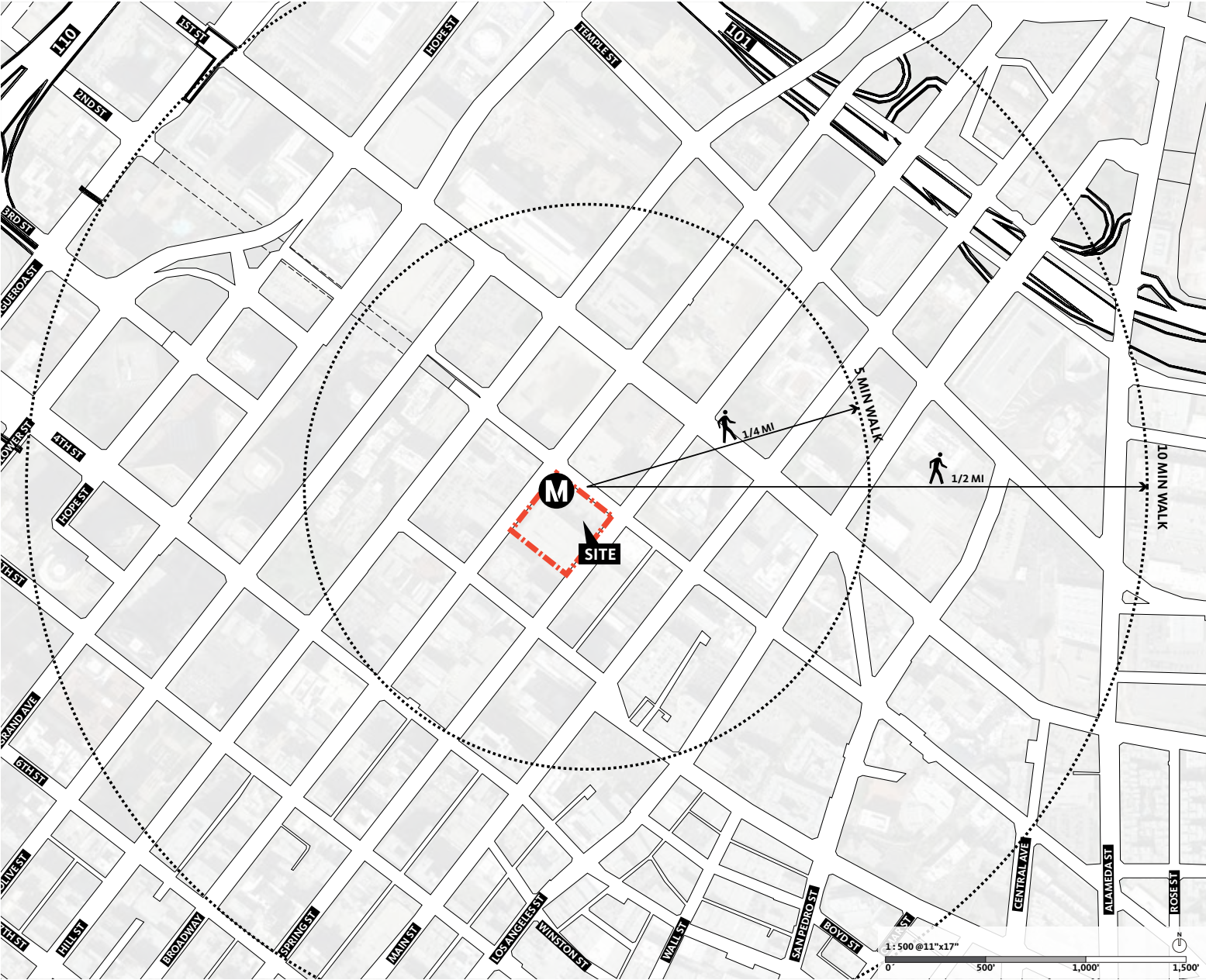


TRANSIT



- LEGEND:
- METRO PURPLE LINE
 - METRO RED LINE
 - METRO ORANGE LINE
 - METRO GOLD LINE
 - METRO REGIONAL CONNECTOR (PROPOSED)
 - LOS ANGELES STREET CAR (PROPOSED)
 - BUS STOPS W/IN A 1/4MI RADIUS

WALKABILITY





ICONIC BUILDINGS

The project site anchors the Broadway Theater and Entertainment District and is at the intersection of several iconic buildings including City Hall and the original LA Times Building.



Federal Courthouse



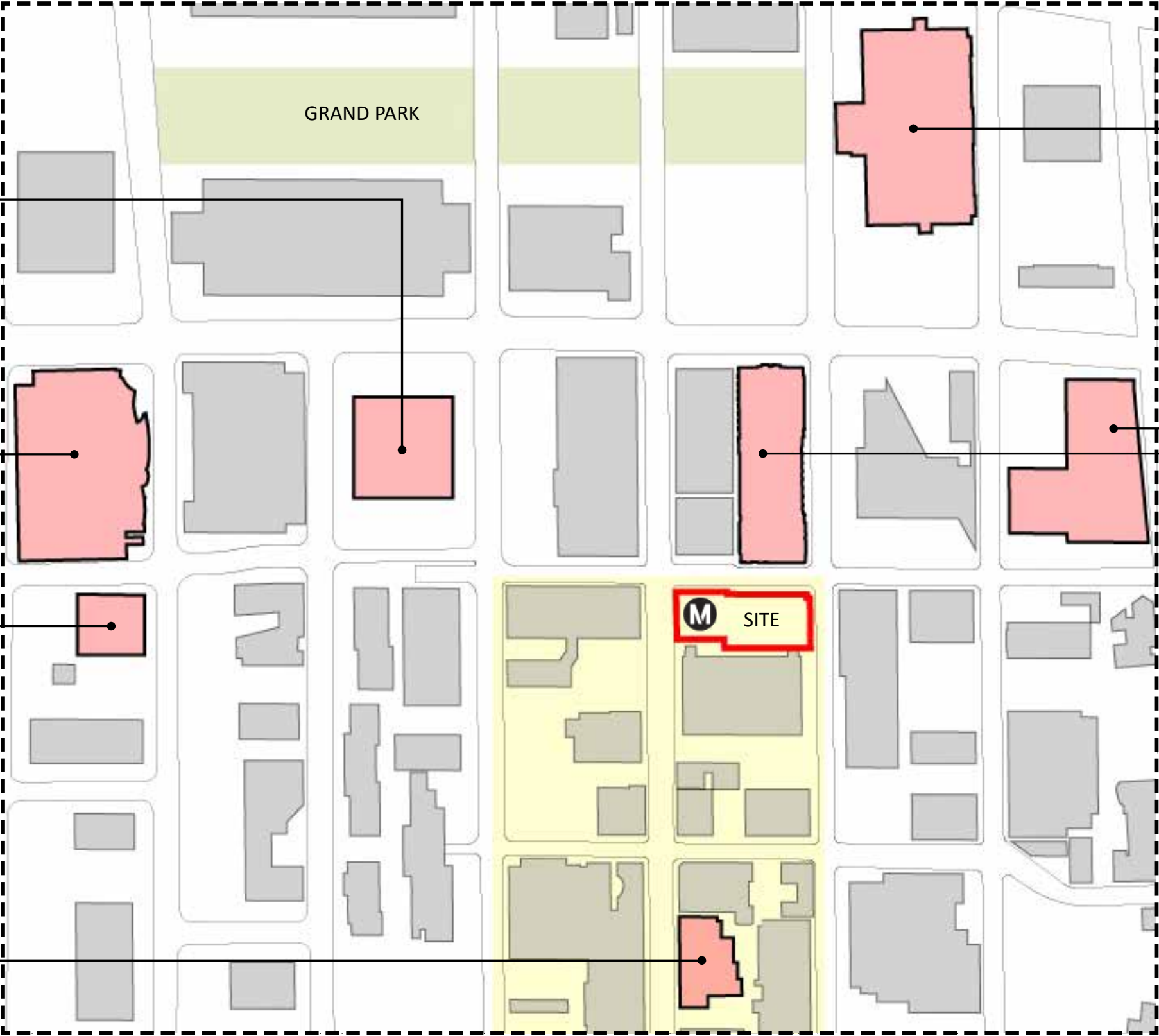
Walt Disney Concert Hall



The Broad Museum



Bradbury Building



City Hall




CalTrans



LA Times Building

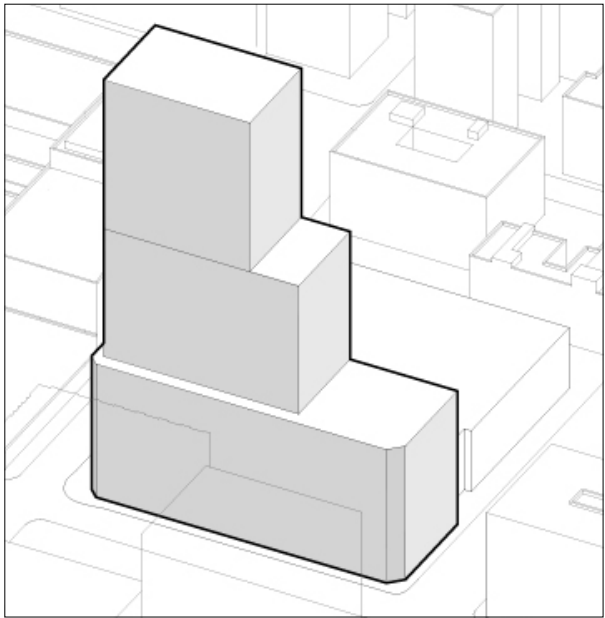


M Proposed Metro Station

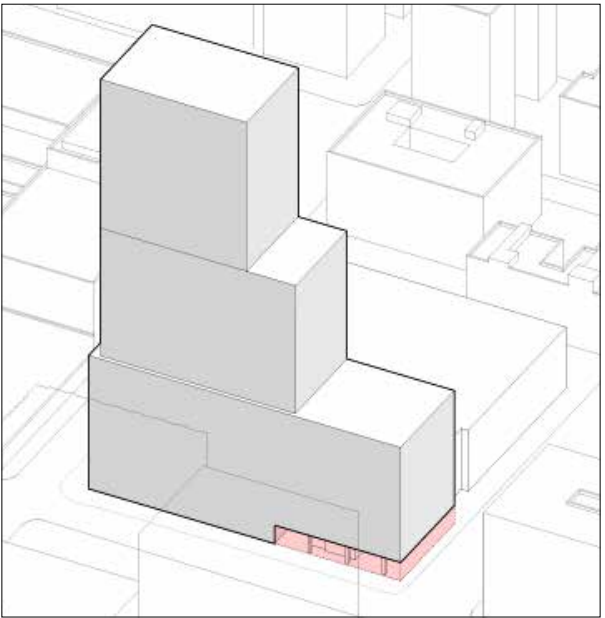
 Broadway Theater & Entertainment District

GROUND FLOOR PLAN

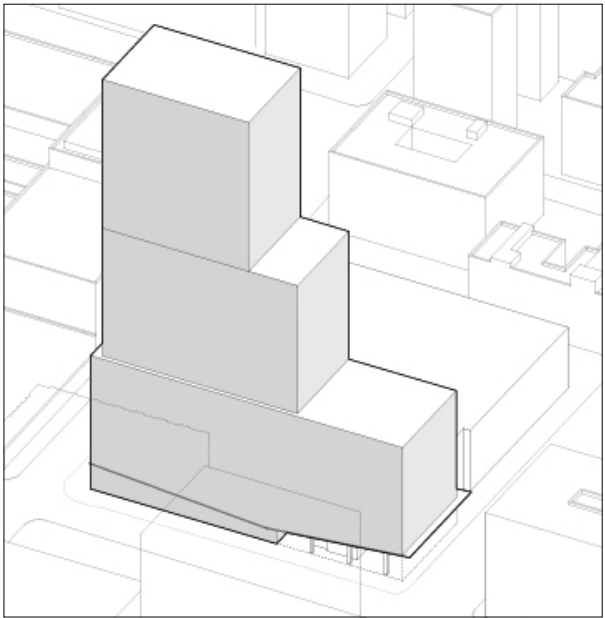




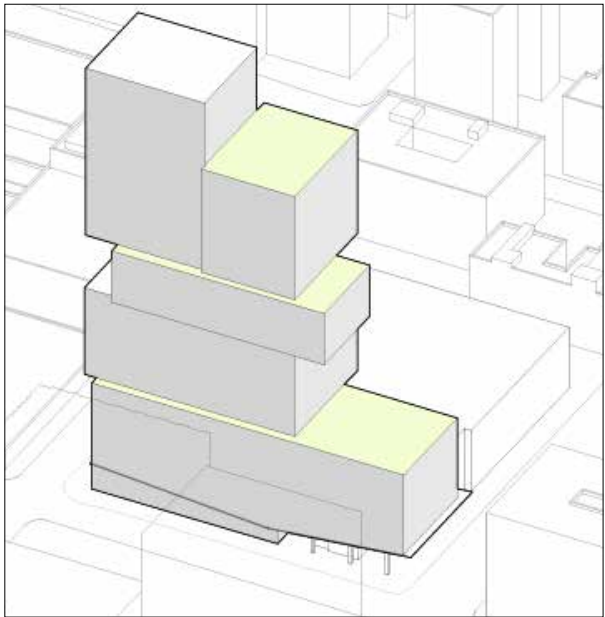
1 The initial building height and area restrictions respond to the city zoning code requirements.



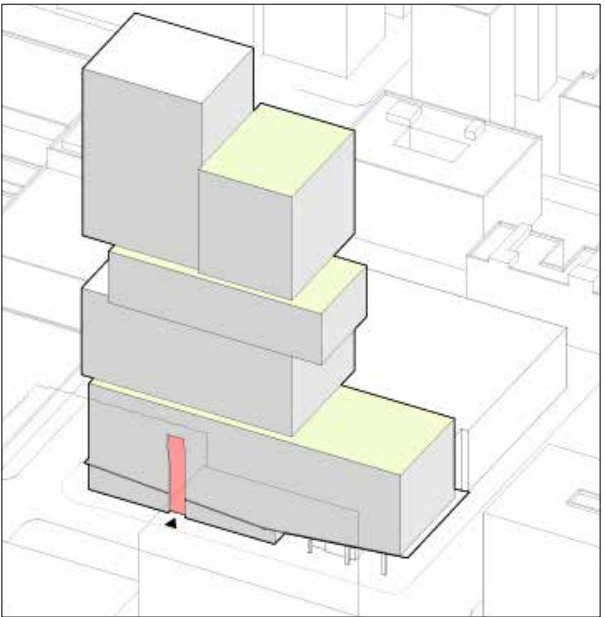
2 The Metro air space lot requires lifting the base of the building above the ground along Broadway and 2nd St.



3 Incorporating a raised canopy above the metro station creates an expansive public space, which leads to the public passage.



4 Outdoor terraces are created by shifting the programmatic volumes, which creates a variety of open space at different levels.



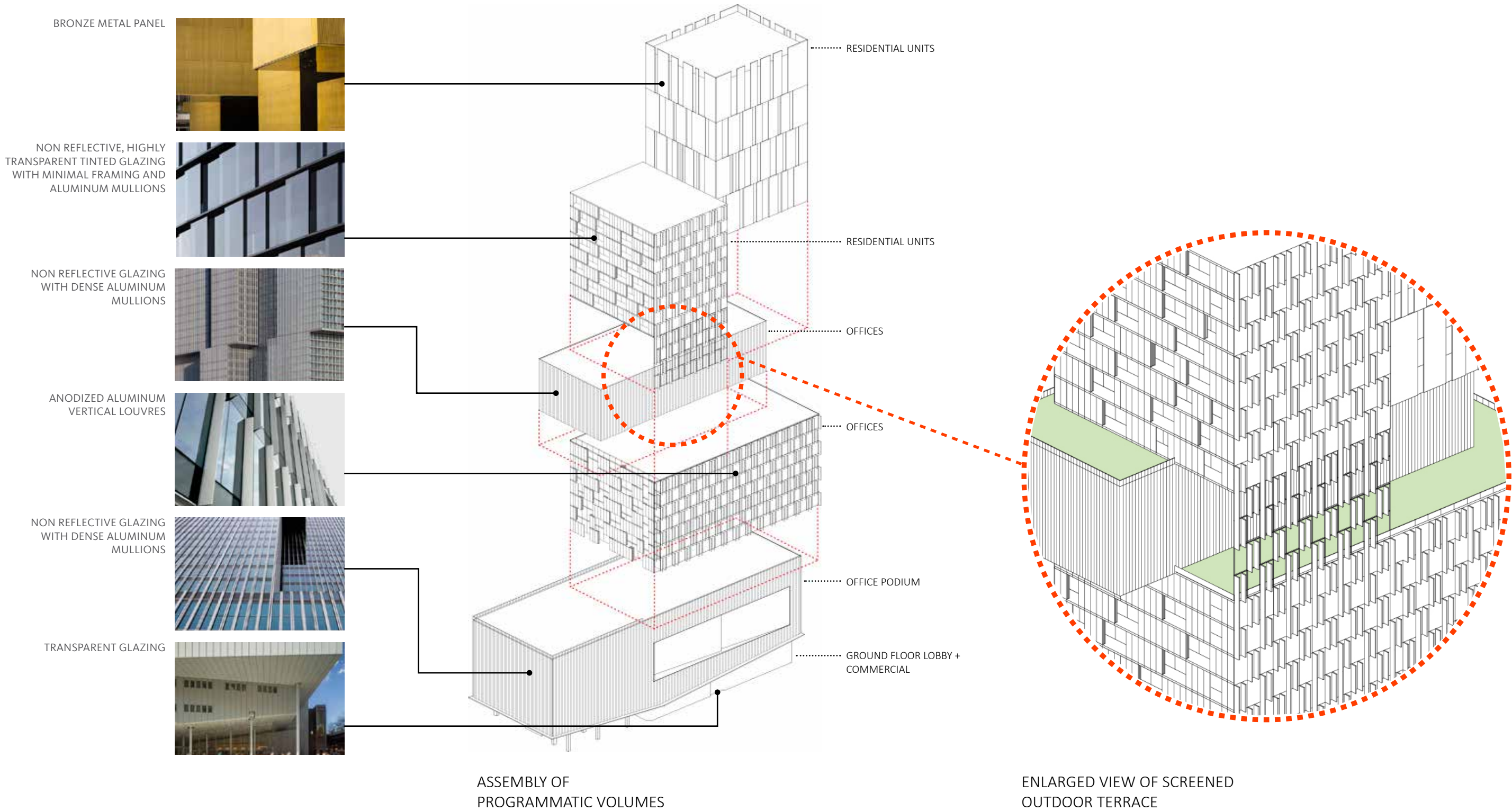
5 The commercial entry to the building from 2nd St is marked by a tall vertical recess in the facade.



6 The material expression of the building is a response to the eclectic mix of historic and contemporary buildings in the immediate vicinity and the spirit of Broadway Theater and Arts District.

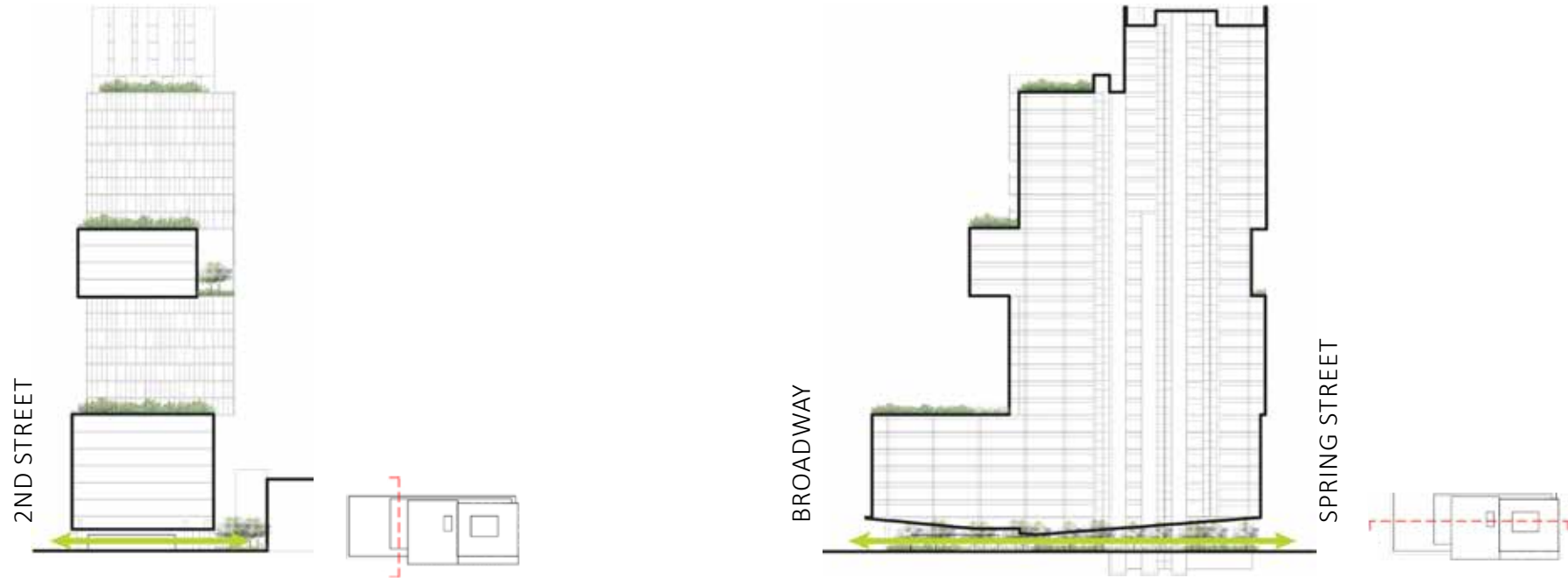
MATERIALS + LANDSCAPE

There are two basic curtain wall systems capped by a bronze box or crown. The building is built over a new metro station, its bulk lifted above the station and the commerical and residential lobbies below.



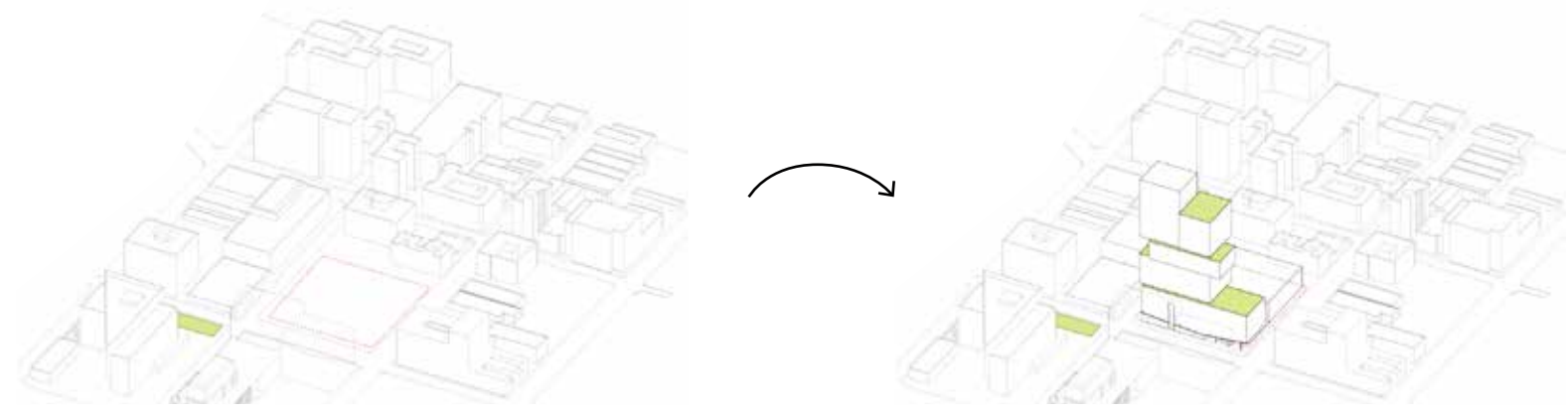
LANDSCAPE CONCEPT

The building shifts away from the metro station. The plaza around the station is integrated into an overall landscape concept which weaves in and around the building into a distinctive urban space.



URBAN TERRACES

There are several outdoor spaces offering a variety of experiences from the active and visually expansive to more passive, intimate settings.



Limited existing green spaces in immediate vicinity

The shifted volumes provide accessible outdoor terraces

EXISTING CONDITION



PROPOSED SOLUTION



ELEVATIONS

EL 449'-0"
T.O. PARAPET

EL 379'-0"
LEVEL 27

EL 267'-0"
LEVEL 19

EL 211'-0"
LEVEL 15

EL 113'-0"
LEVEL 08

EL 29'-0"
LEVEL 02

EL 0'-0"



NORTH/2NDSTREET ELEVATION



WEST/BROADWAY ELEVATION



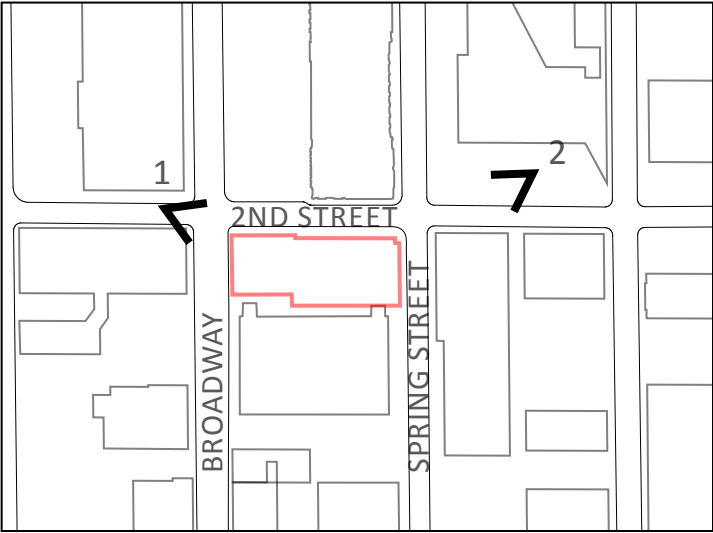
SOUTH/COURTYARD ELEVATION



EAST/SPRING STREET ELEVATION



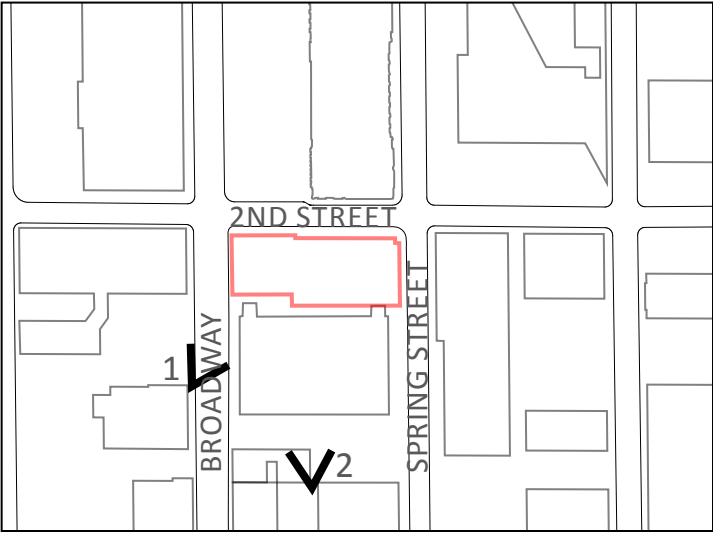
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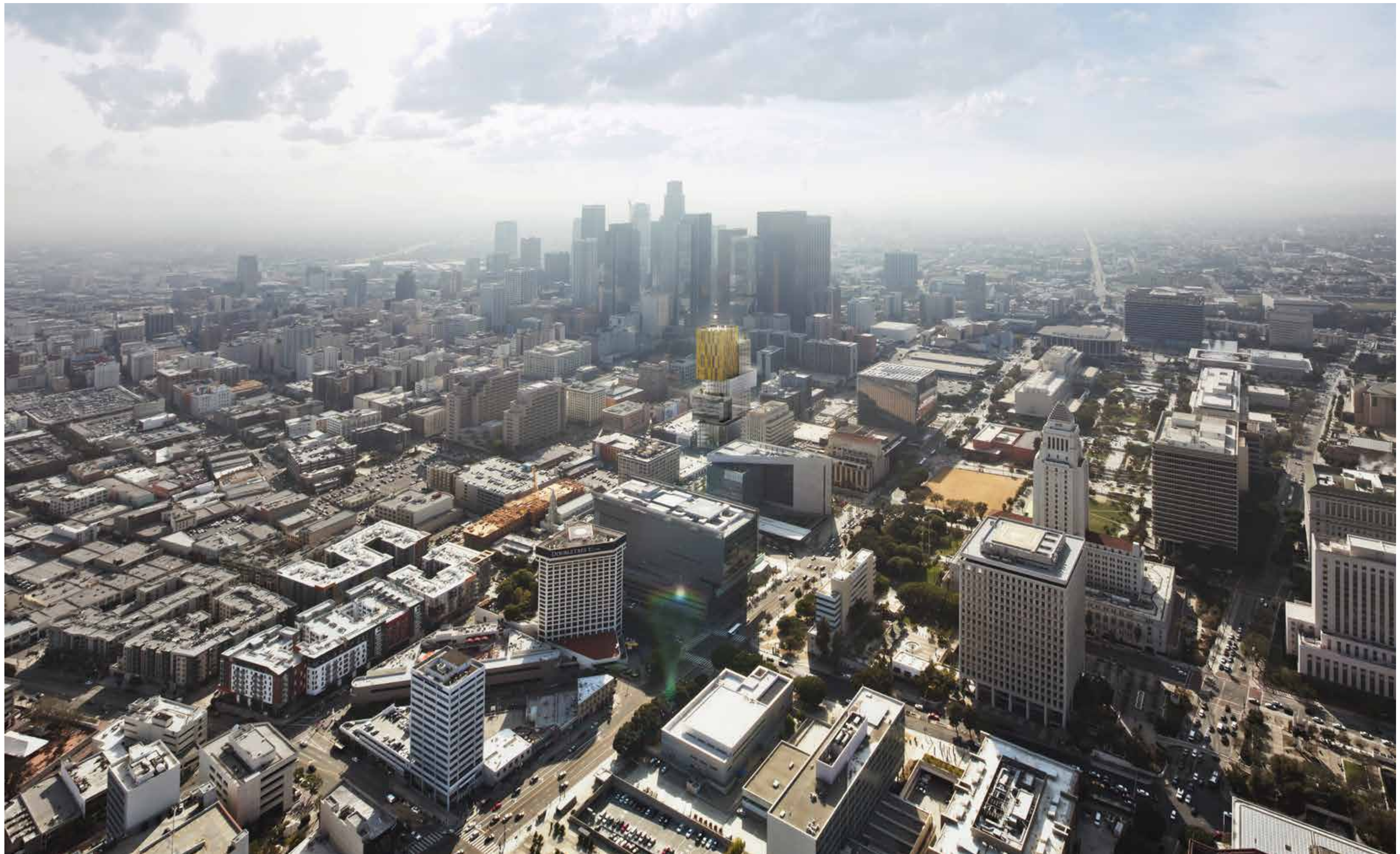
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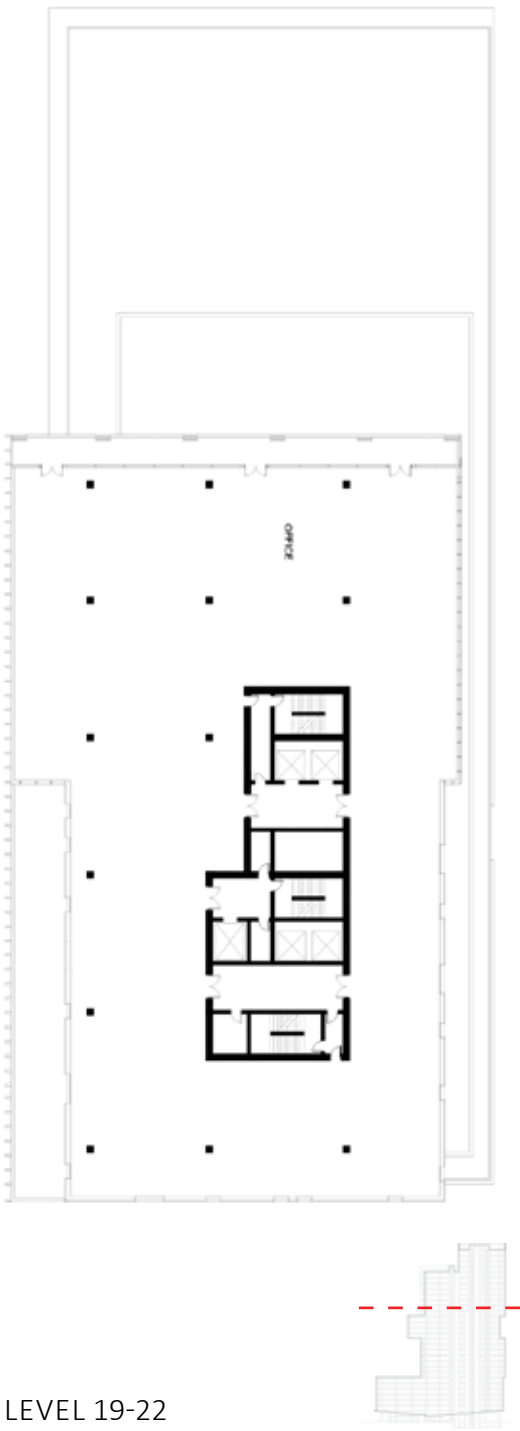
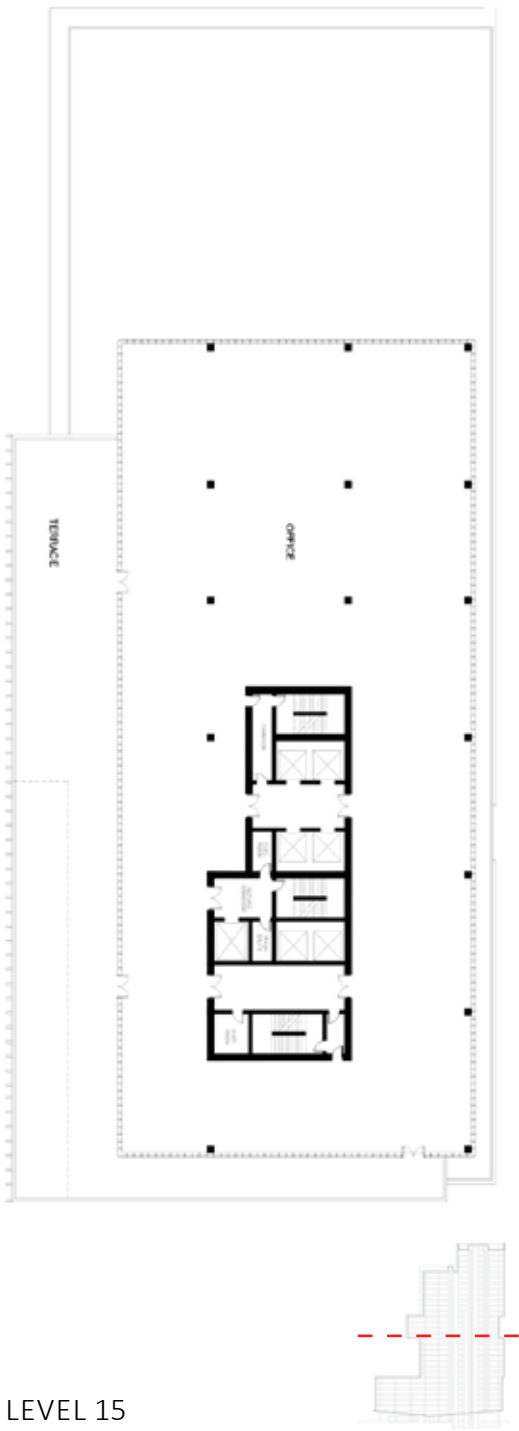
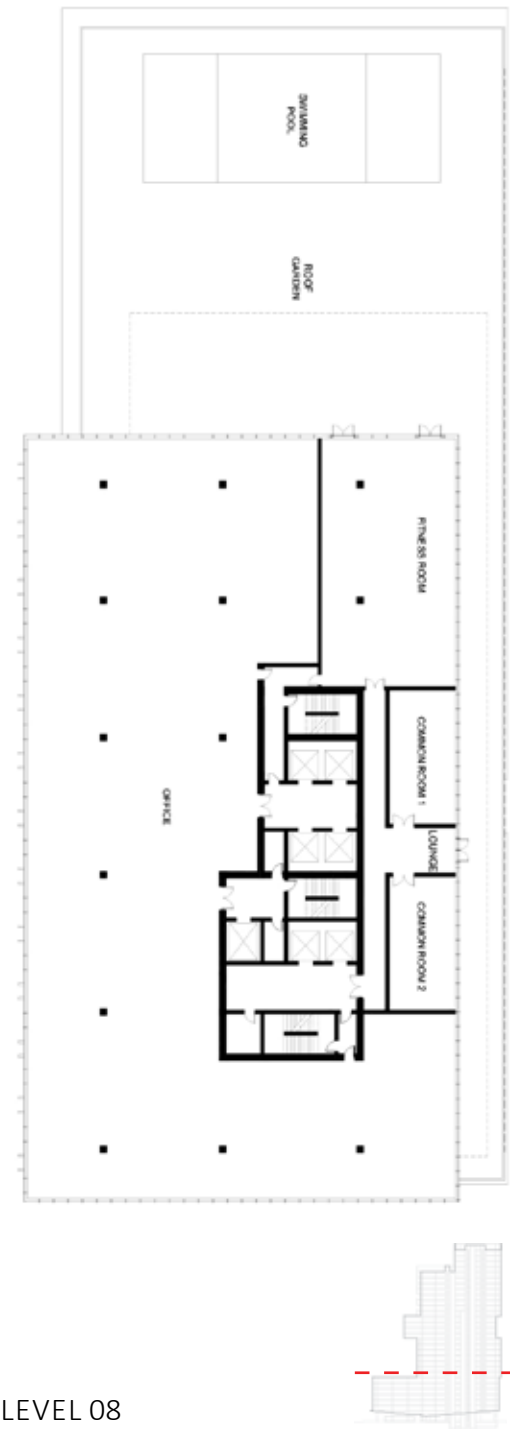
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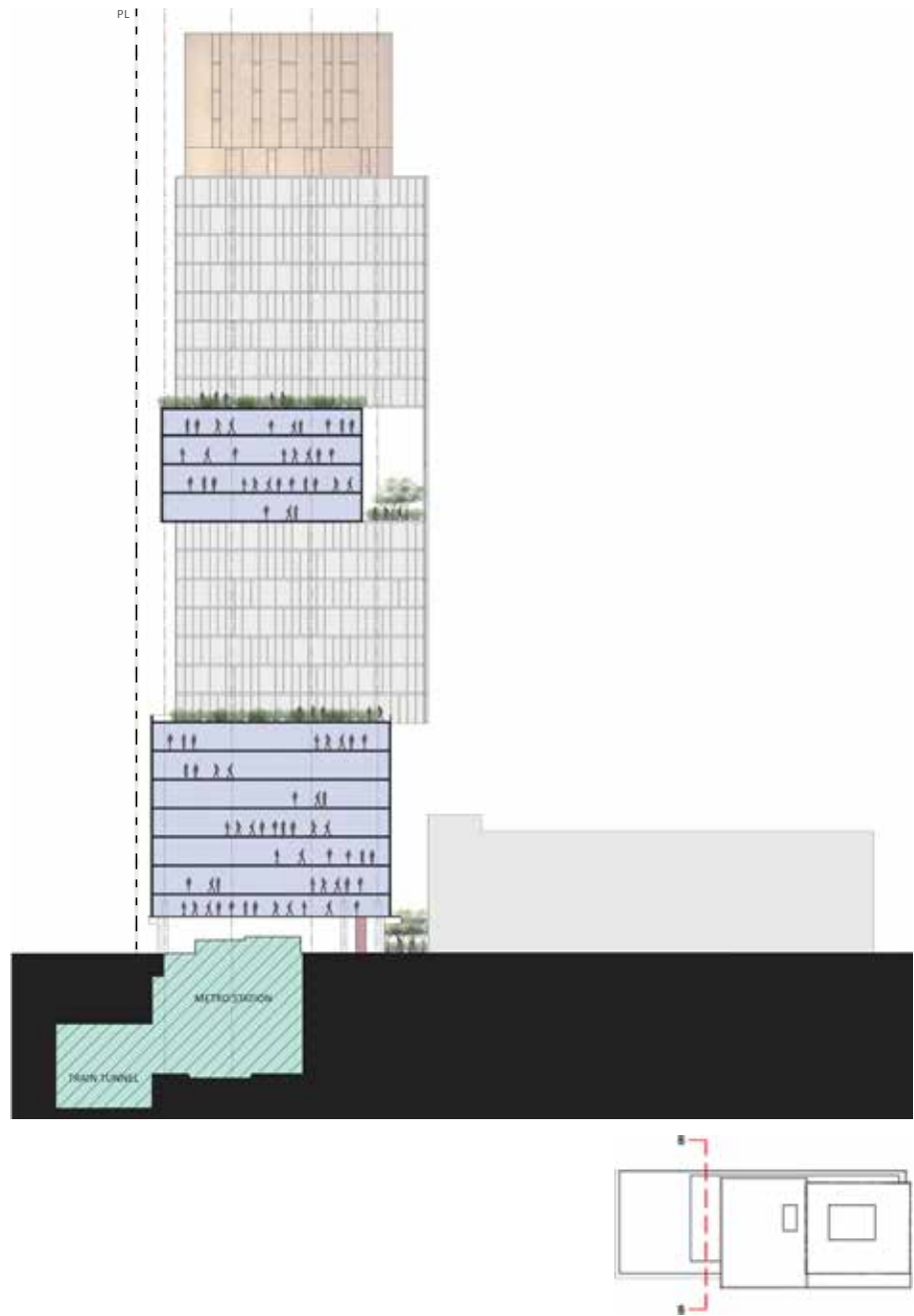
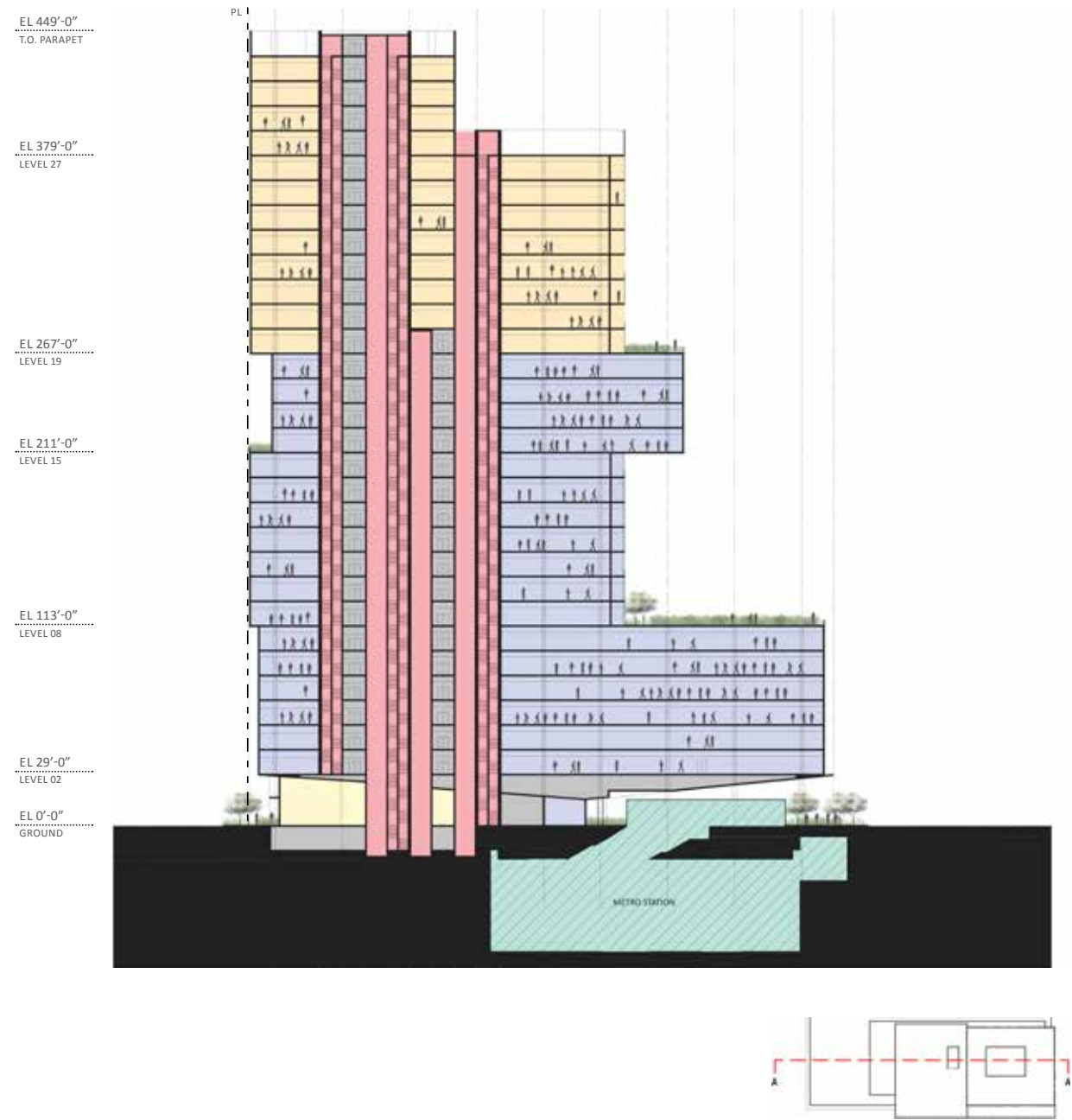
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TYPICAL PLANS



SECTIONS



- COMMERCIAL
- CIRCULATION
- CORE
- SERVICE
- METRO
- LANDSCAPE
- PARKING
- RESIDENTIAL



Appendix C.2

Archaeological Memo

July 9, 2018

Carl Cade
Tribune Real Estate Holdings, LLC
202 West First Street, Suite 4 – 420
Los Angeles, CA 90012

Subject: Archaeological Resources Recommendations for the 222 West Second Street Project, Los Angeles, California

Dear Mr. Cade:

This letter provides a review of archaeological and historical information and a summary of archaeological resources management recommendations for the 222 West Second Street Project (the Project) in Los Angeles, California (Attachment A: Figure 1). The City of Los Angeles is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). The Project proposes the development of a 30-story mixed-use building consisting of 107 residential units (137,347 square feet), approximately 7,200 square feet of ground level commercial retail uses, and 534,044 square feet of office uses in Downtown Los Angeles. The Project falls on public land survey system (PLSS) area Township 1 South, Range 13 West, Section 28 of the Los Angeles, CA 7.5-minute United States Geologic Survey (USGS) Quadrangle (Attachment A: Figure 2) (the “project site”).

REVIEW OF ARCHAEOLOGICAL INFORMATION

A South Central Coastal Information Center (SCCIC) records search was performed for the project site and a 0.5-mile surrounding buffer (collectively, the “project area”) on November 20, 2017. SCCIC records indicate that a total of 18 previously recorded cultural resources fall within the project area, none of which are within the project site. These 18 sites include 10 historic-era buildings or structures, one historic-era site (P-19-001575), two historic-era cemeteries (P-19-003566 and P-19-004218), four historic refuse deposits (P-19-003097, P-19-003129, P-19-003337, and P-19-004171), and one resource containing a segment of a Spanish and Mexican-era water conveyance system known as the Zanja Madre (P-19-004112). This term “zanja”, translating as “ditch” in English, refers to the open earth features that were used during early Euro-American habitation of this area to transport water. The zanja segment that was recorded as part of site P-19-04112 was associated with “Zanja 6-1” and was located immediately east of the intersection of Temple Street and Justin Court, approximately one mile east of the project site.

The current project site is part of an active project being undertaken by Metro involving construction of a new station at West 2nd Street and Broadway. The construction and excavation of the Metro project is within West 2nd Street and portions of the project site, including the southeast corner of West 2nd Street and Broadway. On December 20, 2017, Dudek archaeologist Adam Giacinto spoke with the Metro project's Environmental Specialist, Andrina Dominguez, and archaeologist, Gino Ruzi. Mr. Ruzi reported that archaeological monitors were present during subsurface excavation and did not identify any artifacts or features of Native American origin within this area. He further indicated that the surrounding area was very unlikely to contain prehistoric material, as underground tanks associated with past uses of the site were placed as far as 20-30 feet below the surface. When asked if any evidence of the Zanja Madre was observed, Mr. Ruzi responded that it was not present and would have been destroyed by subsequent historic urbanization regardless.

BRIEF HISTORY OF THE ZANJA SYSTEM

The Zanja Madre network and subsequent additional zanja segments were Los Angeles' original irrigation system, and the network is thought to have run throughout the city in various branches, predominantly along major roads. The location of many of the segments are unconfirmed; however, the believed route has been mapped by Gumprecht (2001) who incorporated information from multiple historical works, particularly a report on irrigation by State Engineer William Hamilton Hall (Hall 1888). Using Gumprecht's 2001 work, Cogstone Environmental prepared a series of maps for the Downtown Los Angeles area, which show an unconfirmed section of a historical-era water conveyance system running in a southerly route just east of the project site, along Main Street (Gust 2017; see map in Attachment B).

The water conveyance system consisted of interconnected ditches known as "zanjas" and was established in 1781 at the same time that El Pueblo de la Reyna de Los Angeles (The Town of Los Angeles) was founded. The first segment of the system was known as the Zanja Madre, and is thought to have run from a point on the Los Angeles River north of the city, south near present-day Main Street terminating near the Plaza, present-day Union Station (Gumprecht 2001: 58). Though researchers and the public often use the term "Zanja Madre" to refer to the larger water conveyance network, this term more accurately describes just the initial component established during the Spanish Period. The segments that were added on later were numbered and grouped based on what part of the city they reached and where on the Los Angeles River they drew water. The size of Los Angeles did not necessitate an expansive system for the first half of the nineteenth century, and there were only three additional segments by 1849. As the city rapidly grew, water become a growing concern particularly because much of the land was agricultural and irrigation

was crucial to farmers' success. As a result, several new zanja segments were constructed post-1855 (Gumprecht 2001: 58-61).

By 1870, the Zanja Madre, being the most important canal in the system, was maintained at a width of ten feet along its entire length, and eight other zanja segments had also been built within the city (Gumprecht 2001: 61). By the late nineteenth century, there were a total of 19 zanja segments. The segments had been lined with concrete or cement piping, which was more efficient and safer than open ditches (Gumprecht 2001: 72, 88). The Zanja system largely faded into disuse by the early twentieth century as the system began to face increased criticism for its inefficiency and imprecision (Gumprecht 2001: 89).

REVIEW OF HISTORICAL INFORMATION

Dudek consulted historic aerials and Sanborn maps to understand the development of the project area and to determine if any zanja segments were previously mapped within the project area or the immediate vicinity. Historical aerials are available from 1948 to present and Sanborn maps are available for the years 1888, 1894, 1906, 1950, and 1955; additionally one Baist Map depicting the project area in 1921 was available (Attachment A: Figure 3-8) (Baist 1921; LAPL 2018; NETR 2018). The earliest Sanborn Map covering this area shows that at this time the block containing the project site was completely developed. City Hall was located in the center of the block along Broadway (at this time called Fort Street). There was also a Theater, a Synagogue, and a Presbyterian Church. The rest of the block was developed as residential housing and commercial properties. There was little significant change until 1906 when the Sanborn Map shows that much of the residential development, as well as the church and synagogue, had been demolished and replaced with offices and stores. The Hollenbeck Hotel was located on the southeastern corner of 2nd Street and Spring Street, within the project site. The 1921 map does not show any significant changes to the block or surrounding vicinity; however, between 1920 and 1950 the block changed dramatically. The Sanborn Maps from the mid-twentieth century show that during this time much of the center of the block and the southeastern corner where the Hollenbeck Hotel once stood had been completely razed and replaced with parking lots. In the 1950s the center and the northeastern corner of the block were occupied by parking lots while the rest of the block was occupied by various commercial buildings. None of these historic maps indicate the zanja running within or near the project site.

Historic aerials consulted indicate that the project site did not undergo further extensive changes until the late 1980s when a large building was constructed in the center of the block, where the

parking lot once stood. No significant changes directly to the project site occurred until recently when the site began to be developed for Metro's 2nd Street and Broadway station.

In addition to reviewing historic maps and aerials, Dudek also reviewed information detailing the Zanja System, including William Hall's 1888 study of irrigation in Southern California (Hall 1888), and Blake Gumprecht's work on the History of the Los Angeles River (Gumprecht 2001). This review indicated that a zanja segment may have run directly east of the project site known as "Zanja No. 8", which was an offshoot of the Zanja Madre. This segment has not been confirmed; as noted above, the nearest confirmed segment is Zanja No. 6-1, located more than a mile away. As described in Hall's 1888 work, Zanja No. 8 was the western branch of the low-service system, so named because this group of canals distributed water that was taken from a lower elevation of the Los Angeles River, while the high-system distributed water that was taken from a higher elevation on the river. The low-system contained the Zanja Madre and the majority of the zanja segments that irrigated the central downtown area. According to this literature review, Zanja No. 8 ran from the end of the Zanja Madre, at the intersection of Main Street and 1st Street, south down Main Street until 8th Street where it turned roughly west until reaching Olive, where it turned and ran generally south until eventually meeting another zanja segment, Zanja 8-R, at the intersection of 18th and Figueroa Street (Gumprecht 2001: 77; Hall 1888: 543-551). Zanja No. 8 is thought to have been dug by hand in 1857 by Orzo W. Childs, who was paid for his work with 200-acres of land and later became a wealthy investor and philanthropist (Gumprecht 2001: 60). Notably, Childs was one of the three men, along with John G. Downey and Isaias W. Hellman, who made the original gift of land to establish the University of Southern California.

The project site is located relatively close to this segment of the zanja; however, no portion of this zanja segment is shown to cross any segment of the project site. Hall indicated that Zanja No. 8 had been converted to a 16-inch cement pipe by the time he published his review in 1888 (Hall 1888: 543-551). Improvements of this kind were common during the late nineteenth century as open ditches were very unsanitary, and cement was more durable than masonry. A review of Hall's work indicated that by 1888 the only zanja that still exhibited any brick conduits was the Zanja Madre, likely because this was the oldest segment of the system (Hall 1888: 544-546).

MANAGEMENT RECOMENDATIONS

The proposed Project is situated within an active project site that has already undergone extensive excavation and disturbance, the results of which have failed to identify prehistoric resources or any remnants of the zanja. The unconfirmed zanja closest to the project site has been identified as Zanja No. 8, thought to have been built by Orzo W. Childs in 1857 and thus unlikely to be

*Subject: Archaeological Resources Recommendations for the 222 West Second Street Project,
Los Angeles, California*

associated with Native American groups during prehistoric or protohistoric times. Additionally, historical map review does not show the zanja mapped anywhere within the project site. Based on reviewed information, the proposed Project will have no impact to this or other archaeological resources. As such, no resource-specific mitigation would be appropriate.

Segments of the zanja system that are encountered today consist of relatively large brick and/or concrete pipe or curved features that are readily identifiable when encountered in subsurface contexts (see Attachment C for examples). In the event any archaeological material or features are unexpectedly encountered during construction, work in the area would cease and all construction personnel would be required to comply with the regulatory standards set forth in Section 21083.2 of the PRC and Section 15064.5(c) of the CEQA Guidelines. As compliance with the regulatory standards in Section 21083.2 and Section 15064.5(c) would ensure the appropriate treatment of any potential unique archaeological resources unexpectedly encountered during grading and excavation activities, the Project's impact on archaeological resources would be less than significant, and no mitigation measures are required.

Should you have any questions relating to this report and its findings please do not hesitate to contact me directly.

Respectfully Submitted,



Erica Nicolay, M.A.
Archaeologist

DUDEK

Office: 760.936.7952

Email: enicolay@dudek.com

Cc: Adam Giacinto, MA, RPA, Micah Hale, PhD, RPA, Dudek

Att: A: Figures

B: Report LA-13239

C: Site Record CA-LAN-4112/P-19-004112

REFERENCES

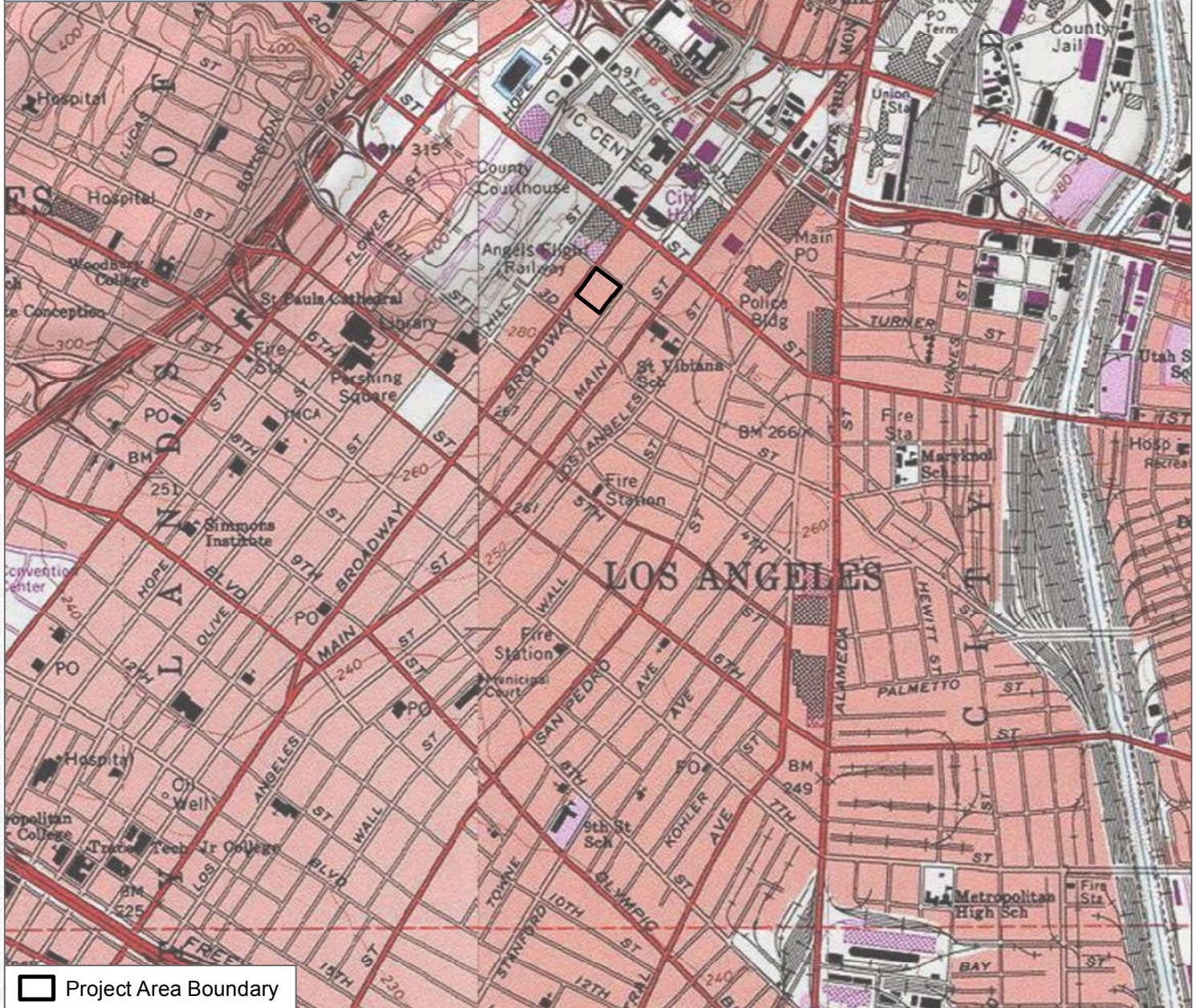
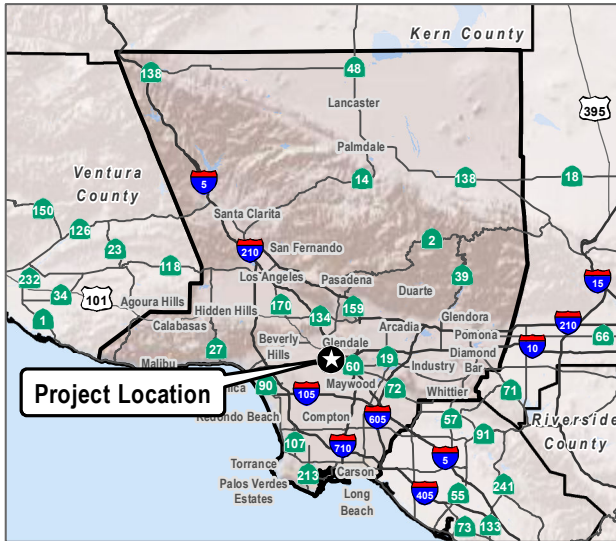
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*Subject: Archaeological Resources Recommendations for the 222 West Second Street Project,
Los Angeles, California*

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Sanborn Map & Publishing Co. New York, New York. . Accessed May 2018.
<http://sanborn.umi.com.ezproxy.lapl.org/>

ATTACHMENT A

Figures



Project Area Boundary

SOURCE: USGS 7.5-Minute Series Los Angeles Quadrangles Township 1S / Range 13W / Section 28



FIGURE 1

Project Location

Tribal Cultural Resources Report



SOURCE: NAIP, 2016



FIGURE 2
Project Area

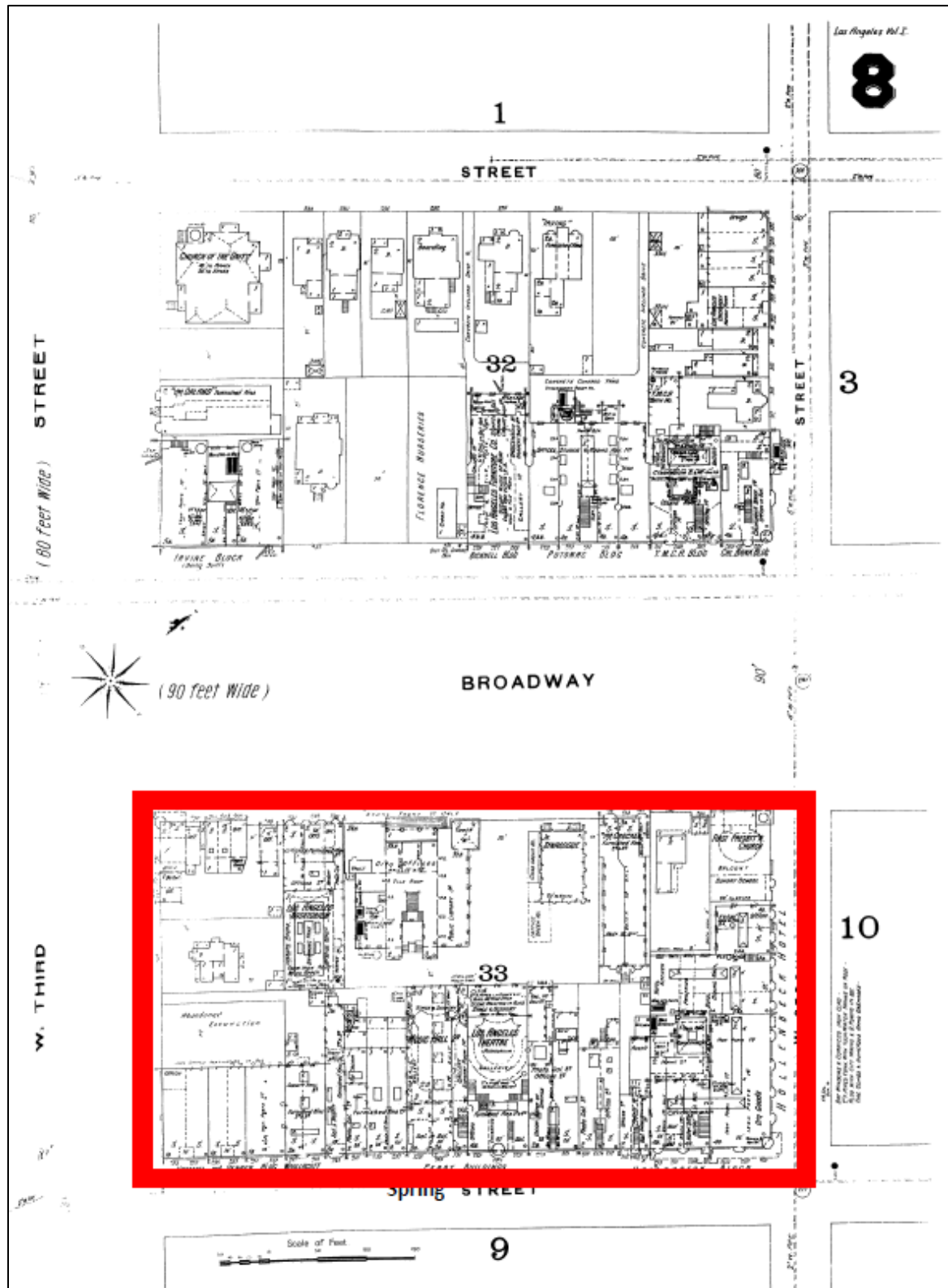


Figure 4. 1894 Sanborn Map depicting the project area (outlined in red) and surrounding area

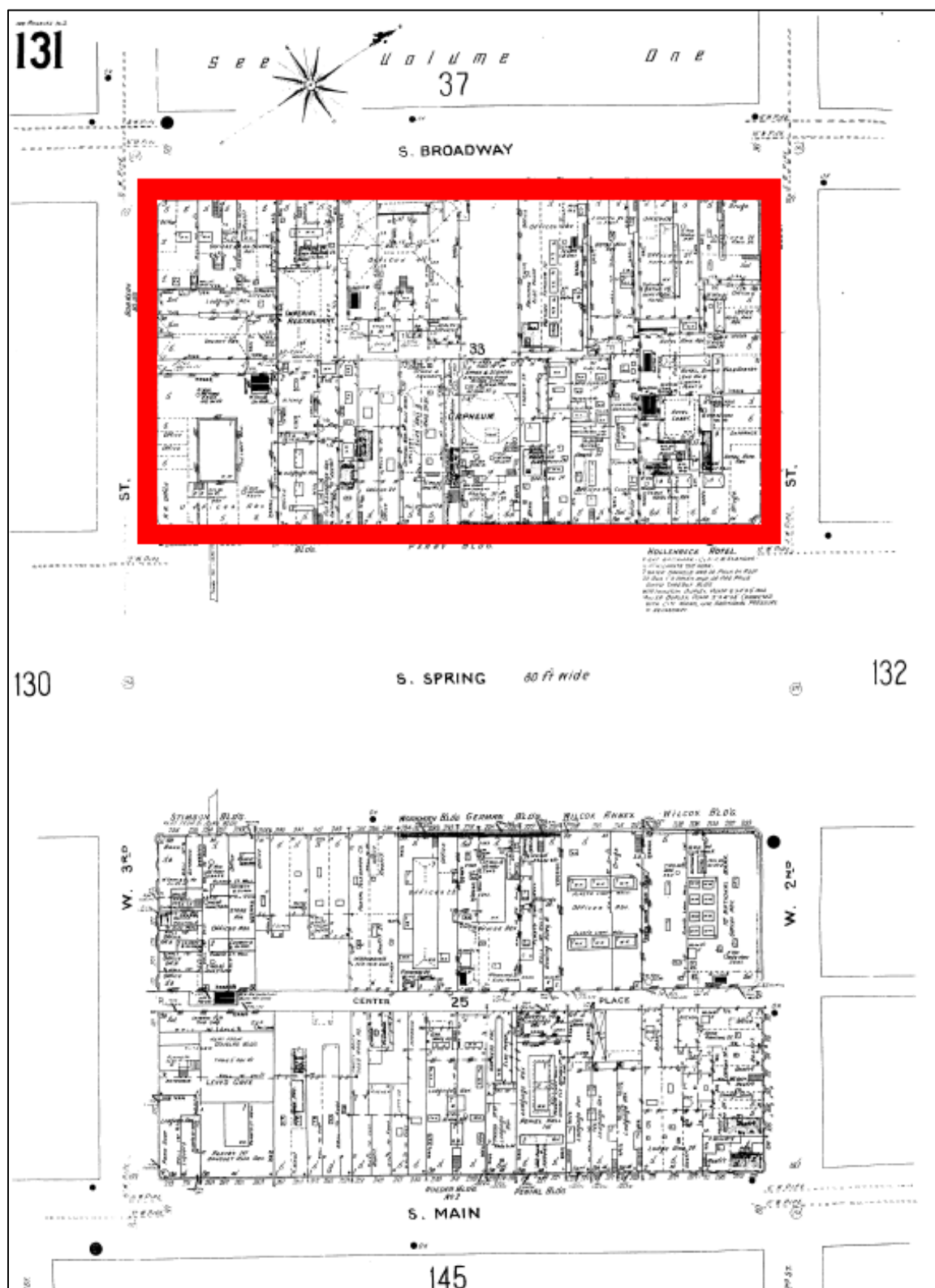


Figure 5. 1906 Sanborn Map depicting the project area (outlined in red) and surrounding area

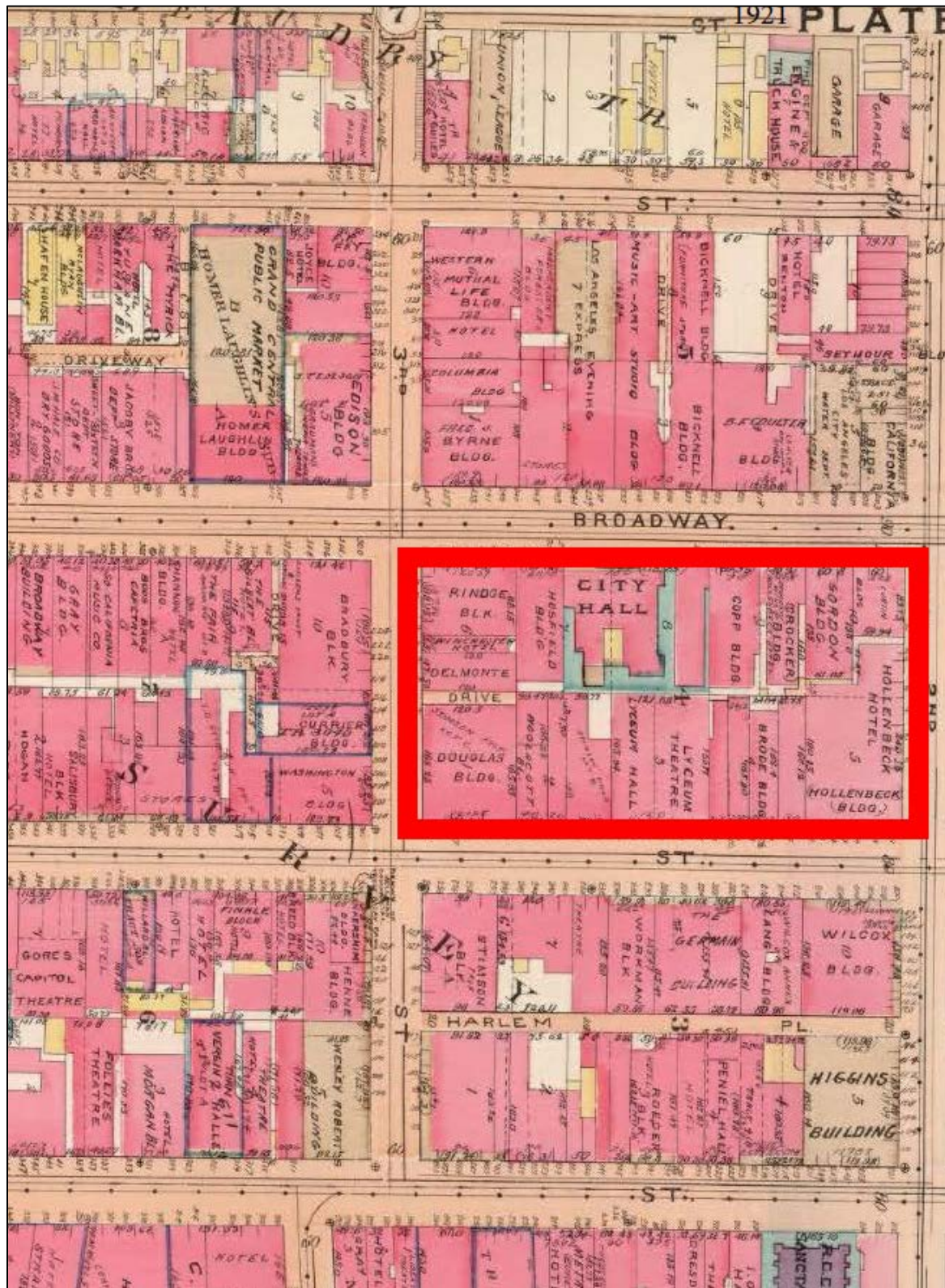


Figure 6. 1921 Baist Map depicting the project area (outlined in red) and surrounding area

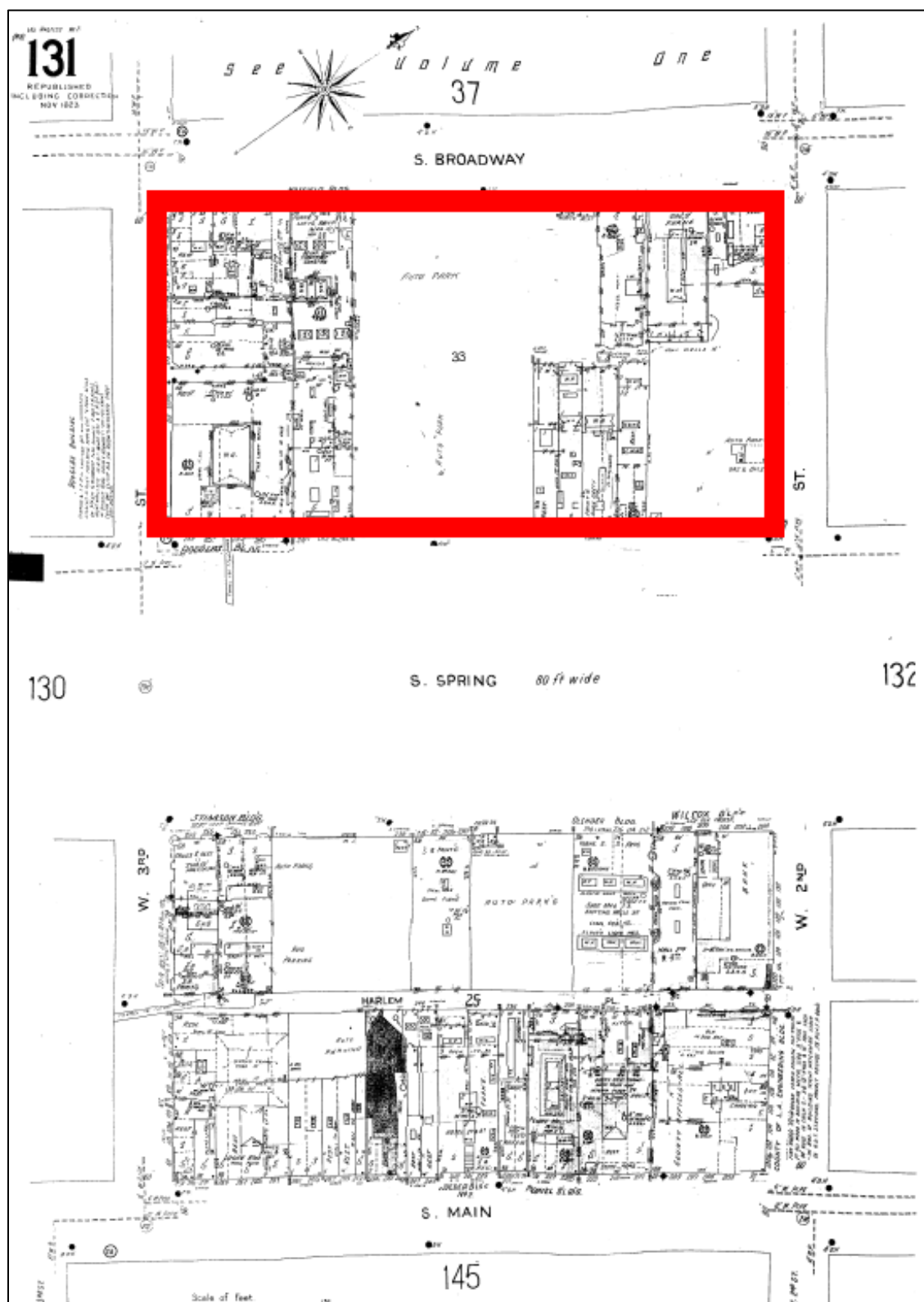


Figure 7. 1950 Sanborn Map depicting the project area (outlined in red) and surrounding area

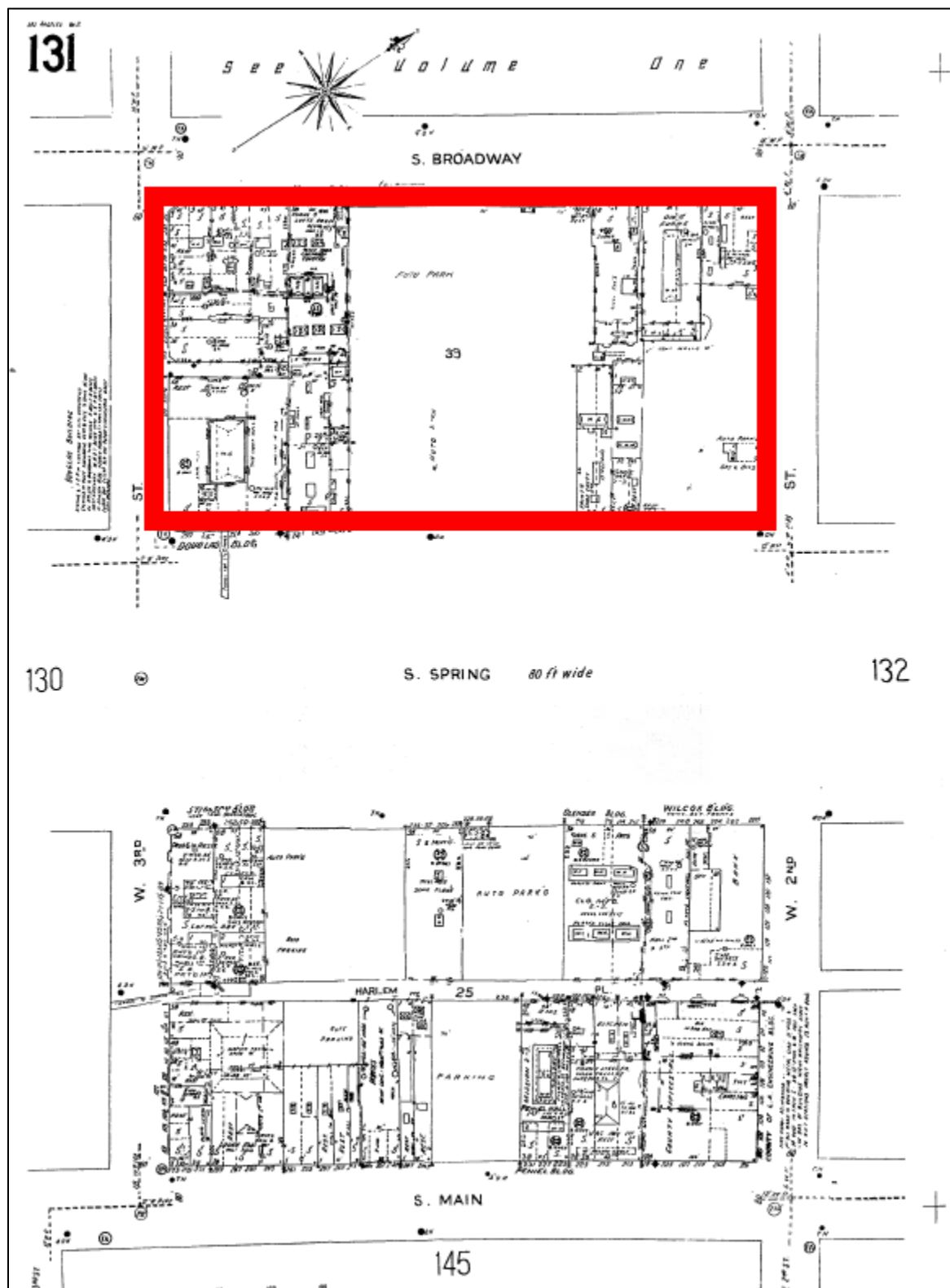


Figure 8. 1955 Sanborn Map depicting the project area (outlined in red) and surrounding area

ATTACHMENT B

Report LA-13239

Extent of Zanja Madre

By: Cogstone

2017

This report number corresponds to the shapefile supplied by Sherri Gust of Cogstone. It represents their research into the entire linear boundary of the Zanja Madre. So far, only portions of the Zanja have been physically surveyed, excavated, and recorded. These are cross referenced with this file.

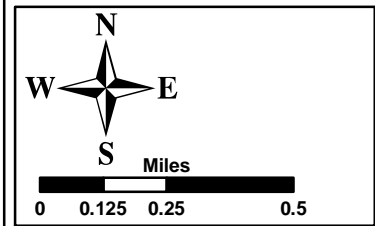
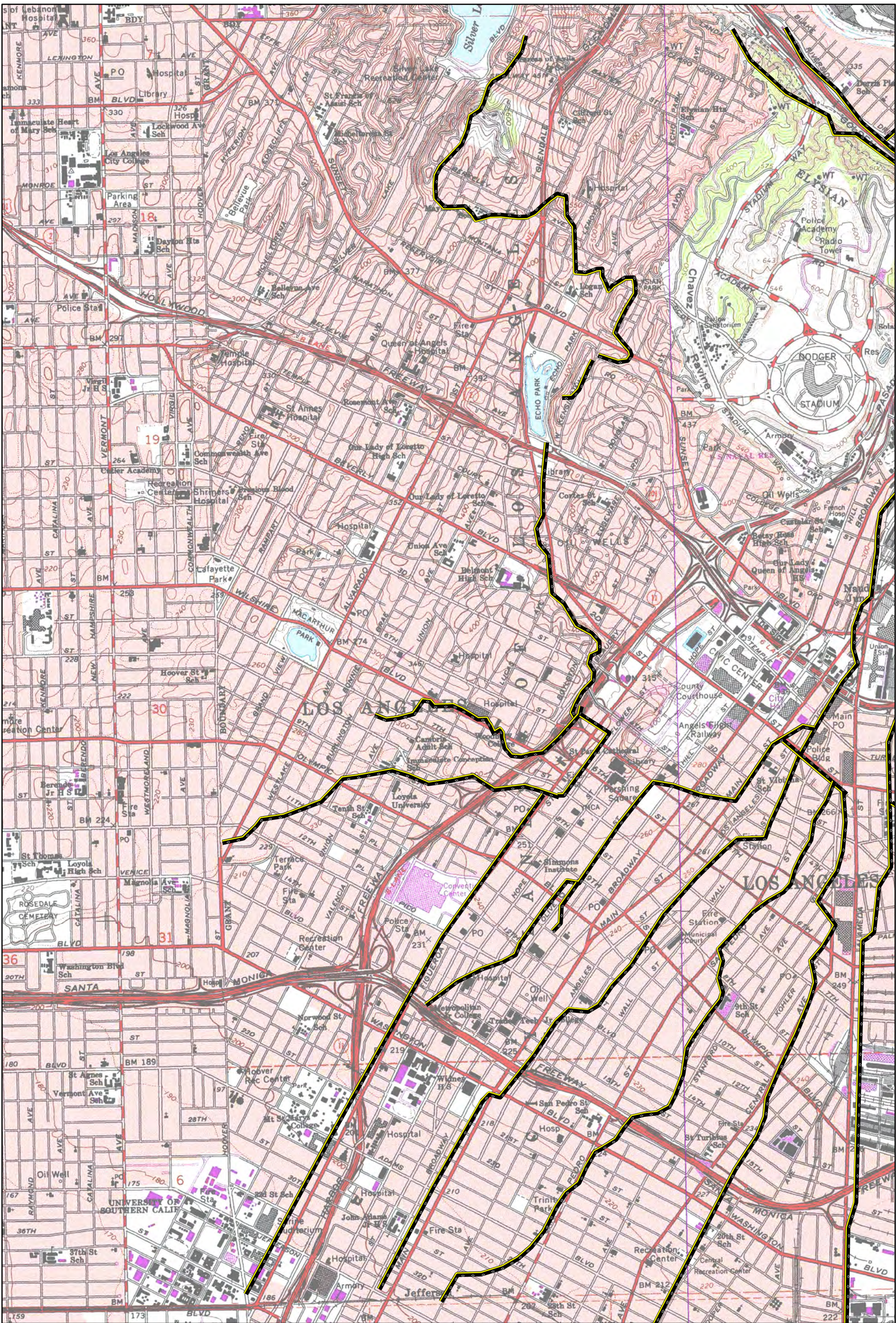
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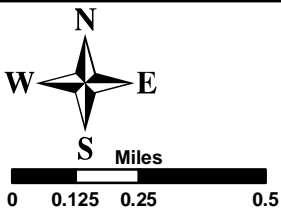
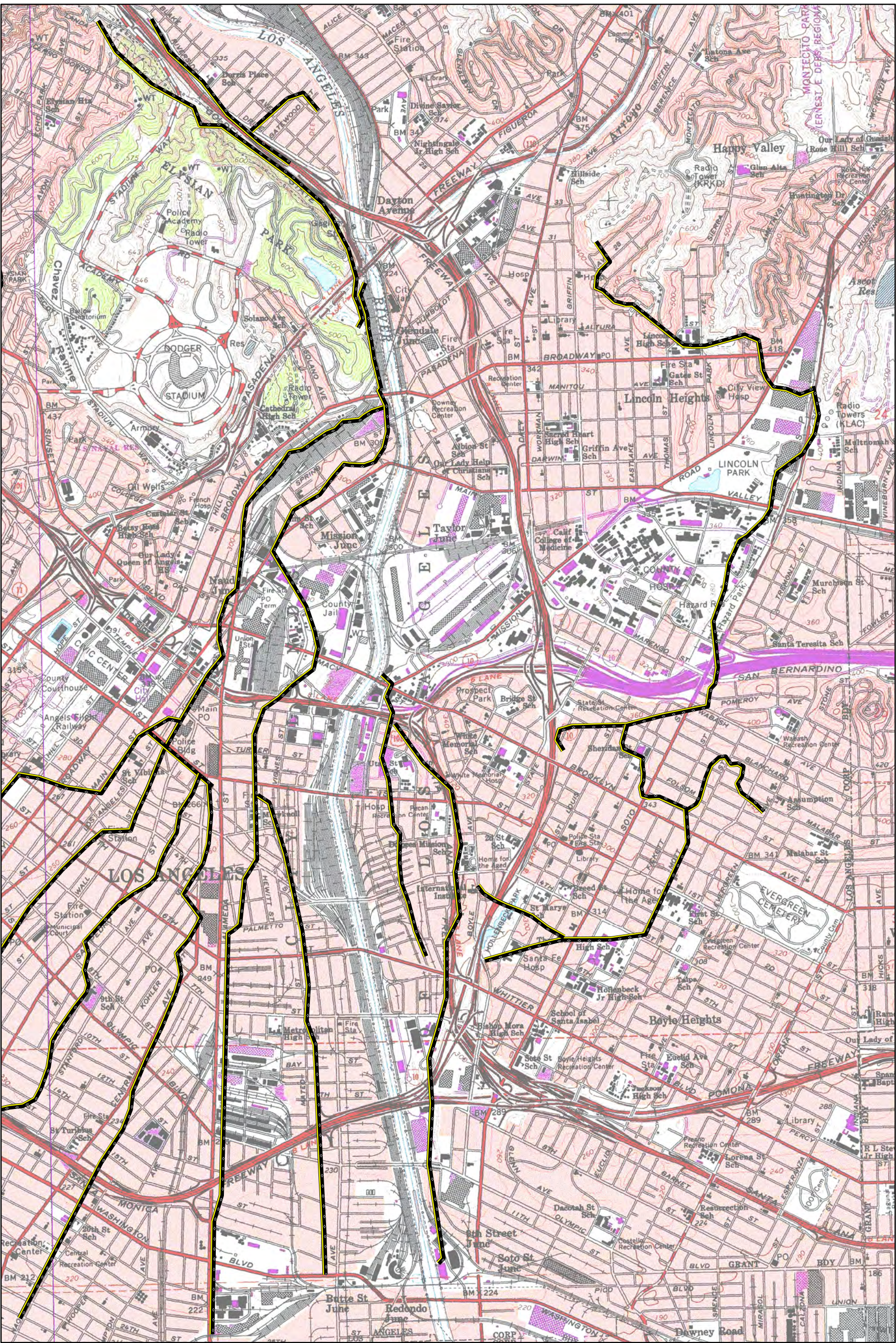
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19-190309

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Hollywood, CA
USGS 7.5'
PR: 1981 1:24,000



Los Angeles, CA
USGS 7.5'
PR: 1981 1:24,000

ATTACHMENT C

Site Record CA-LAN-4113/P-19-004113

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary # 19-004112
HRI #
Trinomial CA-LAN-4112
NRHP Status Code

Other Listings
Review Code

Reviewer

Date

Page 1 of 6

*Resource Name or #: Temple Street Archaeological Site

P1. Other Identifier:

***P2. Location:** ☒ Not for Publication ☐ Unrestricted

***a. County:** Los Angeles

and (P2b and P2c or P2d. Attach a Location Map as necessary.)

***b. USGS 7.5' Quad:** Los Angeles **Date:** 1966. Photo revised 1981; minor revisions 1994

Unsectioned; S.B.B.M.

c. Address: 400, 500 and 600 blocks of E. Temple Street, 300 and 400 block of N. Garey Street, 700 block of E. Banning Street and 200 block of N. Vignes Street

City: Los Angeles

Zip: 90012

d. UTM: NAD83; Zone: 11; 386148.15mE/ 3768411.85mN (G.P.S.) (Center of site)

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate)

The City of Los Angeles, Department of Public Works (City) has completed the widening of Temple Street, east of Alameda Street to Vignes Street, and a portion of Garey Street north of Temple Street, and a portion of North Vignes Street from East 1st Street to north of East Temple Street in downtown Los Angeles.

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

As a result of archaeological monitoring conducted during ground disturbing activities associated with the Temple Street Widening Project, eight archeological features (as well as a segment of the *Zanja 6-1*-recorded separately) were encountered and more than 300 isolated artifacts were recovered. The area is currently characterized by business, administrative buildings, a firestation and an Emergency Operations Center. Written records illustrate that the area was transformed from agricultural to residential by the late 19th century. By the middle of the 20th century, the area was re-configured by industry.

P3b. Resource Attributes: (List attributes and codes) AH4 – Privies/dumps/trash, AH6 – Water conveyance system, AH16 – Other

***P4. Resources Present:** ☐ Building ☒ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☒ Other (Isolates, etc.)

***P6. Date Constructed/Age and Sources:** ☒ Historic

☐ Prehistoric ☐ Both

***P7. Owner and Address:**

City of Los Angeles, Public Works-Engineering

***P8. Recorded by:** (Name, affiliation, and address)

Candace Ehringer, Linda Kry, Frank Humphries, and Adela L. Amaral

Aecom

515 South Flower Street

9th Floor

Los Angeles, Ca 90071

***P9. Date Recorded:**

Features were recorded between January 30 and November 6, 2008

***P10. Survey Type:** (Describe)

Archaeological Monitoring

***P11. Report Citation:** (Cite survey report and other sources, or enter "none.")

Dietler, Sara et. al.

2010 *Archaeological Assessment For The Temple Street Widening Project City Of Los Angeles, California.* AECOM. Submitted to the City of Los Angeles, Bureau of Engineering.

Strauss, M.

2004 *Archaeological Resources Assesment for the Proposed Public Safety Facilities Master Plan Project, City of Los Angeles, California.* EDAW. Submitted to the City of Los Angeles, Bureau of Engineering.

***Attachments:** ☐ NONE ☒ Location Map ☒ Sketch Map ☒ Continuation Sheet ☐ Building, Structure, and Object Record ☒ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☒ Artifact Record ☐ Photograph Record ☐ Other (List):

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
ARCHAEOLOGICAL SITE RECORD

Primary # 19-004112
Trinomial CA-LAN-4112

Page 2 of 6

*Resource Name or #: Temple Street Archaeological Site

*A1. Dimensions: a. Length: 361.5 feet (N/S) × b. Width: 1161.5 feet (E/W)

The dimension of the site are recorded as the area's street boundaries.

Method of Measurement: ☐ Paced ☐ Taped ☐ Visual estimate ☒ Other: GIS

Method of Determination (Check any that apply.): ☒ Artifacts ☒ Features ☐ Soil ☐ Vegetation ☐ Topography

☐ Cut bank ☐ Animal burrow ☐ Excavation ☐ Property boundary ☒ Other (Explain): Historic maps

Reliability of Determination: ☒ High ☐ Medium ☐ Low Explain:

Limitations (Check any that apply): ☐ Restricted access ☒ Paved/built over ☐ Site limits incompletely defined

☒ Disturbances ☐ Vegetation ☐ Other (Explain):

A2. Depth: Artifacts were encountered beginning at 2 feet below surface level ☐ None ☐ Unknown

Method of Determination: Measuring Tape

*A3. Human Remains: ☐ Present ☒ Absent ☐ Possible ☐ Unknown (Explain):

*A4. Features (Number, briefly describe, indicate size, list associated cultural constituents, and show location of each feature on sketch map.):
See continuation sheet.

*A5. Cultural Constituents (Describe and quantify artifacts, ecofacts, cultural residues, etc., not associated with features.):
See continuation sheet.

*A6. Were Specimens Collected? ☐ No ☒ Yes (See technical report for artifact catalog. Artifacts will be curated at the San Diego Archaeological Center)

*A7. Site Condition: ☐ Good ☐ Fair ☒ Poor (Describe disturbances.):

The site area experienced dramatic destruction and construction that most notably began during the middle of the 20th century when the site was transformed from a residential area into a business district. The over 50 years of physical alterations have likely significantly affected the preservation of the pre-1950 material record.

*A8. Nearest Water (Type, distance, and direction.):
Los Angeles River to the east of the project area

*A9. Elevation: 272 feet (Center of site)

A10. Environmental Setting (Describe culturally relevant variables such as vegetation, fauna, soils, geology, landform, slope, aspect, exposure, etc.): Area is entirely developed.

A11. Historical Information:

Historic documents such as Sanborn Fire Insurance maps from the late 19th century illustrate that the project area was principally residential at that time. Additional maps from the late 19th and first decade of the 20th century located in the library of congress also depict the area as characteristically suburban. The fire insurance maps show the suburban growth and decline of the area when by the 1950s, parking lots, businesses, and factories replaced households.

*A12. Age: ☐ Prehistoric ☐ Protohistoric ☐ 1542-1769 ☐ 1769-1848 ☐ 1848-1880 ☒ 1880-1914 ☒ 1914-1945
☐ Post 1945 ☐ Undetermined Describe position in regional prehistoric chronology or factual historic dates if known:

A13. Interpretations (Discuss data potential, function[s], ethnic affiliation, and other interpretations):

See continuation sheet.

A14. Remarks:

None

A15. References (Documents, informants, maps, and other references):

Sanborn Fire Insurance Maps 1888; 1894-1900; 1906-1950; 1906-1955

Library of Congress Digital Archives

The Historic Los Angeles Times

A16. Photographs (List subjects, direction of view, and accession numbers or attach a Photograph Record.):
None

*A17. Form Prepared by:

Linda Kry

Date: 02/18/2010

Affiliation and Address: AECOM 515 South Flower Street, 9th Floor, Los Angeles, Ca 90071

LOCATION MAP

Primary #

19-004112

HRI#

Trinomial

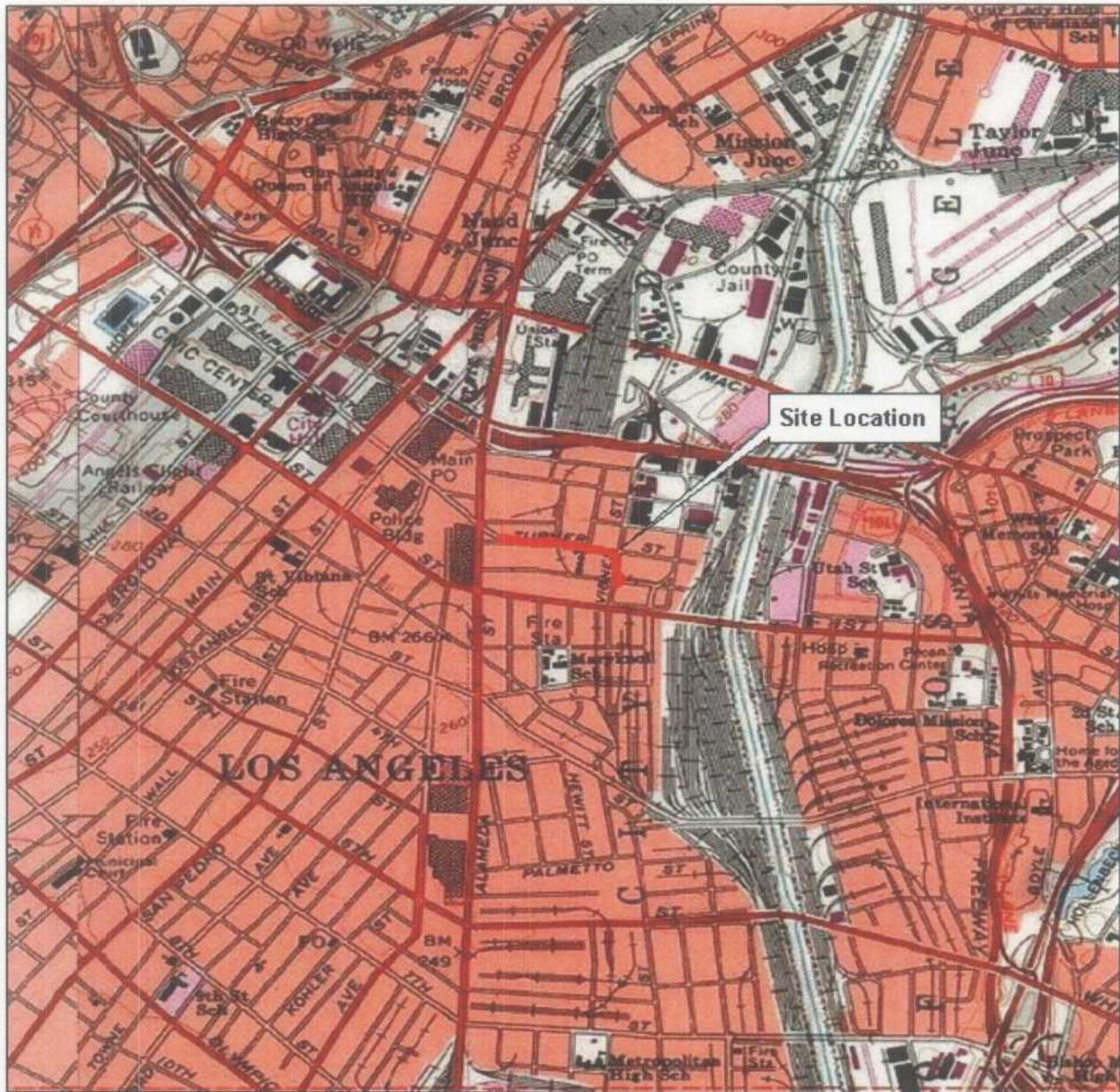
CA-LAN-4112

Page 3 of 6

*Resource Name or #: Temple Street Archaeological Project

*Map Name: Los Angeles

*Scale: 1:24,000 *Date of Map: 2004



Source: USGS 7.5' - Los Angeles Quadrangle, California (2004)

Key

 Site location

AECOM



1" equals 2,000 feet
0 0.25 0.5 0.75 1 Miles

Project Location Map

Archaeological Assessment for the Temple Street Widening Project City of Los Angeles, California



Source: Terraserver-USA



0 115 230 460 690 920 Feet

Site Sketch map

Archaeological Assessment for the Temple Street Widening Project City of Los Angeles, California

☒ Continuation ☐ Update

*A4. Features (Number, briefly describe, indicate size, list associated cultural constituents, and show location of each feature on sketch map.):

A total of nine features were identified in connection with the Temple Street Widening Project Site. These features consisted of historic building foundations, a section of the *zanja* irrigation system and historic refuse deposits. Features 1, 2, 4, 5, 6, 7, 8 and 9 are described and interpreted in the section below. All of the structural features recorded as part of this Project, with the exception of the *zanja* segment (Feature 3), were removed during the construction process and are no longer in situ.

Feature 1

2, 22" square brick piers, with hollow centers, located at the southwest corner of Temple and Gary Streets. Historic ceramic (whiteware and ironstone) and glass bottle fragments were also found along side brick structures.

Feature 2

Brick Alignment 2 courses high measuring between 16 and 20" wide and 47' long. Size of individual bricks varied and 1 brick was marked "LABCo." The maker's mark denotes the Los Angeles Pressed Brick Company which operated between 1887 and 1926. Brick row was located on the south side of Temple Street, between North Alameda and Gary Streets.

Feature 3

Section of Zanja No. 1 (a.k.a Zanja 6-1). See separate records.

Feature 4

Historic sprinkler valve set on a brick and brick and concrete foundation that measured 42" x 18". No maker's marks were observed on the brick. Several markings, including its model, patent, and manufacturing company were etched on the valve. The valve was found south of the LADWP entrance gate on Temple Street.

Feature 5

3 contiguous historic refuse deposits located on N. Vignes Street, beginning at Banning Street and continued south for roughly 1 block south toward E. First Street. Materials from the deposits included an array of building materials such as square and wire cut nails and household artifacts such as fragments of pealware and whiteware ceramics, semi-porcelain jars, eating utensils, possible doll parts, and oyster shells.

Feature 6

3 contiguous historic refuse deposits located in Temple Street between N. Alameda and N. Garey Streets. Clusters measured 2' x 2' and ranged from 3' to 4' in depth. A composite of building materials and ceramic and glass bottle fragments were found. Aqua, amber, green, and clear glass and ceramic bottle fragments were collected in bulk. A blue transfer print mark, "MADE IN JAPAN," was located on several of the ceramic bottle bases. The markings and ceramic type indicate that the stoneware ceramic bottles may be historic sake vessels called, "saka bin."

Feature 7

Low density refuse scatter on the north side of Temple Street extending 30' from east to west and 12' from north to south. No more than 6" deep. Aqua, amber, and clear glass bottle fragments, fragments of ironstone and whiteware ceramics were encountered. Clam, oyster, and abalone shell fragments were also among the scatter.

Feature 8

Refuse deposit on the western sidewalk of N. Vignes Street in between E. Temple and Banning Streets. The refuse pit was encountered in a 6' x 3' tree planting burrow. The feature was located 22" below ground surface and extended at least 38" down. Termination of investigations were contingent of the depth of excavation for the tree planting. Butchered faunal bones, square and wire cut nails, and table glass were collected. A whiteware ceramic bowl, produced in England by the John Meir & Son Company between the years 1837 and 1890 was identified.

Feature 9

Water service vault located on Temple Street. The vault measured 6' x 6', was located 2' bsl, and had a depth of 4'. 2 pipes, each with check valves, crossed at the center of the vault. One pipe was 3" wide and the second was 4" wide.

☒ Continuation ☐ Update

***A5. Cultural Constituents** (Describe and quantify artifacts, ecofacts, cultural residues, etc., not associated with features.):

Just over 300 isolated historic artifacts were recovered as a result of archaeological monitoring in connection with ground-disturbing activities for the Temple Street Widening Project Site. The isolated artifacts were mapped, collected, bagged, and transported to the AECOM Los Angeles archaeological laboratory for analysis. Isolated artifacts were analyzed and catalogued using the same methodological techniques as those used for the refuse deposit features.

The isolate assemblage consists mold- and free-blown glass bottles of various colors, ceramic tableware fragments, electrical insulators, faunal bones, shell and clam shells, and building brick. Isolated artifacts collected from the Project area range in date from 1798 (Cat. No. 0341) to the 1960's (Cat. Nos. 0350, 0469 and 0606).

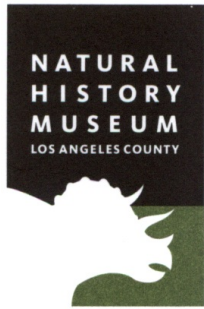
A13. Interpretations (Discuss data potential, function[s], ethnic affiliation, and other interpretations):

Though the area has undergone significant physical transformations since the mid 20th century, the potential of a substantial material record that speaks to residential life, community uprooting, and early 20th century Los Angeles industrialization can still be encountered. Historic records, let alone the material record, of the expansion and settlement south of the plaza and community development in Los Angeles have not been sufficiently studied.

Appendix C.3

Paleontological Records Search

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007
tel 213.763.DINO
www.nhm.org



Vertebrate Paleontology Section
Telephone: (213) 763-3325

e-mail: smcleod@nhm.org

16 February 2017

Eyestone Environmental
6701 Center Drive West, Suite 900
Los Angeles, CA 90045

Attn: Stephanie Eyestone-Jones, President

re: Paleontological resources for the proposed 222 West 2nd Street Project, in the City of Los Angeles, Los Angeles County, project area

Dear Stephanie:

I have conducted a thorough check of our paleontology collection records for the locality and specimen data for the proposed 222 West 2nd Street Project, in the City of Los Angeles, Los Angeles County, project area as outlined on the portion of the Los Angeles USGS topographic quadrangle map that Kevin Varzandeh sent to me via e-mail on 31 January 2017. We do not have any vertebrate fossil localities that lie directly within the proposed project area, but we do have localities nearby from the same sedimentary deposits that probably occur subsurface in the proposed project area.

The entire proposed project site area has surficial deposits of younger Quaternary Alluvium, derived as fluvial deposits from the flood plain of the Los Angeles River that currently flows in a concrete channel just to the east. These younger Quaternary deposits usually do not contain significant fossil vertebrates, at least in the uppermost layers, but the underlying older Quaternary deposits found at varying depths may well contain significant vertebrate fossils.

Our closest vertebrate fossil locality from the older Quaternary deposits is LACM 1755, southwest of the proposed project area near the intersection of Hill Street and 12th Street, that produced a fossil specimen of horse, *Equus*, at a depth of 43 feet below the street. Our next closest vertebrate fossil locality from older Quaternary deposits beneath the younger Quaternary

Alluvium is LACM 2032, east-northeast of the of the proposed project area near the intersection of Mission Road and Daly Street around the Golden State Freeway (I-5), that produced fossil specimens of pond turtle, *Clemmys mamorata*, ground sloth, *Paramylodon harlani*, mastodon, *Mammut americanum*, mammoth, *Mammuthus imperator*, horse, *Equus*, and camel, *Camelops*, at a depth of 20-35 feet below the surface. The pond turtle specimens from locality LACM 2032 were figured in the scientific literature by B.H. Brattstrom and A. Sturn (1959. A new species of fossil turtle from the Pliocene of Oregon, with notes on other fossil *Clemmys* from western North America. Bulletin of the Southern California Academy of Sciences, 58(2):65-71). At our locality LACM 1023, just north of locality LACM 2032 near the intersection of Workman Street and Alhambra Avenue, excavations for a storm drain recovered fossil specimens of turkey, *Meleagris californicus*, sabre-toothed cat, *Smilodon fatalis*, horse, *Equus*, and deer, *Odocoileus*, at unstated depth. A specimen of the turkey, *Meleagris*, from this locality was published in the scientific literatus by D. W. Steadman (1980. A Review of the Osteology and Paleontology of Turkeys (Aves: Meleagridinae). Contributions in Science, Natural History Museum of Los Angeles County, 330:131-207).

Immediately to the north of the proposed project area, north of 5th Street, there are exposures of the marine Pliocene Fernando Formation and the marine late Miocene Yorba Member of the Puente Formation (also referred to as an Unnamed Shale in this area), that also may occur at depth in the proposed project area.

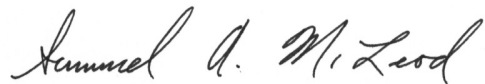
We have a series of vertebrate fossil localities from the Fernando Formation nearby including LACM 7730, immediately to the east of the proposed project area near the intersection of Main Street and 2nd Street; LACM 4726, just south of west of the proposed project area near the corner of 4th and Hill Streets; LACM 6971, further to the west of loclaity LACM 4726 west of Pershing Square near the corner of 6th and Flower Streets; and LACM 3868, just north of west of the proposed project area north of 6th Street between Lucas Avenue and South Bixel Street. These nearby Fernando Formation localities have produced a composite fauna including fossil specimens of stingray, *Dasyatis*, eagle ray, *Myliobatis*, skate, *Raja*, chimaerid, Chimaeriformes, bull shark, *Carcharhinus leucas*, dusky shark, *Carcharhinus obscurus*, hammerhead shark, *Sphyrna*, sixgill shark, Hexanchiformes, bonito shark, *Isurus oxyrinchus*, salmon shark, *Lamna ditropis*, white sharks, *Carcharodon sulcidens* and *Carcharodon carcharias*, herring, Clupeidae, hake, *Merluccius*, sheepshead, *Semicossyphus*, mackerel, *Scomber*, bird, Aves, rorqual baleen whale, Balaenopteridae, and toothed whale, Odontoceti.

Our Puente Formation locality LACM 5961 occurs just north of the proposed project area just north of the intersection of Hill Street and 1st Street. Locality LACM 5961, discovered during excavation for the Metrorail station at unknown depth, produced a specimen of the fossil bristlemouth fish, *Cyclothone*. Our next closest vertebrate fossil locality from the Puente Formation is LACM 7990, northeast of the proposed project area north of Temple Street between Broadway and Spring Street, that produced fossil fish including slickheads, Alepocephalidae, argentinas, Argentinidae, deep sea smelts, Bathylagidae, viperfish, *Chauliodus*, herring, Clupeidae, cod, Gadiformes, bristlemouths, Gonostomidae, mackerel, Scombridae, and dragonfish, Stomiidae.

Shallow excavations in the younger Quaternary Alluvium exposed throughout the proposed project area are unlikely to uncover significant fossil vertebrate remains. Deeper excavations in the proposed project area that extend into the older sedimentary deposits, however, may well encounter significant vertebrate fossils. Any substantial excavations in the proposed project area, therefore, should be closely monitored to quickly and professionally recover any potential vertebrate fossils without impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

Sincerely,

A handwritten signature in cursive script that reads "Samuel A. McLeod". The signature is written in dark ink and is positioned below the word "Sincerely,".

Samuel A. McLeod, Ph.D.
Vertebrate Paleontology

enclosure: invoice