Sixth Street Park, Arts, River & Connectivity Improvements (PARC) Project

Los Angeles, California



Historical Resource Evaluation Report

Prepared by:



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Cover page rendering from Conceptual Plans, July 2018



EXECUTIVE SUMMARY

The Sixth Street Park, Arts, River & Connectivity Improvements (PARC) Project is located in a fully developed, mixed-use urban setting east of downtown Los Angeles, straddling the east and west sides of the Los Angeles River. The PARC Project would occupy vacant property at the footholds of the new Sixth Street Viaduct, which is currently under construction. The purpose of this report was to determine if the PARC Project would have any impacts on historical resources subject to the California Environmental Quality Act (CEQA).

GPA established a Project Study Area for this report that is larger than the PARC Project Site. The Project Study Area is roughly a two-parcel radius to the north and south of East 6th Street and Whittier Boulevard from South Boyle Avenue on the east to Mill Street on the west. The Project Study Area also includes a segment of the Los Angeles River, adjacent railroad right-of-ways, and two bridges located between East 4th Street to the north and East 7th Street to the south (see Figure 1). The Project Study Area comprises 129 legal parcels and two bridges that do not have assessor's parcel numbers (APNs).

Attachment A of this report includes a complete list of the 42 buildings, three structures, and two railroad properties within the Project Study Area that were considered as potential historical resources under CEQA. Properties within the Project Study Area that are less than 45 years of age were eliminated as candidates for further study because there was no evidence that these recently constructed properties met the criteria for landmark designation at the national, state, or local levels. After research and field survey, it was determined that there are four historical resources as defined by CEQA in the Project Study Area: the Fourth and Seventh Street Viaducts, the Los Angeles River Channel, and the Los Angeles Industrial Historic District.

The Fourth and Seventh Street Viaducts are designated as Los Angeles Historic-Cultural Monuments. No other properties in the Project Study Area were previously determined eligible for or are currently listed as landmarks at the national, state, or local levels.

Environmental reviews for past projects involving the Los Angeles River identified segments of the Los Angeles River Channel outside of the Project Study Area as eligible for listing on National Register of Historic Places as contributing elements of the larger, 51-mile linear resource. The Los Angeles River Channel is presumed to be a historical resource under CEQA.

All buildings within the Project Study Area that are potential historical resources under CEQA have been previously evaluated as part of recent historic resources surveys. One district, the Downtown Los Angeles Industrial Historic District, was identified by SurveyLA in 2016 and is partially within the Project Study Area. No district contributors were identified within the Project Study Area.

GPA re-surveyed the Project Study Area and did not identify any historical resources that were not already identified by the SurveyLA historic resource survey or other recent surveys. GPA concurred with the findings of SurveyLA and did not identify any additional historical resources in the Project Study Area.

The PARC Project would not involve the demolition of any buildings or structures within the Project Study Area. Previously identified historical resources would not be materially impaired and would continue to be eligible for listing. The Project would not cause substantial adverse change in the significance of any historical resources. Therefore, the Project's impact on historical resources is less than significant and no mitigation is required or recommended.



1. INTRODUCTION

1.1 Purpose and Qualifications

The purpose of this report is to determine if the Sixth Street Park, Arts, River & Connectivity Improvements (PARC) Project would impact historical resources. The PARC Project Site is currently vacant within a fully developed, urban setting bisected by the channelized Los Angeles River. Land uses along east and west sides of the river are predominantly industrial and commercial. The PARC Project would not involve the demolition of any buildings or structures within the Project Study Area established as roughly a two-parcel radius of the Project Site (see Figure 1).

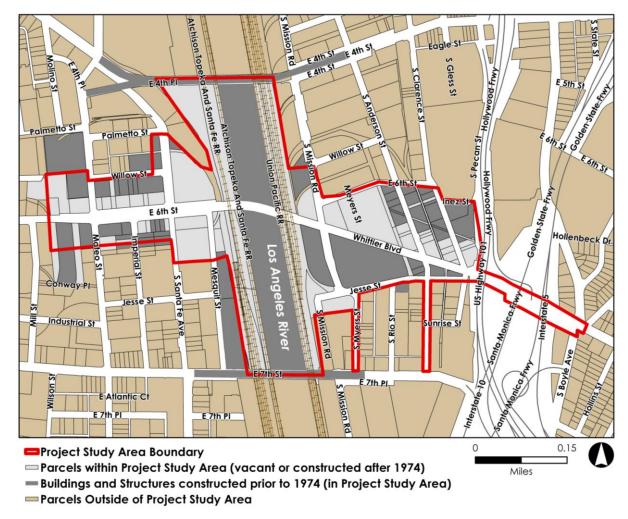


Figure 1: Project Study Area. See Figure 2 and Figure 3 for map insets. (GPA, January 2018)

Attachment A of this report includes a complete list of the 42 buildings, three structures, and two railroad properties within the Project Study Area that are potential historical resources under CEQA (see Figure 2 and Figure 3). Properties within the Project Study Area that are less than 45 years of age were eliminated as candidates for further study because there was no evidence that these recently constructed properties met the criteria for landmark designation at the national, state, or local levels.

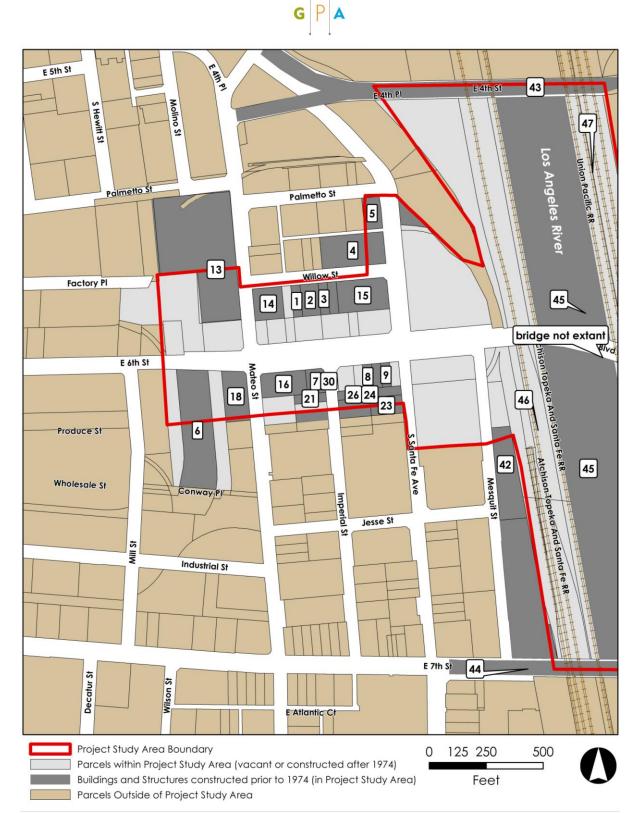


Figure 2: Inset map of west side of Project Study Area; numbered properties correspond to Attachment A. (GPA, January 2018)



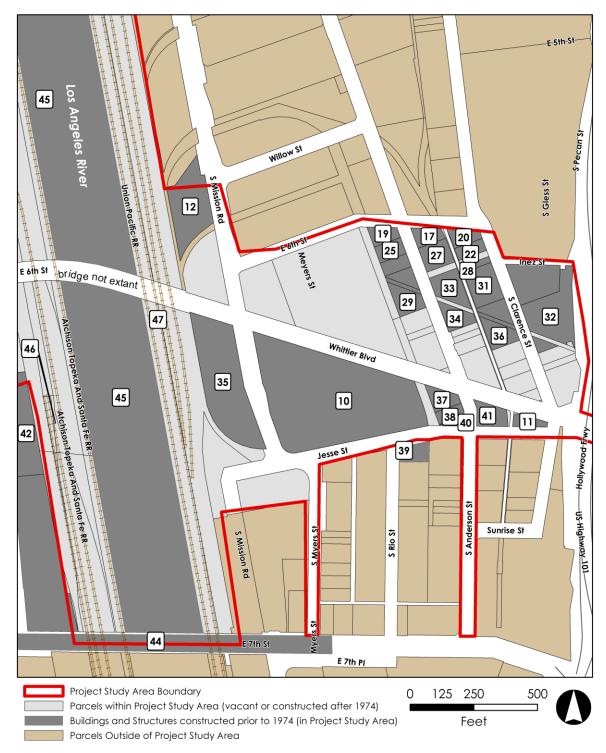


Figure 3: Inset map of east side of Project Study Area; numbered properties correspond to Attachment A. (GPA, January 2018)



Allison M. Lyons, Associate Architectural Historian, and Jenna Kachour, Senior Architectural Historian, at GPA were responsible for the preparation of this report. The report was peer-reviewed by Christine Miller Cruiess, Senior Architectural Historian at GPA. Audrey von Ahrens, Architectural Historian II at GPA, assisted with fieldwork documentation. Ms. Lyons, Ms. Kachour, Ms. Cruiess, and Ms. von Ahrens fulfill the qualifications for historic preservation professionals outlined in Title 36 of the Code of Federal Regulations, Part 61. Their resumes are included as Attachment C.

1.2 Methodology

In conducting the analysis of potential historical resources, GPA performed the following tasks:

- 1. Established the Project Study Area for the report as an area larger than the actual Project Site.
 - The Project Study Area is roughly a two-parcel radius to the north and south of East 6th Street and Whittier Boulevard from Interstate 5 on the east to Mill Street on the west. The Project Study Area also includes a segment of the Los Angeles River, adjacent railroad right-of-ways, and two bridges located between East 4th Street to the north and East 7th Street to the south (see
 - Figure 1).
- 2. Reviewed the California Office of Historic Preservation Historical Resources Inventory (HRI) directory for Los Angeles county, which includes properties listed and determined eligible for listing in the National Register of Historic Places, listed and determined eligible for listing in the California Register of Historical Resources, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historic resource surveys and other planning activities.
 - Three structures, the Fourth Street Viaduct (Bridge No. 53C0044), Sixth Street Viaduct (Bridge No. 53C1880) (demolished), and Seventh Street Viaduct (Bridge No. 53C1321) were determined eligible for listing in the National Register and are included in the database with a status code of 2S2.
- 3. Reviewed the list of designated City of Los Angeles Historic-Cultural Monuments.
 - Three structures, the Fourth Street Viaduct (LAHCM No. 906), Sixth Street Viaduct (LAHCM No. 905) (demolished) and the Seventh Street Viaduct (LAHCM No. 904) were designated Los Angeles Historic-Cultural Monuments.
- 4. Reviewed findings of recent historic resource surveys and historical resource identification completed as part of environmental impact studies in the Project Study Area since 2008. For the purposes of CEQA review, individual properties and districts identified as eligible for federal, state, or local historic designation through SurveyLA are presumed to be historical resources.¹

All of the properties within the Project Study Area that are potentially historical resources under CEQA have been evaluated as part of recent historic resources surveys. The entire Project Study Area was surveyed by SurveyLA, the citywide historic resources survey of Los Angeles. SurveyLA covers the period from approximately 1850 to 1980, and therefore includes

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¹ State CEQA Guidelines Section 15064.5.



properties less than 45 years of age.² The findings of these surveys as they relate to properties within the Project Study Area are included in Attachment A. In chronological order, these surveys included:

- 6th Street Viaduct Seismic Improvement Project, Historical Resources Evaluation Report, completed by Parsons in 2007.
- Adelante Eastside Redevelopment Area, Historic Resources Survey, completed by PCR Services on behalf of the Los Angeles Community Redevelopment Agency in 2008.³
- Sixth Street Viaduct Replacement Project Final Environmental Impact Report/ Environmental Impact Statement and Section 4(f) Evaluation, completed by State of California Department of Transportation and City of Los Angeles in 2011.
- SurveyLA Industrial Development Historic Context Statement, completed on behalf of the City of Los Angeles Department of City Planning's Office of Historic Resources (OHR) for SurveyLA by LSA Associates, Inc. and Chattel, Inc. in 2011. This context covers a broad range of themes that are part of the history of industrial development in the City of Los Angeles. Context contributors conducted several reconnaissance surveys to determine the historic use, character, and overall integrity of industrial historic resources in the city. The context statement identified buildings, structures, and sites that are designated or known historical resources that met the eligibility requirements as defined in the context for significant industrial property types in the City of Los Angeles. The context was used to inform later surveys of areas with industrial property types and zoning.
- SurveyLA: Boyle Heights Community Plan Area, Historic Resources Survey completed on behalf of the City of Los Angeles OHR for SurveyLA. This survey was undertaken by Architectural Resources Group, Inc. from December 2013 to December 2014.
- SurveyLA: Central City North Community Plan Area, Historic Resources Survey completed on behalf of the City of Los Angeles OHR for SurveyLA. This survey was undertaken in two phases: the first phase was conducted by Sapphos Environmental, Inc. between September 2011 and May 2012; the second phase was conducted by Historic Resources Group between October 2015 and September 2016.
- 5. Reviewed a records search conducted by Applied EarthWorks at the South Central Coastal Information Center at California State University, Fullerton in December 2017.
 - A records search was obtained to determine if any additional properties in the study area were previously identified as eligible for listing in the national, state, or local registers. The records search identified 23 previously recorded resources in the study area (see Table 1). Two of these resources, the Fourth Street Viaduct and Sixth Street Viaduct (demolished), were previously determined eligible for listing in the National

² This extended period was established so that potential historical resources could be identified and considered in the City's advanced planning projects such as the Community Plan updates.

³ "This survey was intended to supplement and consolidate the work of previous surveys conducted within the Adelante survey area. Pertinent information from the previous surveys was used to inform the Adelante Survey and was incorporated into the survey report, as appropriate." PCR Services Corporation, Intensive Historic Resources Survey: Adelante Eastside Redevelopment Project Area, Los Angeles, California (Community Redevelopment Agency of the City of Los Angeles, July 2008), 18.



Register of Historic Places and the California Register of Historical Resources and are designated Los Angeles Historic-Cultural Monuments. The remaining previously recorded resources in the study area were found ineligible for NRHP, CRHR, or local listing through survey evaluation.

Table 1: Record Search Results: Previously Recorded Properties in PARC Project Study Area

| Map Ref. No.4 | Record No. | Year Recorded | Location | Name | Status Code⁵ |
|------------------|-------------|---------------------|---|--|---------------------------------|
| 43 | P-19-150194 | 1994, 2001, 2011 | 900-1700 Blocks of E 4th St, Los Angeles | Fourth Street Viaduct (Bridge #53C0044) | 2\$2, 5\$1 |
| 47 | P-19-186110 | 1999, 2002, 2007 | Tracks located on the east side of the Los Angeles River north and south of 6th Street Viaduct | Union Pacific Railroad, Hobart Tower | 6Z (segment only) |
| 47 | P-19-186112 | 1999, 2002, 2009 | Tracks run south from Los Angeles through Watts and Compton to Wilmington | Union Pacific Railroad, Southern Pacific Railroad Los Angeles Division | 6Z (segment only) |
| 46 | P-19-186804 | 2002, 2007, 2011 | Tracks located west of the Los Angeles River | Burlington Northern & Santa Fe Railroad, Atchison Topeka & Santa Fe Railroad | 6Z (segment only) |
| N/A | P-19-188524 | 1987, 2007, 2011 | 6th St at Whittier Blvd, Los Angeles | Sixth Street Viaduct (Bridge #53C-1880) | Demolished (was 2S2, 5S1) |
| N/A | P-19-188525 | 2007 | 1600 E 6th St, Los Angeles (APN 5171-013-002) | Pacific Southern Warehouse Co./Market Wholesale Grocery Co./K.C. Products Co. | Demolished (was 6Z) |
| 19 | P-19-188526 | 2007 | 601 S Anderson St, Los Angeles (APN 5171-012-001) | 601 S Anderson Street Building | 67 |
| 25 | P-19-188527 | 2007 | 605, 607, 609 \$ Anderson \$t, Los Angeles (APN 5171-012-002) | Ken Redlamps | 67 |
| 29 | P-19-188528 | 2007 | 611 \$ Anderson \$t, Los Angeles (APN 5171-012-003) | 611 S Anderson Street Building | 6Z |
| 29 | P-19-188529 | 2007 | 613, 615, 617, 619, 621 S Anderson St, Los Angeles (APN 5171-012-015) | Philip Senegram Co. | 6Z |
| N/A | P-19-188530 | 2007 | 621-625 \$ Anderson \$t, Los Angeles (APN 5171-012-006; 5171-012-007) | Cal Fiber Co. Philip Senegram Co. Building | Demolished (was 6Z) |
| N/A | P-19-188531 | 2007 | 629-641 S Anderson St, Los Angeles (APN 5171-012-008); 631 S Anderson St (APN 5171- 012-014) | 631 S Anderson Street Building | Demolished (was 6Z) |

⁴ Map Reference Numbers correspond with the potential historical resources mapped in Figure 2 and Figure 3 and described in Attachment A.

⁵ See Section 2.2. for list of Status Codes



| Map Ref. No.4 | Record No. | Year Recorded | Location | Name | Status Code⁵ |
|------------------|-------------|------------------|---|---|------------------------|
| 17 | P-19-188532 | 2007 | 600 S Anderson St, Los Angeles (APN 5171-006-015) | A.M.F. Supplies, Inc. | 6Z |
| 33 | P-19-188533 | 2007 | 622 S Anderson St, Los Angeles (APN 5171-006-012) | Sun Max Produce, USA | 6Z |
| 34 | P-19-188534 | 2007 | 624-630 S Anderson St, Los Angeles (APN 5171-006-011) | 624-630 \$ Anderson Street Building | 6Z |
| 20 | P-19-188535 | 2007 | 601 S Clarence St, Los Angeles (APN 5171-005-001) | 601 \$ Clarence Street Building | 6Z |
| 22 | P-19-188536 | 2007 | 605-607 S Clarence St, Los Angeles (APN 5171-005-002); (APN 5171-005-003) | Technical Coatings, Inc | 6Z |
| N/A | P-19-188537 | 2007 | 600-602 S Santa Fe, Ave Los Angeles (APN 5164-015-001) | Clark Co./Transcold/Michelin (Lumary's Tire Service, Inc.) | Demolished (was 6Z) |
| 9 | P-19-188538 | 2007 | 1450 E 6th St, Los Angeles (APN 5164-014-004) | 1450 E 6th Street Building | 6Z |
| 23 | P-19-188539 | 2007 | 605 S Santa Fe Ave, Los Angeles (APN 5164-014-011) | Mrs. Lee's Pies | 6Z |
| 30 | P-19-188540 | 2007 | 613 Imperial St, Los Angeles (APN 5164-013-010) | 613 Imperial Street Building | 6Z |
| 18 | P-19-188541 | 2007 | 601 Mateo St, 1380-1388 E 6th St, Los Angeles (APN 5164-011- 005) | Hills Bros. Coffee Co./Southwestern Bag Co. | 6Z |
| N/A | P-19-188542 | 2007 | 650-652 \$ Clarence \$t, Los Angeles (APN 5171-004-017) | California Steel Spec. Building | Demolished (was 6Z) |

- 6. GPA conducted a field inspection of the Project Study Area to identify potential historical resources. Potential historical resources were considered buildings or structures over 45 years of age (constructed through 1974), substantially unaltered, and/or identified in previous historic resource surveys of the area.
 - Digital photographs were taken of every building, structure, or linear resource 45
 years of age or older within the Project Study Area during the field inspection (see
 Attachment A).
- 7. Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation designations, and assessment processes and programs.



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. 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."⁷

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: 8

- 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 made clear." 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

⁶ Public Resources Code Section 5024.1 and 14 California Code of Regulations Sections 4850 & 15064.5(a)(2).

⁷ Title 36 Code of Federal Regulations Part 60.2.

⁸ Title 36 Code of Federal Regulations Part 60.4.

⁹ 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.



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." ¹⁰ 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.

Historic Districts

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties."

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.¹² A district's significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the
 continuity of the district, such as new construction, highways, or development of a different
 character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.¹³

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.

¹² Title 36 Code of Federal Regulations Part 60.3(d).

¹⁰ National Register Bulletin #15, 44-45.

¹¹ Ibid, 5.

¹³ National Register Bulletin #21: Defining Boundaries for National Register Properties Form (Washington D.C.: U.S. Department of the Interior, 1997), 12.

¹² National Register Bulletin #16: How to Complete the National Register Registration Form (Washington D.C.: U.S. Department of the Interior, 1997), 16.



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.¹⁵

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.¹⁶

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
- 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.¹⁷

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:18

¹⁵ Public Resources Code Section 5024.1 (a).

¹⁶ Public Resources Code Section 5024.1 (d).

¹⁷ Public Resources Code Section 4852.

¹⁸ Public Resources Code Section 5024.1.



- 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 proscribed by the SOHP in its *Instructions for Recording Historical Resources* provide a two or three-digit evaluation code for use in classifying potential historical resources. These are referred to as Historical Resource Status Codes, or Status Codes. In 2003, the Status Codes were revised to address the California Register. The first digit indicates the general category of evaluation. The second digit is a letter code to indicate whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is coded to describe 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.
- 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:

- Individual property determined eligible for National Register by a consensus through Section 106 process. Listed in the California Register.
- Appears eligible for the California Register as an individual property through survey evaluation.
- **3S** Appears eligible for National Register as an individual property through survey evaluation.
- Individual property that is listed or designated locally
- 5S3 Appears to be individually eligible for local listing or designation through survey evaluation.



6Z Found ineligible for NR, CR or Local 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:

- 1. The proposed HCM reflects the broad cultural, economic, or social history of the nation, state or community; or
- 2. The proposed HCM is identified with historic personages or with important events in the main currents of national, state or local history; or
- 3. The proposed HCM embodies the characteristics of an architectural type specimen inherently valuable for a study of a period, style or method of construction; or
- 4. The proposed HCM is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.¹⁹

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.

2.4 Los Angeles Historic Preservation Overlay Zone Ordinance

The Los Angeles City Council adopted the ordinance enabling the creation of Historic Preservation Overlay Zones (HPOZs) in 1979; Angelino Heights became Los Angeles' first HPOZ in 1983. A HPOZ is a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. According to Section 12.20.3 of the City of Los Angeles Municipal Code, the criteria for the designation of contributing buildings in a HPOZ are:

- 1. Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or
- 2. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
- 3. Retaining the building, structure, landscaping, or natural feature, would contribute to the preservation and protection of a historic place or area of historic interest in the City.

¹⁹ Los Angeles Administrative Code Section 22.171.7.



3. ENVIRONMENTAL SETTING

3.1 Description of the Project Study Area

The Project Study Area is roughly a two-parcel radius to the north and south of East 6th Street and Whittier Boulevard from South Boyle Ave on the east to Mill Street on the west. The Project Study Area also includes a segment of the Los Angeles River, two adjacent railroad right-of-ways, and two bridges located between East 4th Street to the north and East 7th Street to the south. (see

Figure 1).

The Project Study Area is a fully developed, mixed-use urban setting, bisected by the channelized Los Angeles River. The river forms the boundary of the City of Los Angeles' Central City North community on the west side of the river with the Boyle Heights community on the east side of the river. Interior streets are arranged in a generally orthogonal grid.

Land uses along east and west sides of the river are predominantly industrial and commercial. The city's earliest and primary industrial districts are located on either side of the river. The area continues to be characterized by industrial building types throughout. Property types in the Project Study Area vary widely in size, from modest industrial buildings to massive warehouses spanning full city blocks. Most buildings in the area were constructed primarily from 1900 to 1940 and are predominantly vernacular or utilitarian in design. The characteristics that define the built environment of the Project Study Area include: the width of the streets and their grid-like arrangement; railroad right-of-ways and the placement of spur tracks to the rear of parcels; the size of parcels and the corresponding footprint and height of the buildings erected; extensive surface parking areas, often designed to accommodate large trucks; evidence of former rail lines (such as remnant tracks and a rail stop); remnant granite infrastructure (including curbs, swales, and rail beds); and the lack of street trees or other landscaping.

Railroad corridors exist along the east and west banks of the river. On the east bank, the two tracks closest to the river are owned by the Metropolitan Transportation Authority (MTA), and the Union Pacific Railroad (UPRR) owns the rest of the tracks. UPRR also operates trains on MTA's tracks on the east side of the river. On the west bank of the river, the two tracks closest to the river are owned by MTA and used by the Southern California Regional Rail Authority (SCRRA) to operate Metrolink trains. The five tracks west of the MTA tracks are owned by Burlington Northern Santa Fe (BNSF), and the rest of the tracks are owned by MTA and used for the Metro Red Line. Amtrak and BNSF also operate trains on MTA's two tracks on the west bank.

The Los Angeles River is contained within a trapezoidal concrete-lined channel.²⁰ A tunnel, owned by the City of Los Angeles, which is in the west side of the river, provides access to the river from Santa Fe Avenue near the frontage road on the south side of the river.

There are two extant bridges within the Project Study Area: the Fourth Street Viaduct (Bridge No. 53C0044) and the Seventh Street Viaduct (Bridge No. 53C1321). The Fourth Street Viaduct is a concrete arch bridge over the Los Angeles River, located along 4th Street. Designed by Merrill Butler, the Fourth Street Viaduct was built in 1930 and has been determined eligible for the

²⁰ The Los Angeles River is a flood control channel that receives storm water runoff from its 834-square-mile watershed, treated effluent from two wastewater treatment plants, and some rising groundwater in the Glendale Narrows area. The river discharges to an estuary in Queensway Bay in the Long Beach Harbor.



National Register.²¹ The Seventh Street Viaduct, also designed by Merrill Butler, is a reinforced concrete arch bridge of three 80-foot clear spans constructed between 1908 and 1910. ²² It is located along 7th Street over the Los Angeles River. The Sixth Street Viaduct Replacement is currently under construction within the Project Study Area.

3.2 Development History²³

The Project Study Area was first utilized as agricultural land by inhabitants of the Pueblo that later became Los Angeles. The area on the east side of the Los Angeles River was used for cattle ranching until the 1830s. The west side of the river was a vineyard in the 1830s. The 1849 Gold Rush brought a large demand for citrus fruit, which was used to protect against scurvy, a common malady of miners. Oranges and grapefruit quickly overtook grapes as the area's primary crops. The fruit industry proved to be the saving grace of the regional economy when a drought in 1862 decimated the cattle industry. In 1858, Andrew Aloysius Boyle purchased a large section of the east side of the river and planted a vineyard. Despite its proximity to the center of Los Angeles, Boyle's land remained pastoral and was generally perceived as unfit for development at the time, due to its geographic isolation from the rest of the city because of the Los Angeles River. The agrarian character of the areas around the river was redefined with the arrival of the railroads in the late nineteenth century.

The development of Los Angeles was heavily dependent on evolving transportation systems for the delivery of raw materials and the moving of finished goods. Until the 1870s, only local rail lines ran through Los Angeles. ²⁴ The Los Angeles and San Pedro Railroad (LA & SP) was incorporated in 1868. The LA & SP built a local line connecting the port of Wilmington with the inland City of Los Angeles. LA & SP was consolidated with the Southern Pacific in 1874 as part of the arrangement to bring the transcontinental Southern Pacific to Los Angeles. ²⁵ In 1876, Southern Pacific opened the line connecting Los Angeles to San Francisco, linking Los Angeles with the transcontinental railroad. The completion of a transcontinental rail line to Southern California in 1885 and a subsequent fare "war" between the Southern Pacific and Santa Fe railroads brought scores of newcomers to Los Angeles, which in turn produced a surge of land speculation and development activity across the region.

As the railroads increased mobility, Los Angeles ceased to be simply a market for manufactured goods produced in San Francisco and the East, and began to support local industries as well. Similarly, as agricultural activities in other areas of the city supplanted those near the city center,

²¹ The Fourth Street Viaduct is sometimes listed as the 4th St Viaduct (Santa Fe Ave) Bridge.

²² The Seventh Street Viaduct is sometimes listed as the AT&SFRR, LA River, UPRR Bridge.

²³ Portions of this section were paraphrased and excerpted from: Community Redevelopment Agency of the City of Los Angeles, *Intensive Historic Resources Survey: Adelante Eastside Redevelopment Project Area, Los Angeles, California*, prepared by PCR Services Corporation, July 2008; SurveyLA, "Historic Resources Survey Report: Central City North Community Plan Area," prepared by Historic Resources Group, September 2016; SurveyLA, Historic Resources Survey Report: Boyle Heights Community Plan Area," prepared by Architectural Resources Group, 2014; "Historic Context Statement: The Northeast Los Angeles Subregional Planning Area of the City of Los Angeles," prepared by Historic Resources Group for The Los Angeles Conservancy (as revised July 9, 1990).

²⁴ Initially, roads connected suppliers with manufacturers and their customers. The Los Angeles region's first major roads connected the pueblo to the two outlying missions: one at San Gabriel to the east and one at San Fernando to the northwest. Mission Road (portions of which are now known as Valley Boulevard) ran east between Lincoln Heights and Boyle Heights to San Gabriel.

²⁵ The Los Angeles and San Pedro Railroad (LA&SP) was incorporated in 1868 to build the first railroad in Southern California connecting the port of Wilmington with the inland City of Los Angeles. As part of the arrangement to bring the transcontinental Southern Pacific (SP) Railroad to Los Angeles, substantial subsidies and the stock of the LA&SP Railroad were given to the SP. In 1874, the LA & SP Railroad was consolidated with the Southern Pacific.



the city center evolved from simply a shipping hub to a processing and manufacturing center. This was particularly true of the areas adjacent to the Los Angeles River where transcontinental railroads, at first the Southern Pacific Railroad on the west side and later the Atchison, Topeka & Santa Fe Railway on the east side, laid their tracks. Streetcars crossed through the area, facilitating the movement of workers and encouraging development along the spine of the river. By 1901, seven streetcar lines traversed the river, linking downtown Los Angeles on the west with Boyle Heights on the east.²⁶ These areas evolved into the city's first industrial district.

Industrial development was diverse and included freight houses and freight yards developed by the railroads in addition to warehouses, manufacturing facilities, and salvage yards. Constructionrelated industries expanded rapidly beginning in the 1880s when the regional real estate boom spurred residential and commercial construction. Industrial development in the area did not begin in earnest until the subdivision of two substantial tracts specifically dedicated for industrial use: the Industrial Tract, recorded in 1903 by the Industrial Realty Company; and the Industrial Center Tract, recorded in 1904. These tracts defined the southwestern section of the Project Study Area, terminating at 7th Street. In the early decades of the twentieth century, many of the area's industrial buildings were one of two types: manufacturing or processing facilities and warehouses. A 1909 map of the area notes the considerable number of warehouses and storage facilities which had been constructed in just a few years, as well as a wide variety of processing and manufacturing operations - including lumber yards, freight yards, ice and cold storage, slaughterhouses, meatpackers, produce companies and canneries, and blacksmiths, among others.²⁷ Many of the area's industrial buildings were constructed directly on a rail spur; these buildings often display curved facades that follow the tracks, with docks and large bay doors set several feet above the ground (to the height of a boxcar), to facilitate the loading and unloading of goods. Warehouses were built either as general storage facilities – with space that could be rented by a variety of companies or operators – or were purpose-built facilities associated with a particular company.

As new local industries established themselves, processing and manufacturing operations in the area continued to expand. Two industries flourished during this period: ice and cold storage, and food processing and packaging. Cold storage emerged in response to the demand for fresh products in urban areas and provided a critical link between agricultural goods from farms, fisheries, and ranches and their distribution to fresh produce markets and food processors. Construction of cold storage warehouses was initially integrally linked with that of ice-making plants, with both frequently located within the same facility.²⁸ Food processing industries represented some of the earliest industrial development in Los Angeles, but the industry exploded

²⁶ In 1895, the Los Angeles Railway Company, known as the "LARy," was created from the consolidation of several independent rail lines including the Los Angeles Cable Railway, which had ceased operating in 1893. The LARy (which railroad magnate Henry E. Huntington purchased in 1898) was the first electric streetcar to connect downtown Los Angeles with Boyle Heights. In 1901, Huntington and Isaias W. Hellman created the Pacific Electric Railway Company (known popularly as the "red car") which also connected Boyle Heights with downtown. By then, there were four LARy trains and three red cars crossing the Los Angeles River between the two areas. Although First Street was the earliest commercial corridor in the Boyle Heights subdivision, Brooklyn Avenue (today Cesar Chavez Avenue), Fourth Street, and Stephenson Avenue (modern-day Whittier Avenue) all underwent commercial development as a direct result of the railways.

²⁷ The map was likely a Sanborn Fire Insurance map. For more information, please see Historic Resources Group, "Historic Resources Survey Report: Central City North Community Plan Area," SurveyLA Los Angeles Historic Resources Survey, (Office of Historic Resources, September 2016) 12.

²⁸ Among the early cold storage operations was the Los Angeles Ice & Cold Storage Co. (now Rancho Cold Storage, 1905) located on the west side of the river.



in operation during the 1910s and 1920s as companies began to embrace mechanization to meet the demands of new chain stores. Food processing eventually became one of the dominant industries in the area.

The character of the industrial areas adjacent to the river remains largely a function of the redevelopment of Union Pacific's former railroad facilities during the 1920s. In response to the strong demand for industrial space arising from the economic growth of the Los Angeles region in the 1910s, Union Pacific, on the east side of the river, began removing many of its facilities near the Los Angeles River and dividing its properties into industrial sites. A major incentive attracting business to this industrial district were the Union Pacific spur tracks interlaced among the streets, providing industries with easy access to a national freight rail network.²⁹ This ushered in a wave of industrial development on the east side of the river.

By the 1920s, the east and west sides of the river were fully established as an industrial hub.³⁰ This was aided in part by the pattern of development occurring outside the central city. As the City of Los Angeles continued to annex existing communities as well as available land in the San Fernando Valley, zoning was amended to eliminate residential development and accommodate the construction of more offices, retail, and manufacturing facilities in the downtown area. Boyle Heights, just east of the Union Pacific industrial zone along the river, had become a densely populated residential suburb.

The east side and Boyle Heights benefited tremendously from the Viaduct Bond Act of 1923, which set into motion an ambitious and far-reaching bridge building program across the city. The sale of bonds financed the construction of a series of monumental concrete viaducts that spanned both the Los Angeles River and the rail lines that ran adjacent to the riverbed; seven of these viaducts, at Macy (now Cesar Chavez), First, Fourth, Whittier/Sixth, Seventh, Ninth (now Olympic), and Washington Streets, were routed into Boyle Heights and were completed between 1925 and 1933. The last of the bond measure bridges, the Whittier/Sixth Street Bridge (demolished), was dedicated in 1933. These bridges replaced several existing wood and metal truss bridges, which were susceptible to flood damage and lacked the capacity to accommodate traffic that had been generated by the area's rapid growth.31

Industrial development in the area declined following World War II. After the Interstate Highway System was launched in the 1950s, the trucking industry became the preferred mode of transportation for industrial activity and the railroads declined. Locating factories and warehouses in districts with spur track access became less important. At the same time, many pre-war industrial districts had become highly congested urban areas that were less convenient for truck access, unlike newly-built factories and warehouses on the outskirts of cities and in suburbs. The construction of an expansive freeway network throughout Southern California also drastically altered the configuration and physical character of the Project Study Area. Five freeways and the

²⁹ Replacing these newly cleared railroad facilities were continuations of South Mission Road to Stephenson Avenue, and East Third, Fifth, and Sixth Streets to South Mission Road; the renaming of South Rio Street to South Anderson Street as it was extended to East Seventh Street; the creation of Boyd and Artemus Streets; and construction of the soaring Whittier Boulevard viaduct that crossed the area just north of Stephenson Avenue.

³⁰ One property that signified the complete industrial development of the area was the Sears Roebuck Company's mailorder warehouse and retail store constructed on an eight-and-one-half-acre site in Hostetter Industrial District, southeast of the project area, between 1927 and 1928.

³¹ All seven viaducts are designated Historic-Cultural Monuments and thus were not re-evaluated as part of SurveyLA. The Macy/Cesar Chavez viaduct was designated in August 1979; the others were designated in January



multi-level East Los Angeles Interchange were routed through Boyle Heights between 1948 and 1965.³²

While industries evolved over time, the area maintained its character as an industrial center, with one processing or manufacturing operation simply replacing another. Over the course of the twentieth century, a single manufacturing facility might house the production of everything from dog food to pie. In the 1950s, the area was home to automotive manufacturing, trucking and transport, furniture manufacturing and storage, paint and chemical manufacturing, and paper and plastic production – as well as historically dominant industries such as food processing and lumber and woodworking operations.

By the 1960s, however, the character of the area was evolving away from that of an industrial center. Local industries and manufacturers struggled to adapt to the competition brought on by containerization and other modern technologies. Outlying fledgling industrial centers such as Vernon and the City of Commerce were comparatively undeveloped and offered plentiful land at lower prices, presenting many companies with an opportunity to relocate and construct newer and more efficient facilities. As a result, by the 1970s many buildings in the industrial district were vacant.

The use of the area's industrial buildings evolved as artists and other creative types began to congregate amidst the vacant buildings and empty lots. Priced out of established artists' colonies in neighborhoods such as Venice and Hollywood, Los Angeles' industrial district provided many with an opportunity to live and work inexpensively in vast warehouse buildings. Many of the area's most prominent industrial buildings found new life as gallery space and underground hangouts for a burgeoning art and music scene. By the 1980s, the area was home to several avant-garde art galleries, giving rise to the group of early artists now called the "Young Turks." In 1981, the City of Los Angeles implemented the Artist-in-Residence Program, which legalized the residential use of formerly industrial buildings for artists, legitimizing their efforts. In the mid-1990s, the area was officially designated as the Arts District by the City. A subsequent wave of development began in 1999 with the passage of the Adaptive Reuse Ordinance which relaxed zoning codes and allowed for the conversion of pre-1974 commercial and industrial buildings into residences for artists and non-artists alike. The area continues to attract new commercial and residential development, as existing facilities are adapted to meet the needs of the growing community.

3.3 Historical Resources in the Project Study Area

Attachment A of this report includes a complete list of the 42 buildings, three structures, and two railroad properties within the Project Study Area that were considered as potential historical resources under CEQA. Properties within the Project Study Area that are less than 45 years of age were eliminated as candidates for further study because there was no evidence that these recently constructed properties met the criteria for landmark designation at the national, state, or local levels. Historical resources are defined as properties that are eligible for or listed under national, state, or local landmark or historic district programs. For the purposes of CEQA review, individual properties and districts identified as eligible for federal, state, or local historic designation

³² Entire blocks were razed to make way for the Interstate 10 (San Bernardino), Interstate 5 (Golden State), US Route 101 (Santa Ana), and State Route 60 (Pomona) freeways, which together consumed some fifteen percent of the total land area within Boyle Heights and culminated in the displacement of businesses and thousands of households.

³³ An extensive discussion of the genesis of the Arts District can be found in Lindsey Miller's "Isolation and Authenticity in Los Angeles' Arts District Neighborhood."



through SurveyLA are presumed to be historical resources.³⁴ Properties and districts identified as such were not researched or evaluated on an intensive-level by GPA independently to evaluate their eligibility as potential historical resources. This report does not refute any previous findings regarding the eligibility of these resources.

As previously stated, the Project Study Area included roughly a two-parcel radius to the north and south of East 6th Street and Whittier Boulevard from South Boyle Avenue on the east to Mill Street on the west. The Project Study Area includes a segment of the Los Angeles River (approximately 2,500 feet long), two adjacent railroad right-of-ways, and two bridges between East 4th Street to the north and East 7th Street to the south.



Figure 4: Fourth Street Viaduct (LAHCM #904 and Bridge No. 53C0044) (GPA, 2017)



Figure 5: Seventh Street Viaduct (LAHCM #906 and Bridge No. 53C1321) (GPA, 2017)

After research and field survey, it was determined that there are four historical resources as defined by CEQA in the Project Study Area:

- 1. The Fourth Street Viaduct (LAHCM #904 and Bridge No. 53C0044, Figure 4), is a designated Los Angeles Historic-Cultural Monument and determined eligible for listing in the National and California Registers (Status Code 2S2).
- 2. The Seventh Street Viaduct (LAHCM #906 and Bridge No. 53C1321, Figure 5) is a designated Los Angeles Historic-Cultural Monument and determined eligible for listing in the National and California Registers (Status Code 2S2).
- 3. For the purposes of CEQA review, the segment of the Los Angeles River Channel within the Project Study Area (see Figure 6) is presumed to be a historical resource. Segments of the Los Angeles River outside of the Project Study Area have previously identified as eligible for listing under NRHP Criterion A and CRHR Criterion 1 as a contributing element of the larger, 51-mile linear resource.³⁵ The river is presumed eligible for its association with flood control in the region and for facilitating the continued development of river-adjacent areas during and after World War II.

³⁴ State CEQA Guidelines Section 15064.5.

³⁵ Emily Rinaldi, GPA Consulting, "Shoemaker Bridge Replacement Project," Draft Historical Resources Technical Memo, (City of Long Beach, June 2017); Amanda Duane, GPA Consulting, "California Department of Parks and Recreation, Continuation Sheet, Los Angeles River Channel (segments of)," (California High Speed Rail Authority, April 21, 2017).



4. The Downtown Los Angeles Industrial Historic District is a historic district identified as eligible for federal, state, and local historic designation through SurveyLA (see Figure 7). The district is significant for its role in the industrial development of Los Angeles; this area served as the city's primary industrial district from the late-nineteenth century through World War II. It was identified as eligible for listing under NRHP Criterion A and CRHR and LAHCM Criterion 1.36 Five buildings within the Project Study Area were evaluated as non-contributors to the Downtown Los Angeles Industrial Historic District by SurveyLA. As non-contributors, these buildings do not add to the historic architectural qualities, historic association, or historic patterns for which the District is significant. In accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, these five buildings are not considered historical resources for the purposes of CEQA compliance; however, the District as a whole is considered a historical resource.



Figure 6: Los Angeles River, segment within the Project Study Area, view facing north from Seventh Street Viaduct (GPA, 2017)

³⁶ The Downtown Los Angeles Industrial Historic District was assigned status codes 3S, 3CS, and 5S3.



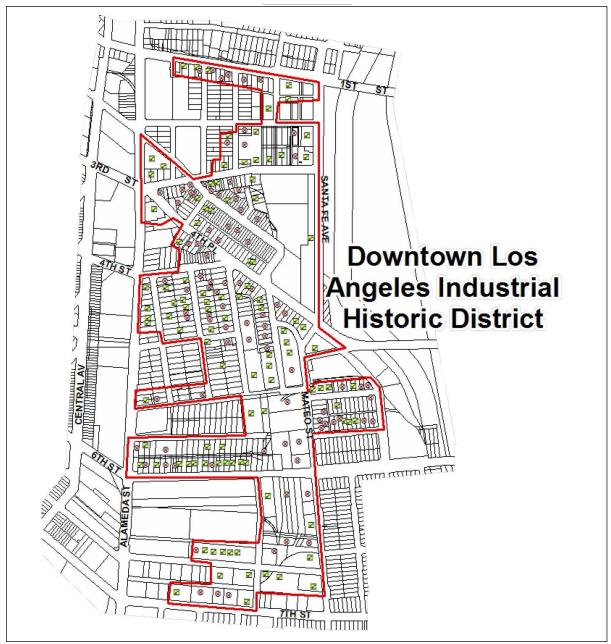


Figure 7: Downtown Los Angeles Industrial Historic District, identified by SurveyLA in 2016 (Central City North, Historic Districts, Planning Districts, and Multi-Property Resources, page 5)

GPA re-surveyed the Project Study Area and did not identify any potential historical resources that were not already identified by SurveyLA and other recent historic resources surveys. GPA concurred with the findings of SurveyLA and did not identify any additional historical resources in the Project Study Area. The results of the re-survey of the area are summarized in Attachment A. It is unlikely that further research would reveal previously unidentified historic associations and the properties in the Study Area were unlikely to meet the criteria for significance. Due to alterations, most of the properties were too altered to retain integrity to convey significance.



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.

Title 14 California Code of Regulations Section 15064.5(b)(1) 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 if a 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).³⁷ Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Standards.³⁸ 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. As discussed in Section 4.3 below, the Project involves modifications to a segment of the Los Angeles River, which is presumed to be a historical resource, and construction in the vicinity of the Fourth Street Viaduct and the Seventh Street Viaduct, which are designated Los Angeles Historic-Cultural Monuments, and the Downtown Los Angeles Industrial Historic District, which was identified as significant by SurveyLA. 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.
- 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.

³⁷ 14 CCR Section 15126.4(b).

^{38 14} CCR Section 155331.



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 Sixth Street Viaduct Division of the City of Los Angeles (City) Department of Public Works (DPW), Bureau of Engineering (BOE), is proposing the construction of the Sixth Street PARC Project. The PARC Project would include the creation of public recreational space on approximately 13 acres in areas underneath and adjacent to the upcoming Sixth Street Viaduct (Viaduct), between Mateo Street to the west and the United States Highway 101 (U.S. 101) to the east, in the city of Los Angeles. The proposed Project will span from the Downtown LA Arts District over the River to Boyle Heights. The PARC Project would be located in Council District 14 at the boundary of the City of Los Angeles' Central City North and Boyle Heights Community Plan areas. See Attachment B for Conceptual Plans.

The proposed Project is divided into the following sections: (1) West Park, which is located in the Central City North Community Plan; (2) Arts Plaza and River Gateway, which is located in the Central City North Community Plan and along the west and east banks of the LA River channel; and (3) East Park, which is located in the Boyle Heights Community Plan (see Figure 8). Construction would be divided into two phases. Phase I would consists of constructing the General Park Elements as well as East Park, West Park, Arts Plaza and River Gateway. Phase II could consist of installing reinforced concrete planted terraces along the banks of the LA River.



Figure 8: Overall conceptual plan for the PARC Project (Hargreaves Associates, 2019)



4.3.1 Phase I

Construction within Phase I may be phased from East to West as space becomes available below the Viaduct. The following elements would be constructed as part of Phase I of the proposed Project:

4.3.1.1 General Park Elements

General park elements that would be incorporated throughout the PARC Project site may include the following elements:

- Typical park site furnishings and amenities, which may include benches, tables, bike racks, bicycle rentals, kiosks, drinking fountains, safety bollards, lighting and signage, fencing, gates, trash receptacles/enclosures, and equipment and maintenance storage unit(s);
- Pedestrian paths, bicycle paths and connections, internal park roadways and service roads;
- Park lighting;
- Minor relocations of existing street lighting along Santa Fe Avenue, Mission Road, and Anderson Street within the Project Area;
- Pedestrian street lighting on Santa Fe Avenue, Anderson Street, and South Clarence Street;
- Public art sculpture and associated interpretive exhibits;
- Utility connections (electrical and plumbing);
- Utility relocations and undergrounding in some areas may be required;
- Other miscellaneous utility improvements such as installation of WiFi, security cameras, and hookups for food trucks, temporary performance equipment (sound and lighting), and water;
- Site soil would be remediated to standards acceptable by the Los Angeles County Fire
 Department and the Department of Toxic Substances Control prior to proposed Project
 construction. Some soil remediation activities may also be required during construction;
- Irrigation systems and open space;
- Demolition of existing urban infrastructure, such as pavement and roadways;
- Landscaping would be consistent with the City's RIO Ordinance (Ordinance Number 183145), which requires that 75 percent of any project's newly landscaped area be planted with any combination of native trees, plants and shrubs, species defined as WatershedWise (i.e., climate adapted and non-invasive plants), or species listed in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palette;
- Connectivity improvements, which may include, but are not limited to, a pedestrian
 activated crosswalk on Santa Fe Avenue, a speed table at the continental crosswalk on
 Santa Fe Avenue, and speed tables with solar-powered rectangular rapid flashing
 beacons at South Clarence Street, Mission Road, and South Anderson Street;



- Retaining wall(s), which would be between approximately 2- and 17-feet high; and
- Stormwater infrastructure improvements, which would include proposed stormwater drainage systems that would capture runoff from the proposed Project Site and tributary Viaduct areas, route stormwater to structural and low impact development (LID) best management practices (BMP) (e.g., proprietary vaults with media-filled cartridges, catch basin filter inserts, incidental infiltration during sheet flow and within localized vegetated basins, and below-grade capture and use systems), and discharge to existing stormwater drainage facilities that drain to the LA River.

4.3.1.2 East Park

The proposed East Park is located on the east side of the River, beneath the Viaduct Replacement, between the railroad right-of-way and the 101 freeway. Elements that may be included in the East Park include (see Figure 9):

- East Building with approximately 332-square-foot concession area, 252-square-foot public restrooms; and 635-square-foot office space and 571-square-foot storage space for City of Los Angeles Department of Recreation and Parks (RAP);
- Two synthetic-turf soccer fields with field lighting, one for youth Under-8 players, and one for youth Under-10 players;
- One flexible play and performance lawn with combined capacity to hold events up to approximately 2,800 people;
- Adult-sized flexible sports court for basketball, futsal, and volleyball;
- Salvaged bridge light poles and salvaged arch as barrier/seat wall;
- Nature walk, meadow and adult fitness circuit;
- Splash pad with outdoor shower;
- Designated picnic and grilling areas;
- Landscaped seating areas and rain gardens;
- Small dog and large dog play areas;
- Parking plaza with 14 dedicated spaces on-site (approximately 9 of which would be used by RAP staff);
- Children's play area; and
- Skate park elements.





Figure 9: Conceptual plan of East Park area. (Hargreaves Associates, 2019)

4.3.1.3 West Park/Arts Plaza and River Gateway

• The proposed West Park is located on the west side of the River, north of the Sixth Street Viaduct Replacement, between Mateo Street and Santa Fe Avenue (see Figure 10).



Figure 10: Conceptual plan of West Park area; view looking northeast from Mateo Street and 6th Street. (Hargreaves Associates, 2019)



The proposed Arts Plaza and River Gateway is located on the west side of the River, beneath the Viaduct Replacement, extending from Santa Fe Avenue to the west bank of the River (see Figure 11). The Arts Plaza would be constructed between Santa Fe Avenue and the railroad right-of-way. The River Gateway would involve alterations to an existing pedestrian and maintenance tunnel (owned by City of Los Angeles) under the railroad right-of-way that connects the Arts Plaza site with the west bank of the River.



Figure 11: Conceptual map of Arts Plaza area. (Hargreaves Associates, 2019)

Elements that may be included in the West Park/Arts Plaza and Gateway include:

- One 630-square-foot café building with outdoor plaza seating;
- One approximately 172-square-foot building with public restrooms;
- Arts Plaza performance area(s), public gathering/assembly areas with capacity up to approximately 1,000 people
- One flexible play and performance lawn;
- Adult fitness equipment;
- Small dog and large dog play areas;
- Landscaped seating area;
- Public art sculpture (approximately 30 feet high, 24 feet wide, by 11 feet long);
- Rain garden;
- Reconstruction and rehabilitation of existing pedestrian/vehicular LA River Access Tunnel entrance to the River (widening the tunnel opening; resurfacing the tunnel entryway, pavement, and tunnel floor; painting; and lighting improvements). Installation of safety



features, including removable bollards or a gate to restrict vehicle access to the tunnel and warning devices to deter pedestrian access during flood events;

- Space for future electric vehicle charging station and City of Los Angeles Department of Transportation (LADOT) mobility hub elements;
- Space for secure bike parking and space for Metro bikeshare; and
- Space for future landscaped garden areas.

4.3.2 Phase II

Phase II could include the installation of reinforced concrete planted terraces on up to approximately 20,000 square feet of the west and east banks of the LA River channel (see Figure 12). Terracing would be up to approximately 10 feet wide and located as high as possible on the west and east LA River banks. The terraces would be anchored into the existing slope liner and would not require excavation into the LA River channel. All landscaping would consist of species included in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palette, consistent with the City's RIO Ordinance (Ordinance Number 183145). Existing access to the LA River would be maintained.

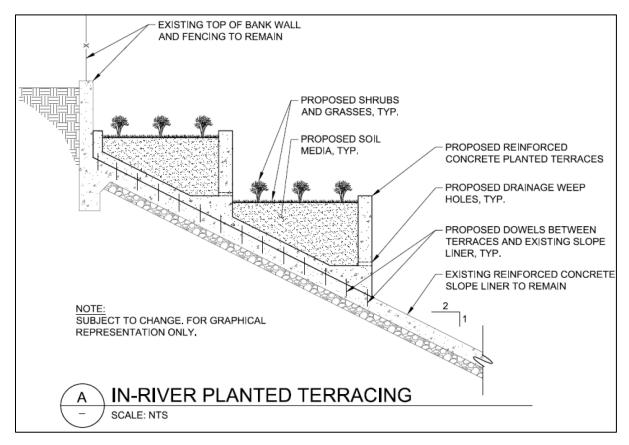


Figure 12: Conceptual plan for planted terraces (LABOE, 2019)



4.4 Analysis of Project Impacts

There are four known, potential, or presumptive historical resources in the Project Study Area: the Fourth Street Viaduct, Seventh Street Viaduct, Los Angeles River Channel, and Downtown Industrial Historic District (see Figure 13). The analysis of project impacts on these historical resources follows.

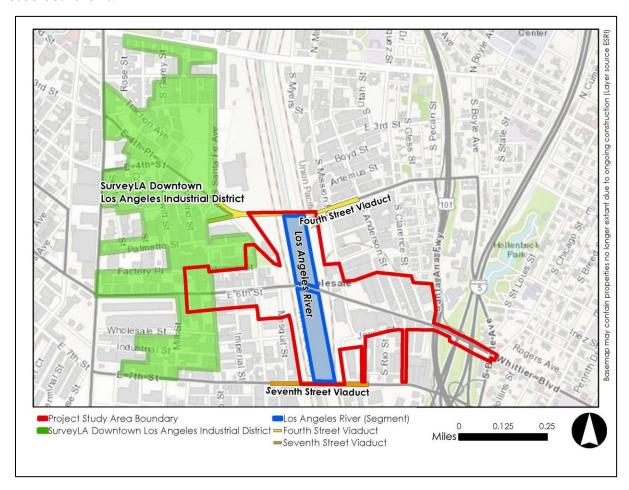


Figure 13: Location of four Historical Resources in the Project Study Area. Base map may contain buildings no longer extant due to ongoing construction (layer source: ESRI). (GPA, January 2018)

4.4.1 Fourth Street Viaduct and Seventh Street Viaduct

The Fourth Street Viaduct and Seventh Street Viaduct (the viaducts) are located at the north and south ends of the Project Study Area, respectively (shown in yellow and orange in Figure 13 above). None of the proposed elements of the PARC project would physically impact the viaducts. Among the seven factors of integrity that convey the significance of a historical resource, only integrity of setting is relevant to the analysis of overall Project impacts in regard to the viaducts.

The viaducts would retain integrity of location, design, materials, workmanship, feeling, setting, and association. The PARC Project would not impact current spatial relationships between the



viaducts and the Los Angeles River. The setting, or the physical environment of the historic properties, would not be changed or altered by the PARC Project. The relationship of the viaducts to surrounding built environment would not change. The PARC Project would not impact the integrity of the viaducts.

As the PARC Project would have no impact on the Fourth Street Viaduct and Seventh Street Viaduct, no mitigation is required or recommended.

4.4.2 Los Angeles River Channel

The Los Angeles River Channel is characterized by trapezoidal reinforced concrete channels, paved parapet berms, and a periodic central trench at the bottom to guide water flow. The Los Angeles River was fully channelized between 1938 and 1960. The Los Angeles River Channel has been previously evaluated as significant for its association with flood control in the region; for facilitating the continued development of river-adjacent areas during and after World War II; and for its method of construction.³⁹

Since construction began in 1938, portions of the channel have been altered and modified. The PARC Project proposes an additional and compatible use for the river channel that would maintain its significant historic features and ensure continued use. Specifically, two elements of the PARC Project have the potential to impact the Los Angeles River (shown in blue in Figure 13 above).

The first element is the rehabilitation of existing pedestrian/vehicular tunnel entrance to the River on the west bank, including widening the tunnel opening; resurfacing of entryway, pavement, and tunnel floor; painting; lighting improvements; and installation of safety features, including removable bollards or gate and warning devices. The work proposed for the tunnel appears to conform with the Secretary's Standards. The tunnel is not a character-defining feature of the River. No distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the River would be altered and no additional features would be added as part of this element of the PARC Project.

The second element is the construction of reinforced concrete planted terraces on up to approximately20,000 square feet of the west and east banks of the LA River channel. These changes would be contained mostly below and immediately adjacent the footholds of the new Sixth Street Viaduct.

The proposed project will not alter the geographic location or alignment of the historic property. New visual elements that will be introduced to the resource's setting as a result of the proposed project include landscape and hardscape improvements. These changes would result in minimal changes to the resource and would not diminish the integrity of setting. New landscaping and hardscape features will result in changes to the segment's surroundings; however, the overall setting will continue to be a densely developed urban corridor representing multiple phases and types of development. The changes to the immediate setting of the River segment within the Project Study Area would not diminish the historical resource's integrity of setting such that it would no longer qualify for listing in the NRHP.

Historical Resource Evaluation Report – Sixth Street PARC, Los Angeles

³⁹ Emily Rinaldi, GPA Consulting, "Shoemaker Bridge Replacement Project," Draft Historical Resources Technical Memo, (City of Long Beach, June 2017); Amanda Duane, GPA Consulting," "California Department of Parks and Recreation, Continuation Sheet, Los Angeles River Channel (segments of)," (California High Speed Rail Authority, April 21, 2017).



Trapezoidal reinforced concrete channels, paved parapet berms, and a periodic central trench at the bottom to guide water flow convey the historic resource's historic function and aesthetic, as well as the building technology from the period of significance. The proposed undertaking will be integrated into these features within a small segment of the river in such a way that will not impact the integrity of design, materials, and workmanship for the 51-mile-long river. The location and form of the proposed terraced area follows the slope of the River bank, and similar materials, including concrete, will be used. The River will still function as a flood control channel, despite these changes. The small section of channel that will be altered will not impact the ability of the historic resource to convey its significance for an association with flood control in the region; for facilitating the continued development of river-adjacent areas during and after World War II; and for its method of construction. The channel will also continue to express the aesthetic and historic sense of its period of significance, retaining its integrity of feeling.

Secretary of the Interior's Standards

The scope of work within the Project Study Area conforms with the Secretary of the Interior's Standards for Rehabilitation. Standards 9 and 10 are most relevant for the proposed project. In conformance with Standard 9, the spatial relationships that characterize the river would remain intact. The new work shall be differentiated from the old through the use of vegetated plantings and contemporary finishes, while still using the palate of concrete and utilitarian materials that characterize the river's channel. The terraces are compatible with the size, scale and proportion, and massing of the existing concrete channel. In conformance with Standard 10, the new work would be constructed in such a manner that if were removed in the future, the essential form of the trapezoidal reinforced concrete channels could be easily restored, and integrity of the historic property and its environment would be unimpaired.

The segment of the Los Angeles River Channel would retain its integrity of location, design, materials, setting, and workmanship. The PARC Project would not impact integrity of feeling and association, as the segment would continue to convey the aesthetic sense of a large infrastructure project of the twentieth century. The historical resource would not be materially impaired; therefore, the project would not cause a substantial adverse change, and the impact is less than significant.

4.4.3 Downtown Industrial Historic District

The boundaries of the Downtown Los Angeles Industrial Historic District (District) cross the Project Study Area; however, no contributing buildings or features of the district are located in the Project Study Area (shown in green in Figure 13 above). Though the PARC Project would not involve the demolition or physical alteration of the five non-contributing buildings within the Project Study Area, the West Park and Arts Plaza & River Gateway elements of the PARC Project have the potential to indirectly impact the overall integrity of the District (see Figure 14).

⁴⁰ Emily Rinaldi, GPA Consulting, "Shoemaker Bridge Replacement Project," Draft Historical Resources Technical Memo, (City of Long Beach, June 2017); Amanda Duane, GPA Consulting, "California Department of Parks and Recreation, Continuation Sheet, Los Angeles River Channel (segments of)," (California High Speed Rail Authority, April 21, 2017).



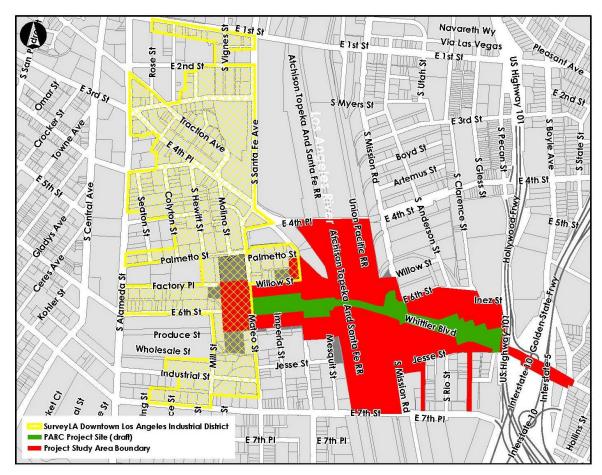


Figure 14: Downtown Los Angeles Industrial District, identified by SurveyLA (in yellow), Sixth
Street PARC Study Area (red), and PARC Project Site (green).
(SurveyLA district boundary data courtesy of City of Los Angeles, Department of City Planning,
GIS Department)

In determining impacts of the PARC Project on the District, the central question is whether the PARC project would affect the physical integrity of the historical resource to the degree that it would no longer be eligible for listing in the National Register and California Register as well as for local designation. Such an effect would only occur if, as a result of the proposed PARC Project, the District no longer retained sufficient integrity to convey its significance as the city's primary industrial district from the late nineteenth century through World War II. The District's contributing buildings are only one feature that adds to its character and ability to convey its significance. Other contributing characteristics of the District include location, interior circulation pattern, industrial use, absence of landscaping such as street trees, and evidence of former rail lines.

According to *National Register Bulletin #15*, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. The only relevant aspects with respect to the impact of the PARC Project on the District are setting and feeling, as there will be no direct physical changes made to the district's contributing elements. While *National Register Bulletin #15* does not directly address the impact of new construction or new landscape features



on the setting or feeling of a historic district, it provides direction in assessing the impact of non-contributing buildings on the physical integrity of a listed historic district, as follows:

When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of historic environment.

As a result, this analysis of impacts on the District considers how the proposed PARC Project might affect the District's integrity of feeling and setting in terms of its relative number, size, scale, design, and location of visual intrusions.

Relative Number

As of the date of this report, 196 properties were recorded within the District. Of these, 104 were evaluated as contributors, or approximately 53 percent, and 92 properties were evaluated as non-contributors due to alterations or construction outside the period of significance. The ratio of contributing to non-contributing buildings within the District is relatively low compared with other designated historic districts.⁴¹ The PARC Project would not affect the number of buildings in the District or the ratio of contributing to non-contributing buildings. No buildings would be altered or demolished as part of the PARC Project. Though the Project Study Area examined the District and included non-contributing buildings in the study of project impacts, the PARC Project Site is not located within the boundaries of the District (see Figure 14). Although the PARC Project would be visible from within the boundaries of the District, the PARC Project would have no impact on the relative number of intrusions within the district's boundaries,

Size, Scale, and Design

While the PARC Project would introduce a new visual element to the area southeast of the District, the impact would be less than significant. The District is characterized by a variety of buildings that range in height from one to seven stories, and include modest industrial buildings to large warehouses spanning full city blocks. There are several vacant and parking lots located immediately adjacent to contributing and non-contributing building within the District (the boundaries of the district are irregular and exclude many vacant parcels). The PARC Project utilizes space currently vacant and would add nothing in size and scale that competes with buildings within the district.

The PARC Project introduces a new visual element within the setting of the District; however, because the PARC Project Site is located outside the District boundaries, the PARC Project would not impact its contributing buildings nor its other distinctive features, such as its location, predominantly industrial use, absence of landscaping such as street trees, and evidence of former rail lines. Overall, the relationships among the District's components, including its contributing buildings, would not be substantially changed from the period of significance. The District would still convey its sense of time and place. The PARC Project, therefore, would not have such a visual impact that it would impair the integrity of the District to the degree it would no longer be eligible for listing under national, state, or local designation programs.

⁴¹ For example, the Spring Street Financial District includes 26 contributing, or approximately 86 percent, and 4 non-contributing buildings while the Broadway Theater and Commercial District includes 66 contributing, or approximately 63 percent, and 38 non-contributing buildings.



Location

The PARC Project Site is located southeast of the District. The District's boundary is irregular with a portion of the eastern boundary located along South Mateo Street from East 7th Street to Willow Street. The PARC Project Site's location is outside of the District, in an area historically occupied by circulation, would not substantially change the relationships between the District's significant components. The PARC Project would not affect the integrity of the District because of an inappropriate location.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards are generally not applicable, as the PARC Project does not involve the preservation, rehabilitation, restoration, or reconstruction of a historic building. Rehabilitation Standards 9 and 10, which address related new construction, are relevant but not determinative in analyzing the potential impact of a new landscape in a historic district. Nevertheless, compliance with Standards 9 and 10 is discussed below.

In conformance with Standard 9, the spatial relationships that characterize the District would remain intact. The PARC Project would be differentiated from the industrial buildings and circulation patterns of the district, notably through plant materials that are not found within the District. The PARC Project is compatible with the size, scale and proportion, and massing of the existing vacant sections adjacent to the District.

In conformance with Standard 10, the PARC Project would be constructed in such a manner that if removed in the future, the circulation patterns and industrial character of the area could be easily restored, and the integrity of the District and its environment would be unimpaired.

The District would retain its integrity of location, design, materials, setting, and workmanship. The PARC Project would not impact integrity of feeling and association, as the District would continue to convey its significance as the city's primary industrial district from the late nineteenth century through World War II. The PARC Project would have no impact on the relative number of contributors and non-contributors. Though the PARC Project would introduce a new visual element to the area southeast of the District, the impact would be less than significant. The PARC Project Site is located outside the District boundaries; therefore, it would not impact the District's contributing buildings or its other distinctive features. Given the Project Site's location outside of the District, the Project would not substantially change the spatial relationships between the District's significant components. As the PARC Project would not materially impair the District, it will not result in a substantial adverse change to the historical resource, resulting in a less than significant impact on the District.



5. CONCLUSIONS

Four historical resources were identified within the PARC Project Study Area: Fourth Street Viaduct, Seventh Street Viaduct, the Los Angeles River, and the Downtown Los Angeles Industrial Historic District. The proposed Project would not significantly alter the characteristics that convey the significance of these historical resources and qualify them for listing in the NRHP, CRHR, and/or as LAHCMs. The PARC Project would not involve the demolition or material impairment of any historical resources. Therefore, the PARC Project would not result in a substantial adverse change to historical resources, and impacts on historical resources would be less than significant. As the PARC Project would not have significant impact on historical resources, no mitigation is required or recommended.



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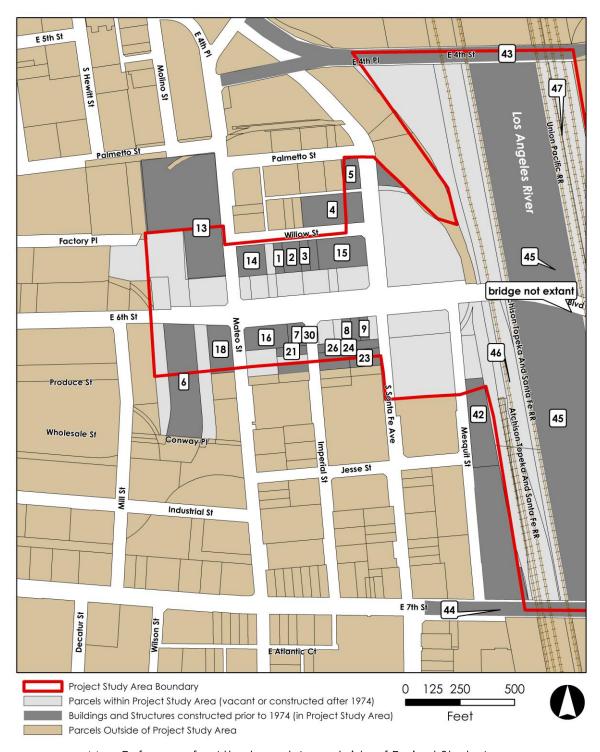
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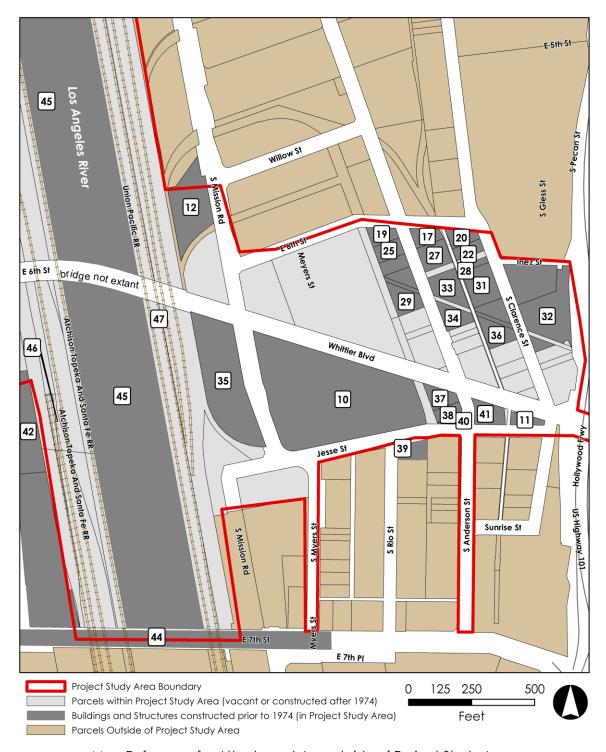
Attachment A





Map Reference for Attachment A, west side of Project Study Area

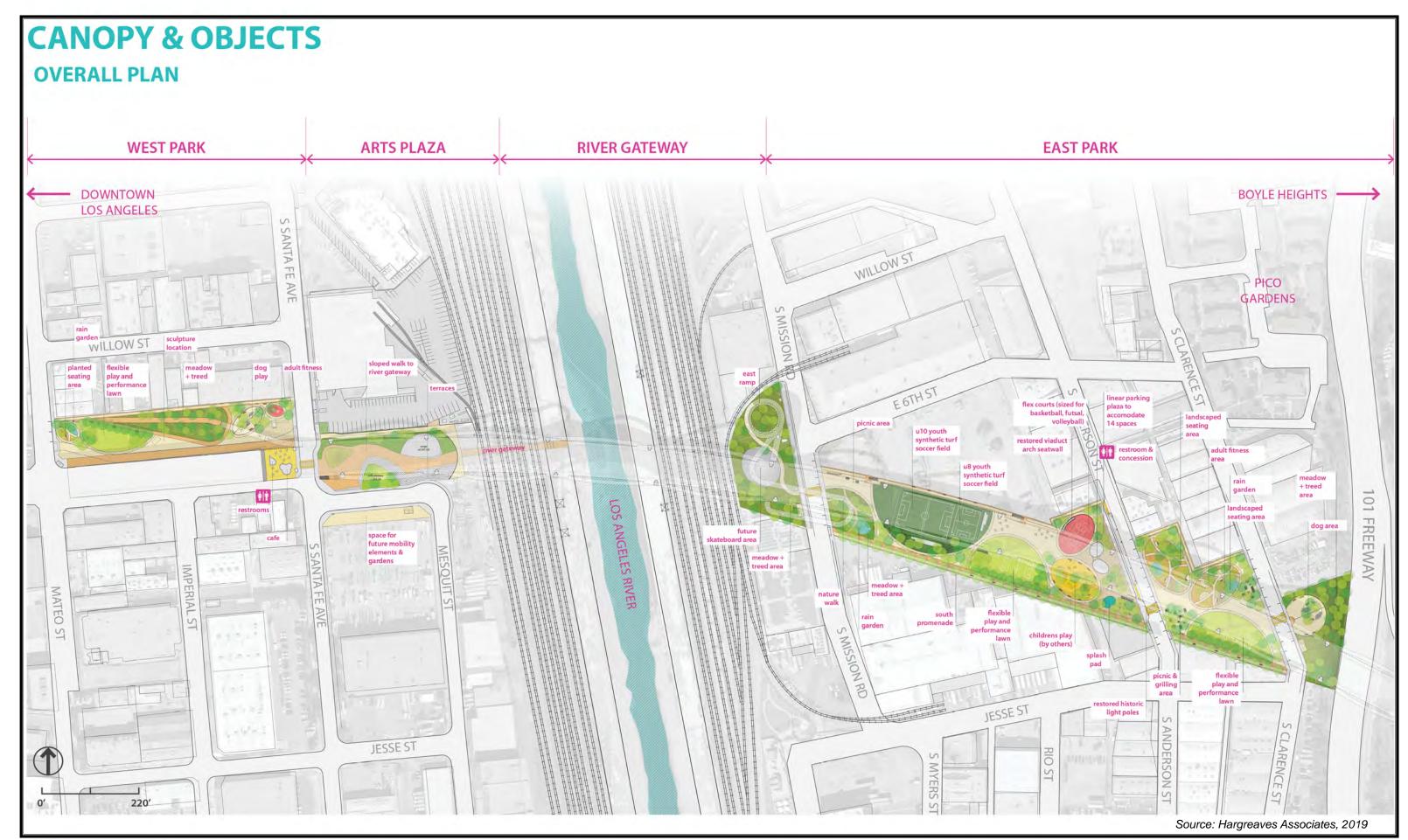




Map Reference for Attachment A, east side of Project Study Area



Attachment B





CANOPY & OBJECTS EAST PARK east **BOYLE HEIGHTS** on-street PICO E6THST parking **GARDENS** linear picnic area parking flex court (sized plaza for basketball, 5 CLARENCE futsol, volleyball) + adult fitness decomposed u10 youth synthetic turf granite ANDERSON soccer field restroom & on-street salvaged arch as concession parking 5 barrier / seatwall rain u8 youth garden synthetic turf sloped meadow rain soccer field + treed area garden on-street landscaped parking seating areas picnic & adult small dog area grilling area fitness & large dog area future skateboard 101 FREEWAY rain garden meadow+ treed area meadow + flexible play and treed area performance south lawn promenade S MISSION RD childrens play splash pad flexible play and picnic & performance grilling area lawn 100' Source: Hargreaves Associates, 2019



EAST PARK - SOCCER FIELDS







EAST PARK - CHILDREN'S PLAY & PLAZA





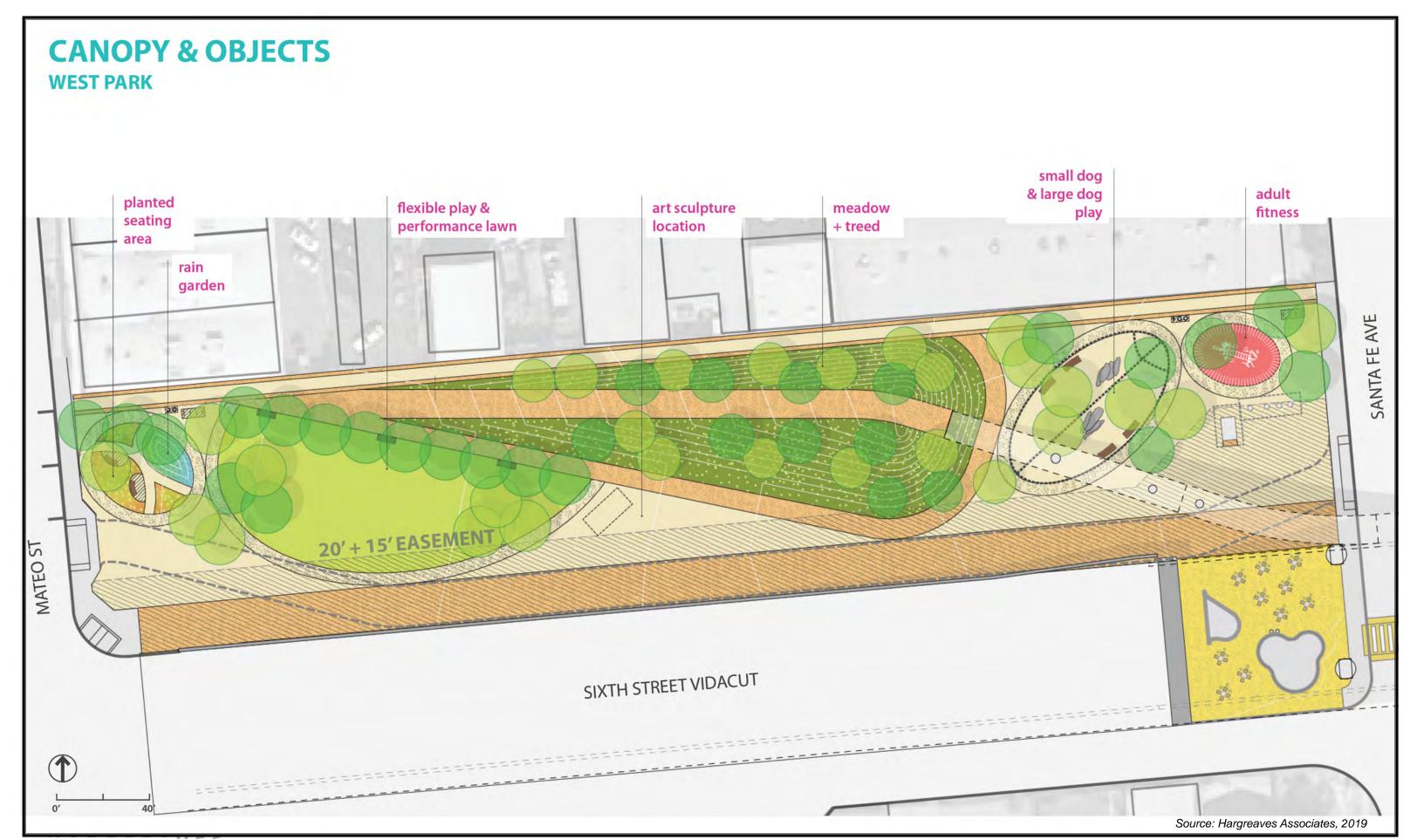


EAST PARK - DOG PARK











WEST PARK - AERIAL





WEST PARK - FROM MATEO





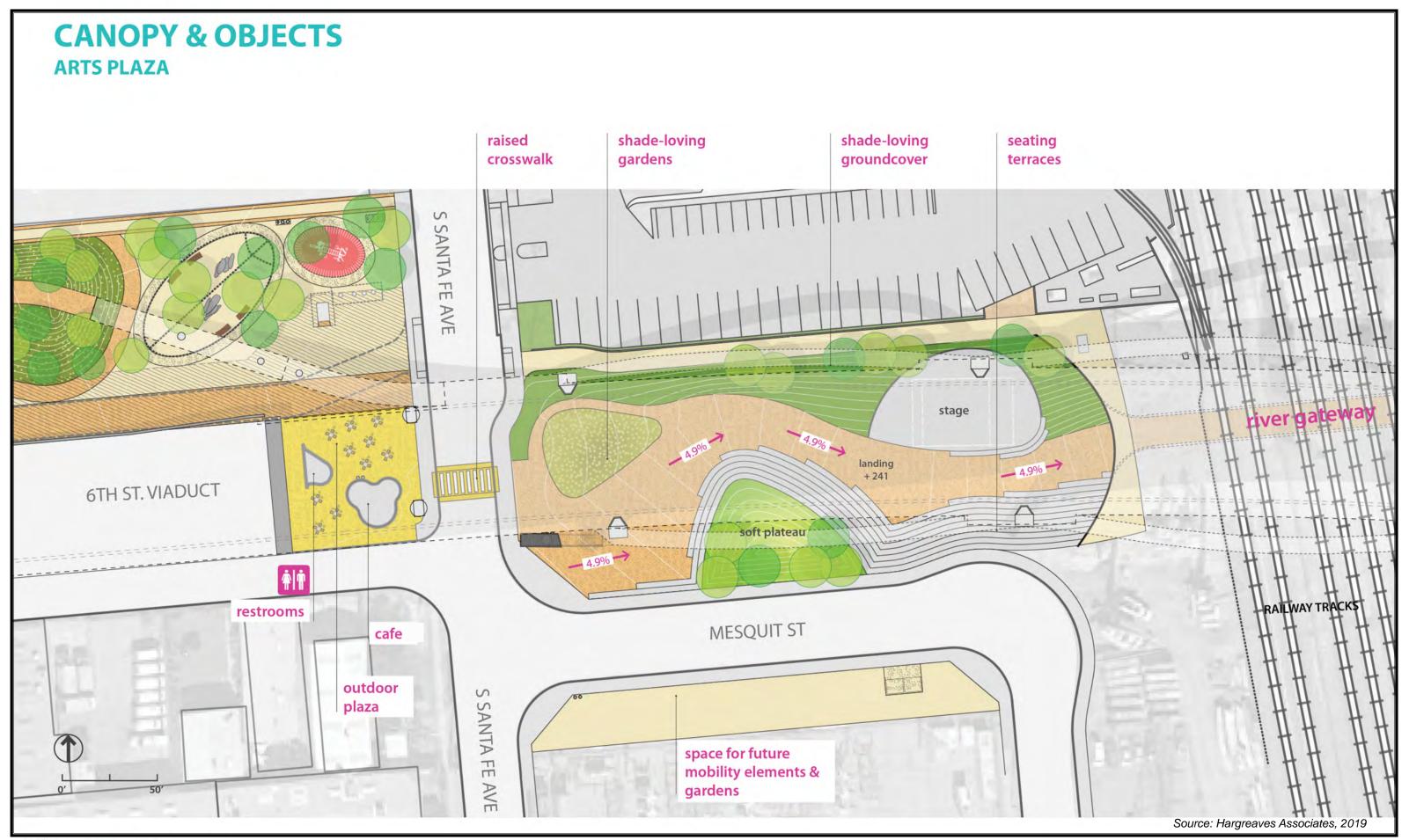


WEST PARK - SLOPED WALK FROM VIADUCT











CANOPY & OBJECTS ARTS PLAZA - AERIAL Performance Terraced Stage Seating Outdoor Raised **Shade-Loving Shade-Loving** Soft Berm Gateway Groundcover Plaza Crosswalk Gardens (for viewing) Access metro yards railway tracks S. SANTA FEAV transformer yards



Source: Hargreaves Associates, 2018

ARTS PLAZA - VIEW FROM BERM (NON-EVENT)







ARTS PLAZA - VIEW FROM BERM (EVENT)







ARTS PLAZA - VIEW FROM UPPER WALKWAY (NON-EVENT)





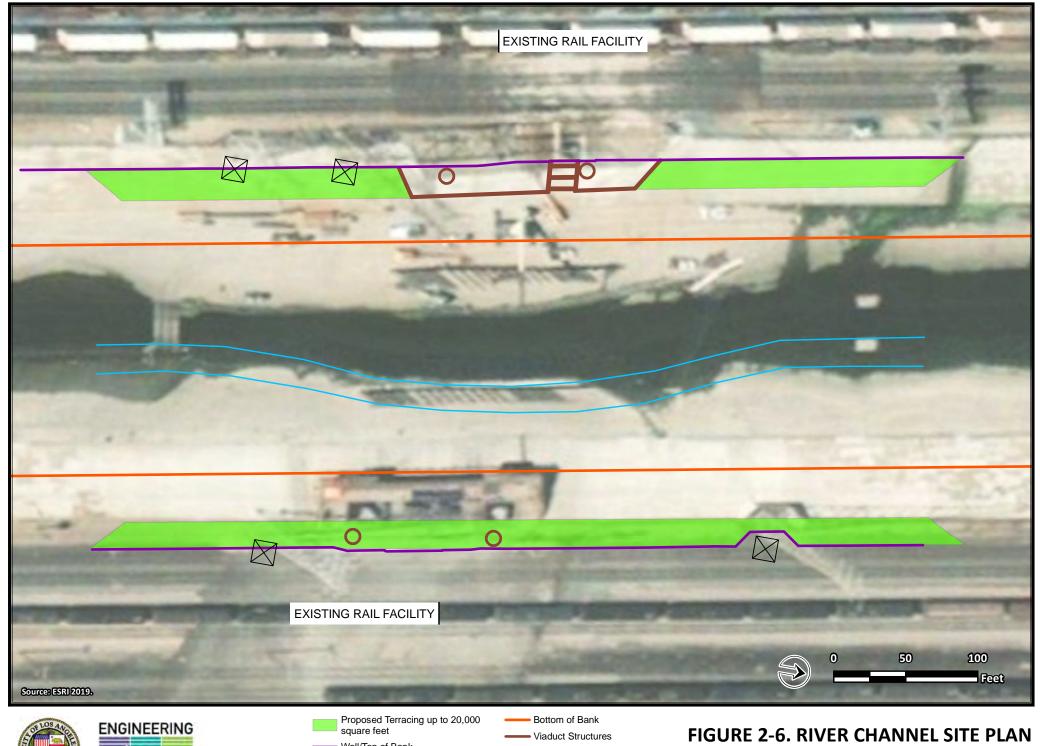


ARTS PLAZA - VIEW FROM UPPER WALKWAY (EVENT)













Wall/Top of Bank LA River Low Flow Channel LADWP Towers

Sixth Street PARC Project



Attachment C





ALLISON M. LYONS is an Associate Architectural Historian at GPA. She has been involved in the field of historic preservation since 2007 and has worked throughout the country. Allison has researched, evaluated, and documented a wide variety of property types. Her many projects have included historic context statements for Fremont and West Hollywood, historic resource surveys from San Diego to Monterey, and National Register nominations for the Great Wall of Los Angeles and properties associated with the Chicano Moratorium. She is a member of the alumni board of Graduate School of Architecture, Planning, and Preservation at

Columbia University. In addition to being a talented researcher and writer, Allison is proficient in ArcGIS and uses her skills to provide technical support, maps, and illustrations on various projects.

Educational Background:

- M.S., Historic Preservation, Columbia University, 2010
- B.A., European Studies, Scripps College, 2006

Professional Experience:

- GPA Consulting, Associate Architectural Historian, 2015-Present
- Chattel Inc., Associate Architectural Historian, 2013-2015
- Architectural Resources Group, Architectural Historian, 2010-2013
- Mellon Graduate Fellowship in Primary Sources, Columbia University, 2009-2010

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.
- Advisory Council on Historic Preservation, Section 106 Essentials

Professional Activities:

- Urban Land Institute, Young Leader's Group, 2014-Present
- Graduate School of Architecture, Planning, and Preservation at Columbia University, Alumni Board Member, 2013-Present

Selected Projects:

- Pico & Hope, Los Angeles, CEQA Historical Resource Evaluation Report, 2017
- Sunset & Western, Los Angeles, CEQA Historical Resource Report, 2017
- Hollywood Roosevelt, Los Angeles, Preservation Plan, 2017
- Farmers & Merchants Bank Building, Los Angeles, Preservation Plan, 2017
- SurveyLA, African American Historic Context Statement, 2017
- Los Angeles Wholesale Flower Terminal, Los Angeles, Historical Resource Evaluation Report, 2017
- Vermont Corridor Development, Historical Resources Evaluation Report, 2017
- Art Center College of Art, Pasadena, CEQA Historical Resource Report, 2016
- 2222 S. Figueroa Street, Los Angeles, CEQA Historical Resource Report, 2016
- 1440-52 Gordon Street, Los Angeles, Historical Resource Evaluation Report, 2016
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- 736-42 Parkman Avenue, Los Angeles, Historical Resource Evaluation Report, 2016
- City of Hope Master Plan, Duarte, CEQA Historical Resource Report, 2015-2016
- SurveyLA, Jewish Historic Context Statement, 2016
- Chicano Moratorium in Los Angeles, Multiple Property Documentation Form, 2015
- La Loma Bridge, Pasadena, HAER Documentation, 2015
- Fremont Mid-Century Historic Context Statement, 2015





JENNA KACHOUR is a Senior Preservation Planner at GPA. She has eleven years of diversified planning experience in the private, public, and non-profit sectors. She has been professionally involved in the field of historic preservation since 2010. Her experience includes preservation advocacy and easement program management for Pasadena Heritage. Skilled as a professional planner, Jenna's work at GPA is informed by her understanding of preservation's role within the larger context of land use planning and decision making. She uses this knowledge to assist project proponents and reviewing agencies with California Environmental

Quality Act/National Environmental Policy Act and Section 106 compliance, Mills Act contracts, and historic resource evaluations, designations, and surveys.

Educational Background:

- Master of Planning, University of Southern California, 2007
- Certificate, Historic Preservation, University of Southern California, 2007
- B.S., Public Policy, Management and Planning, University of Southern California, 2007

Professional Experience:

- GPA Consulting, Senior Preservation Planner, 2013-Present
- Pasadena Heritage, Preservation Director, 2010-2013
- Deborah Murphy Urban Design + Planning, Planner, 2009-2010
- City of Los Angeles Office of Historic Resources, Intern, 2009
- Brown/Meshul, Inc. Land Use Consultants, Assistant Project Manager, 2006-2009
- Los Angeles County Metropolitan
 Transportation Authority, Intern, 2006

Qualifications:

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

Selected Projects:

- California High Speed Rail, Burbank to Los Angeles Project Section, CEQA/NEPA and Section 106 Review, 2016-2017
- Rice Avenue and Fifth Street Grade Separation, Oxnard, Section 106 Historical Resource Evaluation Report and Finding of Effect, 2016-2017.
- I-710 Corridor, Los Angeles County, Section 106 Historical Resource Evaluation Report and Finding of Effect, 2015-2017
- Sunset Junction, Los Angeles, CEQA Historical Resource Evaluation Report, 2015
- Sixth Street and Daisy Avenue Bicycle Lanes, Long Beach, Section 106 Historical Resource Evaluation Report, 2014-21025
- Main Street Bridge Replacement, Sutter Creek, Section 106 Historical Resource Evaluation Report, 2014
- Sunset and Everett, Los Angeles, CEQA
 Historical Resource Evaluation Report, 2014
- Mills Act Program Recommendations Report, Long Beach, 2014
- Mills Act Inspections, Long Beach, 2014
- Mills Act Applications, Laguna Beach, 2013, 2014, and 2016
- Avenue 66 Grade Separation, Riverside County, Section 106 Historical Resource Evaluation Report and FOE, 2013-2014
- Silver Lake/Echo Park/Elysian Valley Historic Resource Survey, SurveyLA, 2013-2014
- High Desert Corridor, Los Angeles County, Section 106 Historical Resource Evaluation Report, 2013
- 2155 Webster Street, San Francisco, CEQA Historical Resource Report, 2013





AUDREY VON AHRENS is an Architectural Historian II at GPA. She graduated from the University of Pennsylvania in the city of Philadelphia in 2016. At GPA, Audrey carries out fieldwork, research, and documentation for a variety of projects. She is also experienced with graphics-editing software programs including Adobe Photoshop and Adobe InDesign as well as tools for mapmaking and 3-D modeling such as ArcGIS and SketchUp, respectively.

Educational Background:

- M.S., Historic Preservation, University of Pennsylvania, 2016
- M., City Planning, University of Pennsylvania, 2016
- B.A., Architectural Studies, University of Pittsburgh, 2013
- B.A., Urban Studies, University of Pittsburgh, 2013

Professional Experience:

- GPA Consulting, Architectural Historian II, December 2017- Present
- GPA Consulting, Architectural Historian I, January-December 2017
- LA Fashion District BID, Marketing Intern, 2016-Present
- Heritage Consulting, Inc., Intern, 2015-2016
- Tacony Community Development Corp., Intern, 2014
- Pittsburgh History & Landmarks Foundation, Intern, 2013
- University of Pittsburgh, Teaching Assistant, 2012-2013
- City of Pittsburgh Planning Department, Intern, 2012
- Pittsburgh Downtown Partnership, Intern, 2011

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.

Selected Projects:

- Los Angeles Mills Act Historical Property Contract Program, Periodic inspections, 2017
- Villa Park Elementary School Oral History and Memory Book Project, 2017
- Historic Center of Quito, Ecuador, Modern Architecture in Urban Heritage Areas, Preservation Studio, 2016.
- Interpreting place identity through consumer marketing techniques for nonprofit community development and business improvement organizations, Master's Thesis, 2016
- City of Philadelphia, An Alternative Preservation Plan for the Sharswood/Blumberg Choice Neighborhood, Preservation Studio, 2015.
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