Appendix IS-3

Historic Resources Technical Report

8th and Alameda Project

Historical Resources Technical Report

Prepared for:

Alameda & 8th Owner, LLC

Prepared by:

Architectural Resources Group

Los Angeles, CA

September 23, 2021

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1. Executive Summary

Architectural Resources Group (ARG) has prepared this Historical Resource Assessment Report for the 8th and Alameda Project (the Project), located generally at the southeast corner of East 8th Street and South Alameda Street in the Central City North Community Plan Area of the City of Los Angeles (Project Site). The Project Site encompasses multiple parcels between Alameda Street to the west, 8th Street to the north, Lemon Street to the east, and Interstate 10 freeway, Olympic Boulevard, and Hunter Street to the south, and includes the following addresses: 1820-2120 E. 8th Street, 150 Hunter Street, 820-840 S. Alameda Street, 2150 E. Damon Street, 1301 S. Lemon Street, 1121-1143 Lawrence Street, and 2015-2101 E. Olympic Blvd (Assessor's Parcel Numbers 5166-023-010, 023-016, 027-014, and 028-004).

The Project Site contains the Los Angeles Times Olympic Printing Plant (Plant), completed in 1989, a number of smaller support buildings and structures constructed at roughly the same time as (or later than) the Plant, and extensive surface parking areas. The Plant was designed by Anthony Lumsden, FAIA, of the firm Daniel, Mann, Johnson & Mendenhall (DMJM).

ARG evaluated the Plant to determine whether it appears to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, and/or as a Los Angeles Historic-Cultural Monument (HCM). At only 32 years of age at this writing, the Plant is generally too young to be considered a historical resource. Federal and state eligibility criteria have age requirements that safeguard against the designation of properties of "passing contemporary interest," ensuring these designation programs remain lists of truly historical resources. However, due to the fact that the subject building was designed by an internationally acclaimed architect, it is evaluated herein for its potential to have exceptional importance such that it meets eligibility criteria despite its very young age.

This analysis incorporates the guidance set forth by the California Office of Historic Preservation (OHP) and National Register Criteria Consideration G, a set of evaluative guidelines applied when assessing resources of the recent past (generally defined as those constructed in the past 50 years).[1] The City of Los Angeles's Cultural Heritage Ordinance (Ord no. 185472, amending Section 22.171 of Article 1, Chapter 9, Division 22 of the Los Angeles Administrative Code) does not have language regarding the required age of potential HCMs. In the absence of such language, ARG used OHP guidance for evaluating resources of the recent past in the application of local criteria, in accordance with best professional practices.

In summary, ARG concludes that the Plant exhibits the character-defining features of Late Modern architecture and is also characteristic of the work of Anthony Lumsden, FAIA, and DMJM. However, as a very young resource, it does not exhibit the exceptional historical and/or architectural importance needed to substantiate its eligibility for listing in the National Register, California Register, or as an HCM. In addition, none of the ancillary buildings and structures are eligible for listing in the National Register, California Register, or as HCMs.

[1] Derived from National Register Bulletin No. 15, How to Apply the National Register Criteria for Evaluation. Criterion Consideration G is addressed in greater detail in Sections 7 and 8 of this report.

The California Environmental Quality Act (CEQA) defines a "historical resource" as a resource listed in, or determined eligible for listing in, the California Register; or a resource included in a local register of historical resources; or a resource identified in a historic resources survey.[2] None of the buildings on the Project Site meet any of these conditions, and therefore none are considered to be historical resources for the purposes of CEQA.

There are two potential historical resources located adjacent to (with a direct view of) the Project Site: the Overland Terminal Produce Warehouse, 872 S. Alameda Street; and the Western Electric Company Historic District, including two buildings located at 800-822 McGarry Street and 1753 E. Olympic Blvd. ARG has assessed the potential of the Project to have an impact on these potential historic resources and found that their significance will not be impaired by the Project. The Project has not been shown to have either a direct or an indirect impact on historical resources. Therefore, the Project would not result in a cumulative impact to any historical resources, and cumulative impacts to historical resources would be less than significant.

The following sections provide a contextual basis for analysis and a detailed discussion of how this determination was made.

[2] California Code of Regulations Section 15064.5(a)(1-3)

2. Assessment Methodology

2.1 Research

For preparation of this assessment, ARG performed the following tasks for research, documentation, and analysis:

- Conducted a search in California's Built Environment Resource Directory (BERD) and the City of Los Angeles' SurveyLA files for previous surveys and evaluations of the subject property.
- Conducted a records search at the South Central Coastal Information Center (discussed in Section 4, below)
- Reviewed state and local technical bulletins, ordinances, and other materials related to the evaluation of historical resources.
- Conducted primary and secondary source research related to the history of the building.
- Evaluated the building against eligibility criteria of the National Register, California Register, and the City of Los Angeles' Cultural Heritage Ordinance.

ARG staff consulted the following archives and repositories as part of their research for this assessment: Los Angeles Public Library (multiple collections); University of Southern California Library (multiple collections); ProQuest, including the historic *Los Angeles Times* database; Los Angeles Department of Building and Safety Online Building Records; Los Angeles City Directories; and ARG's in-house collection. A complete list of references is included in Section 10, *References*, of this assessment.

2.2 Field Methods

In addition to primary and secondary source research, ARG conducted a site visit of the Project Site on December 15, 2020. During the site visit, the property was photographed and notes were taken on its physical appearance and condition.

2.3 Project Team

This report was prepared by Katie Horak, Principal; Mary Ringhoff, Senior Associate; and Rosa Fry, all architectural historians who meet the *Secretary of the Interior's Professional Qualifications Standards* in Architectural History. Project support was provided by ARG intern Emelyn Najera.

3. Previous Evaluations and Designations

The Plant is not designated as a historic resource under any local, state, or federal registration program. It has not been identified or evaluated as a potential historic resource or as an element of a potentially eligible historic district in any known historic resources inventory or survey, including the Los Angeles Citywide Survey (SurveyLA) of the Central City Community Plan Area (CPA) conducted in 2016.

SurveyLA identified 16 resources within a ¼-mile radius of the Project Site, most of which (noted in **Table 1** below) are not within the viewshed of the Plant. Three of the resources are closer to the Project Site and within the viewshed: 872 S. Alameda Avenue (Overland Terminal Produce Warehouse, 1931), 800-822 McGarry Street, and 1753 E. Olympic Boulevard – the last two together comprise the Western Electric Company Historic District, 1925.

One resource identified in SurveyLA, 1200-1208 S. Santa Fe Ave., was also identified in the South Central Coastal Information Center (SCCIC) records search (see Section 4).

Table 1. SurveyLA-Identified Resources within a ¼-Mile Radius

Property Address/Name	Eligibility
872 S. Alameda Ave./Overland Terminal Produce Warehouse	NR/CR/Local
800-822 McGarry St./Western Electric Co. Historic District	NR/CR/Local
1753 E. Olympic Blvd./Western Electric Co. Historic District	NR/CR/Local
1751 E. Olympic Blvd./Sam's Hof Brau	Local
1200-8 S. Santa Fe Ave./Bruck Braid Co./J.M. Overall Furniture Co.	NR/CR/Local
McGarry St. at E. 8th St./Air Raid Siren No. 189	NR/CR/Local
1600 E. 10th St./Williams Transfer Co. Terminal	NR/CR/Local
1226 S. Hooper Ave. (single-family residence)	NR/CR/Local
1240 Naomi St./Lafayette Junior High School	CR/Local
1608 E. 15th St. (industrial)	NR/CR/Local
963 McGarry St./Roberti Bros. Furniture Factory	NR/CR/Local
Elwood St. south of 14th St./Air Raid Siren No. 71	NR/CR/Local
2151 E. 14th St. (single-family residence)	Local
2353 E. Olympic Blvd./E.M. Smith Store and Bank	CR/Local
2417 E. Porter St./Edison Electrical Substation	CR/Local
2039 E. Bay St. (industrial)	NR/CR/Local
1914 E. Bay St./Pioneer Truck and Transfer	NR/CR/Local

4. South Central Coastal Information Center Records Search

The SCCIC conducted a records search for the Project Site and a ¼ mile radius around it. The records search was completed on December 18, 2020.

The records search found no known resources within the Project Site. Nineteen resources[3] are located within a ¼-mile radius:

Table 2. SCCIC-Identified Resources within a 1/4 -Mile Radius

Primary No.	Property Address/Name
19-180814	1406-1408 S. Santa Fe Ave./Cooney & Winterbottom
19-180815	1410-26 Santa Fe Ave./Aardvark's
19-180821	1505-09 S. Santa Fe Ave./Marcotti Trailer Factory
19-180813	1400 S. Santa Fe Ave/Coony & Winterbottom
19-180798	1328 S. Santa Fe Ave/Bay Cities Kitchens
19-189100	1126 S. Santa Fe Ave/Standard Woodenware Co.
19-180794	1200-8 S. Santa Fe Ave./Bruck Braid Co.
19-180822	1515-21 S. Santa Fe Ave./Bixby Warehouse
19-180812	1417-23 Santa Fe Ave./Harper Hand Trucks
19-175286	1504 Mateo St, Los Angeles/Distributing Station No. 5 HRI #097802
19-180823	2357-65 E. Olympic Blvd./Azteca Taekwondo
19-188862	2301 East Olympic Blvd.
19-180810	1401-1407 S. Santa Fe Ave/Oliver Machine Co.
19-180811	1409-15 S. Santa Fe Ave./Bixby Co. Warehouse
19-180796	1218 S. Santa Fe. Ave/Berg & ASU Tool Supply
19-180797	1320 S. Santa Fe Ave./1000 Peliculas Mexicanas
19-180795	1212 S. Santa Fe Ave./Bruck Braid Co.
19-189979	Los Angeles Union Terminal Buildings (now ROW DTLA)
19-187085	Historic rail line. Mapped to historic maps only.

[3] The SCCIC records search results did not specify California Historical Resource Status Codes for these properties.

5. Property History

5.1 Site and Setting

The Plant is located on a large (approximately 26 acre), irregularly shaped parcel in the Central City North community of Los Angeles, in the far southern portion of the Arts District informally known as the Wholesale District or Market District. The Project Site is immediately north of Interstate 10 and is bounded by E. 8th Street on the north, Lemon Street on the east, parcel lines and E. Olympic Boulevard on the south, Hunter Street/Lawrence Street on the south and west, and S. Alameda Street on the west. Its surroundings are largely industrial, with warehouses, distribution facilities, shops, and factories in a range of scales and reflecting a wide variety of construction dates. Some mixed-use and commercial properties are also present. The topography of the area is flat.

The Project Site is outlined in red (base map: Google Earth, 2020).

The main building on the Project Site is the Plant, situated in the southeastern part of the site with its primary façade facing west. This location and orientation mean the building is very deeply set back from S. Alameda Street to the west, and the most visible portions are the south and east façades (side and rear, respectively) as seen from the southwest-bound lanes of Interstate 10. The entire site is surrounded by a metal security fence, and primary access is via a gated driveway from E. 8th Street; two non-original monument signs reading "Los Angeles Times" are present at

this entrance, along with a guard house. A large asphalt-paved surface parking lot with freestanding light standards and concrete curbing, walkways, and curving (half-circle) planters occupies the western portion of the Project Site. Additional surface parking and circulation areas for truck traffic are present to the north and east of the building. A railroad spur line curves into the site from the east and proceeds into the southernmost portion of the printing plant building, for offloading of paper reels. Landscaping on site includes lawn, perimeter hedges, palm trees, and topiary hedges, and is restricted to the western portion of the site; the main building's primary façade is fronted by open lawn with some palm trees, hedges, shrubs, and immature deciduous trees, with a concrete sidewalk. A freestanding pylon sign reading "Los Angeles Times/Olympic Facility" is present on the Alameda Street side of the property.

The Project Site contains seven ancillary buildings and structures, all of which are original to the property and serve utilitarian, support functions to the printing plant. They are constructed of reinforced concrete masonry unit, with some also featuring portions of painted metal panel cladding as seen on the main building. Several of the ancillary buildings and structures retain curving walls or façades, echoing the main building. To the north of the printing plant are a small guard house at the entrance driveway, a pump house/waste storage building, and an angled canopy that once covered a fueling station (demolished). To the east is a one-story drum storage building and a one-story vehicle maintenance building with multiple garages and bays opening to the west. To the south is a pump room and a curving walled enclosure with chain link fencing/gate, sheltering a generator and other equipment.

5.2 Architectural Description

Building – Exterior

The Plant is largely rectangular in plan, except at its primary (west) façade where curved and projecting rectangular volumes are present. It is three stories in height, most prominently at its center volume housing the reel room/press room (printing) function of this portion of the building. This volume features most of the building's complex geometric articulation. Simpler, shorter volumes (double-height at the interior) flank the central volume, reflecting their interior functions: mailroom at the north and roll storage at the south. The building has a concrete foundation and is steel-framed, with some exterior walls of concrete masonry unit but the preponderance of the building clad in white painted metal panels (with the base portion of the primary façade clad in granite panels). Roofs are generally flat and covered with built-up material, with the exception of a slanting metal standing seam roof along the southernmost portion of the building (above the depressed interior rail line). Windows are fixed metal with dark glazing, typically in ribbon or grouped configurations, and most doors are fully glazed aluminum.

The building's primary (west) façade curves at the first story, with the central main entry accessed via a wide rectangular opening in the metal-paneled wall leading to an open forecourt with tile flooring. The main entry comprises a fully glazed, floor-to-ceiling entry assembly with automated, fully glazed sliding doors. It is topped by curved, marble-clad paneling with "Los

Angeles Times" inscribed above the doors; above that is an outdoor open balcony/mezzanine with metal railings. Above the mezzanine, the rest of the building's central façade here comprises a curving set of fixed floor-to-ceiling windows flanking fully glazed doors to the mezzanine. This is topped by three angled metal-clad volumes stepping back to the east, each with a full-width, projecting rectangular volume of fixed windows referencing daylight factory elements (and providing the majority of the illumination to the main lobby within).

Flanking the main entry forecourt, curving painted metal panel walls extend to the north and south; these contain dark-glazed, fixed metal ribbon windows and continue as independent sections at their north and south ends. To the south, the wall ends as a freestanding wing wall that partially obscures a windowless concrete masonry unit wall of the main building volume behind it. This CMU-clad area is framed with metal panel cladding and contains three utilitarian metal doors, each accessed via a concrete stoop and steps. To the north of the main entry, the curving wall shelters a recessed secondary entry of fully glazed sliding doors facing north, with adjacent ribbon windows. North of that, the curving wall splits into two, with the front wall terminating in a semi-attached wing wall and the back wall terminating in a recessed, double-height, fully glazed area facing north. The remainder of the primary façade here is a metal paneled wall with no fenestration.

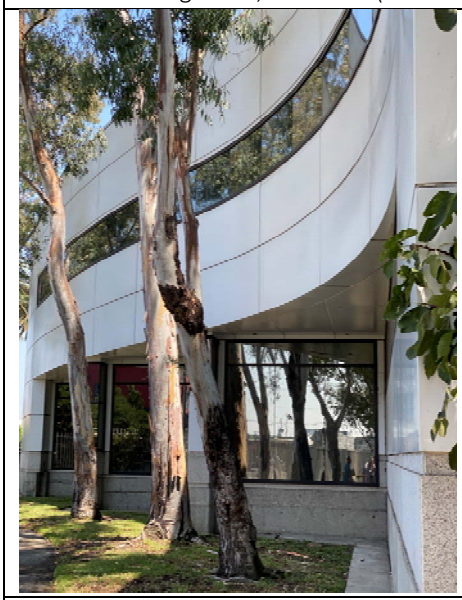
The building's north façade is dominated by a full-width loading dock recessed under a metal paneled canopy. The recessed area has CMU walls and contains the concrete dock with ramps and steps, along with bays with roll-up metal doors. A small projecting volume containing the shipping office is present at this façade; its walls are fixed glazing in the lower portions topped by metal paneling, and it is fronted by concrete ramps and walls with metal railings. Above the loading dock area, the rest of the north façade comprises a full-width metal louvered area topped by a metal-paneled area with wall-mounted "Los Angeles Times" signage.

The east façade also has a full-width loading dock area of CMU walls recessed under metal paneled canopies, which are wider than at the north façade and contain narrow, horizontal recessed areas in their centers. The otherwise continuous canopy is interrupted at its center by a slightly projecting portion (which features the same recessed loading dock area and canopy plane). This central area is topped by stepped and angled articulation with fixed glazing similar to that at the primary façade, bracketed by angled metal panel walls. The loading areas at this façade are restricted to bays with roll-up metal doors, with several sets of concrete steps and landings rather than long docks. Wall-mounted "Los Angeles Times" signage is present on the metal wall above the canopy in the southern portion of the east façade. At the southernmost part of the façade, a railroad spur line with an adjacent concrete wall and ramp leads into the building via a large opening with roll-up metal door.

The south façade lacks fenestration. Its lower portion is CMU with no detailing aside from a projecting, diamond-shaped, enclosed stair volume clad in painted metal panels. The roof of the lower portion of the façade is angled and covered in metal standing seam material. Above this area, the rest of the south façade comprises a full-width metal louvered area topped by a metal-paneled area with wall-mounted "Los Angeles Times" signage.

Existing Conditions Photos, Building Exterior (all ARG, 2020, except where noted)

	
North portion of primary (west) façade, view southeast	South portion of primary (west) façade, view north
	
Central portion of primary (west) façade, view southeast	Forecourt at main entry, primary (west) façade, view southeast
	
Main entry, primary (west) façade, view east	Central portion of rear (east) façade, view northwest (Atlas, 2020)

	
South portion of rear (east) façade, view southwest (Atlas, 2020)	West portion of side (north) façade showing shipping office, view east (Bastien, 2020)
	
West portion of side (south) façade with stair volume in background, view east (Bastien, 2020)	Vehicle Maintenance Building, view southeast (Bastien, 2020)
	
Detail of primary (west) façade south of main entry, view north (Bastien, 2020)	

Building – Interior

The interior of the building includes four primary spaces: the main lobby, press room/reel room, roll storage room, and mailroom. Secondary spaces, some of which were not available for inspection during ARG's site visit, include offices, a cafeteria with dining mezzanine, restrooms, locker rooms, break rooms, a fitness center, and the like. The secondary spaces are typically finished with tile or carpet flooring, painted gypsum board wall finishes, and dropped ceilings, and have simple wood doors. In both primary and secondary spaces, glazing is typically clear rather than dark-glazed as seen on the exterior. The primary spaces are discussed in more detail below.

Main Lobby

The main lobby is the primary public space of the building and reflects more formal design elements and high-quality materials in contrast with the utilitarian finishes of the industrial spaces. An open, full-height (three-story) room primarily illuminated by numerous fixed ribbon and clerestory windows, it is an atrium-like space punctuated by curving elements including a second-story mezzanine/walkway. The ceiling is complex, reflecting the exterior roof's stepped/angled articulation and providing interior visual interest via hardwood details, projecting elements, and angled orientations; it is finished in hardwood paneling, gypsum board, and (in some areas) standard dropped-ceiling panels. The main approach to the lobby is via the primary west entrance, which opens into a short one-story corridor with hardwood paneled walls, polished red-brown granite flooring, and a dropped ceiling with low-profile fluorescent light fixtures. The wall paneling includes prominent cylindrical wood horizontal trim positioned similarly to chair rails and picture rails. The entrance corridor opens into the main space, which on the ground floor is finished with the same granite flooring (also as baseboard) and hardwood paneled walls with cylindrical trim. The east wall of the lobby has large clear-glazed areas separating the lobby from the printing press and reel rooms (described further below). The lobby contains integral granite-clad furniture and fixtures including benches and an information/security desk; also present are two time capsule plaques (one set in a tall base, one in the floor), bronze statues, historic printing presses, informational plaques, and wall-mounted artwork.

The northeast and southeast corners of the room contain vertical circulation features with matching framing of full-height, painted metal panel-clad, square columns and rectangular dark-glazed volumes framed in metal, reflecting an extension of exterior materials to the building interior. The northeast feature is a set of marble stairs with brass and glass panel railings, partially open and partially enclosed by the glazed volumes. The southeast feature is an elevator bay. The stairs and elevator lead to second level walkways accessing other portions of the building. The walkway at the perimeter of the room leads to office spaces, the cafeteria, and a glazing-enclosed dining mezzanine at the west side of the building, leading to the mezzanine/balcony above the building's primary entry. A second, "floating" walkway curves across the lobby's open space; it has granite flooring and brass and glass panel railings topping cladding of plaster and horizontal hardwood slats. At the third level, the stairs and elevator provide access to additional offices at the perimeter of the volume and are also connected to each other via a curving walkway at the

east end of the room. This walkway, which serves as a viewing area for both the lower lobby and the press room to the east, has tile flooring and brass and glass panel railings, below which are the same plaster and horizontal wood slat finishes seen on the second floor walkway. The atrium's second and third story walls are finished largely with gypsum board with hardwood paneled wainscot topped by cylindrical wood trim, though some areas are fully paneled with hardwood.

At the northwest corner of the main lobby's ground floor, a connected secondary open lobby with the same finishes extends to a secondary north-facing entrance as well as additional offices, conference room, and other rooms.

Press Room/Reel Room

Located in the central portion of the building, this is a two-level industrial space with concrete and vinyl composition tile (VCT) floors, gypsum board and CMU walls (some of which exhibit curving corners) and dropped ceilings. The first floor contains the reel room, with equipment holding the massive paper reels. A set of metal stairs leads to the second-floor press room, emerging in a metal and soundproof glass "quiet room" which is flanked by printing presses and support equipment. The quiet room has a trapezoidal roofline and is completely enclosed within the larger, double-height second story room, surrounded by wide corridors. In addition to the stair, the quiet room is accessed via single and paired partially glazed metal doors. The main walls of the press room are mostly CMU in the lower portion with gypsum board punctuated by numerous metal vents in the upper portion; offices and other rooms are present at the south side of the press room, and generally retain typical finishes. Both the first and second stories of the press room/reel room space are separated from the main lobby by window walls with soundproof glass – at the first story, this is a grouping of fixed butted panes, while at the second story this is a grouping of fixed glazing with metal muntins and full-height vertical supports.

Roll Storage Room

Located in the southern portion of the building, this is a single massive, open space with concrete floors, CMU walls, and exposed reinforced concrete structural columns (both attached and freestanding). The ceilings are unfinished, with exposed steel structural members and metal decking, with the exception of the southern portion of the room where a low dropped ceiling is present. The southernmost edge of the room is depressed to accommodate the rail spur line sitting atop gravel ballast. The room primarily contains stored rolls of paper, which are transported by automated vehicles.

Mailroom

Located in the northern portion of the building, this is a single massive, open space with concrete floors, CMU walls, and exposed reinforced concrete structural columns (both attached and freestanding). Dropped ceilings cap the top of the double-height space. Along the south edge of the room, the dropped ceilings are lower above a pedestrian walkway separated from the rest of the room by intermittent metal railings. The walkway fronts a series of offices and employee

rooms with fixed metal windows and simple metal doors. The majority of the mailroom space contains fixed metal newspaper bundling and conveyance equipment.

Existing Conditions Photos, Building Interior (all ARG, 2020)

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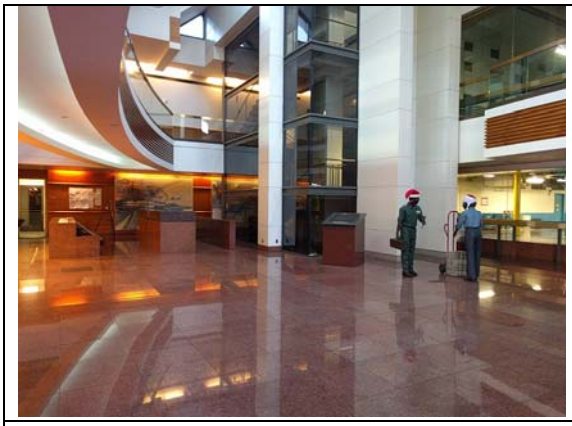
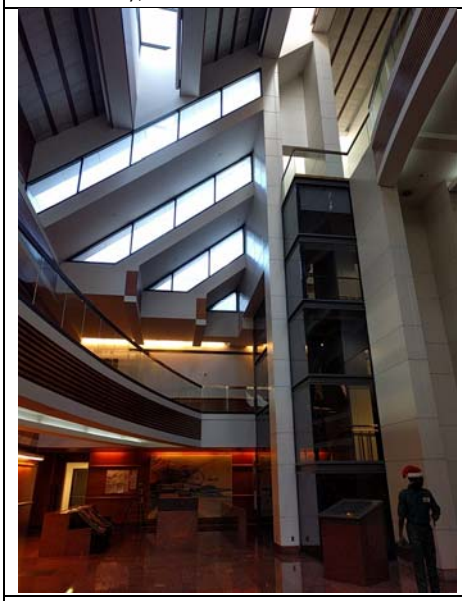
<tr><td>  </td><td>  </td></tr>
<tr><td>Main lobby, view northeast</td><td>Main lobby, view northwest</td></tr>
<tr><td>  </td><td>  </td></tr>
<tr><td>Main lobby ceiling, elevated walkway, and stair bay, view north</td><td>Main lobby elevated walkways/viewing areas and elevator bay, view south</td></tr>
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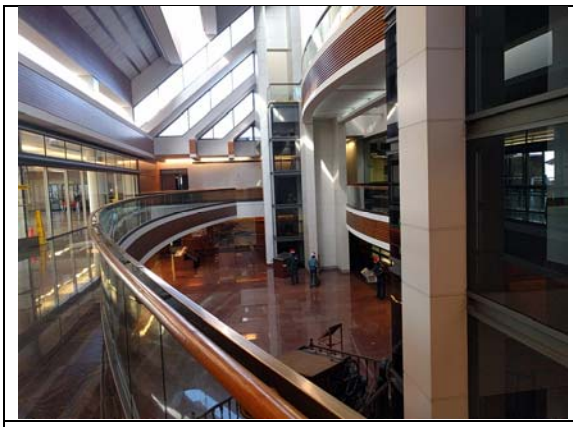
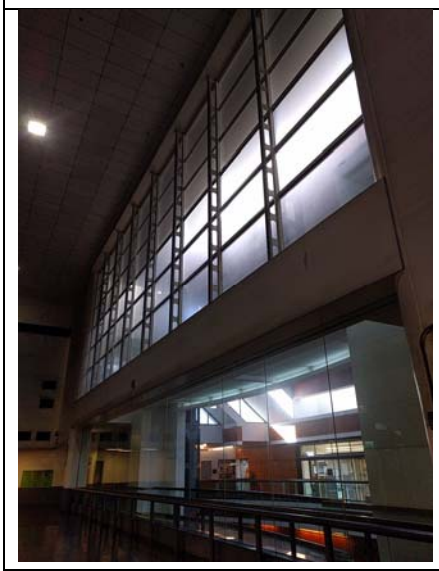
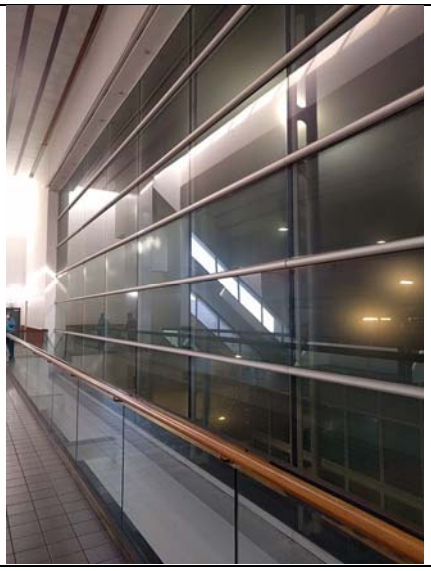
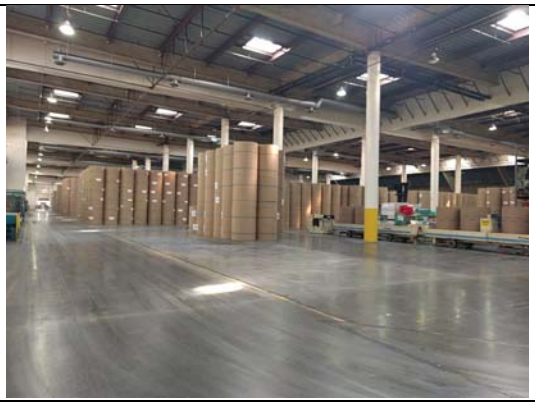
	
Main lobby from elevated walkway, view north	Press room presses (left) and “quiet room” (right), view north
	
Glazing separating press room/reel room from main lobby, view southwest from press room	Glazing separating press room from main lobby, view northeast from lobby walkway
	
Mail room, view northeast	Roll storage room, view southeast

5.3 Chronology of Development and Use

Following is a chronology of development and use of the Los Angeles Times Olympic Printing Plant. Source materials include online building permits from the City of Los Angeles Department of Building and Safety, *Los Angeles Times* newspaper articles, and other online media sources.

1987: Ceremonial groundbreaking for new Los Angeles Times Olympic Printing Plant (City of Los Angeles Permit No. 1987LA78829).

1988: Permits issued for foundation work for two new buildings on the property: Vehicle Maintenance Facility and Printing Plant/Newsprint Warehouse (City of Los Angeles Permits No. 1988LA85393 and 85394). Owner: Los Angeles Times. Engineer: DMJM/David Cho. Architect: DMJM/Thomas Saeda. Contractor: Swinerton & Walberg.

Permits issued for construction of the buildings (City of Los Angeles Permits No. 1988LA97357 and 97358). All owner/engineer/architect/contractor information remains the same.

Permits issued for assorted small ancillary buildings and structures on the site (guard station, generators, pump house/underground water tank, pump house/waste storage, fuel station, drum storage shed, retaining walls).

1989 Permit issued for change to 1988LA97358 adding 2' granite veneer base to west (primary) façade (City of Los Angeles Permit No. 1989LA4410).

1990 Permit issued to clarify 1988LA97358 includes cafeteria space (City of Los Angeles Permit No. 1990LA51157).

Building begins newspaper production in June.[4]

1990-1991 Permits issued for wall signs (City of Los Angeles Permits No. 1990LA57299, 1990LA61844, 1991LA78737

1997 Permit issued for new monument sign in parking area (City of Los Angeles Permit No. 97048-20000-01204).

1998 Permit issued for interior work: remove some non-bearing partitions and add others; new 1-hr corridor and 2-hr doors at second floor; new ceiling grid (location unclear) (City of Los Angeles Permit No. 98016-10000-02686).

2000 Private ownership of the Los Angeles Times ends when the Chandler family sells the Times Mirror Co. to the Chicago-based Tribune Co.[5]

[4] "The Olympic Plant" commemorative plaque, located in the building's main lobby.
[5] David Shaw, "The Chandler Dynasty Steps Aside," *Los Angeles Times* March 14, 2000.

2001	Permit issued for interior work: new doors, partitions, and acoustical panel ceiling in northwest portion of first floor (City of Los Angeles Permit No. 01016-10000-13837).
2005	Permit issued for new illuminated wall sign facing Olympic (City of Los Angeles Permit No. 05048-20000-01969).
2007	Alterations to Vehicle Maintenance Building – remodeling truck wells, partitions, one door driveway (City of Los Angeles Permit No. 06016-10000-24839).
2012	The Times becomes a tenant in the printing plant following the Chapter 11 bankruptcy reorganization of Tribune Co.[6]
2016	Harridge Development Group acquires the 26-acre Project Site.[7]
2019	Atlas Capital Group acquires the 26-acre Project Site.[8]

No major exterior or interior alterations were observed in ARG's December 15, 2020, site visit; some loading dock doors and vehicular doors appear to have been replaced on the main building and vehicle maintenance facility, and the fueling station once located under the extant canopy has been removed.

[6] Liana B. Baker and Ashutosh Pandey, "Publisher Tribune Emerges from Four Year Bankruptcy," *Reuters* December 30, 2012, accessed January 2021, https://www.reuters.com/article/us-tribune-bankruptcy/publisher-tribune-emerges-from-four-year-bankruptcy-idUSBRE8BU02120121231.
[7] Roger Vincent, "Los Angeles Times Printing Plant Sold to New York Real Estate Developer," *Los Angeles Times*, December 12, 2019.
[8] Ibid.

6. Historical Background and Context

6.1 Postwar Industrial Development of Downtown Los Angeles

The Project Site is located in an industrialized section of the Central City North Community Plan Area, at the southeast edge of Downtown Los Angeles; today it is sometimes referred to as being part of the Arts District, Wholesale District, and/or Market District.

Located to the east of the site of the Los Angeles pueblo, and in proximity to the modern central business district that began developing in earnest in the late nineteenth century, Downtown Los Angeles and its immediate environs are home to some of the earliest examples of development in Los Angeles. In addition to the original pueblo settlement that was located nearby, many of the city's "first residences, commercial establishments, and civic and religious institutions were developed here, and the area functioned as the nexus of political, economic, and cultural life in early Los Angeles."[9] In the nineteenth century, as commercial and civic development began to gravitate south and residential development began to eke its way out into the urban periphery, the northern section of Downtown increasingly became seen as the domain of newly arrived immigrants. While ethnic enclaves developed north of the original Los Angeles pueblo, much of the southern portion of the Downtown would come to serve as the city's primary industrial district.

Land south of Cesar E. Chavez Boulevard between Alameda Street and the Los Angeles River was first used for agricultural purposes by the inhabitants of the Pueblo. Subsequently the land was used for cattle ranching, and later vineyards, but following the 1849 Gold Rush, citrus varieties replaced grapes as the area's primary crop. The successful cultivation of citrus groves in this area prompted the construction of rail lines and manufacturing plants to capitalize on fruit shipping. When Los Angeles was linked to the transcontinental railroad via San Francisco in 1876, railway development was encouraged particularly in the area surrounding the Project Site.

In the late decades of the 1800s, northern tracts of the formerly agricultural acreage were subdivided and developed with single family residences, however this pattern was not realized in the subject area. Although the area was recorded as the Leahy Tract in 1896 and apparently planned for residential parcels south of the Thomas Leahy Estate, these proposed streets and subdivisions never came to fruition.[10] Instead, industrial growth took over the area at the turn of the century, with warehouses, storage facilities, and manufacturing operations dominating the landscape and benefiting from railway proximity. This shift toward industry was epitomized by the 1906 sale of the Leahy homestead (directly north of the subject property) to Bishop & Co., a cracker and candy company who soon constructed a vast factory complex on the site of the former ranch.[11]

[9] SurveyLA, "Historic Resources Survey Report: Central City North Community Plan Area," Sept. 2016, 5.
[10] Leahy Tract Map, 1896.
[11] "Cracker-Jack on Crackers," *Los Angeles Times*, September 6, 1906.

By 1917 the subject area was subdivided into two large lots owned by the Los Angeles and Salt Lake Railroad Company.[12] Bounded by Alameda Street, Olympic Boulevard, Eighth Street, and Lemon Street, the Los Angeles and Salt Lake Railroad Company (later Union Pacific Railroad) freight depot and yards occupied the area for decades. The Project Site continues to benefit from freight train adjacency and a railroad spur, which serviced the Plant. Directly to the southwest of the subject area, the Overland Terminal Produce Warehouse (still extant) was built at 870 S Alameda Street in 1931. This warehouse and many other surrounding produce and cold storage warehouses had symbiotic relationships with the railroads and freight depots. Sanborn maps in 1955 depict the subject area as primarily occupied by the Union Pacific Freight Depot and Yards, including freight house buildings, produce warehouses, and an oil and gas burning equipment machine shop.

In 1957, state highway planners, buoyed by the National Interstate and Defense Highways Act, began construction of the Santa Monica Freeway (I-10), which defines the chamfered southeastern corner of the Project Site. The rise of trucking and intermodal shipping transformed the industrial landscape of central Los Angeles after World War II as manufacturing plants could move away from traditional rail line adjacency. Nascent industrial centers outside Los Angeles offered cheap and plentiful land, attracting companies who no longer need to be based downtown. Many of these companies built newer, more efficient structures in outlying parts of Los Angeles County, leaving the former industrial hub at the center of the city largely vacant.

Downtown Los Angeles witnessed the emergence of a vibrant art community in the mid-1970s which revitalized a section of the city just north of the subject area, which would come to be known as the Arts District. In the decades following World War II, the high cost of living in established artist communities in places like Pasadena and Venice had begun to force young and emerging artists to look elsewhere for housing and workspace. Cheap rent and spacious open floor plans made the vacant commercial buildings and industrial warehouses in downtown ideal artist studios. By the early 1980s art galleries had followed the artists, relocating their exhibit spaces to the city center.

The migration of artists to the city center did not go unrecognized. During the 1970s and '80s, articles published in the *Los Angeles Times*, the *Los Angeles Daily*, and other local newspapers heavily publicized the artists' repopulation of downtown and their revitalization of the historic core. The City of Los Angeles's Community Redevelopment Agency (CRA) sought to support the presence of artists and galleries downtown with policies and funding programs. While this revitalization was focused in the area immediately east of the historic downtown core, conversion of industrial buildings to live-work spaces also occurred more sporadically in the southern part of downtown where the Plant soon stood.

The early 1990s marked a decline in investment in Los Angeles's downtown art movement. Heightened social unrest (reaching its peak during the 1992 riots), coupled with a rise in homelessness and a nationwide economic recession, led to a significant reduction in downtown interests. It was not until the end of the decade that city investment in the local arts resumed in

[12] Tract Map 2513, 1917.

earnest. However, the subject area, located to the south of the neighborhood now known as the Arts District is not surrounded by the same concentration of historic lofts and warehouses and thus the area has not yet seen the same intensity of residential redevelopment and reinvestment.

The landscape immediately surrounding the subject area remains functionally industrial. Informally known as the Wholesale District or the Market District (as evidenced by signage in the neighborhood), the majority of buildings house cold-storage facilities and wholesale produce markets. Construction dates of these structures are primarily postwar, with a few older factory buildings representing the area's early industrial purposes.

6.2 Postwar Newspaper Production Facilities

In order to solidify credibility and status, the headquarters of the largest and most prestigious newspaper publications of the early 20th century were often housed in purpose-built architect-designed icons. This trend was epitomized by the 1923 design competition for the Chicago Tribune's Tribune Tower, which became a pivotal moment in American architecture. In order to work efficiently, these purpose-built newspaper facilities were essentially a monopoly, encompassing space for all aspects of journalism and production in one location.[13] However, by the end of the 20th century, technological advancements – particularly digital and color print capabilities – divorced the newsroom from the pressroom. Newspapers also reached the largest print circulations in their history and required larger purpose-built facilities to keep up with increasing demand.

In the postwar period, offsite newspaper production facilities allowed for the most cost-effective publishing solutions. They also provided major papers with a new opportunity to publicize their brands, through the architecture of their new facilities themselves, as well as through the simple reality that massive printing plants have room for equally massive signage. The current predominance of digital media has rendered many of these enormous printing plants obsolete, and ownership changes and consolidation in a post-print world have meant major rethinking of what production facilities should look like. In 2000, the Los Angeles Times' Times Mirror ownership entity merged with the Tribune Co., then "the only media company with a television-newspaper-interactive combination in the top three markets – New York, Los Angeles, and Chicago," reaching almost 80 percent of U.S. households.[14] To enable comparison of the Plant with relevant contemporary examples, the postwar production facilities of the Chicago Tribune and New York Times are examined below.

[13] https://www.washingtonpost.com/lifestyle/magazine/goodbye-old-washington-post-home-of-the-newspaper-the-grahams-built/2015/12/07/023a0382-5d54-11e5-9757-e49273f05f65_story.html

[14] "The Los Angeles Times' History," *Los Angeles Times,* September 21, 2012.

Los Angeles Times Printing Plants

Early Los Angeles Times Printing Plants

The Mirror Printing Office and Book Bindery began publication of the Los Angeles Daily Times in February 1881, under the direction of Nathan Cole Jr. and Thomas Gardiner. The newspaper was first published in a small brick building near the intersection of Spring and Temple streets in downtown Los Angeles. Early in-house printing presses were powered by water from the Los Angeles River.[15] In February of 1887 the first issue of the re-named Los Angeles Times was published and the newspaper's incorporated parent company, Times Mirror Co., moved its headquarters to a three-story brick building at the corner of 1st and Broadway. In 1907 the building expanded allowing for greater printing capabilities including a double-cylinder Hoe press in the basement. [16] On October 1, 1910, the building was dynamited by union activists in protest of the paper's longstanding anti-union stance – resulting in the death of 20 Times employees and the destruction of the building. A third Times building containing both pressroom and printing facility was constructed a year later at the site of the previously destroyed structure. The building was later demolished in 1937.

Times Mirror Square

As the city of Los Angeles grew into a metropolis during the 1920s, the Los Angeles Times flourished, requiring additional square footage. The publication's fourth home was a Gordon B. Kaufmann-designed Art Deco fortress located at 1st and Spring, across the street from the outdated former headquarters. Completed in 1935, Kaufmann's highly lauded masterpiece was the first building in the United States to be completely air-conditioned and featured a four-story printing and binding house with a visitor's gallery overlooking state-of the-art presses.[17] A series of additions and alterations, including a Rowland Crawford-designed volume in 1948 and a William Pereira-designed volume in 1973, expanded the property to an entire city block, known as Times Mirror Square. In 1990, the paper completed moving all printing functions to the new Plant about two miles south of Times Mirror Square, at the southern edge of downtown. It continued using Times Mirror Square as its headquarters until 2018, when it moved all newsroom and office functions to a repurposed office building in El Segundo.

1375 Sunflower Avenue, Costa Mesa

By the 1960s, the Times' postwar circulation had increased enough to necessitate some new facilities in addition to those at Times Mirror Square. In 1968, the paper opened its new Los Angeles Times Newsroom and Printing Plant at 1375 Sunflower Ave. in Costa Mesa to publish the Orange County Edition of the Times. Designed by master architect William L. Pereira and constructed by builder C.L. Peck, the 73,000 square foot building housed "the interrelated function of editorial-advertising-production-printing-circulation."[18] At its peak "the plant had

[15] "L.A. Times Printing Plant," *Los Angeles Times*, April 1, 2019.
[16] "Inside the Historic Buildings that Have Defined the Los Angeles Times," *Los Angeles Times,* accessed December 2020, https://www.latimes.com/projects/latimes-building/.
[17] Ibid.
[18] "A Design for Efficiency, Function, and Eye-Appeal," *Los Angeles Times,* March 31, 1968.

about 1,000 employees and printed approximately 250,000 newspapers daily."[19] Production ceased with the closing of the plant's presses in 2010, and the plant continued as office space until it was vacated by Times and Daily Pilot staff in 2014.[20] The property was subsequently sold in 2017, and construction has begun on a mixed-use development known as the Press at the site, resulting in major changes to the Late Modern style building.[21]

20000 Prairie Street, Chatsworth, San Fernando Valley

Exponential postwar growth in the San Fernando Valley prompted the Los Angeles Times to construct another satellite facility in Chatsworth in 1983. Like the 1968 Costa Mesa plant and the 1973 addition to Times Mirror Square, the Valley facility was designed by William L. Pereira; the builder was Swinerton and Walberg.[22] The $96 million new plant started as a printing operation, though the paper quickly added a newsroom and combined all functions for publication of the Valley and Ventura Editions just one year later.[23] The Chatsworth facility employed about 800 people and "set an industry production milestone with the first successful implementation of stacked color printing units."[24] In December 2005, the Los Angeles Times announced the closure of the Chatsworth plant for the following year – leaving printing and publication to be done on the three remaining plants in Costa Mesa, Los Angeles, and Irwindale.[25] Closure of the Chatsworth plant coincided with reports of the Times' drastic decrease in circulation. The former plant was vacant until becoming the headquarters for MGA Entertainment in 2014. MGA's repurposing of the facility, along with a currently ongoing mixed-use development known as 24, has resulted in major changes to the Late Modern style building.

5091 4th Street, Irwindale

In 2001, Los Angeles Times subsidiary California Community News began leasing a 325,000 square foot industrial space in Irwindale (San Gabriel Valley) for production of another regional edition.[26] The architect of this building is unknown, and it does not have an identifiable architectural style, reflecting a generally vernacular industrial/21st century office park idiom. The Times consolidated processing and printing of its Sunday edition inserts at this facility, which is still in operation today as "one of the largest, most technologically advanced inserting and distribution facilities in the country."[27]

Olympic Printing Plant, 2000 E. 8th Street, Los Angeles (Project Site)

Although the Los Angeles Times had expanded facilities to Costa Mesa and Chatsworth in the postwar period to accommodate growing circulation, these were dedicated to regional editions;

[19] "Ex-L.A. Times Plant in Costa Mesa is sold in $65 million deal," *Los Angeles Times*, November 16, 2017.
[20] Ibid.
[21] "Construction Starts on New Office Space and Food Hall at Former L.A. Times Plant in Costa Mesa." *Los Angeles Times,* February 14, 2019.
[22] Los Angeles Building Permit No. 1981VN36578, December 15, 1981.
[23] "Times to Expand Coverage of Valley with New Edition," *Los Angeles Times,* April 19, 1984.
[24] Ibid., "The Los Angeles Times' History," *Los Angeles Times,* September 21, 2012.
[25] "Times to Close Printing Plant in Chatsworth."
[26] "LA Times Subsidiary Signs $16.3 Million Lease," *Los Angeles Times,* August 21, 2001.
[27] "California Community News," *Los Angeles Times* July 29, 2013.

the bulk of the paper's printing function remained at Times Mirror Square until the late 1980s. The Times acquired a large site about two miles south of Times Mirror Square, at the southern edge of downtown directly abutted by Interstate 10 and hired DMJM to design a new centralized printing facility. This would open up space in Times Mirror Square for other functions and make production more efficient overall as readership continued to expand. Construction of the Plant coincided with the Los Angeles Times circulation reaching an all-time high of 1,225,189 daily and 1,514,096 on Sundays.[28]

DMJM's Design Director, master architect Anthony Lumsden, eschewed the simpler Late Modern designs William Pereira designed for the Times' Costa Mesa (1968) and Chatsworth (1983) facilities in favor of a more complexly articulated Late Modern style reflecting his unique design approach and interests. The design was complete by 1985 and ground was broken for the project in 1987; by then, the City had granted the Times permission to close and build over several public streets and alleys to enable consolidation into one 26-acre site.[29] DMJM (led by project manager Thomas Saeda) handled engineering as well as architectural design, while Swinerton & Walberg Co. acted as contractor.[30]

When completed in 1989, the new three-story Plant provided approximately 665,000 square feet of manufacturing and distribution space with support offices and facilities for loading and distribution by both train and truck.[31] Installing and configuring the facility's complex printing equipment took some time, meaning the plant did not actually begin production until June 1990. It employed some 500 people and saw steady visitation by people curious to witness operation of the massive presses – as in the 1935 Kaufmann building, the Plant incorporated a grand lobby with high-quality materials and details, along with areas explicitly designed for viewing press operation from curving walkways fronting the nearly fully glazed wall separating the lobby from the press room. These public spaces softened the highly industrial nature of the majority of the building and reflected the newspaper's self-image as an essential public institution as well as a for-profit enterprise.

At the building's exterior, Lumsden's expressive primary façade undulated like sheets of newsprint rolling through a press, with blank white expanses punctuated by dark-glazed ribbon windows like lines of type. Above the main entry, stepped and angled metal and glass volumes updated the daylight factory features seen in the older industrial buildings surrounding the new facility. These exterior features are not and have never been readily visible from the street, as the west-facing building is deeply set back from the street it technically fronts on (Alameda Street) and obscured by security fencing. The clearest views of the Plant are of its more utilitarian rear and south façades from the elevated Interstate 10 freeway running past it to the south, though even there the most prominent components are the illuminated wall-mounted signage rather than any architectural design detail.

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[28] "The Los Angeles Times' History."

[29] "The Region," *Los Angeles Times,* April 2, 1987.

[30] City of Los Angeles Permit No. 1987LA78829; "Times Production Plant Completion Scheduled in 1990," *Los Angeles Times*, May 29, 1988.

[31] Informational plaque in Olympic Plant lobby.

The Plant was the heart of Los Angeles Times production since its completion, but within a decade after its opening the landscape of print media had begun its tectonic shift toward digital, web-based circulation. Like other major newspapers, the Times saw a decline in its print readership which only accelerated during the first quarter of the 21st century. The Plant subsumed the functions of the Chatsworth and Costa Mesa plants when they closed in 2006 and 2010, respectively, bringing about consolidation of production the Times had not seen for decades. After multiple ownership changes, the Times itself relinquished its historic downtown headquarters (selling it to a developer for $100 million in 2016) and moved most operations to a repurposed facility in El Segundo in 2018. It also sold the Olympic plant at this time, for $20 million more than Times Mirror Square itself fetched, in a reflection of the high potential for redevelopment on this massive site at the south edge of downtown.[32]

Comparative Case Study: the Chicago Tribune Printing Plant

Designed by Skidmore, Owings, and Merrill (SOM) in 1981, the Chicago Tribune printing plant is known as the Freedom Center. The 850,000 sq. ft. printing building sits on a campus adjacent to the Chicago River which houses 10 presses, a newsprint warehouse, a state-of-the-art press plate room, and multiple inserting machines. The brick-clad industrial building features minimal fenestration or applied decoration, with the exception of an arched entrance at the east façade and blind window and fanlight details at the north façade. Signage for the publication is prominent.

The Freedom Center's construction shifted newspaper production away from the publication's historic home in Tribune Tower on Michigan Avenue. As of 2017 the Freedom Center is slated for redevelopment though printing continues currently as the newspaper's lease runs through 2023.[33]

Comparative Case Study: the New York Times Printing Plant

Built in 1997 in College Point, Queens, the New York Times printing plant is one of the most prominent newspaper printing facilities operating in the United States. Designed as an advertisement for the publication itself, the high-tech facility is an industrial box punctuated with extensive glazing and primary colored blocks. Located in an industrial area, the building prominently features the publication's title wrapped around two facades, highly visible from adjacent interstates and nearby La Guardia airport. The printing plant was designed by Polshek and Partners, with Richard Olocott, FAIA and James S. Polshek, FAIA as design partners and

[32] "Historic Sale of the L.A. Times to Billionaire Patrick Soon Shiong to Close on Monday," *Los Angeles Times,* June 16, 2018.

[33] Danny Ecker, "Tribune Media's bold plan to transform giant printing plant site," accessed December 2020, https://www.chicagobusiness.com/article/20171004/CRED03/171009950/tribune-media-unveils-giant-printing-plant-site-plans.

Parson's Corporation as the architect of record.[34] The plant has won many awards including the AIA National Honor Award for Architecture.

The building's expansive windows are meant to reference the publication's original Brooklyn printing facility which allowed the public to witness the paper's daily production. According to Ennead Architects, the New York Times Printing Plant represents "The result of an intense collaboration among the client, the design architect, engineering firms and the construction manager, the design recomposes the typical industrial shed into a series of dynamic building forms, whose volumes are distilled from and dramatize the printing process."[35] At 540,000 sq. ft. the plant's programs include a press room with six presses, paper storage, employee amenities, and a lunch room.

The opening of the Queens facility marked the end of the publication's printing at the New York Times Building in mid-town Manhattan.[36] In 2018 the plant printed 41% of the New York Times daily papers, and in September 2020 it was reported that the New York Post, Wall Street Journal, and Barron's would soon be published at the Times plant as well, following the closure of the New York Post printing plant in the Bronx. The Post's non-descript Bronx plant was built in 2001 and its shuttering marked a trend of newspaper production consolidation in the wake of declining print sales.[37] With the addition of the Wall Street Journal and the New York Post to the presses, the New York Times printing plant is responsible for three of the most widely circulated news publications in the country.

6.3 Late Modern Architecture

The Plant embodies the distinctive characteristics of Late Modern architecture, specifically a derivative of Late Modernism that reflects High Tech design elements applied to boxy, rectilinear massing. The Late Modern movement first emerged in the 1960s as a reaction against the orthodoxy and ubiquity of post-World War II Modernism and exerted considerable influence on American architecture for the duration of the twentieth century.

Modernism is a broad term that is used to define an array of architectural styles and city planning principles that were conceived in the early twentieth century, honed after World War I, and became a dominant element of American architecture after World War II. The tenets of Modernism are extraordinarily broad and diverse, but in the most general sense the movement eschewed past traditions and called for an approach to design that embraced progress and technology.[38] The development of an American dialect of Modernism was heavily influenced by Swiss-French architect Charles-Edouard Jeanneret (known professionally as Le Corbusier), who

[34] "The New York Times Printing Plant," Ennead, accessed December 2020, http://www.ennead.com/work/nytimes.
[35] Ibid.
[36] "History," *New York Times*, accessed December 2020, https://www.nytco.com/company/history/.
[37] Keith J. Kelly, "News Corp. in multiyear deal to print New York Post, Wall Street Journal at new NYC plant," *New York Post*, accessed December 2020, https://nypost.com/2020/09/16/news-corp-in-multiyear-deal-to-print-the-post-wsj-at-new-nyc-plant/.
[38] Alan Hess, "Everyday Modernisms: Diversity, Creativity and Ideas in L.A. Architecture, 1940-1990," May 2013.

hewed to a set of formal architectural principles articulating many of the key ideas and philosophies underpinning the movement. His strict ideas were further developed - and departed from - by many others, until Modernism became the dominant influence in American architecture in the mid-20th century.

In the period after World War II, International Style Modernism emerged as the dominant mode of domestic architecture, and its emphasis on authenticity and rationality permeated almost every facet of the American built environment at this time. Large, tall cubic boxes, devoid of superfluous ornament, became ubiquitous elements of the American cityscape.[39] However, by the 1960s, architects and the American public alike had begun to grow weary of the Modern orthodoxy. The template for postwar Modernism had been so widely replicated, and so often compromised through cost cutting and value engineering, that it was increasingly perceived as cheap, generic, pedestrian, and effete.[40] In response, architects began to dabble in new modes of architectural expression that reacted to some of the most banal qualities of postwar Modernism. While some of these dissident architects – who would later be identified as "Postmodernists" – popularized an aesthetic that represented a radical departure from Modernism, others took the basic tenets of Modernism and reinterpreted them in new ways, typically by exaggerating a particular structural element or architectural feature. Those in this latter camp honed what became known as the "Late Modern" style.

The term "Late Modern" was coined in 1977 by architectural historian and theorist Charles Jencks. Jencks remarked that "there are many ways to characterize Late Modern architecture, and most of them can be reduced to the single notion of exaggeration. Late Modernism takes Modern architecture to an extreme in order to overcome its monotony and the public's boredom with it."[41]

Several derivatives of the Late Modern movement emerged beginning in the 1960s, each of which had a distinctive architectural vocabulary and its own catalog of distinguishing features. Among the most common derivatives of Late Modern architecture in Southern California include Brutalism, which emphasized the structural and aesthetic merits of raw concrete; High-Tech/Structural Expressionism, in which structural, infrastructural, and operating systems are emphasized with dematerialized imagery; Sculptural, which utilized obscure shapes like chamfers, cuts, punchouts, sharp angles, and curves to break apart the rectilinear forms that characterized Modern buildings; and the glass skin variant, in which the glass curtain wall method of construction expanded to cover the entire exterior surface of a building.[42] As discussed in more detail below, architects Cesar Pelli and Anthony Lumsden of DMJM are most widely credited with the glass skin innovation.

Character-defining features of Late Modern architecture include the following:

[39] Hess (2013).
[40] Charles Jencks, "Postmodern and Late Modern: The Essential Definitions," *Chicago Review* 35.4 (1987): 31-58.
[41] Charles Jencks, *Late Modern Architecture and Other Essays* (New York: Rizzoli, 1980).
[42] Derived from SurveyLA, "Los Angeles Citywide Historic Context Statement, Context: Architecture and Engineering, Subcontext: Los Angeles Modernism, Theme: Late-Modern," prepared by Daniel Paul, July 2020.

- Spatial and geometric complexity
- Exaggerated sense of abstraction; a sense of isolation within the surrounding environment
- Manipulation of two and three-dimensional compositional systems (such as grid patterns) to modulate space, structure, and surface
- Flat roofs, often capped by gardens or other landscape features
- Unrelieved exterior wall surfaces, occasionally softened by warmer material accents
- Overarching sense of transparency and ambiguity; abundant fenestration and ribbon windows
- Incorporation of Corbusian elements including ramps, pipe rails, accent curves, and *pilotis*
- Absence of historical references or superfluous ornament

6.4 Architect: Anthony Lumsden, FAIA, of DMJM

DMJM

The firm that would become DMJM formed in 1946 as a partnership between architects Phillip Daniel, S. Kenneth Johnson, and Arthur Mann. Based in Santa Maria, California and working primarily on educational facilities, the group intended to capitalize on the postwar construction boom. In 1950, after the struggling firm reorganized in order to develop long-term economic objectives, structural engineer Irvan Mendenhall was made partner, which resulted in the new firm named Daniel, Mann, Johnson, and Mendenhall, Architects and Engineers.[43] DMJM offices were moved to Los Angeles by this time and the firm took on a fully-integrated, multi-divisional structure as architecture and engineering services were both completed in-house. This incorporation of engineering as an equal part of the firm was unusual for the time, but ultimately set the framework for the group's ascendency as a multi-disciplinary conglomerate.[44]

Military commissions in late 1950s brought the firm international recognition and by 1958 Architectural Forum ranked DMJM as the second "biggest" architectural firm in the United States based on dollar value of construction projects.[45] In 1960 the firm incorporated in California, building on financial successes and cementing a corporate climate and organizational structure. Architectural output at this time included the American Cement Company Building (1961), a marvel of sculptural concrete and structural engineering. The dramatic use of structural cement as an external design element married the building's construction to its tenant and served as powerful advertisement for the American Cement Company and its product. However, elegant

[43] Aaron Cayer, *Design and Profit: Architectural Practice in the Age of Accumulation* (PhD diss., University of California, Los Angeles, 2018), 56.
[44] Ibid, 58.
[45] Editors of Architectural Forum, *The 1958 FORUM Directory of the 100 Biggest Architectural Firms, Building Customers, Building Contractors* (Time, Inc., 1958).

architectural designs were a rarity from the firm at this time, DMJM had a heavy role in military work and other engineering projects, and during the 1960s the growing multi-service corporation would list architecture as just one of 22 separate divisions.[46]

Architectural design gained increased prominence at the firm in 1964 with the hiring of Cesar Pelli and Anthony Lumsden as Design Director and Assistant, respectively. The two architects had previously worked for the prestigious firm of Eero Saarinen on corporate headquarters and laboratories. Pelli and Lumsden elevated DMJM's position as a lauded design firm while maintaining a bottom-line oriented corporate structure.[47] Additionally, Lumsden and Pelli's DMJM projects encouraged a nascent discourse about Los Angeles architecture while the relatively young city expanded and reacted to the constraints of Mid-Century Modern styles.[48]

While working at DMJM, Lumsden and Pelli pioneered the sub-type of Late Modern design known as glass skin. It was Lumsden who first proposed that by reversing window mullions to face inwards instead of out, these connective elements could be virtually flush with expanses of glass, thus creating a smooth exterior skin. The glass skin design system broke from the traditional delineation of base, shaft, and capital that had become the established method of creating high-rise structures during the late 19th century (noted Chicago architect Louis Sullivan is credited with developing this method).

Lumsden's ideas were initially rejected by Roche-Dinkeloo and Associates (Saarinen's posthumous successor firm) when suggested for the Bell Telephone Laboratories in New Jersey.[49] However, during their DMJM tenure Pelli and Lumsden collaborated on seminal glass skin designs including the Federal Aviation Administration Western-Pacific Region headquarters building (FAA Building) designed in 1966, and the Century City Medical Plaza also designed in 1966. When the Century City Medical Plaza was completed in 1969 (pre-dating the FAA Building's completion in 1973) it was likely the first building ever to be clad entirely in a sleek surface of flattened mullions and solar performance glass.[50] Lumsden and Pelli's advancements in glass skin cladding reflected other high technology and aerospace industry innovations of the time while also remaining remarkably cost effective. Less metal was necessary for the reduced mullions, and the standardization of isotropic forms allowed even further economy while creating new opportunities for curvilinear shapes and sculptural volumes.

Cesar Pelli left DMJM in 1968 for a design partnership at Gruen Associates and went on to design significant Southern California buildings such as San Bernardino City Hall (1969-72) and the Pacific Design Center Blue Building (1971-75) before moving to Connecticut to become Dean of the Yale Architecture Department and start his own highly-regarded practice.[51] Lumsden would go on to

[46] SurveyLA, "Los Angeles Citywide Historic Context Statement, Context: Architecture and Engineering, Sub-context: Los Angeles Modernism, Theme: Late-Modern," prepared by Daniel Paul, July 2020, 7.
[47] Leon Whiteson, "Anthony Lumsden: A Critical View," in *The Master Architect Series II: A.J. Lumsden, Selected and Current Works* (Stephen Dobney, ed.) (Mulgrave, Victoria: The Images Publishing Group Pty Ltd., 1997), 9.
[48] Survey LA Late Modern, 6.
[49] Survey LA Late Modern, 9.
[50] Survey LA Late Modern, 10.
[51] Survey LA Late Modern, 13.

work at DMJM as Senior Vice President and Principal for Design until 1993 at which point he departed to start his own Los Angeles-based architectural firm.

The multinational engineering and consulting firm AECOM (Architecture, Engineering, Construction, Operations, and Maintenance) formed in 1990 and acquired DMJM as a semi-autonomous office of design services. However, after multiple reorganizations the DMJM name disappeared from the AECOM roster as all associated companies of AECOM were dissolved under the unified brand name.[52]

Anthony Lumsden, FAIA

A prolific architect and the Design Director at DMJM from 1968 to 1993, Anthony Lumsden's innovative designs and technological advances left an indelible mark on the late 20th century architecture of Southern California.

Born in England in 1928, Anthony John Hale Lumsden was educated in Australia and received his architecture degree from the University of Sydney. In 1954 Lumsden moved to Michigan to work in the office of Eero Saarinen, the renowned Finnish-American architect. During his tenure at Saarinen's firm and at the successor firm of Roche-Dinkeloo and Associates, Lumsden conceptualized the technological innovations that would lead to the cladding method known as glass skin. However, it was at the Los Angeles based architecture and engineering firm DMJM that Lumsden would work collaboratively on his idea of the skin as a flexible membrane, changing the aesthetic of corporate architecture.

In 1964, DMJM hired Cesar Pelli as the corporation's second-ever Design Director and Pelli immediately hired Lumsden, his former colleague, as Assistant Design Director. This collaboration was an immensely creative period for both architects as they explored new technological and material frontiers in order to create buildings clad in taut glass and metal.

After Pelli's departure from DMJM in 1968, Lumsden ascended to Design Director at the office, a position he held until 1993. Lumsden's experimental designs during this time, often linked to avant-garde minimalist art and sculpture, consistently prioritized efficiency, uniting the corporate and creative tendencies of the Late Modern Style. During his 25 years as Design Director, Lumsden worked on a number of national and international design projects, ranging from new towns and urban centers to university campuses and high-rise office buildings.

Between 1969 and 1971, Lumsden designed three internationally acclaimed office towers on Wilshire Boulevard: One Park Plaza (1969-1971), the Century Bank Building (1969-1972), and Manufacturers Bank (also known Roxbury Plaza, 1971-1974). In all three examples, Lumsden applied the glass skin as a "flexible membrane" that could be shaped to form curving wall surfaces that "relieved the glass box monotony of the standard office high-rise while providing

[52] Aaron Cayer, *Design and Profit: Architectural Practice in the Age of Accumulation* (PhD diss., University of California, Los Angeles, 2018), 187.

interior areas with distinctive spaces."[53] Continuing through the next two decades, Lumsden's work combined the glass skin membrane with explorations into the section as a generator of form, in what can be viewed as a natural extension of Corbusier's strategy of a sturdy framework interrupted by differing volumes.[54] He sought an expressive mannerism in which undulating, unbroken skins could clad complex rolled shapes, almost sculptural in nature, referring to this technique as "extrusion."

Lumsden's "extrusion aesthetic" was most radically expressed in unbuilt projects like the Lugano Convention Center (1972) and the Beverly Hills Hotel (1973), featuring dynamic rolled shapes clad entirely in smooth membrane. But it is also quite evident in a number of his 1970s and 80s designs that were realized, including the Hertz Turnaround Facility near Los Angeles International Airport (1970-1971), the University Bus Station in Los Angeles (1972-1975), Ontario International Airport Terminal in Ontario, CA (1984-1998), the Olympic Printing Plant (1985-1989), the Hyperion Wastewater Treatment Plant (1985-1997), and Moscone Convention Center in San Francisco (1987-1992). All of these designs used extruded sections to generate rolled and angled forms, clad in smooth membranes – not just glass, but increasingly other materials including concrete and painted metal panels.

Lumsden's best-known project from his time as DMJM Design Director is the Donald C. Tillman Water Reclamation Facility in Van Nuys, at the Sepulveda Basin Recreation Area. Designed in 1974 and completed in 1982, this industrial property contains layers of water treatment functions as well as an administration building which exemplifies a modular plan and complex section. Lumsden's design harmonizes with the landscape design by Koichi Kawana, who created a public Japanese garden using water features (using reclaimed water) and greenscape to soften the edges of the machine-like building. Lumsden's interest in formal approaches and sequences at both the exterior and interior of buildings may have found its truest expression in this design.

Lumsden's design for the Plant reflects his signature explorations of dynamic sections wrapped in smooth membranes, as seen in the building's undulating, angled, and stepped forms with metal cladding. Like the Hyperion Wastewater Treatment Plant and Tillman projects, the Plant is a particularly clear illustration of Lumsden's ability to design a cost-effective modular kit of parts in order to construct expressive, elegant forms on otherwise utilitarian structures. It also sits firmly within the realm of Lumsden's exploration of section as a generator of form. "Modernist architects have tended to ignore the creative possibilities of the section in favor of the complexities of the plan," Lumsden stated, "But in many great historical structures, such as a Gothic cathedral or Ise shrine, the plan is simple while all the richness of design springs from the section."[55]

In 1994 Lumsden left DMJM to open his own firm, Anthony J. Lumsden and Associates, with co-founder Charles Wee and his son, John Lumsden. Based in Los Angeles with an office in Seoul, South Korea, the firm designed numerous projects in Lumsden's honed techno-expressive style.

[53] Whiteson, "Anthony Lumsden," 10.
[54] Ibid.
[55] Quoted in Leon Whiteson et al., "Anthony Lumsden: A Critical View," *Space Design* November 1993, No. 11(350), 33.

Without the constraints of working for a large firm, Lumsden was able to achieve more complex and sculptural spatial interactions and an enhanced expressiveness of form. Several of the firm's projects won architectural design competitions, including the Tae Leung International Speed Skating Arena (1994-1998), the Yong Dong Area International Airport (1994-1998), the Korea Energy Management Center (1995-1998), and the X-Zone mixed-use development (1997-2000).[56]

Throughout his career, Lumsden won over 30 architectural design awards from the American Institute of Architects (AIA), the American Institute of Steel Construction, the Institute of Human Engineering Sciences, the U.S. Department of Housing and Urban Development, the National Society of Professional Engineers, and *Progressive Architecture* magazine. He became a fellow of AIA in 1979. His work has been displayed in a number of design exhibitions, including at the Museum of Modern Art (MoMA) in New York. As a visiting instructor, Lumsden taught at University of Southern California (USC), University of California, Los Angeles (UCLA), University of California, Berkeley, Southern California Institute of Architecture (SCI-Arc), California State Polytechnic University, Pomona (Cal Poly Pomona), Rhode Island School of Design, Stanford University, and Harvard University. He served as architectural advisor for the Urban Design Committee for the Mayor of Los Angeles, and for Foreign Building Operation of the U.S. State Department. Lumsden was a member of UCLA's Silver Group (six distinguished Los Angeles Late Modern architects), and Cal Poly Pomona's LA12 (12 prominent postwar Los Angeles architects).[57] Anthony J. Lumsden died in 2011, by which point his glass skin cladding techniques had become ubiquitous across city skylines.

Thomas Saeda

Building permits for the Plant list architect Thomas Y. Saeda. While Saeda was likely the project manager, Anthony Lumsden would have been responsible for the design as DMJM's Design Principal. The project is attributed to Lumsden in the *The Master Architect Series II* monograph.

Little information could be found on Saeda's other work, though he is known to have designed at least one single-family residence in Los Angeles: 10630 Johanna Ave, a 1962 "Japanese Modern Ranch" home identified in SurveyLA as National Register-eligible for its distinctive architectural style. Saeda was also a co-author of the 1979 DMJM publication "Computer-Aided Engineering and Architectural Design System," a technical report analyzing computer aids to the design process for military construction. He has been a member of the AIA since 1974.

[56] *The Master Architect Series II*, 233-234.
[57] "Anthony J. Lumsden, FAIA," *Anthony J. Lumsden and Associates*, accessed 12 August 2015, http://www.ajlumsden.com/index_thefirm.shtml.

7. Regulatory Framework

7.1 National Register of Historic Places

The National Register is the nation's master inventory of known historic resources. Created under the auspices of the National Historic Preservation Act of 1966. The National Register is administered by the National Park Service (NPS) and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. As described in National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*, in order to be eligible for the National Register, a resource must both (1) be significant and (2) retain sufficient integrity to convey its significance.

Significance is assessed by evaluating a resource against established criteria for eligibility. A resource is considered significant if it satisfies any one of the following four National Register criteria:[58]

A. Associated with events that have made a significant contribution to the broad patterns of our history;

B. Associated with the lives of significant persons in our past;

C. Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction;

D. Has yielded, or may be likely to yield, information important in prehistory or history.

Once significance has been established, it must then be demonstrated that a resource retains enough of its physical and associative qualities – or integrity – to convey the reason(s) for its significance. Integrity is best described as a resource's "authenticity" as expressed through its physical features and extant characteristics. Whether a resource retains sufficient integrity for listing is determined by evaluating it against the seven aspects of integrity defined by the NPS:

- Location (the place where the historic property was constructed or the place where the historic event occurred)
- Setting (the physical environment of a historic property)
- Design (the combination of elements that create the form, plan, space, structure, and style of a property)
- Materials (the physical elements that were combined or deposited during a particular period of time and in a particular manner or configuration to form a historic property)

[58] Some resources may meet multiple criteria, though only one needs to be satisfied for National Register eligibility.

- Workmanship (the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory)
- Feeling (a property's expression of the aesthetic or historic sense of a particular period of time)
- Association (the direct link between an important historic event/person and a historic property)

Integrity is evaluated by weighing all seven of these aspects together and is ultimately a "yes or no" determination – that is, a resource either retains sufficient integrity or it does not.[59] Some aspects of integrity may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for its significance. Since integrity depends on a resource's placement within a historic context, integrity can be assessed only after it has been established that the resource is significant, and under which criteria.

Criteria Consideration G

Generally, a resource must be at least 50 years of age to be eligible for listing in the National Register. NRB 15 explains that "fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance. This consideration guards against the listing of properties of passing contemporary interest and ensures that the National Register is a list of truly historic places."[60]

However, the NPS acknowledges that on occasion, a resource less than 50 years of age may merit consideration for listing in the National Register. Criteria Consideration G offers guidance related to the evaluation of properties that may have achieved significance within the past 50 years, setting forth the conditions under which these resources may be eligible for listing. It provides that exceptions to the age threshold may be granted if it can be demonstrated that a resource less than 50 years of age if the individual resource is: (1) of exceptional importance, or (2) an integral component of a National Register-eligible historic district whose other component parts are predominantly 50 years or older.[61]

In justifying exceptional importance for individual resources (*i.e.,* outside of the National Register-eligible historic district context), NRB 15 cites the necessity of comparative analysis. Specifically, it states that "it is necessary to identify other properties within the geographical area that reflect the same significance or historical associations and to determine which properties *best* represent the historic context in question." It continues, "Several properties in the area could become eligible with the passage of time, but few will qualify now as exceptionally important."[62]

[59] Derived from National Register Bulletin 15, Section VIII: "How to Evaluate the Integrity of a Property."
[60] Derived from NRB 15, Section VII: "How to Apply the Criteria Considerations."
[61] The subject building is not an integral component of a National Register-eligible historic district whose other component parts are predominantly 50 years of age or older, therefore this report will not further evaluate the building under this consideration standard.
[62] NRB 15, Section VII: "How to Apply the Criteria Considerations."

7.2 California Register of Historical Resources

The California Register is the authoritative guide to the State's significant historical and archeological resources. In 1992, the California legislature established the California Register "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change."[63] The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for historic preservation grant funding; and affords certain protections under CEQA. All resources listed on or formally determined eligible for the National Register are automatically listed in the California Register. In addition, properties designated under municipal or county ordinances, or through local historic resources surveys, are eligible for listing in the California Register.

The structure of the California Register program is similar to that of the National Register but places its emphasis on resources that have contributed specifically to the development of California. To be eligible for the California Register, a resource must first be deemed significant at the local, state, or national level under one of the following four criteria, which are modeled after the National Register criteria listed above:

1. It is associated with events or patterns of 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;

2. It is associated with the lives of persons important to local, California, or national history;

3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;

4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state, or the nation.[64]

Like the National Register, the California Register also requires that resources retain sufficient integrity to be eligible for listing. A resource's integrity is assessed using the same seven aspects of integrity used for the National Register. However, since integrity thresholds associated with the California Register are generally less rigid than those associated with the National Register, it is possible that a resource may lack the integrity required for the National Register but still be eligible for listing in the California Register.

Resources are automatically listed in the California Register if they are listed in or have been officially determined eligible for the National Register. State Historic Landmarks #770 and

[63] California Public Resource (CPR) Code, Section 5024.1 (a).
[64] California Public Resources Code SS5024.1, Title 14 CCR, Section 4852.

forward are also automatically listed in the California Register.[65]

California Register Age Considerations

There is no prescribed age limit for listing in the California Register, although OHP technical assistance guidelines state that resources less than 50 years old may be considered for listing as long as sufficient time has passed "to obtain a scholarly perspective on the events or individuals associated with the resource."[66]

7.3 City of Los Angeles, Cultural Heritage Ordinance

The local designation programs for the City of Los Angeles (City) include HCM designation for individual resources and the adoption of Historic Preservation Overlay Zones (HPOZs) for concentrations of buildings, commonly known as historic districts. The City's Cultural Heritage Ordinance (Chapter 9, Section 22.171 *et seq.* of the Los Angeles Administrative Code) defines an HCM as any site (including significant trees or other plant life located thereon), building, or structure of particular historic or cultural significance to the City, meaning that it meets one or more of the following criteria:

1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;
2. Is associated with the lives of historic personages important to national, state, or local history;
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

The City established its HPOZ ordinance in 1979. The ordinance was revised in 1997, 2000, 2004, and 2018. According to Section 12.20.3.B.17 of the Los Angeles Municipal Code (LAMC), a *Preservation Zone* is "any area of the City of Los Angeles containing buildings, structures, landscaping, natural features or lots having historic, architectural, cultural or aesthetic significance."

Local historic preservation ordinances often include standards for determining whether a resource retains sufficient integrity to merit local historic designation, and this language can vary widely from municipality to municipality. Some local ordinances do not mention integrity at all. The Los Angeles Cultural Heritage Ordinance does not include language about integrity. When

[65] California Department of Parks and Recreation, Office of Historic Preservation, *Technical Assistance Series #5: California Register of Historical Resources, The Listing Process* (Sacramento, CA: California Department of Parks and Recreation, n.d.), 1.
[66] California Office of Historic Preservation, *Technical Assistance Series #6: California Register and National Register: A Comparison* (Sacramento, CA: California Department of Parks and Recreation, 2001), 3.

evaluating historical resources in municipalities where the historic preservation ordinance does not provide guidance for assessing integrity, in accordance with best professional practices it is customary to use the National Register seven aspects of integrity to assess whether or not a resource retains sufficient integrity to convey its significance at the local level.

Los Angeles' Cultural Heritage Ordinance Age Considerations

The City's Cultural Heritage Ordinance does not have language regarding the required age of potential HCMs. However, in practice, the City generally follows California OHP guidelines for evaluating resources of the recent past, which provides guidance that sufficient time must have passed to obtain a scholarly perspective on a resource's historic importance.

7.4 CEQA and Historical Resources

CEQA Thresholds

Enacted in 1970, CEQA is the principal statute mandating environmental assessment of discretionary land use and development projects in California. The primary goal of CEQA is to (1) evaluate a project's potential to have an adverse impact on the environment, and (2) minimize these impacts to the greatest extent feasible through the analysis of project alternatives and, if needed, implementation of mitigation measures.

Historical resources are considered to be a part of the environment and are thereby subject to review under CEQA. Section 21084.1 of the California Public Resources Code (PRC) states that for purposes of CEQA, "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment."[67] This involves a two-part inquiry. First, it must be determined whether the project involves a historical resource. If it does, then the second part involves determining whether the project may result in a "substantial adverse change in the significance" of the historical resource.

To address these issues, guidelines relating to historical resources were formally codified in October 1998 as Section 15064.5 of the CEQA Guidelines. The guidelines state that for purposes of CEQA compliance, a "historical resource" shall be defined as any one of the following:[68]

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources.
2. A resource included in a local register of historical resources, or identified as significant in a qualified historical resource survey, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrate that it is not historically or culturally significant.

[67] California Code of Regulations, Title 14, Chapter 3, Section 15064.5.
[68] Ibid.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register of Historical Resources.

Once it has been determined that a historical resource is present, it must then be determined whether the project may result in a "substantial adverse change" to that resource. Section 5020.1. of the PRC defines a substantial adverse change as the "demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired." Furthermore, according to Title 14 of the California Code of Regulations (CCR), the significance of a historical resource is materially impaired when a project:

A. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

C. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

8. Evaluation of Eligibility

8.1 Previous Evaluations

As previously stated, the Plant has not been formally designated under federal, state, or local programs. It also has not been previously evaluated for historical significance under any survey or project-specific evaluation. It is not listed in the California Historical Resource Inventory (HRI) or the Built Environment Resource Database (BERD) and was also not identified in any of the City's historic resource survey efforts (SurveyLA, Central City North, 2016).

8.2 Evaluation of Eligibility

At only 32 years of age at this writing, the subject building is generally too young to be considered a historical resource. As previously enumerated, federal and state eligibility criteria have age requirements that safeguard against the designation of properties of "passing contemporary interest," ensuring these designation programs remain lists of truly historical resources, by requiring – for properties fewer than 50 years of age – that individual properties have exceptional importance, as in the case of the National Register, or that sufficient times has passed in order to gain a scholarly perspective on their importance, as in the case of the California Register.

Illustrative of these guidelines, only an extremely small handful of properties in the same age range as the Plant have been successfully listed in the National Register of Historic Places as individual properties of exceptional importance. Among these are Michael Graves' Portland Public Service Building (Portland Building), which was listed at 29 years of age; and E. Fay Jones's Thorncrown Chapel, which was listed at only 20 years of age. Both of these resources were determined to possess exceptional and superlative importance because they were the best-known and most pivotal buildings of their respective architects' careers.

Similarly, only an extremely small number of properties in the same age range as the Plant have been listed in the California Register. In Los Angeles, the only example is the California Aerospace Museum, which was architect Frank Gehry's first major public commission and the first large-scale realization of the idea of the "frozen explosion," which would become one of Gehry's signature design elements. The building was internationally published in the years after its completion and was even the subject of a single-building monograph by architectural historian James Steele.[69] Completed in 1984, the building was listed in the California Register in 2012 at 28 years of age.

Due to the fact that the Plant was designed by an internationally acclaimed architect, Anthony Lumsden of DMJM, it is evaluated herein for its potential to have exceptional importance and that sufficient time must have passed to obtain a scholarly perspective on a resource's historic importance such that it meets eligibility criteria despite its very young age.

[69] James Steele, *California Aerospace Museum*, New York: Phaidon Press, 1992.

ARG concludes that the Plant is not eligible for listing in the National Register, California Register, or as a Los Angeles HCM, due to the fact that scholarship does not reference or suggest that it is an exceptional or pivotal work of Anthony Lumsden such that it would meet the criterion considerations for recent-past buildings. The property is evaluated under federal, state, and local eligibility criteria below.

National Register of Historic Places and California Register of Historical Resources

National and California Register Criteria A/1: associated with events that have made a significant contribution to the broad patterns of history.

The Plant is associated with the late 20th century growth of the Los Angeles Times, a significant and influential newspaper founded in 1881. The Times grew along with the City (and a number of competing news publications) until it was the largest newspaper on the West Coast. Completed in 1989, the Plant was the sixth Times printing facility, post-dating satellite printing facilities in Costa Mesa (1968, including a newsroom) and Chatsworth (1983) as well as four combined newsroom/office/printing press locations in downtown Los Angeles dating from 1881 to 1935. The Plant's construction reflected the need for a new purpose-built facility to handle the Times' exploding circulation during the 1980s as Los Angeles became a truly global city. With the subject building's opening, the Times completed the shift of all printing functions away from the paper's downtown headquarters (Times Mirror Square), and the Plant later took over printing from the Costa Mesa and Chatsworth plants when they closed.

The Plant is associated with the growth and development of the Los Angeles Times, a historically significant entity on both state and national levels. However, it is only one of multiple properties associated with the Times, including the most notable, Times Mirror Square (1935, with additions in 1948 and 1973). Furthermore, the Plant is relatively recent; at 32 years of age, it does not meet the 50-year threshold for National Register eligibility and research did not find it to have exceptional significance as required for eligibility under Criterion Consideration G. Although the California Register does not have a specific age criterion, guidelines state that "sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource."[70] The Plant is a standard industrial printing facility for its time period and is not unique or exceptional in terms of its function, association, or embodiment of historic industrial development patterns. Research did not uncover scholarship suggesting that this property is exceptionally significant for its association with the Los Angeles Times or with larger patterns of historical development. In fact, aside from perfunctory mentions in self-published timelines of Los Angeles Times history by the *Times* itself, it does not appear in any known periodicals, published histories of the Los Angeles Times, studies of printing plant typology, or studies of industrial property types in general. Therefore, the property does not appear eligible under Criteria A/1 of the National and California Registers.

[70] California Office of Historic Preservation, *Technical Assistance Series #6: California Register and National Register: A Comparison* (Sacramento, CA: California Department of Parks and Recreation, 2001), 3.

National and California Register Criteria B/2: associated with the lives of persons significant in our past.

Research did not suggest that the Olympic Printing Plant was directly associated with any significant individuals, including former owners or employees of the Los Angeles Times. The Plant does not appear eligible under Criteria B/2 of the National and California Registers.

National and California Register Criteria C/3: embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.

The Plant embodies distinctive characteristics of the Late Modern style, including complex geometric massing and articulation; an exaggerated sense of abstraction; manipulation of compositional systems (including extrusion of sections); flat rooflines; unrelieved exterior wall surfaces of painted metal; ribbon windows; and absence of historical references or superfluous ornament.

The subject building was designed by master architect Anthony Lumsden of DMJM, known for his development (with Cesar Pelli) of the glass skin variant of Late Modernism and renowned for a number of dynamic Modern designs in Los Angeles. Lumsden is widely regarded as one of the nation's most important late modernists, as reflected by his work's many architectural awards and his iconic designs in Los Angeles, Seoul, and elsewhere – not to mention the ubiquity of the glass skin form he pioneered. Due perhaps to DMJM's corporate structure and wide range of client and property types, Lumsden's work has not received the same level of scholarship and discussion as that of some of his peers; in the seminal *Modern Architecture: A Critical History,* Kenneth Frampton referred to the "talented but unappreciated" Lumsden as one of the great American minimalists of the 1970s, "whose most brilliant work remains largely unbuilt."[71]

The Plant was one of Lumsden's last completed commissions during his tenure with DMJM, which ended in 1994. His last decade of work with DMJM was as fruitful as his earlier years; during this time, his growing confidence in his own style successfully combined dynamic sections and stretched skins, elevating them "to a higher level of complexity and metaphoric power."[72] Like his other designs from the 1980s and early 1990s, the Plant conveys Lumsden's ability to transform otherwise utilitarian structures into sculptural forms.

However, as a young resource of only 32 years of age, the building must meet National Register and California Register age considerations in order to be eligible for listing. An analysis of the building against these consideration follows.

[71] Kenneth Frampton, *Modern Architecture: A Critical History* (London: Thames & Hudson Ltd., 2007), 302.
[72] Whiteson, "Anthony Lumsden: A Critical View," 10.

National Register Age Requirement: Criteria Consideration G

According to National Register Criteria Consideration G, it is not enough for a resource to simply meet the conditions enumerated in the criteria to justify eligibility for the National Register if the resource being evaluated is less than 50 years of age. For resources that are not yet 50 years of age, it must be demonstrated that the resource is not merely significant but exhibits *exceptional* importance within its requisite historic context(s). This consideration "guards against the listing of properties of passing contemporary interest" and ensures that enough time has elapsed to develop historical perspective.[73]

Determining whether a resource is exceptionally significant for purposes of the National Register requires comparative analysis of the resource against contextually related properties. If, when the resource is compared to others, it becomes evident that (1) it is the property that *best* represents the historic context in question, or (2) represents a type so rare or fragile that extant examples of any age are unusual, it is generally considered to meet Criteria Consideration G.[74]

As discussed above, the Plant does not meet the National Register's 50-year age threshold and research did not find it exceptionally significant per Criterion Consideration G. Scholarship evidenced in multiple publications confirms the importance of Lumsden's work and his legacy as a Modern architect, but the Plant appears in only one self-published monograph and is otherwise not mentioned as a notable or influential design by either Lumsden or DMJM. Extensive research into architectural periodicals and journals did not reveal any articles at the time discussing the building's design or construction, and scholarship regarding Lumsden's significance as an architect do not discuss the Plant as a pivotal or important work. In Los Angeles, there are several other examples of 1980s-1990s work by Anthony Lumsden that received far more critical acclaim both at the time of their construction and with the passing of time, most notably the Tillman Water Reclamation Facility and the Hyperion Wastewater Treatment Plant. His design for Moscone Convention Center in San Francisco (completed 1992) is commonly cited as a notable work from Lumsden's last years at DMJM, while the Ontario International Airport Terminal (completed 1998) is a well-known design from his post-DMJM career. Other Los Angeles Lumsden designs that have received far more scholarly and public attention than the Plant include Century City Medical Plaza (1969, with Cesar Pelli); One Park Plaza (1971); the Hertz Turnaround Facility near LAX (1971); the Century Bank Building (1972); the FAA building (1973, with Cesar Pelli); Manufacturers Bank (also known as Roxbury Plaza, 1974); and the University Bus Station (1975).

The comparative analysis of the Plant against contextually related properties did not find it to be a significant example of Anthony Lumsden's work, the best representative of its historic contexts, or a type so rare or fragile that extant examples are unusual. Therefore, the subject building does not appear to meet the requirements of Criterion Consideration G.

[73] Derived from NRB 15, Section VII: "How to Apply the Criteria Considerations."
[74] Ibid.

California Register Age Requirement

The California Register does not set forth a minimum age requirement for listing, as does the National Register, but stipulates that sufficient time has to have elapsed to have a scholarly perspective on the historical significance of a resource to be eligible for listing.[75] As stated above, a review of monographs, articles and other materials related to Lumsden's built projects does not suggest that the subject building is considered by critics, scholars, or the architectural community as a seminal work. In fact, it was not discussed at all at the time of its design and construction or in more recent texts regarding Lumsden's work and career, except in a self-published monograph.

In conclusion, while the subject building generally represents the Late Modern style and work of Anthony Lumsden and DMJM, it is not an exceptionally important or pivotal work. Taking into account the high eligibility thresholds associated with resources of the recent past, the building does not satisfy National/California Register Criterion C/3 at this time.

National and California Register Criteria D/4: has yielded or may likely yield information important in prehistory or history.

A records search for known archaeological resources was conducted for the Project Site and a 1/4-mile radius around it, and it yielded no known resources. As no subsurface resources are known to exist, it is unlikely for there to be resources present that meet Criterion D or 4 of the National or California Registers.

Los Angeles Historic-Cultural Monument (HCM)

Los Angeles HCM criteria 1-3 generally mirror those of National Register and California Register A/1 – C/3. As previously stated, the local ordinance does not have requirements regarding the age of potential HCMs. Rather, the City typically follows OHP guidance on the evaluation of recent-past resources, and only rarely are resources younger than 45-50 years of age designated as HCMs. However, taking into account the inherent flexibility in the local age requirement due to the absence of language in the Cultural Heritage Ordinance, the subject building's eligibility against HCM criteria is separately evaluated herein.

Local Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.

As previously stated in the evaluation under National/California Register Criteria A/1, the Plant is associated with the historical development of the Los Angeles Times during the late 20th century, when the newspaper saw its largest increases in circulation and influence. The property is notable as the Times' last and largest purpose-built facility constructed prior to the 21st century shift from

[75] California Office of Historic Preservation, *Technical Assistance Series #6: California Register and National Register: A Comparison* (Sacramento, CA: California Department of Parks and Recreation, 2001), 3.

print to digital media. However, it is neither the only nor the best-known property associated with the Los Angeles Times – the Times Mirror Square complex is the most closely associated property, with the longest and strongest period of association, and it includes the iconic 1937 Gordon Kaufmann-designed Times headquarters building. The Plant's association is clear but late, and relatively short in comparison to the Times' downtown headquarters. As a result, the Plant does not appear eligible under local Criterion 1.

Local Criterion 2: Is associated with the lives of historic personages important to national, state, or local history.

For the reasons stated in its evaluation under National/California Register Criteria B/2, the Plant does not appear eligible for listing under local Criterion 2. Research did not indicate that any of the individuals associated with the Los Angeles Times were significant to the history of the city, state, or region in a way that is directly associated with this property.

Local Criterion 3: Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

As stated in its assessment under National/California Register Criteria C/3, the Plant embodies the distinctive characteristics of the Late Modern style as applied to an industrial building and represents the work of local master architect Anthony Lumsden of DMJM. It reflects approaches and themes characteristic of Lumsden's work, including explorations into the section as a generator of form; an "extrusion" approach using undulating skins to clad complex rolled shapes; and dynamic rectilinear massing and projections.

However, given its young age, the subject building does not appear to meet the local threshold of "notable work" in comparison to Lumsden's other extant projects in the City of Los Angeles. Buildings such as the Century City Medical Plaza (1969), One Park Plaza (1971), the Century Bank Building (1972), the FAA Building (1973, with Cesar Pelli) and Manufacturers Bank (1974) were internationally published and are widely recognized as pivotal works by Lumsden in his development of the glass skin curtain wall. Others, such as the Hyperion Treatment Plant (1985-1997) and Donald C. Tillman Water Reclamation Facility (1982) feature a high tech, sectionally extruded aesthetic that characterized Lumsden's later work. The Plant does not exhibit characteristics of Lumsden's best-known innovation, the glass skin, nor does it appear to be a pivotal example of his later "high tech" work. It bears mentioning that the City's citywide historic context statement for Late Modernism specifies a period of significance of 1966-1990, and amidst extensive discussion of Anthony Lumsden and his work in Los Angeles, the Los Angeles Times Olympic Printing Plant is not mentioned as a significant work.[76] In contrast, all of the buildings listed above are discussed at some length. The building was also not identified as eligible in the SurveyLA survey of Central City North.

For these reasons, the Plant does not appear to meet HCM Criterion 3 at this time.

[76] Late Modernism HCS.

Los Angeles Historic Preservation Overlay Zone

The Plant's surroundings, both inside and outside of the Project Site, are largely industrial, reflecting a wide range of construction dates, scales, and architectural styles. No single, cohesive development pattern or style is represented, and this area was not identified as a potential Historic Preservation Overlay Zone in the Central City North CPA during SurveyLA. The Plant/Project Site does not appear to be a contributor to a potential Historic Preservation Overlay Zone.

9. Impacts Analysis

9.1 Summary of Historical Resource Findings

The Project Site is improved with an industrial building, the Plant, and associated ancillary buildings and site and landscape features. As discussed in Section 8 of this report, the Plant is not eligible under federal, state, or local designation criteria, and therefore does not meet the definition of a historical resource under CEQA. Thus, there are no historical resources located on the Project Site.

There are two potential historical resources adjacent to (with direct views of) the Project Site that have been determined eligible for designation as part of the SurveyLA surveys of the Central City and Central City North Community Plan Areas. Although a finding of eligibility per SurveyLA in isolation does not meet the definition of historical resource per CEQA, for the purposes of this analysis these resources are being treated as presumed historical resources. Adjacent potential historical resources include:

1. Overland Terminal Produce Warehouse, 872 S. Alameda Street
2. Western Electric Company Historic District, including two buildings located at 800-822 McGarry Street and 1753 E. Olympic Blvd.

The Project Site is outlined in red, and adjacent potential historical resources in blue, numbers corresponding with the list above (base map: Google Earth, 2020).

Overland Terminal Produce Warehouse, 872 S. Alameda Street

The Overland Terminal Produce Warehouse was identified in SurveyLA as an excellent example of a 1930s industrial warehouse building in Los Angeles' primary industrial district, where most examples from the period no longer retain integrity.[77] The 1931 building was found in the survey to be eligible for listing in the National Register, California Register, and as a Los Angeles HCM. The six-story building is located immediately to the southwest of the Project Site, separated from it by Hunter Street and Lawrence Street.

The long, rectangular building is situated on an east-west axis with its long façades facing south onto Olympic Blvd. and north onto Hunter Street. The north façade, which faces the Project Site, is lined at grade with trucking bays, and a surface parking lot is located to the north of the building providing further separation from the Project Site.

Western Electric Company Historic District, 800-822 McGarry Street and 1753 E. Olympic Blvd.

The Western Electric Company Historic District was identified in SurveyLA as an excellent example of an intact 1920s daylight factory. Comprising two contributing buildings on a trapezoidal-shaped property, the complex was found in the survey to be eligible for listing in the National Register, California Register, and as a Los Angeles HCM.[78]

The historic district consists of two contributing buildings, 800-822 McGarry Street and 1753 E. Olympic Blvd. Both buildings were constructed in 1925 and designed by the noted Los Angeles architectural firm, Morgan, Walls and Clements. 800-822 McGarry Street occupies the west side of the property and is five stories tall; 1753 E. Olympic Blvd. is located at the south edge of the property and is four stories tall. The rest of the site is paved for surface parking.

The complex was originally constructed as a manufacturing and distribution center for the Western Electric Company, which manufactured mechanical parts for telephones. When it opened in 1925, the campus provided more than 100,000 square feet of space and an adjoining truck yard.

[77] City of Los Angeles, Historic Places LA, Los Angeles Historic Resources Inventory, accessed 10 February 2021. http://www.historicplacesla.org/reports/994fa608-6f26-44eb-8032-2b839423ca66
[78] City of Los Angeles, Historic Places LA, Los Angeles Historic Resources Inventory, accessed 10 February 2021. http://www.historicplacesla.org/reports/99293d5c-6e6e-400b-81ea-40fdb6e51059

9.2 Significance Threshold

According to the CEQA Guidelines, a project has the potential to impact a historical resource when the project involves a "substantial adverse change" in the resource's significance. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource will be materially impaired."[79]

The significance of a historical resource is materially impaired when a project:

a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resources that convey its historical significance and that justify its inclusion in, or eligibility for, the California of Historical Resources; or

b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code (PRC) of its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project established by a preponderance of evidence that the resource is not historically or culturally significant; or

c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for the purposes of CEQA.

A project that has been determined to conform with the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (the Standards) shall generally be considered to be a project that will not cause a significant impact on a historical resource (Title 14 CCR, Section 15064.5(b)(3).

9.3 Project Description

The Project proposes a change of use and renovation of the existing Plant and vehicular maintenance building and the construction of new studio uses, support/office uses, a shops/office building, a nine-level above-ground parking structure, and three guard booths at 1820-2120 E. 8th Street.; 820-840 S. Alameda Street.; 2150 E. Damon Street; 1301 S. Lemon Street; 1121-1143 Lawrence Street; and 2015-2101 E. Olympic Boulevard (the Project Site). The Project's change of use and renovation would provide approximately 582,400 sf of motion picture and television production sound stage, production support, office and ancillary uses, while the construction of new buildings would provide approximately 249,790 sf of motion picture and television production sound stage, production support, office and ancillary uses.

[79] Title 14 CCR, Section 15064.5

The Project would retain, renovate and change the use of the existing Plant and vehicular maintenance building, in order to provide a total of approximately 582,400 sf of motion picture and television production sound stage, production support, office, and ancillary uses. It would also construct three new, three-story buildings, and one new, two-story building in order to provide approximately 249,600 sf of sound stage, production support, and office uses. The new guard booths would provide 190 sf of floor area. As such, upon completion of renovation and new construction Project's total floor area would be approximately 832,190 sf.

The existing newspaper production plant building would be renovated to include: 11 sound stages totaling 156,100 sf; 215,130 sf of support/office space; 15,600 sf of stage support uses; 55,400 sf of offices; 17,000 sf of post-production facilities; 59,670 sf of mill/shop uses; a 15,500-sf fitness and health center; and 24,000 sf of food services, including a 16,550-sf commissary, 5,800 sf of outdoor dining, and a 1,700-sf café. Renovation of the existing vehicular maintenance building, which is detached from the Plant and located further to the east of the Site along Lemon Street, would provide 24,000 sf of grip and lighting uses.

The Project's three, new three-story buildings, would be located over the western portion of the Site presently improved with surface parking areas. The new, three-story building located directly west of the existing LA Times newspaper production plant would contain two 19,400-sf sound stages, 1,500 sf of stage support uses, and three stories of support/office uses totaling 29,600 sf . The new, three-story building located further west along Alameda Street would contain two 18,600-sf sound stages, 1,200 sf of stage support uses, and three stories of support/office uses totaling 26,550 sf. The new, three-story building located along 8th Street would contain two 19,400-sf sound stages, 1,500 sf of stage support uses, and three stories of support/office uses totaling 29,600 sf.

The Project's new, two-story building would be located along 8th Street, and would maintain approximately 20,700 sf in ground-floor mill/shop uses and 20,700 sf in second-story, office uses.

The Project would also include three new guard booths, including a 100-sf main guard booth, a 40-sf pedestrian guard booth, and a 50-sf truck guard booth. The main guard booth and pedestrian guard booth would be located in the northern portion of the Project Site, adjacent to 8th Street to the north, at the main gate. The truck guard booth would be located at the proposed truck entrance in the southeastern corner of the Project Site, adjacent to Lemon Street to the east.

Parking would be provided at-grade throughout the Site, and in a new 9-level parking structure located at the north of the Site. The Project's at-grade 143 parking spaces would help support the Project's sound stage and production support uses by facilitating transit and loading throughout the Site. The Project's new, 9-level parking structure would provide a total of 1,522 spaces and would reach a maximum height of approximately 106 feet and 3 inches.

The main gate providing ingress and egress to the Project would be located to the south of the intersection between Lawrence Street and 8th Street, along the northern property line of the Site. The Project would also include vehicular egress gates along Hunter Street, Lawrence Street, Olympic Boulevard, and Lemon Street as well as truck gates along Lemon Street.

9.4 Analysis of Direct Project Impacts

As previously stated, there are no historical resources located on the Project Site. Therefore, the Project will not have a direct impact on historical resources.

9.5 Analysis of Indirect Impacts

While there are no historical resources on the Project Site, there are two potential historic resources in its immediate vicinity. An analysis of the effect of the Project on each of these resources follows.

The following historical resources are directly adjacent to the Project Site:[80]

Overland Terminal Produce Warehouse, 872 S. Alameda Street

The Overland Terminal Produce Warehouse (the Warehouse) is located directly to the southwest of the Project Site, on a parcel that is separated from the Project Site by Hunter Street to the north and Lawrence Street to the east. The Warehouse parking lot, which is north of the building, is surrounded by a tall fence and even taller (approximately 12-18' tall) privacy hedge, with an opening for a driveway/vehicular entrance.

The Project Site is currently improved with surface parking in the area directly to the north of the Warehouse. At the Warehouse's eastern edge, it is directly across Lawrence Street from the southwestern edge of the Plant. The Project would reconfigure the existing surface parking lot and add three new three-story soundstage buildings of roughly 49,100 sf to 51,600 sf each. One building would be located along Hunter Street, the other along Alameda Street, and the third along 8th Street. The new buildings along Hunter and Alameda Street will have adjacency to the Warehouse. The Plant, adjacent to the east edge of the Warehouse, will remain unchanged in size and scale.

At six stories tall, the Warehouse will remain considerably larger and taller than the new buildings to be constructed to the north, on the Project Site. The primary public views of the Warehouse are from Olympic Blvd. to the south and Alameda Street to the west, and these views will remain unchanged by the Project, which is located to the north and east. There are no important views of or from the Warehouse from any direction that will be blocked by the Project.

The historic setting of the Warehouse has already been significantly changed due to the construction of the Plant in the late 1980s, replacing what had been an expansive railyard with what appear to have been train sheds immediately to the north of the Warehouse. Therefore, the

[80] For the purposes of this study, ARG has defined adjacent resources as those historic resources with direct adjacency to the Project Site, either within its viewshed or with a view of it. Although there are other historical resources nearby (within a quarter mile radius), they are not within view or direct adjacency of the Project Site and therefore the Project does not have the potential to impact their significance or integrity.

addition of three-story buildings and nine-story parking structure to the north of the Warehouse would not modify or compromise the historic setting of the building; its setting is already lost.

For these reasons, the significance of the Warehouse, which is adjacent to the Project Site, would not be impaired by the Project.

Western Electric Company Historic District, 800-822 McGarry Street and 1753 E. Olympic Blvd.

The Western Electric Company Historic District (the Historic District) comprises two buildings located to the west of the Project Site, across Alameda Street.

The Project would add a three-story soundstage and support/office building of 49,100 sf at the west edge of the Project Site, directly across Alameda from the Historic District.

At four and five stories tall, the two Historic District contributors will remain considerably larger and taller than the new building to be constructed to the east, on the Project Site. The primary public views of the Historic District are from Alameda Street, and these views will remain unchanged by the Project. There are no important views of or from the Historic District from any direction that will be blocked by the Project.

Furthermore, the historic setting of the Western Electric Company Historic District has already been significantly modified due to the removal of structures on its site (on what is currently surface parking) around mid-20th century. The construction of the Plant in the late 1980s further changed its setting, replacing what had been an expansive railyard with what appear to have been train sheds immediately to the east of the historic district. Therefore, the addition of three-story buildings and nine-story parking structure on the Project Site, across Alameda from the potential historic district, would not further modify or compromise its historic setting; its setting is already compromised.

For these reasons, the significance of the Historic District, which is adjacent to the Project Site, would not be impaired by the Project.

10. Conclusion

Upon documentary research, Project Site analysis, the development of historical background, and an evaluation against federal, state, and local eligibility criteria, ARG finds that the Plant is not eligible for listing in the National Register, California Register, or as a Los Angeles Historic-Cultural Monument due to its young age (32 years) and the fact that scholarly evidence does not suggest it is an exceptional or pivotal work of Anthony Lumsden, FAIA, of DMJM.

Pursuant to Section 15064.5(a)(2) of the State CEQA Guidelines (CEQA Guidelines), the term "historical resource" includes a resource listed or determined eligible for listing in the California Register, listed in a local register of historical resources, or identified as significant in an historical resources survey meeting the requirements in Section 5024.1(g) of the PRC. The Los Angeles Times Olympic Printing Plant does not meet any of these requirements. Therefore, the building does not qualify as a historical resource under Section 15064.5(a)(2).

There are no historical resources on the Project Site. There are two potential historic resources adjacent to the Project Site: the Overland Terminal Produce Warehouse, 872 S. Alameda Street; and the Western Electric Company Historic District, including two buildings located at 800-822 McGarry Street and 1753 E. Olympic Blvd. The Project will not impair the significance of either of these potential historic resources.

The Project has not been shown to have either a direct or an indirect impact on historical resources. Therefore, the Project would not result in a cumulative impact to any historical resources, and cumulative impacts to historical resources would be less than significant.

10. References

"Anthony Lumsden." *Los Angeles Conservancy.* Accessed November 2020, https://www.laconservancy.org/architects/anthony-lumsdenHistoric Resources Group.

Berges, Marshall. *The Life and Times of Los Angeles : A Newspaper, a Family, and a City.* New York: Atheneum, 1984.

California Code of Regulations (Title 14, Division 6, Chapter 3, Sections 15000-15387).

California Office of Historic Preservation. *Technical Assistance Series #5: California Register of Historical Resources, The Listing Process.* Sacramento, CA: California Department of Parks and Recreation, n.d.

California Office of Historic Preservation. *Technical Assistance Series #6: California Register and National Register: A Comparison.* Sacramento, CA: California Department of Parks and Recreation, 2001.

California Public Resource Code (Section 21000-21177).

Cayer, Aaron F. "Design and Profit: Architectural Practice in the Age of Accumulation." UCLA Dissertation, 2018.

City of Los Angeles. "SurveyLA Los Angeles Citywide Historic Context Statement: LA Modernism, 1919-1980, Theme: Late Modern, 1966-1990." Prepared by Daniel Paul for the City of Los Angeles, Department of City Planning, Office of Historic Resources, July 2020.

City of Los Angeles Administrative Code (Chapter 9, Section 22.171).

City of Los Angeles Department of Building and Safety. Building Permits. Various dates.

County of Los Angeles. Los Angeles County Tract Maps.

Daniel, Mann, Johnson & Mendenhall. *Architecture at Work : DMJM Design Los Angeles* New York, N.Y: Edizioni Press, 2004.

Dobney, Stephen (editor). *The Master Architect Series II: A.J. Lumsden, Selected and Current Works*. Mulgrave, Victoria: The Images Publishing Group Pty Ltd., 1997.

"DMJM." *Los Angeles Conservancy.* Accessed November 2020, https://www.laconservancy.org/architects/dmjm.

"Frame Finder." Special Research Collections, UCSB Library, University of California Santa Barbara. Accessed November 2020. https://mil.library.ucsb.edu/ap_indexes/FrameFinder/.

Frampton, Kenneth. *Modern Architecture: A Critical History.* London: Thames & Hudson Ltd., 2007.

Geske, Patrick. "Spaceship or Water Recycling Plant? Inside Anthony Lumsden's Toilet Utopia." *Archinet* August 8, 2019. Accessed December 2020, https://archinect.com/features/article/150150597/spaceship-or-water-recycling-plant-inside-anthony-lumsden-s-toilet-utopia.

Grimmer, Anne E. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (Revisions to Kay D. Weeks and Anne E. Grimmer, 1995). Washington, D.C.: U.S. Department of the Interior, National Park Service, Technical Preservation Services, 2017. https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf.

"Historic Aerials." *NETRONLINE*. Accessed November 2020. https://www.historicaerials.com/.

Historic Resources Group. "SurveyLA Historic Resources Survey Report: Central City North Community Plan Area." Prepared for the City of Los Angeles, Department of City Planning, Office of Historic Resources, September 2016.

"Inside the Historic Buildings that Have Defined the Los Angeles Times." *Los Angeles Times.* Accessed December 2020, *https://www.latimes.com/projects/latimes-building/*.

Los Angeles Times. Various dates (as noted in footnotes).

"The Los Angeles Times' History." *Los Angeles Times.* Accessed November 2020, https://www.latimes.com/la-mediagroup-times-history-htmlstory.html.

Lumsden, Anthony. *Anthony Lumsden*. Tokyo: A+U Publ. Co., 1975.

Lumsden, Anthony J. *A.J. Lumsden: selected and current works*. Mulgrave: The Images, 1997.

"Lumsden, Anthony." *AIA Historical Directory of Architects*. Accessed November 2020, https://aiahistoricaldirectory.atlassian.net/.

Mears, Hadley. "From Its Downtown Fortress, the *Los Angeles Times* Built L.A." *Curbed Los Angeles.* Accessed November 2020, https://la.curbed.com/2018/7/13/17558644/los-angeles-times-history-chandler.

Paul, Daniel. "Westward Transitions." In *L.A. Forum for Architecture and Urban Design* Issue 7: Late Moderns, 2015. Accessed January 2021, http://laforum.org/article/westward-transitions/.

"Saeda, Thomas." *AIA Historical Directory of Architects*. Accessed November 2020. https://aiahistoricaldirectory.atlassian.net/.

"Timeline: History of the Los Angeles Times." *KCET.* Accessed November 2020, https://www.kcet.org/shows/inventing-la-the-chandlers-and-their-times/timeline-history-of-the-los-angeles-times.

United States Department of the Interior, National Park Service. National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation.* Washington D.C., U.S. Department of the Interior, National Park Service, 1990, rev, 1997.

Whiteson, Leon. "Anthony Lumsden: A Critical View," in *Space Design Special Feature: Recent Works of Anthony J. Lumsden/DMJM* (Leon Whiteson, Hayahiko Takase, and Anthony Lumsden) November 1993, No. 11(350).