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September 15, 2013

Honorable Bernard Parks, Councilmember, Council District 8
Honorable Herb Wesson, President, Los Angeles City Council
Honorable Members of the Los Angeles City Council
Los Angeles City Council
C/O City Clerk (Sharon.Gin@lacity.org)
200 North Spring Street, Room 395
Los Angeles, CA 90012

RE: 1342 West Adams Blvd., Los Angeles CA 90007
Council File No. 13-0903, Case No. DIR-2012-3128-COA-SPP-1A; ENV-2012-3129-CE

Dear Sir or Madam,

I have been asked by West Adams Heritage Association to render a professional opinion with regard to the determination made by the Los Angeles Office of Historic Resources and Department of City Planning on the William T. Bishop Residence/Roger Williams Baptist Church located at 1342 W. Adams Boulevard. This structure was originally constructed in 1898 and adapted for use as the church in the early 1930's. As an architectural historian and Historic Preservation Consultant with almost 30 years experience, I am particularly qualified to comment on this case. Some months ago I submitted an initial letter regarding this case wherein I was asked to address the application of the Secretary of the Interior Standards. Now I have been requested to render an opinion on the historic significance of the interior features.

The subject building was originally constructed as a lavish residence and later converted to use as a church building. The conversion of mansions along West Adams Boulevard from residential to religious use is not unique. Quite a few have been successfully adapted to accommodate the usage while continuing to respect the historic nature and distinctive characteristics of the original structures. For the project that has been proposed for the Bishop/Roger Williams property, no attempt has been made to assimilate the existing features with the proposed new usage although successful models were easily accessible for review.

A historic building is more than a managed façade. Interior features are a critical component of such a property. A radical interior reconstruction produces a "disconnect" for the visitor, who expects at least a reasonable transition and connection between outside and in. Although it is possible to make alterations to an interior without destroying the essential character, the current conditions demonstrate wholesale removal rather than the preparation of a Historic Structures/Assessment Report, which is the professional standard. Careful review of "before and after" photographs shows that many character-defining features along with basic finish construction materials have been removed.

The Secretary of the Interior Standards are very clear about how a historic property or potential historic property should be treated. This project has violated every one of them, which I have listed below for your convenient review along with comments relevant to the proposed project.

CALIFORNIA STATE OFFICE OF HISTORIC PRESERVATION
Department of Parks & Recreation

TECHNICAL ASSISTANCE BULLETIN #8

User's Guide to the
California Historical Resource Status Codes
&
Historic Resources Inventory Directory

This Technical Assistance Bulletin #8 provides guidance on use of the California Historical Resource Status Codes (adopted by the Office of Historic Preservation in August 2003, formerly known as the National Register Status Codes) and provides a key to the programmatic and evaluation codes used in the Statewide Historical Resources Inventory (HRI) database maintained by the Office of Historic Preservation (OHP) and the California Historical Resources Information System (CHRIS).

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November 2004

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GUIDE TO THE CALIFORNIA HISTORICAL RESOURCE STATUS CODES

Background

The Office of Historic Preservation (OHP) initially created the *National Register Status Codes* in 1975 as a database tool to classify historical resources in the state's inventory which had been identified through a regulatory process or local government survey. In the early 1990s, a system of complex elaborations on the code groups was adopted which resulted in nearly 150 individual codes. Many were ambiguously defined; others were never even used. Implicit within the status codes was a hierarchy reflecting the level of identification, evaluation and designation to which a property had been subjected which did not always convey the significance of the resource for purposes of the *California Environmental Quality Act (CEQA)*.

The *California Register of Historical Resources* was created in 1998 by an act of the State Legislature. Under the provisions of that legislation, the following resources are automatically included in the California Register:

- Resources formally determined eligible for, or listed in, the *National Register of Historic Places* through federal preservation programs administered by the Office of Historic Preservation, including the National Register program; the Tax Certification program; National Historic Preservation Act Section 106 reviews of federal undertakings;
- State Historical Landmarks (SHL) numbered 770 or higher; and
- Points of Historical Interest (PHI) recommended for listing in the California Register by the State Historical Resources Commission.

For the purposes of CEQA, resources eligible for or listed in the California Register are, by definition, "historical resources." Additionally, resources included in a local register of historical resources or deemed significant, i.e., given a status code 3-5 in a survey meeting OHP's requirements, are presumed to be historically or culturally significant for purposes of CEQA.

In spite of the need to identify resources eligible for the California Register for CEQA purposes, the NRHP codes only addressed National Register and local eligibility. As a consequence, by failing to address California Register eligibility, environmental review and local land use planning decisions which relied on the status codes assigned prior to 2004 may have been made on the basis of incomplete information.

Effective August 2003, in order to simplify and clarify the identification, evaluation, and understanding of California's historic resources and better promote their recognition and

preservation, the (former) National Register status codes were revised to reflect the application of California Register and local criteria and the name was changed to “California Historical Resource Status Codes.”

CALIFORNIA HISTORICAL RESOURCE STATUS CODES

(effective as of August 2003)

Available online in a single page format at http://www.ohp.parks.ca.gov/default.asp?page_id=1069

1 Properties listed in the National Register (NR) or the California Register (CR)

- 1D Contributor to a district or multiple resource property listed in NR by the Keeper. Listed in the CR.
- 1S Individual property listed in NR by the Keeper. Listed in the CR.

- 1CD Listed in the CR as a contributor to a district or multiple resource property by the SHRC
- 1CS Listed in the CR as individual property by the SHRC.
- 1CL Automatically listed in the California Register – Includes State Historical Landmarks 770 and above and Points of Historical Interest nominated after December 1997 and recommended for listing by the SHRC.

2 Properties determined eligible for listing in the National Register (NR) or the California Register (CR)

- 2B Determined eligible for NR as an individual property and as a contributor to an eligible district in a federal regulatory process. Listed in the CR.
- 2D Contributor to a district determined eligible for NR by the Keeper. Listed in CR.
- 2D2 Contributor to a district determined eligible for NR by consensus through Section 106 process. Listed in CR.
- 2D3 Contributor to a district determined eligible for NR by Part I Tax Certification. Listed in CR.
- 2D4 Contributor to a district determined eligible for NR pursuant to Section 106 without review by SHPO. Listed in CR.
- 2S Individual property determined eligible for NR by the Keeper. Listed in CR.
- 2S2 Individual property determined eligible for NR by a consensus through Section 106 process. Listed in CR.
- 2S3 Individual property determined eligible for NR by Part I Tax Certification. Listed in CR.
- 2S4 Individual property determined eligible for NR pursuant to Section 106 without review by SHPO. Listed in CR.

- 2CB Determined eligible for CR as an individual property and as a contributor to an eligible district by the SHRC.
- 2CD Contributor to a district determined eligible for listing in the CR by the SHRC.
- 2CS Individual property determined eligible for listing in the CR by the SHRC.

3 Appears eligible for National Register (NR) or California Register (CR) through Survey Evaluation

- 3B Appears eligible for NR both individually and as a contributor to a NR eligible district through survey evaluation.
- 3D Appears eligible for NR as a contributor to a NR eligible district through survey evaluation.
- 3S Appears eligible for NR as an individual property through survey evaluation.

- 3CB Appears eligible for CR both individually and as a contributor to a CR eligible district through a survey evaluation.
- 3CD Appears eligible for CR as a contributor to a CR eligible district through a survey evaluation.
- 3CS Appears eligible for CR as an individual property through survey evaluation.

4 Appears eligible for National Register (NR) or California Register (CR) through other evaluation

- 4CM Master List - State Owned Properties – PRC §5024.

5 Properties Recognized as Historically Significant by Local Government

- 5D1 Contributor to a district that is listed or designated locally.
- 5D2 Contributor to a district that is eligible for local listing or designation.
- 5D3 Appears to be a contributor to a district that appears eligible for local listing or designation through survey evaluation.

- 5S1 Individual property that is listed or designated locally.
- 5S2 Individual property that is eligible for local listing or designation.
- 5S3 Appears to individually eligible for local listing or designation through survey evaluation.

- 5B Locally significant both individually (listed, eligible, or appears eligible) and as contributor to a district that is locally listed, designated, determined eligible, or appears eligible through survey evaluation.

6 Not Eligible for Listing or Designation as specified

- 6C Determined ineligible for or removed from California Register by SHRC.
- 6J Landmarks or Points of Interest found ineligible for designation by SHRC.
- 6L Determined ineligible for local listing or designation through local government review process; may warrant special consideration in local planning.
- 6T Determined ineligible for NR through Part I Tax Certification process.
- 6U Determined ineligible for NR pursuant to Section 106 without review by SHPO.
- 6W Removed from NR by the Keeper.
- 6X Determined ineligible for the NR by SHRC or Keeper.
- 6Y Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or Local Listing.
- 6Z Found ineligible for NR, CR or Local designation through survey evaluation.

7 Not Evaluated for National Register (NR) or California Register (CR) or Needs Reevaluation

- 7J Received by OHP for evaluation or action but not yet evaluated.
- 7K Resubmitted to OHP for action but not reevaluated.
- 7L State Historical Landmarks 1-769 and Points of Historical Interest designated prior to January 1998 – Needs to be reevaluated using current standards.
- 7M Submitted to OHP but not evaluated - referred to NPS.
- 7N Needs to be reevaluated (Formerly NR Status Code 4)
- 7N1 Needs to be reevaluated (Formerly NR SC4) – may become eligible for NR w/restoration or when meets other specific conditions.
- 7R Identified in Reconnaissance Level Survey: Not evaluated.
- 7W Submitted to OHP for action – withdrawn.

Using Status Codes

Users of the California Historic Resource Status Codes should keep in mind that the status codes are broad indicators which, in most cases, serve as a starting place for further consideration and evaluations. Because the assigned status code reflects an *opinion* or *action* taken at a *specific point in time*, the assigned status code may not accurately reflect the resource's eligibility for the National Register, California Register, or local listing or designation at some later time.

Individuals and agencies attempting to identify and evaluate historical resources need to consider the basis for evaluation upon which a particular code was assigned, i.e., date of evaluation, the reason and criteria applied for evaluation, the age of the resource at the time of evaluation, and any changes that may have been made to the resource that would impact its integrity. Keep in mind that:

- Older surveys and evaluations were biased towards architectural values (Criteria C (NR) and 3 (CR)). Resources may not have been evaluated for significance for their association with important event or people or their information potential.
- Identification and evaluation of resources in compliance with Section 106 does not involve evaluations for the California Register or any local designations.
- Because the California Register was not implemented before 1999, relatively few resources in the HRI have been evaluated for eligibility for the California Register.
- Because the National Register generally excludes resources less than fifty years old, resources that were once determined ineligible for the National Register because they were less than 50 years of age, need to be reevaluated for eligibility after they have aged.
- Our understanding of historical significance changes over time. In 2004, there is a greater appreciation and understanding of social and cultural history than in earlier years. Understanding of the importance of cultural landscapes and resources of the recent past is evolving as historic preservationists are grappling with how to recognize and characterize these types of resources.

Assigning Status Codes

In many cases, more than one status code logically could be assigned. Since resources listed in or determined eligible for the National Register are automatically listed in the California Register, it is not necessary to use codes for both the National register and the California Register.

Resources identified and evaluated in local government surveys may appear to be eligible for the National Register or the California Register as well as be a locally designated landmark or eligible for local designation. For local government purposes, it may be desirable to show more than one code. However, when the data is incorporated into the HRI, the code with the lowest initial number (1-5) will be used.

Example:

Codes assigned in survey - 3S/5S1

Code assigned in data base – 3S

Because resources may meet the criteria for multiple designations, it is important to include that information in the significance statements on the DPR 523B forms or in a narrative evaluation.

Highlights of Status Codes Revisions

The codes revision undertaken in 2003 clarified definitions, consolidated groups of closely related codes, and created new codes to reflect the evaluation of resources for the California Register. **Note that the code elaborations, i.e., 2D2 or 5D1, serve OHP's data management purposes. For CEQA purposes, it is the initial code, 1- 5, that is relevant.**

- Under the broad definition for status code 1, “*Properties listed in the National Register (NR) or the California Register (CR)*,” 1D and 1S will continue to signify National Register listing as they have in the past. Additions of 1CD, 1CS, and 1CL will denote resources listed on the California Register by the State Historical Resources Commission, paralleling formal listing on the National Register by the Keeper. Because properties listed in or formally determined eligible for listing in the NR are automatically listed in the California Register, there is no need to assign dual codes.
- The definition of status code 2 is broadened to “*Properties determined eligible for listing in the National Register (NR) or the California Register (CR)*.” Just as 2s were previously used and will continue to be used to identify resources formally determined eligible for the National Register through a regulatory process, 2Cs will identify resources formally determined eligible for the California Register by the State Historical Resources Commission.
- The parallel between the resources identified through a survey as appearing eligible for the National Register and those which appear eligible for the California Register are reflected in the 3 codes which are broadly defined as “*Appears eligible for National Register (NR) or California Register (CR) through Survey Evaluation*.”
- Formerly, 4s were assigned through surveys to properties that had the potential, if some circumstance or event was to happen in the future, to become eligible for the National Register. Thus by definition, resources identified as 4s were not eligible for the National Register. Yet under CEQA, they were presumed to be historical resources. OHP will convert all former 4s to either a 7N or 7N1, whichever is appropriate, to signify that these resources need to be reevaluated using current standards and applying both National Register and California Register criteria. Henceforth, a status code of 4 will be broadly defined as “*Appears eligible for National Register (NR) or California Register (CR) through other evaluation*,” and will be used to denote those state owned properties evaluated pursuant to Public Resources Code §5024.

- To facilitate their CEQA reviews and making other land use planning decisions, local governments asked for codes that more clearly identified locally significant properties that are not eligible for either NR or CR. The 5 status codes are broadly defined as *“Properties Recognized as Historically Significant by Local Government.”*

Formerly, status codes 5S3 and 5D3 were used to identify properties that were not eligible for the California Register, National Register or local listing but warranted special consideration in local planning, will be converted to 6L, *“Determined ineligible for local listing or designation through local government review process; may warrant special consideration in local planning.”*

Under the CHRS codes, 5D3 and 5S3 now will be used to identify resources which appear eligible for local designation through a historic resources survey evaluation. 5B is used to identify resources that are locally significant both individually (listed, designated, eligible for listing or designation, or appears eligible for local listing through a survey evaluation) and as a contributor to a district that is locally listed or designated, determined eligible, or appears eligible for local listing through a survey evaluation.

- The broad definition of status code 6 is now *“Not Eligible for Listing or Designation as specified.”* Several of the 6 status codes denote *only* that a resource was evaluated and determined ineligible for the National Register through a regulatory process; as the resource was not evaluated for the California Register or local significance, it should be evaluated, using current standards, for the California Register and/or local designations. Resources formerly identified as not eligible for the National Register may be eligible for the California Register or meet locally established criteria and thus still warrant consideration under CEQA or at a local level under a local ordinance.
- Similarly, resources given a status code 7, have either not been evaluated for the National Register (NR) or the California Register (CR) or need reevaluation. It can not be assumed that they are not historic resources; they need to be evaluated using current standards and criteria.

Code Conversions

At some point in the future, National Register Status Codes entered into the Historic Resources Inventory data base prior to August 2003 will be converted to the revised California Historical Resource Status Codes. In cases where the status code assigned in the past can be converted to more than one new code, the program code will be used to help determine the new status code. (Note: Until the conversion is complete, the old codes will continue to appear in the inventory.)

| Old NR Status Code | DESCRIPTION of former NR Status Codes | NEW CHR STATUS CODE |
|---------------------------|---|----------------------------|
| 1 | Property is listed on the Nat. Register. | 1S OR 1D |
| 1B | Listed in NR as an individual property and as a Contributor. | 1S OR 1D |
| 1D | Listed in NR as a Contributor to a district or multi. resource property. | 1D |
| 1S | Listed in NR as an individual property. | 1S |
| 2 | Determined elig. for Nat. Register in a formal process. | 2S, 2D, 2B |
| 2B | Deter. elig. for NR as separate and as a contributor. | 2B |
| 2B1 | Determined elig. by the Keeper for separate and as a contributor. | 2B |
| 2B2 | Det. elig. by Keeper as separate & as a contributor by consensus. | 2B |
| 2B3 | Det. elig. as separate by consensus and as contributor by Keeper. | 2B |
| 2B4 | Determined elig. by consensus as separate and as a contributor. | 2B |
| 2D | Determined elig. for Nat. Reg. as a contributor to a district. | 2D |
| 2D1 | Determined elig. for listing as a contributor by the Keeper. | 2D |
| 2D2 | Determined elig. for listing as a contributor by consensus det. | 2D |
| 2D3 | Det. elig. for NR list as a contrib. by other than cons. det. or keeper. | 2D |
| 2D4 | Det. elig. for NR as a contrib. by MOA Participant w/o review by OHP | 2D |
| 2S | Determined elig. for Nat. Reg. as separate listing. | 2S |
| 2S1 | Determined elig. for separate listing by the Keeper. | 2S |
| 2S2 | Det. elig. for separate listing by a consensus determination. | 2S |
| 2S3 | Det. elig. for NR list as individ. by other than cons. det. or keeper. | 2S |
| 2S4 | Det. elig. for separate listing by MOA Participant without review by OHP | 2S |
| 3 | Appears elig. for NR to person completing or reviewing form. | 3S, 3D, 3B |
| 3B | Appears elig. as sep. and as contributor to a documented district. | 3B |
| 3D | Appears elig. as contributor to a fully documented district. | 3D |
| 3S | Appears eligible for listing in NR as a separate property. | 3S |
| 4 | Might become eligible for listing on the Nat. Register. | 7N |
| 4B | May become elig. for NR as separate and as a contributor. | 7N |
| 4B1 | May become elig. for NR under 4S1 and 4D1-4D8 or 4M1-4M8. | 7N |
| 4B2 | May become elig. for NR under 4S2 and 4D1-4D8 or 4M1-4M8. | 7N |
| 4B3 | May become elig. for NR under 4S3 and 4D1-4D8 or 4M1-4M8. | 7N |
| 4B4 | May become elig. for NR under 4S4 and 4D1-4D8 or 4M1-4M8. | 7N |
| 4B5 | May become elig. for NR under 4S5 and 4D1-4D8 or 4M1-4M8. | 7N |
| 4B6 | May become elig. for NR under 4S6 and 4D1-4D8 or 4M1-4M8. | 7N |
| 4B7 | May become elig. for NR under 4S7 and 4D1-4D8 or 4M1-4M8. | 7N |
| 4B8 | May become elig. for NR under 4S8 and 4D1-4D8 or 4M1-4M8. | 7N |
| 4D | May become elig. for NR as a contributing property. | 7N |
| 4D1 | May become elig. for NR as contrib. when Dist. becomes old enough. | 7N |
| 4D2 | May become elig. for NR as contributor with more research on Dist. | 7N1 |
| 4D3 | May become elig. for NR as contrib. if context info. is expanded. | 7N1 |
| 4D4 | May become elig. for NR as contrib. if approp. prop. type defined. | 7N1 |
| 4D5 | May become elig. for NR as contrib. when prop. types are clarified. | 7N1 |
| 4D6 | May become elig. NR as contrib. if Dist. is eval. in diff. context. | 7N1 |
| 4D7 | May become elig. for NR as contrib. if integrity of Dist. is restored. | 7N1 |
| 4D8 | May become elig. for NR as contrib. when other like Dist. are lost. | 7N1 |
| 4M | May become elig. for NR as a contributor. | 7N |
| 4M1 | May become elig. NR as contrib. if restored and Dist. becomes old enough. | 7N1 |

| Old NR Status Code | DESCRIPTION of former NR Status Codes | NEW CHR STATUS CODE |
|---------------------------|--|----------------------------|
| 4M2 | May become elig. for NR as contrib. if restrd & more research on Dist. | 7N1 |
| 4M3 | May become elig. for NR as contrib. if restrd & context is expanded. | 7N1 |
| 4M4 | May become elig. NR as contrib. if restrd & approp. prop. type is defined. | 7N1 |
| 4M5 | May become elig. NR as contrib. if restrd & prop. types are clarified. | 7N1 |
| 4M6 | May become elig. NR as contrib. if rstrd & Dist. eval. in diff. context. | 7N1 |
| 4M7 | May become elig. NR as contrib. if rstrd & integ.of Dist. is rstrd. | 7N1 |
| 4M8 | May become elig. NR as contrib. if rstrd & oth like Dist. are lost. | 7N |
| 4R | May become a contributor to a listed/elig./appears. elig. dist. | 7N |
| 4S | May become elig. for NR as a separate property. | 7N |
| 4S1 | May become elig. for NR as separate when it becomes old enough. | 7N1 |
| 4S2 | May become elig. for NR as separate with more research. | 7N1 |
| 4S3 | May become elig. for NR as separate if context info. is expanded. | 7N1 |
| 4S4 | May become elig. for NR as sep. if more approp. prop. type is def. | 7N1 |
| 4S5 | May become elig. for NR as sep. when regis.requirements are clarified. | 7N1 |
| 4S6 | May become elig. for NR as separate when eval. in another context. | 7N1 |
| 4S7 | May become elig. for NR as sep. when its integrity is restored. | 7N1 |
| 4S8 | May become elig. for NR as sep. when other like prop. are lost. | 7N |
| 4X | May become elig. for NR as contrib. to District that has not been doc. | 7N |
| 5 | Ineligible for the NR but still of local interest. | 5D1, 5D2, 5S, 5S2 |
| 5B | Elig. for Loc List only - Both as separate property and as contrib. | 5B |
| 5B1 | Eligible for Local Listing only - Both 5S1 and 5D1. | 5B |
| 5B2 | Eligible for Local Listing only - Both 5S2 and 5D2. | 5B |
| 5B3 | Not Elig. Loc List but for spec. consid. in Loc Plan - Both 5S3 and 5D3. | 6L |
| 5B4 | Elig. for Loc List only - Both 5S1 and 5D2. | 5B |
| 5B5 | Elig. for Loc List only - Both 5S1 and 5D3. | 6L |
| 5B6 | Elig. for Loc List only - Both 5S2 and 5D1. | 5B |
| 5B7 | Elig. for Loc List only - Both 5S2 and 5D2. | 5B |
| 5B8 | Elig. for Loc List only - Both 5S3 and 5D1. | 5B |
| 5B9 | Elig. for Loc List only - Both 5S3 and 5D2. | 5B |
| 5D | Elig. for Local Listing as contributor only. | 5D2 |
| 5D1 | Elig. for Local Listing only-contributor to District listed or eligible under Local Ordinance | 5D1 |
| 5D2 | Elig. for Local Listing only-contributor to District listed or eligible under possible Local Ordinance | 5D2 |
| 5D3 | Not Elig. for Local Listing-contributor to District eligible for special consideration in Local Planning | 6L |
| 5N | Not Elig. for anything but Needs special consid. for other reasons. | 6L |
| 5S | Eligible for Local Listing only. | 5S2 |
| 5S1 | Elig for Local Listing only-listed or elig separately under Local Ordinance | 5S1 |
| 5S2 | Eligible for Local Listing only-likely to become eligible under Local Ordinance | 5S2 |
| 5S3 | Not Elig for Local Listing-is elig for special consid in Local Planning | 6L |
| 5X | Unknown | not used |
| 6 | Det. inelig. for National Register listing. | 6T, 6U, 6X, 6Y, or 6Z |
| 6CW | Removed from the Cal. Register by the SHRC | 6C |

| Old NR Status Code | DESCRIPTION of former NR Status Codes | NEW CHR STATUS CODE |
|---------------------------|--|----------------------------|
| 6CX | Determined ineligible for listing in the Cal. Register by the SHRC | 6C |
| 6U | Determined inelig. for NR by MOA Participant without review by SHPO | 6U |
| 6U1 | Determined inelig. for NR pursuant to a PA. | 6U |
| 6U2 | Det. inelig. for NR pursuant to Part 800 without review by SHPO. | 6U |
| 6W | Removed from Nat. Reg. by Keeper. | 6W |
| 6W1 | Removed from Nat. Reg. by Keeper - Listed Property destroyed. | 6W |
| 6W2 | Removed from NR by Keeper - Property still extant - not re-evaluated. | 6W |
| 6W3 | Dist. Rmvd from NR by Kpr - Prop. extant - Appears individually elig. | 6W |
| 6X | Determined inelig. for NR by Keeper. | 6X |
| 6X1 | Det. inelig. for NR by Keeper with no potential for any listing. | 6X |
| 6X2 | Det. inelig. NR by Keeper, no potential for NR, n/eval for Loc List. | 6X |
| 6X3 | Det. inelig. NR by Kpr, n/eval potential NR, n/eval Loc List. | 6X |
| 6Y | Det. inelig. for NR by consensus. | 6Y |
| 6Y1 | Det. inelig. for NR by consensus with no potential for any listing. | 6Y |
| 6Y2 | Det. Inelig. NR by consensus, no potential NR, n/eval for Loc List. | 6Y |
| 6Y3 | Det. inelig. NR by consen., n/eval potential NR, n/eval Loc List. | 6Y |
| 6Y4 | Det. inelig. NR/consensus, appears elig. for Loc. List or may become elig. for NR | 6Y |
| 6Z | Found inelig. for NR. | 6Z, 6U, 6X, 6Y, or 6Z |
| 6Z1 | Found inelig. for NR with no potential for any listing. | 6T, 6U, 6X, 6Y, or 6Z |
| 6Z2 | Found inelig. for NR, no potential for NR, n/eval for Loc List. | 6T, 6U, 6X, 6Y, or 6Z |
| 6Z3 | Found.inelig. NR, n/eval for potential for NR, n/eval for Loc Lst. | 6T, 6U, 6X, 6Y, or 6Z |
| 7 | Not evaluated. | 7W, 7R, or possible 6s |
| 7C | SUBMITTED TO AN INFORMATION CENTER - NOT EVALUATED | removed |
| 7CD1 | Contributor to a district listed in the Cal. Register by the SHRC | 1CD |
| 7CD2 | Contributor to a district det elig for listing in the Cal Reg by the SHRC | 2CD |
| 7CRD | CR district contributor automatically by being NR-listed, det. elig. for NR, SHL > 770, or SPHI after 1/1/1998 | 1CL, 2B, 2S, or 2D |
| 7CRS | CR Individual property listed automatically by being NR-listed, det. elig. for NR, SHL > 770, or SPHI after 1/1/1998 | 1CL, 2B, 2S, or 2D |
| 7CS1 | Individual property listed in the Cal Register by the SHRC | 1CS |
| 7CS2 | Individual property det elig for listing in the Cal Register by the SHRC | 2CS |
| 7J | Received by OHP for evaluation or action but not yet evaluated. | 7J, 7K, 7W |
| 7K | Resubmitted to OHP for action but not reevaluated. | 7K |
| 7L | Evaluated for a Register other than the National Register. | 7L, 1CL |
| 7M | Submitted to OHP for eval. but not evaluated - referred to NPS. | 7M |
| 7R | Submitted as Part of a Recon Level Survey: NOT EVALUATED! | 7R |
| None | Property without evaluation status (Mistakes) | evaluate |

GUIDE TO THE HISTORIC RESOURCES INVENTORY DIRECTORY

Pursuant to federal and state laws, the California Office of Historic Preservation (OHP) is charged with the responsibility of maintaining a statewide inventory of historical resources identified and evaluated through federal and state programs managed by OHP. The California Historical Resources Information System (CHRIS) includes the Historical Resources Inventory (HRI), information on resources which has been acquired and managed by OHP since 1975, as well as information and records maintained and managed, under contract, by the independent regional Information Centers (ICs) located throughout California and the maintained by OHP.

Individuals and government agencies seeking information on cultural and historical resources should begin their research by contacting the regional Information Center which services the county in which the resource is located. The IC Roster which identifies the locations, contact information, and counties served by each regional IC is available online at <http://www.ohp.parks.ca.gov/pages/1068/files/IC%20Roster.pdf>.

Information Centers

Twelve independent regional **Information Centers** (ICs) provide archeological and historical resources information, on a fee-for-service basis, to local governments and individuals with responsibilities under the National Environmental Policy Act (NEPA), the National Historic Preservation Act (NHPA), and the California Environmental Quality Act (CEQA), as well as to the general public. In addition to providing public access to the Historical Resources Inventory (HRI) maintained by OHP, the Information Centers collect and maintain information on historical and archaeological resources which was not reviewed under a program administered by OHP nor included in the HRI maintained by OHP.

Information available at the ICs includes, but is not limited to, the following, which may or may not have also been submitted to OHP:

- Information on historic resources identified in local government surveys or in local registers, ordinances, or through local planning processes as well as CEQA evaluations.
- Individual property evaluations which are not prepared as part of the federal regulatory process, including information on resources identified and evaluated in CEQA documents.

- Archaeological surveys performed by academic or avocational groups which are not associated with federal projects;
- Archeological and/or historical resource surveys conducted by agencies for planning purposes that do not involve an undertaking subject to review under Section 106 of the NHPA

Historical Resources Inventory

The **Historical Resources Inventory** (HRI) maintained by OHP includes *only* information on historical resources that have been identified and evaluated through one of the programs that OHP administers under the National Historic Preservation Act or the California Public Resources Code. The HRI includes data on:

- Resources evaluated in local government historical resource surveys partially funded through Certified Local Government grants or in surveys which local governments have submitted for inclusion in the statewide inventory;
- Resources evaluated and determinations of eligibility (DOEs) made in compliance with Section 106 of the National Historic Preservation Act;
- Resources evaluated for federal tax credit certifications;
- Resources considered for listing in the National and California Registers or as California State Landmarks or Points of Historical Interest.

Additional Sources of Historical Resources Information

Although the HRI includes more than 200,000 resources, it is not a comprehensive listing of all the known historic resources in the State of California.

- Local governments as well as private cultural resources consulting firms also collect and maintain records on historical resources that are not incorporated into the statewide inventory and may not have been submitted to the appropriate regional IC.
- Information on historical resources included in the **Sacred Lands Inventory** is maintained by the Native American Heritage Commission.

Native American Heritage Commission
 915 Capitol Mall, Room 364
 Sacramento, CA 95814
 (916) 653-4082
nahc@pacbell.net
<http://ceres.ca.gov/nahc/>

- Information on historical resources identified in the **Submerged Shipwrecks Inventory** is maintained by the California State Lands Commission available online at <http://shipwrecks.slc.ca.gov/>.

California State Lands Commission
100 Howe Ave., Suite 100 South
Sacramento, CA 95825-8202
(916) 574-1900
FAX (916) 574-1810
<http://www.slc.ca.gov/>

Historical Resources Inventory Directory

Information on resources submitted to and evaluated by OHP is recorded in OHP's archeological inventory or historical resource inventory databases. When information on a historic resource is entered into the inventory database, the resource is assigned a property number and the data captured on DPR 523 forms or other submittal documents is summarized in the Historic Resources Inventory (HRI) database. Archeological resources are identified with a trinomial number assigned by the Information Center that services the area within which the resource is located. Archeological site information is protected and is not available to the general public. (*See California Government Code Section 6254.10 and Section 304 of the NHPA, (16 USC 470w-3)*).

The HRI directory lists all the properties within a specified area (city, county, forest, or military installation) for which information has been entered into the HRI by OHP. Additional information for individual properties listed in the directory is displayed on the HRI printout.

An HRI directory printout can be generated in the following formats.

- Summarizes resource information for a specified county including the property-number, primary-number, street address, resource name, city name, type of ownership, year of construction, OHP program, program reference-number, status date, historical resource status code, and evaluation criteria. This is the format used for the directory updated and provided quarterly to the Information Centers.
- Summarizes resource information drawn from the property database for a specific city, county, military installation, or forest including the street address, resource name, parcel-number, type of ownership, year of construction, property type, number of resources included within a district, designations under programs other than the National Register, landmark number if applicable, property number, OHP program, program reference number, status date, status code, and applicable criteria.. An annual report is provided to Certified Local Governments using this format.

- Using selection criteria from any combination of database fields, a customizable report can be generated in response to a query requesting data from specific fields.

Note: Over the years, OHP has used a number of paper and electronic database systems and different data capture protocols. Conversion from an older system to a later system has occasionally resulted in fields for which there is no data and other minor inconsistencies. There is also evidence that some data may have been lost in the processes of conversion.

Sample Page from Historic Resources Inventory Directory

Below is a sample page from a directory printout for the County of Santa Clara. The large bold numbers denote specific items which are explained on subsequent pages. The Directory Key which follows explains the meanings of the codes used in the data fields for the directory and single property printouts.

OFFICE OF HISTORIC PRESERVATION

Directory of Properties in the Historic Property Data File for SANTA CLARA County.

| PROPERTY-NUMBER | PRIMARY # | STREET.ADDRESS | RESOURCE NAME | CITY | OWN | YR-C | OHP-PROG | PRG-REFERENCE-NUMBER | STAT-DAT | Status Code | CRIT |
|-----------------|-----------|----------------|---|-----------|-----|------|------------|----------------------|----------|-------------|------|
| 1 136554 | 1985 | LOUIS RD | CONGREGATIONAL CHURCH | PALO ALTO | P | | HIST.RES. | DOE-42-02-0029-0000 | 12/18/02 | 6Y | |
| 1 136554 | 1985 | LOUIS RD | CONGREGATIONAL CHURCH | PALO ALTO | P | | PROJ.REVW. | FCC020816B | 12/18/02 | 6Y | |
| 2 008509 | 601 | MELVILLE AVE | ALLEN, THEOPHILUS,HOUSE | PALO ALTO | P | 1905 | HIST.RES. | NPS-99000580-9999 | 05/20/99 | 1S | C |
| 2 008509 | 601 | MELVILLE AVE | ALLEN, THEOPHILUS,HOUSE | PALO ALTO | P | 1905 | NAT.REG. | 43-0042 | 05/20/99 | 1S | C |
| 008509 | 601 | MELVILLE AVE | ALLEN, THEOPHILUS,HOUSE | PALO ALTO | P | 1905 | HIST.SURV. | 4302-0296-0000 | | 3S | |
| 121177 | 601 | MELVILLE AVE | ALLEN, THEOPHILUS,GARAGE | PALO ALTO | P | 1905 | HIST.RES. | NPS-99000580-0001 | 05/20/99 | 1D | C |
| 121178 | 601 | MELVILLE AVE | ALLEN, THEOPHILUS, COTTAGE | PALO ALTO | P | 1905 | HIST.RES. | NPS-99000580-0002 | 05/20/99 | 1D | C |
| 3 079265 | 0 | RAMONA ST | RAMONA STREET ARCHITECTL DISTRICT | PALO ALTO | P | 1924 | HIST.SURV. | 4302-0431-9999 | 03/27/86 | 1S | C |
| 4 008527 | 518 | RAMONA ST | GOTHAM SHOP | PALO ALTO | P | 1925 | HIST.SURV. | 4302-0314-0000 | | 3S | |
| 4 008527 | 518 | RAMONA ST | GOTHAM SHOP | PALO ALTO | P | 1925 | HIST.SURV. | 4302-0431-0001 | 03/27/86 | 1D | C |
| 008528 | 526 | RAMONA ST | GALLERY HOUSE | PALO ALTO | P | 1926 | HIST.SURV. | 4302-0315-0000 | | 3S | |
| 008528 | 526 | RAMONA ST | GALLERY HOUSE | PALO ALTO | P | 1926 | HIST.SURV. | 4302-0431-0002 | 03/27/86 | 1D | C |
| 5 127964 | 528 | RAMONA ST | 528-530 RAMONA STREET | PALO ALTO | | 1926 | TAX.CERT. | 537.9-43-0046 | 07/23/01 | 7J | |
| 008530 | 532 | RAMONA ST | UNIVERSITY TRAVEL | PALO ALTO | P | 1926 | HIST.SURV. | 4302-0317-0000 | | 3S | |
| 008530 | 532 | RAMONA ST | UNIVERSITY TRAVEL | PALO ALTO | P | 1926 | HIST.SURV. | 4302-0431-0003 | 03/27/86 | 1D | C |
| 008531 | 538 | RAMONA ST | THE PHOTOGRAPHERS GALLERY, | PALO ALTO | P | 1926 | HIST.SURV. | 4302-0318-0000 | | 3S | |
| 008531 | 538 | RAMONA ST | THE PHOTOGRAPHERS GALLERY, | PALO ALTO | P | 1926 | HIST.SURV. | 4302-0431-0004 | 03/27/86 | 1D | C |
| 008532 | 541 | RAMONA ST | RAMONAS RESTAURANT | PALO ALTO | P | 1929 | HIST.SURV. | 4302-0319-0000 | | 3S | |
| 008532 | 541 | RAMONA ST | RAMONAS RESTAURANT | PALO ALTO | P | 1929 | HIST.SURV. | 4302-0431-0007 | 03/27/86 | 1D | C |
| 008535 | 668 | RAMONA ST | PALO ALTO ART CLUB | PALO ALTO | P | 1927 | HIST.SURV. | 4302-0322-0000 | | 3S | |
| 6 008535 | 668 | RAMONA ST | PALO ALTO ART CLUB | PALO ALTO | P | 1927 | HIST.RES. | DOE-43-98-0015-0000 | 06/18/98 | 2S2 | C |
| 6 008535 | 668 | RAMONA ST | PALO ALTO ART CLUB | PALO ALTO | P | 1927 | PROJ.REVW. | HUD980511A | 06/18/98 | 2S2 | C |
| 7 008537 | 819 | RAMONA ST | UNIVERSITY AFRICAN METHODIST EPISCOPAL ZION CHURCH | PALO ALTO | P | 1924 | HIST.RES. | NPS-96000297-0000 | 03/29/96 | 2S | A |
| 7 008537 | 819 | RAMONA ST | UNIVERSITY AFRICAN METHODIST EPISCOPAL ZION CHURCH | PALO ALTO | P | 1924 | NAT.REG. | 43-0026 | | | A |
| 008537 | 819 | RAMONA ST | UNIVERSITY AFRICAN METHODIST EPISCOPAL ZION CHURCH | PALO ALTO | P | 1924 | HIST.SURV. | 4302-0324-0000 | | 5S1 | |
| 8 077733 | 550 | SAN JUAN ST | PHI PSI HOUSE | PALO ALTO | U | 1900 | PROJ.REVW. | FEMA920708C | 10/16/92 | 2S2 | |

Explanation:

1. The Congregational Church was evaluated through the Section 106 project review process. This action was recorded using the modern (circa 1995 – present) 2 line evaluation data entry system. In this instance the property was determined ineligible for the National Register as indicated by the 6Y status code. The top program-reference-number (DOE-42-02-0029-0000) is for OHP's internal filed tracking and the second reference line (FCC020816B) records the agency responsible for submitting the project for OHP's review.
2. The Allen, Theophilus, House was initially identified and evaluated through survey # 4302-0296-000, date not given, and then subsequently nominated and listed to the National Register under Criterion C for its architectural values. This action was recorded using the modern (circa 1995 – present) 2 line data entry system. The top program-reference-number (NPS-99000580-9999) records the National Register Information System's reference number; the status code 1S indicates the resource was listed on the National Register. The Second line (43-0042) links the nominated resource with OHP's registration process tracking (reglog); the status code 1S reflects the SHRC's recommendation to forward the nomination to the Keeper who has the authority to list resources on the National Register. The cottage and garage, listed on separate lines, were also listed on the National Register; their status as contributors to the multi-property listing is reflected in the 1D code.
3. The Ramona Street Architectural District was nominated to and subsequently listed on the National Register under Criterion C for its architectural values. These actions were recorded using a pre 1995 data entry system. There is one event line with a program reference number or resource number formatted like modern survey records (4302-0431-9999). This record actually documents the district's listing in the National Register because it has the Historic Resource status code of 1S.
4. The Gotham Shop listing demonstrates a property evaluated through survey # 4302-0314 and given a 3S status code. It was subsequently listed as a contributor to the Ramona Street Architectural District, under Criterion C for its architectural values, as demonstrated by the 4302-0431- program-reference number and the 1D status code.
5. The property at 528-530 Ramona Street was submitted to OHP for review through the Tax Certification program. The 7J status code tracks the submittal, and in the absence of a code reflecting and evaluation for National Register eligibility, suggests that the certification process was not completed.
6. The Palo Alto Art Club was initially evaluated through survey # 4302-0332 and given a 3S status code as it appeared individually eligible for the National Register. Subsequently, the property was evaluated through the Section 106 project review process. This action was recorded using the modern (circa 1995 – present) 2 line evaluation data entry system. The top program-reference-number (DOE-43-98-0015-0000) is for OHP's internal filed tracking and the second reference line (HUD980511A) records the agency responsible for submitting the project for OHP's review. The 2S2 Status code reflects the determination of eligibility for the National Register by consensus through the Section 106 review process.
7. The University African Methodist Episcopal Zion Church was initially identified and evaluated through survey 4302-0324 and determined to be eligible for local listing. Subsequently, it was nominated to the National Register under criterion A for its historical rather than architectural significance. This action was recorded using the modern (circa 1995 – present) 2 line evaluation data entry system. The top program-reference-number (NPS-96000297-0000) records the National Register Information System's reference number. The status code 2S indicates that resource was determined eligible for the National Register by the Keeper but not actually listed due to the owner's objection. The second line (43-0026) links the nominated resource with OHP's

registration process tracking (reglog); the accompanying status code indicates the SHRC's recommendation to forward the nomination to the Keeper of the National Register.

8. The Phi Psi House was subjected to an evaluation through the Section 106 review process of a FEMA project. This action was recorded using an interim (circa 1990-1995) 1 line evaluation data entry system. In this instance the property was determined eligible as an individual property for the National Register through a consensus determination. The site records for these projects are difficult to locate because the lack the internal file tracking reference number.

Historical Resources Inventory Individual Property Printout

The Historical Resources Inventory (HRI) Individual Property Printout displays the summarized data for a single resource as shown in the two examples below.

| | | | | | |
|---|--------------------|--------------------------|-------------------------------|------------------------|--|
| HISTORIC PROPERTY FILE | | SINGLE PROPERTY PRINTOUT | | 09/26/03 | |
| Prop.#: 061544 RANCHO SANTA ROSA | | | | | |
| Prim.#: | | | | | |
| Address: | | | | | |
| 22115 TENAJA RD | | 92362 | | County: RIV | |
| MURRIETA | | | | X-Street: | |
| | | | | Vicinity: | |
| | | | | Parcel #: | |
| Category: SITE | | | | | |
| Owner Type: PRIVATE | | | | | |
| Present Use: NONCOMMERCIAL | | | | | |
| Other Recognition: S | | | | | |
| Dates of Construction: 1846 - 1910 | | | | CHL #: 1005 | |
| Architect: | | | Builder: JUAN MORENO & A MACH | | |
| Historic Attributes: TREES-VEGETATION, RURAL OPEN SPACE | | | | | |
| Eth: | | | | | |
| Previous Determinations on this property: | | | | | |
| Program | Prog. Ref Number | Eval Crit | Eval-date | Evaluator | |
| ----- | | | | | |
| HIST.RES. | SHL-1005-0000 | 1CL | 02/18/92 | ST HIST RES COMMISSION | |
| ST.HS.LDMK | 33-0017 | 1CL | 02/18/92 | ST HIST RES COMMISSION | |
| HIST.RES. | SPHI-RIV-059 | 7W | 11/03/89 | ST HIST RES COMMISSION | |
| ST.PT.INT. | 33-0010 | 7W | 11/03/89 | ST HIST RES COMMISSION | |
| ST.FND.PRG | 619.0-HP-88-33-004 | 3S | 12/20/88 | PERSON UNKNOWN | |
| HIST.SURV. | 2362-0057-0000 | 3S | | PERSON UNKNOWN | |
| Key to EVAL: | | | | | |
| 1CL: Automatically listed in the California Register - Includes State Historical Landmarks 770 and above and Points of Historical Interest after December 1997 and recommended for listing by the SHRC. | | | | | |
| 7L: State Historical Landmarks 1-769 and Points of Historical Interest designated prior to January 1998 - Needs to be reevaluated using current standards. | | | | | |
| 3S: Appears eligible for listing in NR as a separate property. | | | | | |

Explanation:

Determinations are listed chronologically with the latest submittal on top. In this example, the Rancho was first recorded through a survey submittal prior to 1988. In 1988, the resource was

evaluated again as part of a state funding project and appeared eligible for listing to the National Register. In 1989 the State Historic Resource Commission (SHRC) granted it the status of a State Point of Historical Interest. Subsequently, in 1992, the SHRC then approved its nomination as a California Historical Landmark in 1992, retiring its status as a State Point. The ST.PT.INT. AND ST.HS.LDMK program entries link the inventory database with the registration tracking database. These lines remain after the registration process to maintain the registration history. The site was automatically placed on the California Register of Historical Resources with the Register's enactment on January 1, 1998 based on its Landmark Number being after 770.

| | | | | | |
|--|---------------------|-----------------------------------|-------------------------------|-----------|------------------------|
| HISTORIC PROPERTY FILE | | SINGLE PROPERTY PRINTOUT | | 09/26/03 | |
| Prop.#: 039744 SANTORA BLDG | | | | | |
| Prim.#: 30-160372 | | | | | |
| Address: | | County: ORA | | | |
| 207 N BROADWAY | | X-Street: | | | |
| SANTA ANA | | 92701 | | Vicinity: | |
| Parcel #: | | | | | |
| Category: BUILDING | | | | | |
| Owner Type: PRIVATE | | | | | |
| Present Use: COMMERCIAL | | | | | |
| Other Recognition: C | | | | | |
| CHL #: | | | | | |
| Dates of Construction: 1928 - | | | | | |
| Architect: LANSDOWN, FRANK | | | Builder: SANTORA LAND COMPANY | | |
| Historic Attributes: COMM.BLG, 1-3ST. | | | | | |
| Eth: | | | | | |
| Previous Determinations on this property: | | | | | |
| Program | Prog. Ref Number | Eval | Crit | Eval-date | Evaluator |
| HIST.RES. | NPS-84000438-0069 | 1D | C | 12/19/84 | KEEPER OF THE REGISTER |
| HIST.RES. | NPS-82000976-0000 | 1S | C | 12/27/82 | KEEPER OF THE REGISTER |
| TAX.CERT. | 537.9-30-0043 | 2D3 | | 12/10/82 | WESTERN REGION |
| HIST.SURV. | 2701-0009-0051 | 7K | | 01/01/81 | PERSON UNKNOWN |
| HIST.RES. | DOE-30-80-0006-0094 | 2D2 | AC | 11/12/80 | KEEPER OF THE REGISTER |
| PROJ.REVW. | FHWA801017A | 2D2 | AC | 11/12/80 | KEEPER OF THE REGISTER |
| HIST.RES. | SPHI-ORA-005 | 7L | | 09/01/76 | PERSON UNKNOWN |
| 1D : Listed in NR as a Contributor to a district or multiple. resource property. | | | | | |
| 1S : Listed in NR as an individual property. | | | | | |
| 2D3: Determined eligible for NR list as a contrib. by other than consensus determination or keeper. | | | | | |
| 7K : Resubmitted to OHP for action but not reevaluated. | | | | | |
| 2D2: Determined eligible for listing as a contributor by consensus determination. | | | | | |
| 7L : State Historical Landmarks 1-769 and Points of Historical Interest designated prior to January 1998 – Needs to be reevaluated using current standards. | | | | | |
| This property was evaluated as part of the following district: | | | | | |
| 2701-0009-9999 | | DOWNTOWN SANTA ANA HISTORIC DIST. | | | |

Explanation:

Determinations are listed chronologically with the latest submittal on top. The Santora Building was first recorded as a California Point of Historical Interest in 1976 prior to the creation of registration process tracking. The next two lines show that in 1980, the building was evaluated as part of a Technical Assistance Bulletin 8

Federal Highways Administration project submittal through the National Historic Preservation Act's Section 106 project review process. In this instance the property was determined eligible for the National Register. When the property was surveyed it was not reevaluated. The property was again determined eligible to the National Register as part of a tax certification program applied for by the owner. The Keeper placed the building on the National Register in 1982 as a single property. The building is a contributor to the 1984 Downtown Santa Ana National Register Historic District. The property is on the California Register based on four different evaluations (Section 106, Tax Certification, and both National Register evaluations).

APPENDICES

Appendix 1 - Historic Resources Inventory Directory & Printout Key

The following column headings and codes may appear on an HRI Directory or Individual Property Printout.

| Column Heading | Identifies... | | | | | | | | | | | | | | |
|-----------------|--|------|-------------|-----------|-------------------------|----------|----------------------------------|-------|--|------------|--------------------------------|-----------|---------------------------------|------------|---------------------------|
| PROPERTY-NUMBER | Property number assigned in the OHP database. | | | | | | | | | | | | | | |
| PRIMARY-# | Identification number assigned by the California Historical Resources Information System (CHRIS) | | | | | | | | | | | | | | |
| STREET-ADDRESS | Street number and street name. This field will not accept fractional or alphabetical street numbers. All numerical street names are numerically designated; e.g. "1 st " not "First". | | | | | | | | | | | | | | |
| RESOURCE NAME | Name given to the resource by OHP or by the entity submitting the resource to OHP. It may be abbreviated or truncated and may, in some cases, indicate the purpose for which the resource was submitted to OHP. | | | | | | | | | | | | | | |
| CITY.NAME | The name of the city, town, nearest post office, or the approved abbreviation for the National Forest | | | | | | | | | | | | | | |
| OWN | The type of ownership: F = federal C = county D = special district S = state M = municipal P = private U = unknown | | | | | | | | | | | | | | |
| YR-C | Year of construction. | | | | | | | | | | | | | | |
| HP-PROG | The program within OHP for which this resource was submitted for consideration. <table style="width: 100%; border: none;"> <thead> <tr> <th style="text-align: left;">CODE</th> <th style="text-align: left;">DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td>ARCH.INV.</td> <td>Archeological Inventory</td> </tr> <tr> <td>CAL.REG.</td> <td>California Register Applications</td> </tr> <tr> <td>CHRIS</td> <td>California Historical Resources Information System</td> </tr> <tr> <td>FED.FND.PR</td> <td>Federally Funded Acq/Dev Proj.</td> </tr> <tr> <td>HIST.RES.</td> <td>Historical Resource Information</td> </tr> <tr> <td>HIST.SURV.</td> <td>Historic Resources Survey</td> </tr> </tbody> </table> | CODE | DESCRIPTION | ARCH.INV. | Archeological Inventory | CAL.REG. | California Register Applications | CHRIS | California Historical Resources Information System | FED.FND.PR | Federally Funded Acq/Dev Proj. | HIST.RES. | Historical Resource Information | HIST.SURV. | Historic Resources Survey |
| CODE | DESCRIPTION | | | | | | | | | | | | | | |
| ARCH.INV. | Archeological Inventory | | | | | | | | | | | | | | |
| CAL.REG. | California Register Applications | | | | | | | | | | | | | | |
| CHRIS | California Historical Resources Information System | | | | | | | | | | | | | | |
| FED.FND.PR | Federally Funded Acq/Dev Proj. | | | | | | | | | | | | | | |
| HIST.RES. | Historical Resource Information | | | | | | | | | | | | | | |
| HIST.SURV. | Historic Resources Survey | | | | | | | | | | | | | | |

| Column Heading | Identifies... | | | | | | | | | | | | | | | | | | | | | | |
|----------------------|---|------------|--------------------------------|------------|---------------------|----------|--------------------------------|-----|----------------------|------------|-------------------------------------|------------|--|------------|---|------------|--|------------|---|-----------|----------------------------------|-----------|---------------------------|
| | <table> <tr> <td>LOC.C.DIST</td> <td>Local Certified District (Tax)</td> </tr> <tr> <td>MAINST.PRG</td> <td>Main Street Program</td> </tr> <tr> <td>NAT.REG.</td> <td>National Register Applications</td> </tr> <tr> <td>NUL</td> <td>Program Area Unknown</td> </tr> <tr> <td>PROJ.REVW.</td> <td>Project Review - 106 Determinations</td> </tr> <tr> <td>ST.AG.5024</td> <td>Master List of State-owned Historic Properties</td> </tr> <tr> <td>ST.FND.PRG</td> <td>State Funded Acquisition and Development Projects</td> </tr> <tr> <td>ST.HS.LDMK</td> <td>State Historical Landmark Applications</td> </tr> <tr> <td>ST.PT.INT.</td> <td>State Point of Historic Interest Applications</td> </tr> <tr> <td>TAX.(NPS)</td> <td>NPS's '91 Tax Certification Data</td> </tr> <tr> <td>TAX.CERT.</td> <td>Tax Certification Actions</td> </tr> </table> | LOC.C.DIST | Local Certified District (Tax) | MAINST.PRG | Main Street Program | NAT.REG. | National Register Applications | NUL | Program Area Unknown | PROJ.REVW. | Project Review - 106 Determinations | ST.AG.5024 | Master List of State-owned Historic Properties | ST.FND.PRG | State Funded Acquisition and Development Projects | ST.HS.LDMK | State Historical Landmark Applications | ST.PT.INT. | State Point of Historic Interest Applications | TAX.(NPS) | NPS's '91 Tax Certification Data | TAX.CERT. | Tax Certification Actions |
| LOC.C.DIST | Local Certified District (Tax) | | | | | | | | | | | | | | | | | | | | | | |
| MAINST.PRG | Main Street Program | | | | | | | | | | | | | | | | | | | | | | |
| NAT.REG. | National Register Applications | | | | | | | | | | | | | | | | | | | | | | |
| NUL | Program Area Unknown | | | | | | | | | | | | | | | | | | | | | | |
| PROJ.REVW. | Project Review - 106 Determinations | | | | | | | | | | | | | | | | | | | | | | |
| ST.AG.5024 | Master List of State-owned Historic Properties | | | | | | | | | | | | | | | | | | | | | | |
| ST.FND.PRG | State Funded Acquisition and Development Projects | | | | | | | | | | | | | | | | | | | | | | |
| ST.HS.LDMK | State Historical Landmark Applications | | | | | | | | | | | | | | | | | | | | | | |
| ST.PT.INT. | State Point of Historic Interest Applications | | | | | | | | | | | | | | | | | | | | | | |
| TAX.(NPS) | NPS's '91 Tax Certification Data | | | | | | | | | | | | | | | | | | | | | | |
| TAX.CERT. | Tax Certification Actions | | | | | | | | | | | | | | | | | | | | | | |
| PRG-REFERENCE-NUMBER | Program's reference number for this determination. See Appendices 4 & 5. | | | | | | | | | | | | | | | | | | | | | | |
| STAT-DAT | Date this status was determined. | | | | | | | | | | | | | | | | | | | | | | |
| STATUS CODE | <p>Status code assigned which reflects the resource's eligibility or listing in either the National Register of Historic Places, the California Register of Historical Resources, or local government register or listing. Frequently, a resource has been evaluated under a number of different programs at different times and received a different status code for each evaluation incident. A separate listing of the resource is made for each determination. The California Historical Resource Status Codes are elsewhere in this Bulletin and online at www.ohp.parks.ca.gov under Publications and Forms.</p> | | | | | | | | | | | | | | | | | | | | | | |
| CRIT | <p>Reflects the National Register or California Register criteria under which the resource has been listed or determined eligible:</p> <p>NR CR</p> <p>A 1 = associated with events</p> <p>B 2 = associated with persons</p> <p>C 3 = embodies distinctive characteristics</p> <p>D 4 = has yielded or has the potential to yield information</p> | | | | | | | | | | | | | | | | | | | | | | |
| Parcel #: | Parcel number that was designated by the documentation. | | | | | | | | | | | | | | | | | | | | | | |
| C | <p>Code designating the type of property:</p> <p>D = district</p> <p>B = building</p> <p>C = site</p> <p>S = structure</p> <p>O = object</p> | | | | | | | | | | | | | | | | | | | | | | |

| Column Heading | Identifies... |
|-----------------------|---|
| #PR | Number of total resources included within a district, both contributing and non-contributing. |
| OTHREG | <p>Codes for listings or designations other than the National Register of Historical Places:</p> <p>C = CA.POINT OF HISTORICAL INTEREST (CPHI)</p> <p>H = HABS OR HAER (HIST.AM.BUILD.SURV. OR HIST.AM.ENG.REC.)</p> <p>L = LOCALLY DESIGNATED LANDMARK</p> <p>N = NATIONAL HISTORIC LANDMARK (NHL)</p> <p>O = OTHER TYPE OF REGISTRATION OR DESIGNATION</p> <p>P = STATE OR LOCAL PARK</p> <p>R = CALIFORNIA REGISTER OF HISTORICAL RESOURCES (CRHR)</p> <p>S = STATE HISTORIC LANDMARK (SHL) OR (CHL)</p> |
| CHL# | The State Historical Landmark number, if the property is a State Historical Landmark |
| EVAL | Identifies the individual who made the evaluation and that person's programmatic responsibility. See Appendix 1 Evaluator Codes |

Appendix 2 - Evaluator Codes

| CODE | NAME | CAPACITY |
|------|---------------------|------------------------------|
| **TA | | OHP / TAX CERTIFICATION |
| ABHS | ANNE BLOOMFIELD | CONSULTANT / HISTORIC SURVEY |
| AGPR | ANDREA GALVIN | OHP / PROJECT REVIEW UNIT |
| AMPR | ANMARIE MEDIN | OHP / PROJECT REVIEW UNIT |
| BHPR | BLOSSOM HAMUSEK | OHP/PROJECT REVIEW UNIT |
| BMHS | BETTY MARVIN | CONSULTANT / HISTORIC SURVEY |
| BWPR | BRIAN WICKSTROM | OHP / PROJECT REVIEW UNIT |
| CAHS | CARSON ANDERSON | CONSULTANT / HISTORIC SURVEY |
| CCPR | CLARENCE CAESAR | OHP / PROJECT REVIEW UNIT |
| CCRG | CLARENCE CAESAR | OHP / REGISTRATION UNIT |
| CHRG | CYNTHIA HOWSE | OHP / REGISTRATION UNIT |
| CMHS | CHRISTY MCAVOY | CONSULTANT / HISTORIC SURVEY |
| CMPC | CHRISTY MCAVOY | PRIVATE CONSULTANT |
| CRRG | CAROL ROLAND | OHP / REGISTRATION UNIT |
| CWPR | CHERYLYN WIDELL | OHP / SHPO |
| DAPR | DANIEL ABEYTA | OHP / ACTING SHPO |
| DBPR | DAN BELL | OHP / PROJECT REVIEW UNIT |
| DCPR | DORENE CLEMENT | OHP / PROJECT REVIEW UNIT |
| DDPR | DWIGHT DUTSCHKE | OHP / PROJECT REVIEW UNIT |
| DNHI | DON NAPOLI | OHP / HISTORIC INVENTORY |
| DNHS | DON NAPOLI | CONSULTANT/HISTORIC SURVEY |
| DSPR | DANA SUPERNOWICZ | OHP / PROJECT REVIEW UNIT |
| DTRG | DIANNE THOMAS | OHP / REGISTRATION UNIT |
| EIPR | EUGENE ITOGAWA | OHP/PROJECT REVIEW UNIT |
| EKHI | EILEEN KERR | OHP / HISTORIC INVENTORY |
| GIRG | GENE ITOGAWA | OHP / REGISTRATION UNIT |
| GKHS | GARY KNECHT | CONSULTANT / HISTORIC SURVEY |
| GRPR | GARY REINOEHL | OHP / PROJECT REVIEW UNIT |
| GWPR | GEORGIE WAUGH | OHP / PROJECT REVIEW UNIT |
| HBPR | HENRY BASS | OHP / PROJECT REVIEW UNIT |
| HKPR | HANS KREUTZBERG | OHP / PROJECT REVIEW UNIT |
| HKRG | HANS KREUTZBERG | OHP / REGISTRATION UNIT |
| ICCH | INFORMATION CENTER | IC / CHRIS |
| J1HI | JAN WOOLEY | OHP / HISTORIC INVENTORY |
| J1RG | JAN WOOLEY | OHP / REGISTRATION UNIT |
| JBPR | JEFFERY BINGHAM | OHP / PROJECT REVIEW UNIT |
| JCHI | JAY CORREIA | OHP / HISTORIC INVENTORY |
| JCPR | JANICE CALPO | OHP / PROJECT REVIEW UNIT |
| JDPR | JENNIFER DARCANGELO | OHP / PROJECT REVIEW UNIT |
| JFPR | JAMES FISHER | OHP / PROJECT REVIEW UNIT |
| JFRG | JAMES FISHER | OHP / REGISTRATION UNIT |
| JHPR | JULIA HUDDLESON | OHP / PROJECT REVIEW UNIT |

| | | |
|------|------------------------|------------------------------|
| JMHS | JUDITH MARVIN | CONSULTANT / HISTORIC SURVEY |
| JNPR | JOAN RAPPOLD | OHP / PROJECT REVIEW UNIT |
| JPMS | JANICE PREGLIASCO | OHP / MAIN-STREET PROGRAM |
| JRPR | JOHN SHARP | OHP / PROJECT REVIEW UNIT |
| JSPR | JEANETTE SCHULZ | OHP / PROJECT REVIEW UNIT |
| JSRG | JEANETTE SCHULZ | OHP / REGISTRATION UNIT |
| JSTA | JEANETTE SCHULZ | OHP / TAX CERTIFICATION |
| JTHS | JUDY TRIEM | CONSULTANT/HISTORIC SURVEY |
| JWPR | JOHN (CHUCK) WHATFORD | OHP / PROJECT REVIEW UNIT |
| KPNP | KEEPER OF THE REGISTER | NATIONAL PARK SERVICE |
| L1HS | LESLIE HEUMANN | CONSULTANT / HISTORIC SURVEY |
| LALA | CITY OF LOS ANGELES | CITY OF LOS ANGELES |
| LHPR | LESLIE HARTZELL | OHP / PROJECT REVIEW UNIT |
| LNLN | COUNTY OF LOS ANGELES | COUNTY OF LOS ANGELES |
| LWPR | LUCINDA WOODWARD | OHP / PROJECT REVIEW UNIT |
| MBRG | MARVIN BRIENES | OHP / REGISTRATION UNIT |
| MLRG | MARYLN LORTIE | OHP / REGISTRATION UNIT |
| MMPR | MICHAEL MCGUIRT | OHP / PROJECT REVIEW UNIT |
| MNHI | MARIE NELSON | OHP / HISTORIC INVENTORY |
| MNPR | MARIE NELSON | OHP / PROJECT REVIEW UNIT |
| MNRG | MARIE NELSON | OHP / REGISTRATION UNIT |
| MRPR | MICHAEL RONDEAU | OHP / PROJECT REVIEW |
| MSRG | JENAN M. SAUNDERS | OHP / REGISTRATION UNIT |
| MTHS | MARK THORNTON | CONSULTANT/HISTORIC SURVEY |
| NDPR | NICK DEL CIOPPA | OHP / PROJECT REVIEW UNIT |
| NSHS | NANCY STOLTZ | CONSULTANT/HISTORIC SURVEY |
| NTPR | NATALIE LINDQUIST | OHP / PROJECT REVIEW |
| NWTA | NORBERT WALERY | OHP / TAX CERTIFICATION |
| PSRG | PATRICIA SEATON | OHP / REGISTRATION UNIT |
| RFPR | RICK FITZGERALD | OHP / PROJECT REVIEW UNIT |
| RJPR | ROBERT JACKSON | OHP / PROJECT REVIEW UNIT |
| RMPR | ROBERT MACKENSEN | OHP / PROJECT REVIEW UNIT |
| RMTA | ROBERT MACKENSEN | OHP / TAX CERTIFICATION |
| RWHS | ROBERT W. WINTER | CONSULTANT / HISTORIC SURVEY |
| S1PO | ST HIST PRES OFFICER | OFFICE HISTORIC PRESERVAT |
| SCPR | STEADE CRAIGO | OHP / PROJECT REVIEW |
| SCTA | STEADE CRAIGO | OHP / TAX CERTIFICATION |
| SERG | SANDRA ELDER | OHP / REGISTRATION UNIT |
| SGPR | STEVE GRANTHAM | OHP / PROJECT REVIEW UNIT |
| SHRC | ST HIST RES COMMISSION | STATE OF CALIFORNIA |
| SMPR | STEPHEN MIKESELL | OHP / PROJECT REVIEW UNIT |
| TBPR | TIMOTHY BRANDT | OHP / PROJECT REVIEW UNIT |
| TBTA | TIMOTHY BRANDT | OHP / TAX CERTIFICATION |
| TVPR | THAD VAN BUEREN | OHP / PROJECT REVIEW UNIT |
| TWTA | TOM WINTERS | OHP / TAX CERTIFICATION |
| UNKN | PERSON UNKNOWN | CAPACITY UNKNOWN |
| WRNP | WESTERN REGION | NATIONAL PARK SERVICE |
| WSPR | WILLIAM SEIDEL | OHP / PROJECT REVIEW |

Appendix 3 – Numbering Conventions for Historical Resources

PROGRAM NUMBER

KEY to Number

STATE HISTORIC LANDMARKS

State Historic Landmarks are ordered numerically, i.e. SHL-0001. In the case of satellites the Landmarks will receive an extra two digits, i.e. SHL-0001 and its satellite SHL-0001-01. The numbering of satellites generally begins with "-01". In some isolated cases however, the numbering appears to begin at "-02".

Some State Historic Landmarks are part of a thematic nomination. In these cases multiple properties may appear under one historic resource number. Generally thematic properties will be identified as such in their name, i.e. John Medica's Garden (Folk Art Them.).

SHL-####-xxxx

= State Historical Landmark number
xxxx = satellite

CALIFORNIA POINTS OF HISTORIC INTEREST

Points of Historic Interest are numbered numerically by county, i.e. SPHI-ALA-001. In the case of satellite properties, the properties are first numbered numerically and then alphabetically, i.e. SPHI-LAN-042 and its satellite SPHI-LAN-042-A. Occasional gaps in numerical sequence may occur if a property has been retired from the Point of Historical Interest program. This happens every time a property is upgraded from a Point of Historical Interest to a State Historic Landmark.

SPHI-CCC-###-xxxx

CCC = county initials
= sequential number in county
xxxx = satellite

DETERMINATIONS OF ELIGIBILITY

DOES-CC-YY-####-xxxx

CC = county number
YY = year of determination
= sequential number
xxxx = contributor number

LISTED ON NATIONAL REGISTER

NPS-#####-xxxx

= National Park Service's National Register Number
xxxx = contributor number

DESIGNATED NATIONAL HISTORIC LANDMARK

NHL-#####-xxxx

= National Park Service's National Register Number
xxxx = contributor number

LISTED ON CALIFORNIA REGISTER

CR-#####-

= OHP's California Register Number

SUBMITTED FOR INVENTORY IN ACCORDANCE WITH OHP'S SURVEY STANDARDS

zzzz-####-xxxx

zzzz=last four numbers of city zip
####=resource inventoried in that zip code
xxxx = contributor number

SUBMITTED FOR LISTING ON THE NATIONAL REGISTER BUT NOT LISTED

REG-yymmdda-xxxx

yy = year, mm = month, dd = day,
a = alpha ordering of submissions on a given day
xxxx = contributor number

ENTERED INTO THE CHRIS BY AN INFORMATION CENTER

P-CC-#####-xxxx

P-CC-##### = Primary Number, assigned by the Information Center
CC = county number
= sequential number
xxxx = contributor number, assigned by OHP

Appendix 4 - Numbering Conventions for Transaction Logs

PROGRAM
NUMBER

KEY to Number

PROJECT REVIEW (EIRLOG)

AAAA#####a

AAAA = 3 or 4-letter abbreviation for a federal agency
= YYMMDD, year, month, day
a = sequential lettering of daily receipt from an Agency

TAX CERTIFICATION (TAXLOG)

537.9-CC-####

CC = county number
= sequential number

STATE FUNDED PROJECTS (ST.FND.PRG)

619.0-SS-YY-CC-###

SS = state funding source
YY = year of determination
CC = county number
= sequential number

FEDERALLY FUNDED PROJECTS (FED.FND.PRJ)

629.0-YY-PPP-CC-### or
629.0-PPP-YY-CC-###

PPP = federal funding source
YY = year of determination
CC = county number
= sequential number

REGISTRATION PROGRAMS (REGLOG)

CC-####

CC = county number
= sequential number

Appendix 5 - CHRIS County Codes

| COUNTY | PRIMARY NUMBER CODE | TRINOMIAL CODE | REPORT NUMBER CODE | COUNTY | PRIMARY NUMBER CODE | TRINOMIAL CODE | REPORT NUMBER CODE |
|-----------|---------------------|----------------|--------------------|-------------|---------------------|----------------|--------------------|
| ALAMEDA | 01 | ALA | AA | ORANGE | 30 | ORA | OR |
| ALPINE | 02 | ALP | AP | PLACER | 31 | PLA | PL |
| AMADOR | 03 | AMA | AM | PLUMAS | 32 | PLU | PU |
| BUTTE | 04 | BUT | BT | RIVERSIDE | 33 | RIV | RI |
| CALAVERAS | 05 | CAL | CA | SACRAMENTO | 34 | SAC | SA |
| COLUSA | 06 | COL | CO | SAN BENITO | 35 | SBN | SN |
| CONTRA | 07 | CCO | CC | SAN | 36 | SBR | SB |
| DEL NORTE | 08 | DNO | DN | SAN DIEGO | 37 | SDI | SD |
| EL DORADO | 09 | ELD | ED | SAN | 38 | SFR | SF |
| FRESNO | 10 | FRE | FR | SAN JOAQUIN | 39 | SJO | SJ |
| GLENN | 11 | GLE | GL | SAN LUIS | 40 | SLO | SL |
| HUMBOLDT | 12 | HUM | HU | SAN MATEO | 41 | SMA | SM |
| IMPERIAL | 13 | IMP | IM | SANTA | 42 | SBA | SR |
| INYO | 14 | INY | IN | SANTA CLARA | 43 | SCL | SC |
| KERN | 15 | KER | KE | SANTA CRUZ | 44 | SCR | SZ |
| KINGS | 16 | KIN | KI | SHASTA | 45 | SHA | SH |
| LAKE | 17 | LAK | LK | SIERRA | 46 | SIE | SE |
| LASSEN | 18 | LAS | LS | SISKIYOU | 47 | SIS | SI |
| LOS | 19 | LAN | LA | SOLANO | 48 | SOL | SO |
| MADERA | 20 | MAD | MA | SONOMA | 49 | SON | SX |
| MARIN | 21 | MRN | MR | STANISLAUS | 50 | STA | ST |
| MARIPOSA | 22 | MRP | MP | SUTTER | 51 | SUT | SU |
| MENDOCINO | 23 | MEN | MD | TEHAMA | 52 | TEH | TE |
| MERCED | 24 | MER | ME | TRINITY | 53 | TRI | TR |
| MODOC | 25 | MOD | MO | TULARE | 54 | TUL | TU |
| MONO | 26 | MNO | MN | TUOLUMNE | 55 | TUO | TO |
| MONTEREY | 27 | MNT | MT | VENTURA | 56 | VEN | VN |
| NAPA | 28 | NAP | NA | YOLO | 57 | YOL | YO |
| NEVADA | 29 | NEV | NE | YUBA | 58 | YUB | YU |

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

While the proposed change of use is not completely unrelated to its historic use, the proposed changes are considerable and would (and already have) obliterate many of the distinctive features, spaces and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

The historic character of the subject property has not been preserved and the removal distinctive materials, features, spaces and relationships have not been avoided, but rather have been sanctioned by the City through inappropriate use of established process.

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

Again, the property has not been recognized and the changes that have already been made and those that are further proposed will not only create a false sense of history but will erase the historic continuum that the building has acquired over the last 115 years.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

Because of the historic change in use from residence to church, there are many aspects of the building which have attained their own level of significance, however, at the present time we have no way of knowing what those are. Without a process that quantifies the specific features, we are unable to qualify them. This is one reason for preparation of a Historic Structures/Assessment Report.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

This Standard has been violated wholesale. So much of the interior finishes have been gutted that we may never have a complete list of features that have been lost. Without a thorough Historic Structures/Assessment Report, there is no way for anyone to categorize or rank the characteristics with any accuracy.

The answer to this problem lies not in condemning the building to further destruction, but in redoubling the effort to reconstruct that which has been lost and restore the interior as closely as possible to what it was.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

As with all the others, this Standard has been violated. The directive that replacement features be substantiated is done with the aid of a "Historic Structures/Assessment Report" and

without that we do not know which, if any, features were deteriorated. Certainly there have been no repairs nor was anything replaced—only summarily demolished.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The response to this seems obvious: the physical treatment of historic materials has been erosive, with willful disregard.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

This is the only Standard which has no application in this case, as the building is not on an archeological or paleontology site.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

Everything that has so far been done to the subject building has been in gross violation of Standard 9. The developer seems to have used the “better to ask forgiveness than permission” tack. Historic materials, finishes, features, and special relationships have been destroyed.

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

It is the responsibility of the City to ensure that any work be approved and codified and that such approvals be made according to established regulations, which in this case, include the Secretary of the Interior Standards. The destruction done thus far has caused serious harm to this historic building and the currently proposed new construction will continue to ravage it. The developer must be required to go back to the beginning of the process, document the structure as much as possible, present for review a project plan which incorporates these Standards, and conform said project within the limitations imposed by the established process and procedures. Any changes must be reversible in order to return the building to the state in which it was first found.

The coved ceiling, corbels, beams, and wainscoting, fireplace, columns, sash and multi-paned windows, etc. are (were) all significant character-defining features. They are traditional components which identify and define the sense of place and time which dates the structure. The twelve-paned French doors are also indicative of the original design. Fortunately, there remains in place the balcony railing which provides the sense of proportion that would be necessary to facilitate a restoration. Further, the doorways and many window fenestrations are also extant; these too characterize the original plan.

The same is true for the “cloister”—the breezeway which connects the two major structures on the property. Although not original to the residence itself, it was constructed in the 1930’s and has achieved its own level of significance. Additionally, there are many aspects of the building which have great cultural, as well as architectural, significance. The entryway, mezzanine and other ground floor areas were used by church congregants and therefore have significance as a

public space and religious use. The interior tells a continuing story which should also be evaluated according to established guidelines.

Lest anyone think that, due to the destruction that has taken place, that the interior is now too far gone to support a restoration and therefore the appropriate course of action is to allow the project to go forward, I will state unequivocally that in my professional experience and opinion, the property is very restorable, although it may prove more costly now than it would have otherwise been. Financial consideration is not a condition for dispensation.

I understand that there has been some misunderstanding and/or disagreement with the listed status of the building. For the record, the California State Office of Historic Preservation is very clear about the status codes and their meaning. These are codified in the "User's Guide to the California Historic Resource Status Codes & Historic Resources Inventory Directory" (see attachment). The Office of Historic Preservation (OHP) initially created the National Register Status Codes in 1975 as a database tool. For the purposes of CEQA, resources eligible for or listed in the California Register are, by definition, "historical resources." Additionally, resources included in a local register of historical resources or deemed significant, i.e., given a status code 3-5 in a survey meeting the OHP's requirements, are presumed to be historically or culturally significant for purposes of CEQA. In August 2003, in order to simplify and clarify the identification, evaluation, and understanding of California's historic resources and better promote their recognition and preservation, the (former) National Register status codes were revised to reflect the application of California Register and local criteria and the name was changed to "California Historical Resource Status Codes."

A property that is formally listed on the National Register of Historic Places is given the code 1. A letter following the number defines it as an individual resource, part of a historic district and other formal designations. Properties with the status code 2 are those which have been determined eligible for either National or California Register. Properties such as the Bishop/Roger Williams which have been given a code 3 are those which are defined as "appears to be eligible." This is usually through a survey evaluation. The 2003 revision specifies that codes 1-5 are to be treated as historic for purposes of CEQA review and application. This is not ambiguous or open to interpretation. Indeed, the understanding of the status codes and their treatment is pretty much "Preservation 101."

It is unfortunate that the city of Los Angeles has not required the developer to adhere to the law with an Environmental Impact Report, Historic Structures/Assessment Report, or other complete form of environmental/historic review. Presumably laws, regulations, codes, etc are made in the public interest and all are required to comply, not just some and not just on occasion. I do not see any way in which so-called "mitigations" might be applied to counteract the damage that the building has sustained. It is beyond the purview of this letter and my role at this time to reach any conclusions or findings with regard to specific features of the structure, but I can state that there is a legally established process which has been ignored or dispensed with. In the interest of public veracity and transparency that process must be restored, a full environmental review must be done in recognition of the status of the building, and the arbitrary, subjective and prejudicial manner in which this project has been handled by the City be corrected.

Sincerely,

Mitzi March Mogul

Mitzi March Mogul