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August 3, 2018

VIA E-MAIL (clerk.plumcommittee@lacity.org)

Chairman Jose Huizar and Hon. Members of the
Planning & Land Use Management Committee
City of Los Angeles, City Hall
200 N. Spring Street, Room 340
Los Angeles, CA 90012
Attn: Zina Cheng, Legislative Assistant

Re: 925 and 927 West Marco Place (Lots 22, 23, & 24)
DIR-2015-3504-CDP-SPP-MEL-1A; DIR-2015-3506-CDP-SPP-MEL-1A; DIR-
2015-3507-CDP-SPP-MEL-1A
Council File No.: 18-0574
PLUM Hearing Date: August 7, 2018

Dear Chairman Huizar and Honorable Members of the PLUM Committee:

This office represents the Harel family ("Applicant") in connection with their application to construct three single family homes on three single-family lots located at 925 and 927 West Marco Place ("Project"). After working with City of Los Angeles ("City") staff for several years, on January 11, 2018, the City's Zoning Administrator approved the Project based on detailed findings that the development complied with the Los Angeles Municipal Code ("LAMC"), the California Environmental Quality Act ("CEQA"), and the California Coastal Act ("Coastal Act"). Three Venice residents appealed the approval to the West Los Angeles Area Planning Commission ("APC"). The appeal was heard over three separate hearings held on March 7, 2018, March 21, 2018, and May 16, 2018, at which time the APC listened to the concerns of the appellants, and scrutinized the development plans to assure consistency with the Coastal Act and other applicable regulations, *including* CEQA. After several hearings, the APC ultimately voted unanimously to approve the Project, and denied the appellant's claims that the project's environmental review was inadequate. On June 18, 2018, the appellants appealed the APC's environmental determination to the City Council, and on June 20, 2018, appealed the Coastal Development Permit ("CDP") to the California Coastal Commission. The appeal on the CDP is scheduled to be heard by the Coastal Commission on August 9, 2018, and the staff recommendation to the Commission recommends denial of the appeal. For the reasons set forth below, this appeal to the City Council should likewise be denied.

This appeal relates solely to the appellants frivolous claim that the Project will create a "substantial adverse changes in the significance of a historical resource." This claim is

being asserted by the appellants notwithstanding the fact that the project: (1) was specifically designed in coordination with the City's Office of Historic Resources ("OHR") to *assure* the preservation of any and all historic resources; (2) was reviewed by multiple experts qualified to opine on the Secretary of the Interior Standards (or "Standards"), all of whom concluded that the Project would not change the significance of a historical resource; and (3) was extensively vetted by the Department of City Planning, which reviewed the appellant's claims and found them to be unsubstantiated and pure "speculation." In this regard, the following findings have been made by the City and independent historic experts:

On February 9, 2018, the ESA's Director of Historic Resources Margarita Jerabek, Ph.d, who meets the Secretary of the Interior's Professional Qualification Standards in history and architectural history (i.e., a "Qualified Expert"), found that the project "conform[s] with the Standards and [] would not materially impair the significance of either the [Contributor] as a District contributor, or the District as a whole as a historical resource." [See February 9, 2018 Historical Resources CEQA Impacts Analysis for 925 Marco Place, ESA.]

On January 11, 2018, the Director of Planning found that the project was designed "consistent with the Secretary of the Interior's Standards for the treatment of Historic Properties... and the two new single-family dwellings were reviewed by the Office of Historic Resources and determined to be consistent and compatible with the Contributors in the block and would not have an adverse impact on the integrity of the District." [See January 11, 2018, Director's Determination, Department of City Planning.]

On March 7, 2018, the Department of City Planning confirmed that the "appropriate environmental clearance was granted..." and that the project would not "have a significant impact on the integrity of the Contributor and District. Appellant's arguments concerning the property's historic significance are based on speculation and are unsupported by any substantial evidence..." [See March 7, 2018, APC Recommendation Report, Department of City Planning.]

In choosing to ignore these findings, the entirety of the appellant's claim relies on a letter submitted by Charles Fisher, a "professional historian," which argues that the project "does not appear to meet the Secretary of the Interior's standards." As found by the Department of City Planning, Mr. Fisher's findings are unpersuasive. On a very fundamental level, Mr. Fisher's opinion on the application of the Secretary of the Interior's Standards has questionable relevance, given that he is not qualified under the Secretary of the Interior's Professional Qualifications Standards to provide these opinions. (See Code of Federal Regulations, 36 CFR Part 61, for the minimum education and experience required to perform Secretary of the Interior historic identification, evaluation, registration, and treatment activities.) Accordingly, not only was the substance of Mr. Fisher's analysis unpersuasive, it is wholly inappropriate for the appellants to misrepresent this analysis as an "expert" opinion, when it is not. Each and every expert that is qualified under the Secretary of the Interior's Standards has concluded that this

Project meets the Secretary's standards, and will not result in a substantial adverse change to a historical resource. The appellant's speculative assertions to the contrary are erroneous.

Moreover, out of an abundance of caution, the applicant retained Carrie Chasteen, Senior Architectural Historian with Sapphos Environmental, Inc., to review the project, the claims made by the appellants, and to provide a peer review of ESA's analysis. Ms. Chasteen meets the Secretary of the Interior's Professional Qualification Standards for history and architectural history, and in performing her analysis, considered the City's findings, ESA's findings, as well as Mr. Fisher's letter. Ms. Chasteen's peer review memorandum, dated August 1, 2018, found the following:

"As a result of the review of the Fisher report and a review of the structure and proposed [Project and its] modifications, Sapphos Environmental, Inc. has determined that the project is consistent with the Standards [and]... would not result in a substantial adverse change to a historical resource (individual and the Milwood Venice Walk Streets Historic District) pursuant to Section 15064.5(b) of the CEQA Guidelines as described in the HRA and CEQA impact analysis prepared by... ESA."

The peer review memorandum is attached hereto as **Exhibit A**. Ms. Chasteen's findings are consistent with ESA's independent analysis, OHR's determination, the Department of City Planning's recommendation, and ultimately the finding made by the APC which denied the appellant's appeal in the first instance. Here, the record is clear that the project will not result in a substantial adverse change to a historical resource, and that the appellant's claims to the contrary are not supported by evidence. The appellant's claims to the contrary are pure speculation. Accordingly, consistent with the recommendation of the Department of City Planning and the unanimous vote of the APC, we respectfully request that the City Council deny this appeal and uphold the City's environmental review performed for this project. Thank you for your consideration.

Sincerely,



BENJAMIN M. REZNIK and
DANIEL F. FREEDMAN of
Jeffer Mangels Butler & Mitchell LLP

Enclosure

Planning & Land Use Management Committee
August 3, 2018
Page 4

CC: Ken Bernstein, Principal City Planner, Department of City Planning.
Juliet Oh, Unit Head / Project Planner, Department of City Planning.
Kevin Ocubillo, Planning Deputy, Council District 14.
Len Nguyen, Planning Deputy, Council District 11.

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Len Nguyen, Planning Deputy, Council District 11.

EXHIBIT A



August 1, 2018
Job Number: 2339-001
Peer Review for
925–927 Marco Place, Venice, CA

MEMORANDUM FOR THE RECORD

2.6 2339-001.M01

TO: Jeffer Mangels Butler & Mitchell LLP | JMBM
(Mr. Daniel F. Freedman)

FROM: Sapphos Environmental, Inc.
(Ms. Carrie Chasteen)

SUBJECT: Peer Review for 925–927 Marco Place, Venice, CA

ATTACHMENTS: A. Historic Resource Assessment
B. CEQA Impact Analysis
C. Plans

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EXECUTIVE SUMMARY

In support of the Categorical Exemption (CE) approved for this proposed project, PCR Services Inc. (PCR) prepared a Historic Resource Assessment (HRA) for the subject properties in November 2016 (Attachment 1) and PCR/ESA prepared a CEQA impact analysis for 925 Marco Place, Los Angeles on February 9, 2018 (Attachment B). On behalf of the applicant, Sapphos Environmental, Inc. was retained to conduct a peer review of the previous HRA and CEQA impact analysis prepared by PCR and PCR/ESA. Consideration of comments received pertaining to this project were also addressed in this peer review. This Memorandum for the Record (MFR) describes the proposed project, methods used to conduct the peer review, evaluates the properties for inclusion in federal, state, or local registers, evaluates the proposed project for compliance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties for Rehabilitation* (Standards), and confirms the previous evaluation and impact findings. Six of the 10 Standards for Rehabilitation apply to this project. The project complies with the Standards because significant character-defining features of the historic residence will be retained, and the two-story addition will be set back from the existing residence, connected with a hyphen, the roofline will mirror the existing sloped and pitch of the historic residence, and the materials of the addition will be discernable as modern and compatible with the historic building. Additionally, relocating the building conforms with the National Park Service bulletin for Moving Historic Buildings, which recognizes moving a building is sometimes the only way to save it and that relocation is a legitimate preservation alternative, through the implementation of commonly accepted moving techniques and practices.

In addition to the HRA and CEQA impact analysis prepared by PCR and PCR/ESA, an independent evaluation and impact analysis was submitted by Mr. Charles J. Fisher, Historian. Sapphos Environmental, Inc. (Ms. Carrie Chasteen, Senior Architectural Historian) reviewed the Fisher report, and disagrees with findings. Sapphos Environmental, Inc. (Ms. Chasteen) agrees with the HRA and the City of Los Angeles that the project is designed consistent with the Standards and will not result in a substantial adverse change on a historical resource. Ms. Chasteen meets the Secretary of the Interior's *Professional Qualification Standards* for History and Architectural History. As a result of the review of the Fisher report and a review of the structure and proposed modifications, Sapphos Environmental, Inc. has determined that the project is consistent with the Standards. This determination is based on the fact that the residential structure is a contributing element to the Milwood Venice Walk Streets Historic District; however, it is not individually eligible for listing in the National Register of Historic Places, the California Register of Historic Resources, or for designation as a City of Los Angeles Historic-Cultural Monument. The building will continue to contribute to the Milwood Venice Walk Streets Historic District following completion of the project.

The application includes multiple elements that would not result in significant adverse effects on the eligibility of the historic district:

- Demolition of a one-story, 688-square-foot, single-family dwelling located at 927 W. Marco Place (Lot 24)
- Relocation of one-story, 1,256-square-foot, single-family dwelling located at 925 W. Marco Place (Lots 22 & 23) to 927 West Marco Place (Lot 24);
- Construction of two new single-family homes on lots 22 and 23;

- Preservation of the relocated structure, to be connected with an 'L'-shaped hyphen to a two-story addition to be constructed anterior to the preserved structure, resulting in a two-story, 2,335-square-foot single-family dwelling with an attached two-car garage.
- The project does not violate the exception for use of a CE that was approved for the redevelopment of two parcels, 925 and 927 Marco Place, in the Venice Community Plan Area of the City of Los Angeles, Los Angeles County, California (Sections 15303, 15331, and 15332 of the CEQA Guidelines; City of Los Angeles CEQA Guidelines Article III, Section 1, Class 3, Category 1). An appeal of this approval was filed on January 26, 2018.

INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA), a Categorical Exemption (CE) was approved for the redevelopment of three parcels, 925 Marco Place (lots 22 and 23) and 927 Marco Place (lot 24), in the Venice Community Plan Area of the City of Los Angeles, Los Angeles County. In support of the CE, PCR Services Inc. (PCR) prepared a Historic Resource Assessment (HRA) for the subject properties in November 2016 (Attachment A, *Historic Resource Assessment*) and PCR/ESA prepared a CEQA impact analysis for 925 Marco Place, Los Angeles on February 9, 2018 (Attachment B, *CEQA Impact Analysis*). An appeal of this approval was filed on January 26, 2018.

On behalf of the applicant, Sapphos Environmental, Inc. (Ms. Carrie Chasteen) was retained to conduct a peer review of the previous HRA and CEQA impact analysis prepared by PCR and PCR/ESA. Consideration of comments received pertaining to this project were also addressed in this peer review. Ms. Chasteen meets the Secretary of the Interior's *Professional Qualification Standards* in the fields of History and Architectural History. This Memorandum for the Record (MFR) describes the proposed project, methods used to conduct the peer review, evaluates the properties for inclusion in federal, State, or local registers, evaluates the proposed project for compliance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties for Rehabilitation*, and confirms the previous evaluation and impact findings.

PROJECT DESCRIPTION

The demolition of a one-story, 688-square-foot, single-family dwelling located at 927 W. Marco Place (Lot 24) and the relocation of one-story, 1,256-square-foot, single-family dwelling located at 925 W. Marco Place (Lots 22 & 23) to 927 West Marco Place (Lot 24); the structure is to be preserved and a two-story addition will be constructed to the rear, resulting in a two-story, 2,335-square-foot single-family dwelling with an attached two-car garage. The project also includes the construction of one, two-story, 2,337 square-foot, single-family dwelling with a rooftop deck and an attached two-car garage at 925 West Marco Place (Lot 22) and one, two-story, 2,104 square-foot, single-family dwelling with a rooftop deck and an attached two-car garage at 927 West. Marco Place (Lot 23). Each single-family dwelling will provide a total of three parking spaces on site.

METHODS

Sapphos Environmental, Inc. (Ms. Chasteen) reviewed the documents on file in the City of Los Angeles Planning Department case file (CEQA Case No. ENV-2015-3505-CE). Ms. Chasteen possesses Bachelor of Arts degrees in History and Political Science, a Master of Science in Historic Preservation, and has more than 16 years of experience in the field of Cultural Resource Management within the City of Los Angeles. No additional research was conducted in the review of the HRA and CEQA impact analysis because the documents presented a thorough historic context of the subject properties and included supporting materials such as Sanborn fire insurance maps, tract maps, and photographs. A site visit was conducted on July 19, 2018, to verify the current condition of the buildings located at 925 and 927 Marco Place, Los Angeles, California, which were documented using digital photography.

EVALUATION

925 Marco Place

A Craftsman-style residential building is located at 925 Marco Place. The building is generally square in plan. The hipped-with-flared-eaves roof is accented with a front-facing gable with barge board and exposed rafter tails. The exterior walls are clad in horizontal wood siding with brick piers at the corners. Fenestration consists of two-over-one wood casement windows, fixed-pane windows, and a stained-glass transom over the northern fixed-pane window. The primary entrance is raised and accessed via a covered porch. The porch roof is supported by brick piers, and the porch is partially enclosed with a wood-siding-clad half-height wall (Figure 1, *925 Marco Place, Primary Façade*). The rear of the building features the same wood siding and fenestration and is modest in design (Figure 2, *925 Marco Place, Rear Façade*).

This building was identified as a contributor to the Milwood Venice Walk Streets Historic District in SurveyLA. The HRA found the subject building is not individually eligible for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), or for local designation due to lack of significance. However, the HRA found the building does contribute to the Milwood Venice Walk Streets Historic District under Criterion A/1/1 (events). Based upon a review of the information presented in the HRA and the site visit, this finding appears to remain valid and the building is a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines. Projects that comply with the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstruction Historic Buildings* or the Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* shall be considered as mitigated to a level of less than significant impact on the historical resource as defined in Section 15064.5(b)(3) of the CEQA Guidelines.



Figure 1. 925 Marco Place, Primary Façade
SOURCE: Sapphos Environmental, Inc., 2018



Figure 2. 925 Marco Place, Rear Façade
SOURCE: Sapphos Environmental, Inc., 2018

927 Marco Place

The vernacular building located at 927 Marco Place faces Superba Avenue and is accessed from that street (Figure 3, *927 Marco Place as seen from Superba Avenue*). The small building features a low-slope gabled roof and one-over-one wood sash windows with security bars. The entrance is at-grade, and a projecting front-facing gable shelters the entryway. Dense vegetation is located in the property fronting Marco Place (Figure 4, *927 Marco Place as seen from Marco Place*). Because of the vegetation, the property was not assessed for contributing to the Milwood Venice Walk Streets Historic District for SurveyLA. The HRA documented and evaluated this property and found the subject building is not a contributor to the Milwood Venice Walk Streets Historic District and is not individually eligible for listing in the National Register, California Register, or for local designation. Based upon a review of the information presented in the HRA and the site visit, this finding appears to remain valid. Therefore, the building is not a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines. Demolition of this building would not result in a substantial adverse change to a historical resource pursuant to Section 15064.5(b) of the CEQA Guidelines.



Figure 3. 927 Marco Place as seen from Superba Avenue
 SOURCE: Sapphos Environmental, Inc., 2018



Figure 4. 927 Marco Place as seen from Marco Place
 SOURCE: Sapphos Environmental, Inc., 2018

Milwood Walk Street Historic District

The Milwood Venice Walk Streets Historic District is a residential district located in the northern portion of Venice. The district contains 471 properties. It is bounded by Lincoln Boulevard to the northeast, Amoroso Court to the southeast, Venice Boulevard and Electric Avenue to the southwest and west, and Palms Boulevard to the northwest. The Milwood Venice Walk Streets Historic District is significant as a unique example of early-20th-century residential development oriented on walk streets in the Venice community. The district's period of significance is from 1904 to 1939. This range represents the primary period of development during which the land was subdivided, and original residences were constructed.

Of the 23 properties of the 900 block of Marco Place, 9 were identified as contributors, 9 were identified as non-contributors, and 5 were rated as “not sure” for this historic district. The 900 block of Marco Place features many parcels with front yard fences and dense vegetation (Figure 5, *Facing South from 925 Marco Place*; Figure 6, *Facing North from 925 Marco Place*).



Figure 5. Facing South from 925 Marco Place
SOURCE: Sapphos Environmental, Inc. 2018



Figure 6. Facing North from 925 Marco Place
SOURCE: Sapphos Environmental, Inc.

CEQA IMPACT ANALYSIS PEER REVIEW

Secretary of the Interior Standards for Rehabilitation

Six of the 10 Standards for Rehabilitation apply to this project with respect to the proposed relocation and addition to the existing contributing building:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall 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 architectural elements from other buildings, shall not be undertaken.
4. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Relocate the Building

Pursuant to the National Park Service's National Register Bulletin: *How to Apply the National Register Criteria for Evaluation*, Criteria Consideration B: Moved Properties, a moved property significant under Criterion C must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association. The proposed project would relocate the building within its current site, which would not result in a change of setting. Additionally, 927 Marco Place was found to contribute to the Milwood Venice Walk Streets Historic District under Criterion A/1/1 for its association with the development of the neighborhood and was not found significant under Criterion C/3/3 because it is not an excellent example of a Craftsman-style residence.

Additionally, the building will be moved by a licensed building mover with experience in moving historic buildings. The National Park Service provides guidance for successfully moving buildings and the building will be moved in accordance with these guidelines.¹ The building will be relocated within its existing site by a qualified building mover in accordance with the National Park Service guidelines; therefore, the building will continue to contribute to the Milwood Venice Walk Streets Historic District and the proposed project will not result in a substantial adverse change to a historical resource in accordance with Section 15064.5(b) of the CEQA Guidelines.

¹ Curtis, John Obed. 1979. *Moving Historic Buildings*. U.S. Department of Interior, Heritage Conservation and Recreation Services, Technical Preservation Services, Division, Washington D.C. Available at: <https://www.nps.gov/tps/how-to-preserve/preservedocs/Moving-Historic-Buildings.pdf>

Design Review

It should be noted that CEQA does not apply to the interior of privately owned buildings. The decision issued on December 29, 2005 in *Martin A. Martin III, Plaintiff and Appellant, v. City and County of San Francisco, et al, Defendants and Respondents*, stated a municipality does not have authority to extend to imposing CEQA review upon such an interior home project, even where the residence is listed as a city landmark and is located within an area registered as a state and a national historic district. Therefore, potential impacts to the interior renovation of the building were not analyzed for compliance with the Standards for Rehabilitation.

The property has been used as a single-family residence and will continue to be used for this purpose following completion of the project (Standard 1). The primary façade of the building possesses many of the character-defining features of the Craftsman style of architecture. The rear façade of the building does not possess significant character-defining features of this style of architecture and is common and modest. Therefore, demolition of the rear of the building would not destroy the historic character of the property or distinctive features, finishes, or architectural elements of the building. Any masonry damaged during the relocation would be repaired or replaced in kind (Standards 2 and 4). The proposed rear addition would not create a false sense of history through the use of modern materials (Standard 3). The required demolition of the rear of the building in order to construct the addition would not destroy distinctive historic materials as described above. Additionally, the proposed addition is set back from the existing historic building as shown on Sheet A-2.00, the slope of the roof addition is similar and compatible to the existing building as shown Sheet A-2.10, and the transparency of the materials as rendered on Sheet A-0.00 is differentiated from the old and is compatible with the massing, size, scale, and architectural features of the existing building (Standard 9; Attachment C, *Plans*). The setback, scale, and massing of the proposed addition would be undertaken in a manner that the essential form and integrity of significant features of the historic building will be retained (Standard 10). Because the proposed project is in compliance with the Standards for Rehabilitation, the project would not result in a substantial adverse change to a historical resource pursuant to Section 15064.5(b)(3) of the CEQA Guidelines. The findings in the CEQA Impact Analysis remain valid for the individual resource.

Cumulative Impacts to the Milwood Venice Walk Streets Historic District

The proposed project would improve one contributing and one non-contributing property within this historic district. There are 471 properties within the historic district boundary, and the project would impact 0.004 percent of those properties. Numerous buildings in the 900 block of Marco Place have been altered or replaced with modern infill construction. Additionally, many buildings in this block of Marco Place are screened from public view through the use of fences and dense vegetation. The addition of two new residential buildings will not create an impact on the historic district through commonly employed screening devices such as fences and landscaping, as found throughout the historic district. The proposed project would retain at least one heritage oak tree on the site. Because of the screening on many neighboring properties, through the retention of significant tree(s), and the negligible impact on the historic district when considered as a whole, the proposed project would not result in a cumulative impact on the Milwood Venice Walk Streets Historic District. Furthermore, the project would benefit the historic district through the restoration and improvement of the existing contributing building.

CONCLUSION

The proposed project complies with the Secretary of the Interior's *Standards for the Treatment of Historic Properties for Rehabilitation* and would not result in a substantial adverse change to a historical resource (individual and the Milwood Venice Walk Streets Historic District) pursuant to Section 15064.5(b) of the CEQA Guidelines as described in the HRA and CEQA impact analysis prepared by PCR and PCR/ESA. Therefore, the proposed project does not violate the exception for use of a CE.

Should there be any questions pertaining to the content of this MFR, please contact Carrie Chasteen at (626) 683-3547, extension 102.

ATTACHMENT A
HISTORIC RESOURCE ASSESSMENT

HISTORICAL RESOURCES ASSESSMENT AND ENVIRONMENTAL IMPACTS ANALYSIS REPORT

**925 AND 927 MARCO PLACE
VENICE, CALIFORNIA**



Prepared for:

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Prepared by:

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Amanda Y. Kainer, M.S.
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PCR Services Corporation
201 Santa Monica Boulevard, Suite 500
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NOVEMBER 2016

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I. INTRODUCTION

A. EXECUTIVE SUMMARY

The purpose of this Historic Resources Assessment and Environmental Impact Analysis Report (“Report”), completed by PCR Services Corporation (“PCR”), is to identify and evaluate historical resources that may be affected by the implementation of a residential redevelopment project (“Project”), located at 925 and 927 Marco Place, Venice, Los Angeles County, California on assessor parcel number 4241-023-021 and 4241-023-022. This report was prepared to comply with the California Environmental Quality Act (CEQA), to assess the existing buildings and landscapes on the subject properties and neighboring parcels for eligibility as historical resources, and to analyze the potential impacts of the proposed Project on potential historical resources. This Report documents and evaluates the federal, state, and local significance and eligibility of the subject property. The Report includes a discussion of the survey methods used, a brief historic context of the property and surrounding area, the identification and evaluation of the subject property, and an impacts analysis.

The project site (“Project Site”) is located at 925 and 927 Marco Place in the neighborhood of Venice, City of Los Angeles, as shown in **Figure 1, Regional Map**. The rectangular block of the Project Site is boarded by Linden Avenue to the south, Lincoln Boulevard to the north, Superba Court to the west, and Marco Court to the east, and is bisected by the “walk street” of Marco Place as shown in **Figure 2, Aerial Photograph**. The Project Site is currently developed with two single-story Residences. 925 Marco Place features a Craftsman style single-family bungalow (“Bungalow”) constructed circa 1907, while 927 Marco Place is improved with a vernacular single-family residence (“Residence”) constructed in 1923. In 2014, SurveyLA identified the Bungalow as a contributor to the proposed Milwood Venice Walk Streets Historic District, while at the same time listing the Residence as “not sure” due to a lack of visibility from the public-right-of-way caused by overgrown vegetation. Therefore, SurveyLA findings for the improvements on the Project Site were inconclusive and required further evaluation.

After extensive research and a physical inspection of the properties, PCR determined that neither the Bungalow nor the Residence appear individually eligible, under any of the applicable federal, state or local eligibility criteria. Both 925 and 927 Marco Place are associated with the Pre-Consolidation of Venice and Streetcar Suburbanization themes developed by SurveyLA. However, extensive research and physical examinations of the buildings revealed no significant associations with these themes for the Bungalow or the Residence. Research of the occupants did not reveal any personages significantly related to national, state, or local history. Furthermore, neither structure appears to be the work of a master architect or builder, nor do they exhibit distinctive characteristics of a type, period, region, or method of construction. Therefore, the Bungalow located at 925 Marco Place and the Residence at 927 Marco Place do not appear individually eligible for the National Register, California Register or local designation.

SurveyLA recently identified a potential historic district in the immediate area. The District, known as the Milwood Walk Streets Historic District, represents “unique example of early-20th century residential development oriented on walk streets in Venice.” SurveyLA found that the Bungalow at 925 Marco Place qualified as a contributor to the District, while the Residence at 927 Marco was not visible from the public-right-of-way and therefore given the designation of “not sure.” PCR’s examination of both properties revealed that SurveyLA correctly identified 925 Marco Place as a contributor. However 927 Marco Place is significantly lacking in integrity and possesses few if any of its features associated with its original construction in 1923. In its present condition, the Residence at 927 Marco does not exhibit the characteristics of a contributor to the

District. Because of these findings, PCR recommends assigning the Bungalow at 925 Marco a CHR status code of 5D2, “contributor to a district that is eligible for local listing or designation”; and we recommend assigning the Residence at 927 Marco a CHR status code of 6Z, “found ineligible for National Register, California Register, or local designation through survey evaluation.”

Based on these findings, the proposed Project was reviewed to determine its potential impact to historical resources including the Bungalow at 925 Marco Place as well as the surrounding District and nearby contributors. The Project would result in the demolition of the Residence at 927 Marco Place (Non-Contributor) and the relocation of 925 Marco Place (Contributor) within the existing lot. Therefore, the Project would have no impact on the 927 Marco Place Residence (Non-Contributor). However, the Project would have an adverse effect to a contributing historical resource, the 925 Marco Place Bungalow, because it would be relocated. However, the adverse effect would be less than significant because relocation of the Bungalow would not detract from its eligibility as a contributor, the eligibility of the potential district, nor the eligibility of any other individual resources in the area. Furthermore, the Project would have no indirect impacts to the potential district because the overall district integrity has already been comprised by infill development. In addition, relocation of the contributing Bungalow, and the new construction proposed by the Project would conform to the Secretary of the Interior’s Standards for Rehabilitation (“Standards”) as it relates to the existing contributing buildings and spatial relationships of the historic district. Therefore, the Project would protect the eligibility of the Bungalow as a district contributor, and the Project would have a less than significant impact under CEQA because the potential Milwood Walk Streets Historic District would retain eligibility as a potential district after Project completion.

B PROJECT DESCRIPTION

This assessment is required by the City of Los Angeles as part of the review process for a Project which would redevelop the subject property. The Project site is located on three lots within the potential Milwood Walk Streets Historic District and proposes the removal of a non-contributing Residence at 927 Marco Place, and the relocation of the contributing Bungalow at 925 Marco Place. The Project will preserve and add a two-story rear addition to the existing Bungalow at 925 Marco Place. A plan review for the new addition has been completed and presented as an amendment to this report. The Project would then redevelop two of the three lots with two new contemporary single-family residences with integrated two-car garages. Project plans are included in Appendix F.

C. METHODOLOGY

This Assessment Report was conducted by PCR’s Historic Resources Division personnel, including Margarita Jerabek, Ph.D., Director of Historic Resources, Amanda Y. Kainer, M.S., Senior Architectural Historian, and Christian Taylor, M.H.P., Architectural Historian, all of whom meet and exceed the Secretary of the Interior’s Professional Qualification Standards in history and architectural history.¹ Professional qualifications are provided in Appendix G of this report.

The historical resources evaluation involved a review of the National Register and its annual updates, the California Register, the Statewide Historical Resources Inventory (HRI) database maintained by the State Office of Historic Preservation (OHP) and the California Historical Resources Information System (CHRIS), and

¹ *The Professional Qualification Standards are requirements used by the National Park Service and have been published in the Code of Federal Regulations (“CFR”), 36 CFR Part 61.*

the City of Los Angeles's inventory of historic properties to identify any previously recorded properties within or near the Project Site, as well as environmental review assessments for other projects in the vicinity. An intensive pedestrian survey was also undertaken to document the existing conditions of the property and Project vicinity. In addition, the following tasks were performed for the study:

- Searched records of the National Register, California Register, California Historic Resources Inventory Database, and City of Los Angeles City Historic-Cultural Monuments designations.
- Conducted field inspections of the study area and the ECT, and utilized the survey methodology of the State OHP.
- Photographed the Residence on the Project Site, and examined other properties in the area that exhibited potential architectural and/or historical associations.
- Conducted site-specific research on the property utilizing building permits, assessor's records, Sanborn fire insurance maps, City directories, historical photographs, California Index, Avery Index, Online Archive of California, USC Digital Collections, historical *Los Angeles Times*, and other published sources. Conducted research at the City of Los Angeles Department of Building and Safety and Los Angeles County Assessor.
- Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation, designation assessment processes, and related programs.
- Utilized the applicable Context/Theme/Property Type eligibility standards formulated for SurveyLA.
- Evaluated potential historic resources based upon criteria used by the National Register, California Register, and City of Los Angeles Cultural Heritage Ordinance.
- Assessed the Project against the CEQA thresholds for determining the significance of impacts to historical resources.



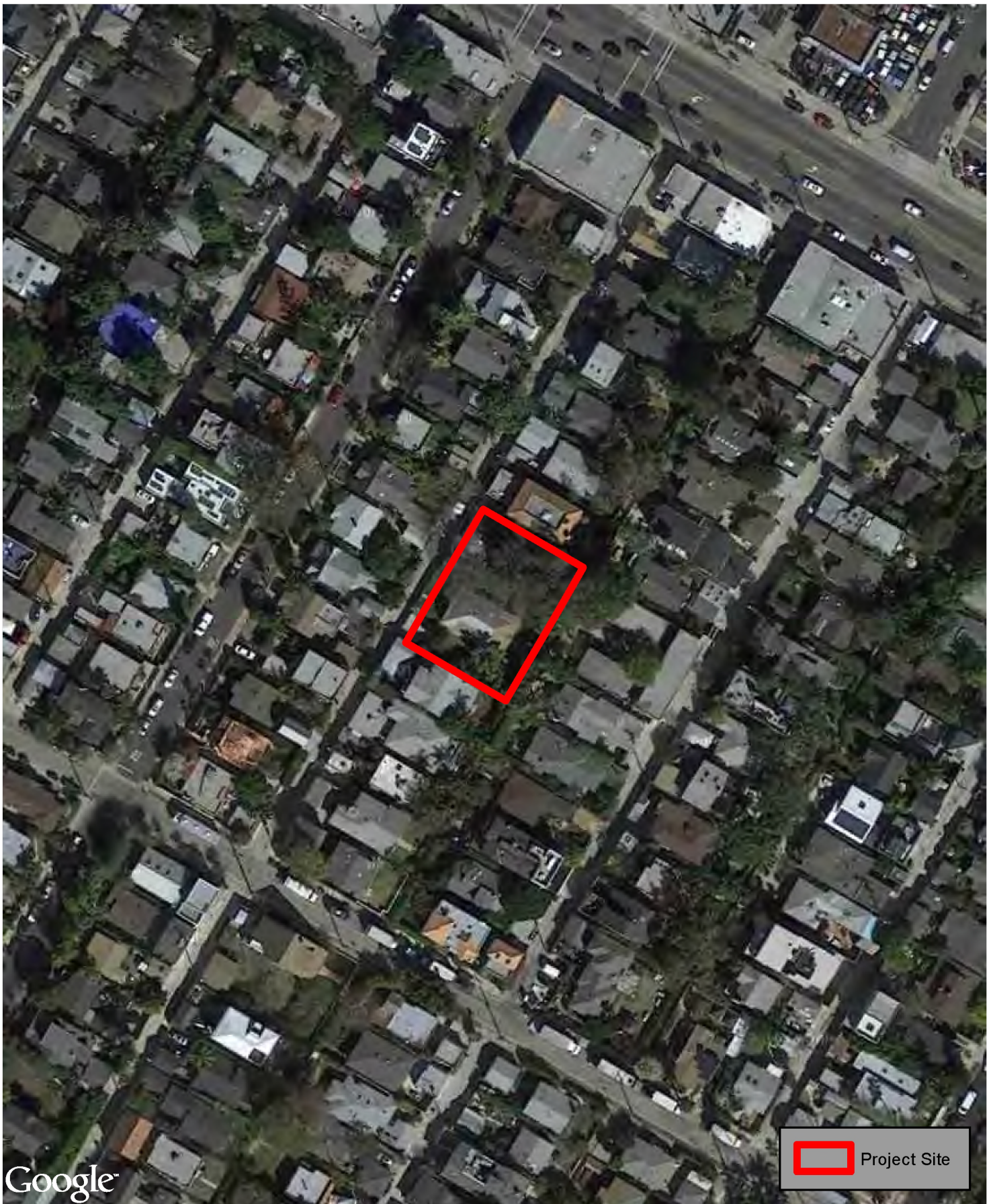
0 250 500 Feet

Regional and Project Vicinity Map

925 and 927 Marco Place, Venice, Los Angeles
Source: ESRI Street Map, 2009; PCR Services Corporation, 2016.

FIGURE

1



0 100 200 Feet

Aerial View of Project Site and Vicinity

925 and 927 Marco Place, Venice, Los Angeles
Source: Google Maps (Aerial) 2015; PCR Services Corporation, 2016.

FIGURE

2

II. REGULATORY FRAMEWORK

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, and in certain instances, protection of historic resources. Additionally, states and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities. The National Historic Preservation Act (NHPA) of 1966, as amended and the California Public Resources Code (PRC), Section 5024.1, are the primary federal and state laws and regulations governing the evaluation and significance of historic resources of national, State, regional, and local importance. Descriptions of these relevant laws and regulations are presented below.

A. FEDERAL LEVEL

1. National Register of Historic Places

The National Register was established by the NHPA as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”² The National Register recognizes properties that are significant at the national, state, and/or local levels.

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

- a. It is associated with events that have made a significant contribution to the broad patterns of our history;
- b. It is associated with the lives of persons significant in our past;
- c. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;
- d. It yields, or may be likely to yield, information important in prehistory or history.³

Districts, sites, buildings, structures, and objects that are 50 years in age must meet one or more of the above criteria and retain integrity (this is, convey their significance) to be eligible for listing. Under the National Register, a property can be significant not only for the way it was originally constructed, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.⁴

² 36 CFR Section 60.2.

³ “Guidelines for Completing National Register Forms,” in *National Register Bulletin 16, U.S. Department of Interior, National Park Service, September 30, 1986. This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the NRHP.*

⁴ *National Register Bulletin 15, p. 19.*

Within the concept of integrity, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity: Location, Design, Setting, Materials, Workmanship, Feeling, and Association:

1. *Location* is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved.
2. *Design* is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials. A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.
3. *Setting* is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historic role. It involves *how*, not just *where*, the property is situated and its relationship to surrounding features and open space.
4. *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components.
5. *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. A property must retain key exterior materials dating from the period of its historic significance.
6. *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character.
7. *Association* is the direct link between an important historic event or person and a historic property. A property retains association if it *is* the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer.⁵

⁵ National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, 44-45, <http://www.nps.gov/nr/publications/bulletins/pdfs/nrb15.pdf>, accessed July 7, 2013.

To retain historic integrity, a property will always possess most of the aspects and depending upon its significance, retention of specific aspects of integrity may be paramount for a property to convey its significance.⁶ Determining which of these aspects are most important to a particular property requires knowing why, where and when a property is significant.⁷ For properties that are considered significant under National Register Criteria A and B, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (“*National Register Bulletin 15*”) explains, “a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).”⁸ In assessing the integrity of properties that are considered significant under National Register Criterion C, *National Register Bulletin 15* states, “a property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.”⁹

B. STATE LEVEL

1. California Register of Historical Resources

The OHP, as an office of the California Department of Parks and Recreation (DPR), implements the policies of the NHPA on a statewide level. The OHP also carries out the duties as set forth in the PRC and maintains the HRI and the California Register. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the State’s jurisdictions. Also implemented at the State level, CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historical resources.

The California Register was created by Assembly Bill 2881 which was signed into law on September 27, 1992. The California Register is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”¹⁰ The criteria for eligibility for the California Register are based upon National Register criteria.¹¹ Certain resources are determined by the statute to be automatically included in the California Register by operation of law, including California properties formally determined eligible for, or listed in, the National Register.¹²

⁶ The National Register defines a property as an “area of land containing a single historic resource or a group of resources, and constituting a single entry in the National Register of Historic Places.” A “Historic Property” is defined as “any prehistoric or historic district, site, building, structure, or object at the time it attained historic significance. *Glossary of National Register Terms*, http://www.nps.gov/nr/publications/bulletins/nrb16a/nrb16a_appendix_IV.htm, accessed June 1, 2013.

⁷ *National Register Bulletin 15*, p. 44.

⁸ “A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property’s historic character. . . Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register.” *Ibid*, p. 46.

⁹ “A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.” *Ibid*.

¹⁰ PRC Section 5024.1(a).

¹¹ PRC Section 5024.1(b).

¹² PRC Section 5024.1(d).

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

- California properties listed on the National Register and those formally Determined Eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward;
- Those PHI that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.¹³

Other resources which may be nominated to the California Register include:

- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance ratings of Category 1 through 5;
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an HPOZ.¹⁴

To be eligible for the California Register, a historic resource must be significant at the local, State, or national level, under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Additionally, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of seven aspects of integrity similar to the National Register, location, design, setting, materials, workmanship, feeling, and association. Also like the National Register, it must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance. It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. A resource that has lost its

¹³ *Ibid.*

¹⁴ *PRC Section 5024.1(e)*

historic character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.¹⁵

2. California Office of Historic Preservation Survey Methodology

The evaluation instructions and classification system prescribed by the California OHP in its manual, *Instructions for Recording Historical Resources* (March 1995) provide a three-digit evaluation rating code (“Status Code”) for use in classifying potential historic resources. The first digit indicates one of the following general evaluation categories for use in conducting cultural resources surveys:

1. Listed on the National Register or the California Register;
2. Determined eligible for listing in the National Register or the California Register;
3. Appears eligible for the National Register or the California Register through survey evaluation;
4. Appears eligible for the National Register or the California Register through other evaluation;
5. Recognized as Historically Significant by Local Government;
6. Not eligible for any Listing or Designation; and
7. Not evaluated for the National Register or California Register or needs re-evaluation.

The second digit of the Status Code is a letter code indicating whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number that is used to further specify significance and refine the relationship of the property to the National Register and/or California Register. Under this evaluation system, categories 1 through 4 pertain to various levels of National Register and California Register eligibility. Locally eligible resources are given a rating code level 5. Properties found ineligible for listing in the National Register, California Register, or for designation under a local ordinance are given an evaluation Status Code of 6. Properties given an evaluation Status Code of 6Z are “found ineligible for the National Register, California Register, or Local designation through survey evaluation.”¹⁶

C. LOCAL LEVEL

1. City of Los Angeles

The City enacted a Cultural Heritage Ordinance in April 1962 which defines City Monuments. According to the Ordinance, City Monuments are sites, buildings, or structures of particular historic or cultural significance to the City in which the broad cultural, political, or social history of the nation, state, or City is reflected or exemplified, including sites and buildings associated with important personages or which embody certain distinguishing architectural characteristics and are associated with a notable architect. These City Monuments are regulated by the City’s Cultural Heritage Commission and the City Council.

¹⁵ Codified in California Code of Regulations, Title 14, Chapter 11.5, Section 4852(c) which can be accessed on the internet at <http://ohp.parks.ca.gov>

¹⁶ *Ibid.*

a. Los Angeles Cultural Heritage Ordinance

The Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Chapter 9, Division 22, Article 1, Section 22.171.7) establishes criteria for designating local historic resources as City Monuments. A City Monument is any site (including significant trees or other plant life located on the site), building or structure or particular historic or cultural significance to the City of Los Angeles, such as historic structures or sites:

- In which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified;
- Which are identified with historic personages or with important events in the main currents of national, State or local history;
- Which embody the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or
- Which are a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

A proposed resource may be eligible for designation if it meets at least one of the criteria above.

When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the Cultural Heritage Commission and the staff of the Office of Historic Resources often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a “master” architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the City or had a role in the development or history of Los Angeles?
- Has the building retained “integrity”? Does it still convey its historic significance through the retention of its original design and materials?
- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?¹⁷

With regard to integrity, the seven aspects of integrity of the National Register and California Register are the same and the threshold of integrity for individual eligibility is similar. However, the threshold of integrity for HPOZs is lower; a contributing structure in an HPOZ is a building that was constructed during the predominant period of development in the neighborhood and that has retained most of its historic features.

¹⁷ *What Makes a Resource Historically Significant?* City of LA Office of Historic Preservation, <http://preservation.lacity.org/commission/what-makes-resource-historically-significant>, accessed July 7, 2013.

b. Los Angeles Historic Preservation Overlay Zone (HPOZ)

City of Los Angeles Ordinance Number 175891, found in Section 12.20.3 of the Los Angeles Municipal Code, describes the procedures for creation of new Historic Preservation Overlay Zones (HPOZs), the powers and duties of HPOZ Boards, and the review processes for projects within HPOZs. The Ordinance was adopted by the Los Angeles City Council on March 19, 2004, and became effective on May 12, 2004.¹⁸ An Historic Preservation Overlay Zone (HPOZ) is an area of the city which is designated as containing structures, landscaping, natural features or sites having historic, architectural, cultural or aesthetic significance. To receive such designation, areas must be adopted as an HPOZ by the City Planning Commission and the City Council through a zone change procedure that includes notification of all affected and nearby property owners and public hearings. Once designated, areas have an HPOZ overlay added to their zoning, and are subject to special regulations under Section 12.20.3 of the Los Angeles Municipal Code. Each HPOZ area has a five member HPOZ Board to review and make recommendations on projects and promote historic preservation within the designated area. Most types of exterior changes or improvements to properties in an HPOZ area require written approval from the City of Los Angeles Planning Department.¹⁹

Before an HPOZ may move into the formal adoption process, an historic resources survey of the proposed district must be completed. The survey studies the historic and architectural significance of the neighborhood and identifies structures and features as either “contributing” or “non-contributing” to the district. A contributing structure is a building that was constructed during the predominant period of development in the neighborhood and that has retained most of its historic features. A non-contributing structure is one that was either constructed after the major period of the neighborhood’s development, or has been so significantly altered that it no longer conveys its historic character.²⁰

According to Section 12.20.3 of the City of Los Angeles Municipal Code, features designated as contributing shall meet one or more of the following criteria:

- Adds to the Historic architectural qualities or Historic associations for which a property is significant because it was present during the period of significance, and possesses Historic integrity reflecting its character at that time; or
- Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
- Retaining the building, structure, Landscaping, or Natural Feature, would contribute to the preservation and protection of the resource and its environment.²¹

¹⁸ “Citywide HPOZ Ordinance,” City of Los Angeles Historic Resources, <http://www.preservation.lacity.org/hpoz/citywide-hpoz-ordinance>, accessed July 24, 2013.

¹⁹ “How to Establish an HPOZ,” City of Los Angeles Office of Historic Resources, <http://www.preservation.lacity.org/hpoz/how-establish-hpoz>, accessed July 24, 2013.

²⁰ “How to Establish an HPOZ,” City of Los Angeles Office of Historic Resources, <http://www.preservation.lacity.org/hpoz/how-establish-hpoz>, accessed July 24, 2013.

²¹ “Citywide HPOZ Ordinance,” City of Los Angeles Historic Resources, <http://www.preservation.lacity.org/hpoz/citywide-hpoz-ordinance>, accessed July 24, 2013, pgs. 11-12.

III. HISTORIC CONTEXT AND EVALUATION

A. HISTORIC CONTEXT

The historic context developed below presents the background necessary to evaluate the historical and architectural significance of the properties located at 925 and 927 Marco Place within the Project Site, including the construction and alterations history, the history of the development of Venice and the neighborhoods surrounding the subject properties. The period of significance associated with 925 Marco Place is 1910, its date of construction. The period of significance associated with 927 Marco Place is 1923, its date of construction. Research indicates the properties are associated with the following historical and architectural themes: Abbot Kinney (1850-1920); Pre-Consolidation of Venice (1850-1925); The Consolidation and Decline of "Coney Island of the Pacific" (1925-1965); Subdivision and Development of Venice Annex Tract (1905-1952); and American Craftsman Style Architecture (1905-1930). The historic context is organized to correspond with the SurveyLA Historic Context Statement and is tailored to reflect the local history of the Residence.

1. Abbot Kinney (1850-1920)



Figure 3. Abbot Kinney (Los Angeles Public Library Photo Collection)

Abbot Kinney (1850 -1920), the founder of the Venice of America tract, was born in Brookside, New Jersey on November 6, 1850 (Figure 3).²² He spent the majority of his childhood living with his uncle, Senator James Dixon of Connecticut, and completed his education at Heidelberg University in Germany before traveling throughout Europe.²³ When Kinney completed his studies, he returned to the United States and began working in the tobacco industry. In 1877 Kinney toured the world to study the methods of cigarette production in other countries. When Kinney returned to the United States three years later, he arrived in California and found the climate agreeable with his asthma. He purchased a large tract of land in the Sierra Madre where he cultivated a citrus orchard, which he named "Kinneloa."²⁴ Kinney became a well respected member of society and was

²² Luther A Ingersoll, *History of Santa Monica Bay Cities, Los Angeles, Ca: LA Ingersoll, 1908, 327.*

²³ "Founder of Venice Dies," *Los Angeles Times*, November 5, 1920.

²⁴ Luther A Ingersoll, 327.

particularly active in the preservation of California's natural environment. "In all of his public work, Mr. Kinney has shown a broad public spirit and devotion to the general good."²⁵ Abbot Kinney's contributions to the state included serving as President of the Southern California Academy of Science and the Southern California Forest and Water Association as well as Vice President of the American Forestry Association.

After living in Kinneloa four years, Kinney purchased a summer home on Ocean Avenue in Santa Monica. His first real estate investment was "Santa Monica Heights," a development in the bluffs of the Santa Monica Canyon. However, he sold his holdings to the Southern Pacific Railroad, the future site of the long wharf, before he developed the property.²⁶

In 1891, he shifted his interests to the coastal areas of south Santa Monica. Kinney and his business partner, Francis G. Ryan, acquired controlling interest in the beachfront Ocean Park Casino in 1891 and subsequently purchased the surrounding tract of land, reaching from Pico Boulevard in Santa Monica to Mildred Avenue in Venice and extending between 1,000 feet and one-half mile inland. The name Ocean Park apparently initially referred to the present community as well as the present-day Venice, and possibly to additional land as far south as Playa del Rey. Some accounts suggest that a city named Ocean Park incorporated around the turn of the century, later changing its name to Venice under Abbot Kinney's guidance; the community within Santa Monica, therefore, retained the name Ocean Park.²⁷ The community adopted the name Ocean Park in 1895. Growth and development of Ocean Park began in 1898, when Kinney was granted permission by the City of Santa Monica to build a 1,250-foot pier at the end of Pier Avenue.²⁸

After Abbot Kinney's business partner Francis G. Ryan died in 1899, his widow's new husband Thomas Dudley transferred his interest to Alexander Faser, Henry Gage, and George Merritt Jones on February 12, 1902.²⁹ This arrangement lasted for two years, until they divided their interests and Kinney obtained the title to all of the undeveloped southern holdings. Kinney's partners thought the southern portion was undesirable marshland, but Kinney envisioned a city like Venice, Italy, constructed on the marshes that would inspire a cultural Renaissance in Southern California.³⁰

2. Pre-Consolidation of Venice (1850-1925)

After the Ocean Park Improvement Company was dissolved in 1904, Kinney began to develop "Venice of America," intending to create a seaside resort reminiscent of its namesake in Italy. To prepare a town plan, Kinney commissioned architects Norman Marsh and C.H. Russell and Fremont Ackerman as civil engineer.³¹ The fully equipped city included businesses, hotels, residences, and canals radiating out from a Grand lagoon. Residential lots faced inwards towards six miles of canals with colorful names such as Aldebaran (Market Street), Coral, Lion (Windward Avenue), Venus, Altair, and Grand (Grand Boulevard). Kinney may have been inspired by the network of canals, gondoliers, lagoon, and central basin featured at the World's Columbian

²⁵ *Luther A Ingersoll, 328-329.*

²⁶ *Lynn Craig Cunningham, Venice, California: From City to Suburb, Los Angeles, Ca: UCLA, 1976, 11.*

²⁷ *North Main Street Mixed-Use Development Project EIR, 3.9-3.*

²⁸ *North Main Street Mixed-Use Development Project EIR, 3.9-4.*

²⁹ *Lynn Craig Cunningham, 11.*

³⁰ *Jeffery Stanton, Venice of America: 'Coney Island of the Pacific,' Los Angeles: Donahue Pub, 1988, 8.*

³¹ *Jeffery Stanton, 8.*

Exposition of 1893 in Chicago, Illinois.³² The plan for Venice of America was more modest in comparison but incorporated the Columbian Exposition's concepts into its town layout, including the canals, parks, hotels, entertainment facilities, and the Renaissance Revival style of architecture.



Figure 4. Venice of America Plat Tract, circa 1905 (Prince D.S. Minsky's *The Venice Canals 1850-1939*, Vol 1, Venice, Ca: Ulan Bator Foundation, 1992, p. 58)

The Venice of America Tract was recorded with the County of Los Angeles on January 18, 1905 (Figure 4). The tract was bounded by Camino Real/Toltec Place (Washington Boulevard, later renamed Abbot Kinney Boulevard in 1989) to the east, Westminster Avenue to the north, Mildred Avenue (Venice Boulevard) to the south, and the Pacific Ocean and Pacific Avenue to the west (Figure 5). The Pacific Electric Railroad routes formed the boundaries of the tract, as the railroad ran parallel to Camino Real/Toltec Place (Washington Boulevard/Abbot Kinney Boulevard), Mildred Avenue (Venice Boulevard), and Pacific Avenue.

Canal dredging commenced on August 15, 1904, first with the Grand Canal, a half mile long, seventy foot wide, four feet deep channel curbed with concrete (Figure 6).³³ The canal network connected to the ocean with two large pipes running under Windward Avenue allowing the canals to be flushed daily by tidal action. Work progressed rapidly and by September 1904, the pier and electric power plant were constructed, however on March 13, 1905, a storm wiped out most of the pier, auditorium and hotel.³⁴ Determined to meet the proposed grand opening date of July 4, 1905, Kinney hired 600 laborers to work nonstop. To protect his facilities from future ocean storms, Kinney constructed a 60-foot breakwater.

³² Jeffery Stanton, 8.

³³ Jeffery Stanton, 9.

³⁴ Carolyn Elayne Alexander, *Images of America: Venice*, Charleston, SC: Arcadia Pub, 2004, 17.



Figure 5. Map of the Venice of America Tract (Jeffery Stanton's *Venice of America: 'Coney Island of the Pacific,'* Los Angeles: Donahue Pub, 1988, p. 113)



Figure 6. Dredging the Canals. Circa 1904 (Santa Monica History Museum Image Archives)

a. Transportation

In addition to the canal system, the city plan for the Venice of America tract was determined by the surrounding railroad tracks. Abbot Kinney was aware that the success of Venice depended greatly upon transportation. Kinney negotiated with Henry Huntington's Pacific Electric Company extending the Lagoon Line route south from Ocean Park to the Venice Club House in 1901.³⁵ In 1905 the track, which ran down Ocean Avenue, was extended to Playa del Rey. The Los Angeles Pacific railway extended its Short Line, a route originating from downtown Los Angeles at 4th and Hill Street, south down Venice Boulevard and to the north along Electric Way to Ocean Park in 1903.³⁶ When tourists arrived on the "Red Cars" of the Pacific Electric Railway they then had the option to tour Venice from the canals and gondolas (Figure 7), ride along the concrete boardwalk on one of Venice's trackless electric trams, or travel on Venice's miniature steam railroad along a 2½ mile track. The Speedway, which ran between the beach cities of Ocean Park and Venice, was the main automobile corridor.³⁷



Figure 7. Boating on the Grand Canal, circa 1908 (Santa Monica History Museum Image Archives)

b. Entertainment

Venice of America opened on July 4, 1905 attracting approximately 40,000 visitors.³⁸ The 1,200-foot-long pleasure pier had an auditorium, ship-style restaurant, dance hall, a hot salt-water plunge, and a block-long arcaded Venetian business street (Windward Avenue). The opening festivities included a 42-piece Venice of

³⁵ The Electric Railway Historical Association, *Pacific Electric: Lagoon Line*, <http://www.erha.org/pewll.htm>, accessed March 14, 2011.

³⁶ The Electric Railway Historical Association, *Pacific Electric: Short Line*, <http://www.erha.org/pewvs.htm>, accessed March 14, 2011; "Solid Trains," *Los Angeles Times*, June 9, 1905.

³⁷ Historic Resources Group, *Historic Context Statement: The Southeast Los Angeles Subregional Planning Area of the City of Los Angeles*, October 1, 1990, A-9.

³⁸ Carolyn Elayne Alexander, 19.

America band, art exhibits, water basketball, swimming races, diving exhibitions, dancing at the auditorium, and a fireworks display over the Grand Lagoon.³⁹

Kinney hired the best lecturers and performers to help establish Venice of America as an art and cultural center modeled after Chautauqua, New York. On March 1, 1905 the Los Angeles Times reported, "A big pavilion, to be erected at Venice, would house the assemblages, and the plan is to gather there during the months of July and August many of the most famous sociological experts from various departments of the world's work – such as personages as Roosevelt, Taft, LaFollette, Thomas J. Lawson, Dolliver, Debs, Parry, Tom Johnson, Miss Jane Adams and Booker Washington."⁴⁰ Despite Kinney's efforts, the Chautauqua-like assembly lost \$16,000 the first summer. Unfortunately the majority of Venice's visitors and residents were not interested in art and culture.

By December of 1905, Kinney had accepted the fate of his beloved Venice, giving up on his dream of creating a cultural center and instead focusing his attention on the desires of the public. The character of Venice succumbed to the beach-goers and summer holiday guests who frequented the community's many amusement attractions and Venice became known as the "Coney Island of the Pacific." By mid-January 1906, the area featured foreign exhibits, amusements, and freak shows. Attractions on the Kinney Pier became more amusement oriented by 1910, when a Venice Scenic Railway, Aquarium, Virginia Reel, Whip, Racing Derby, and game booths were added. The golden era of the Venice Pier lasted until 1920, the year Abbot Kinney died.

3. The Consolidation and Decline of "Coney Island of the Pacific" (1925-1965)

After Abbot Kinney died in 1920, his oldest son Thornton resumed operation of the Abbot Kinney Company.⁴¹ That same year, in December a fire engulfed the amusement pier destroying everything but the new roller coaster and bandstand tower.⁴² The pier was rebuilt and reopened six months later on July 4, 1921.⁴³ Although the pier was reconstructed and business resumed, the owners incurred millions of dollars worth of losses.

Venice was annexed by Los Angeles on November 25, 1925.⁴⁴ Los Angeles' Blue Laws immediately had an effect on Venice's amusement area, banning dancing and gambling on Sundays. Shortly after annexation, the Venice of America canals came under sharp scrutiny by the health department.⁴⁵ The lack of water circulation through the system left the waters stagnant so the city paved over some of the canals. In 1930, oil was found on the Venice peninsula and within a year 148 oil wells produced over 46,932 barrels a day.⁴⁶ Although jobs were created, environmental pollution on the beaches and residential areas became widespread.

³⁹ Carolyn Elayne Alexander, 20; "Assembly Programme: Patriotic Concert for the Fourth of July and Grand Display of Fireworks," *Los Angeles Times*, June 25, 1905.

⁴⁰ "B. Fay Mill's Vast Projects: To Hold Many Congresses at "Venice of America," *Los Angeles Times*, March 1, 1905.

⁴¹ "Founder of Venice Dies," *Los Angeles Times*, November 5, 1920.

⁴² "World Famous Venice Pier is Burned," *Los Angeles Times*, December 22, 1920.

⁴³ "Work on Venice Pier to Begin," *Los Angeles Times*, March 20, 1921.

⁴⁴ Jeffery Stanton, 103.

⁴⁵ Jeffery Stanton, 122.

⁴⁶ Jeffery Stanton, 129.

The Great Depression in the 1930s had an effect on the Venice economy, which rebounded only slightly during World War II. In 1946 the city failed to renew the Kinney Company's lease on the tidelands, deciding to tear down the piers leading to The Venice Pier's demise.⁴⁷ The City wanted to widen the beach and remove all structures obscuring the way. The pier was slowly dismantled and finally destroyed in 1947 when it caught on fire. During the 1950s Venice attracted artists composing of what became known as the Beat Generation. These artists were interested in Venice's low rent, mild climate, and tolerance of their lifestyle.

The invasion of the Beat Generation into the Venice community was not enough to impede the dismantling of the Venice of America tract. The Shoreline and Landmarks Society was established to prevent demolition and declare buildings as City of Los Angeles historic landmarks. However, despite their efforts the city claimed the buildings were not representative of Southern California architecture and denied landmark status. In accordance with the Earthquake Enforcement Code, 550 buildings were demolished by 1965.⁴⁸

4. Subdivision and Development of the Venice Annex Tract (1905-1952)

The Project Site is located on lots 22, 23, and 24 of block 16 in the Venice Annex Tract (Figure 8) subdivided by the Union Trust Company in August of 1905. The Venice Annex Tract included approximately four hundred and sixty-five residential plots adjacent to Abbot Kinney's Venice of America Tract and the Venice canals and was one of the larger tracts in the district. The tract was laid out in a similar fashion to Abbot Kinney's Golden Bay tract, developed earlier, organized to provide separate thoroughfares for automobile and pedestrian access, with "drive streets" paralleling "walk streets," and walks streets accessed via rear alleys.

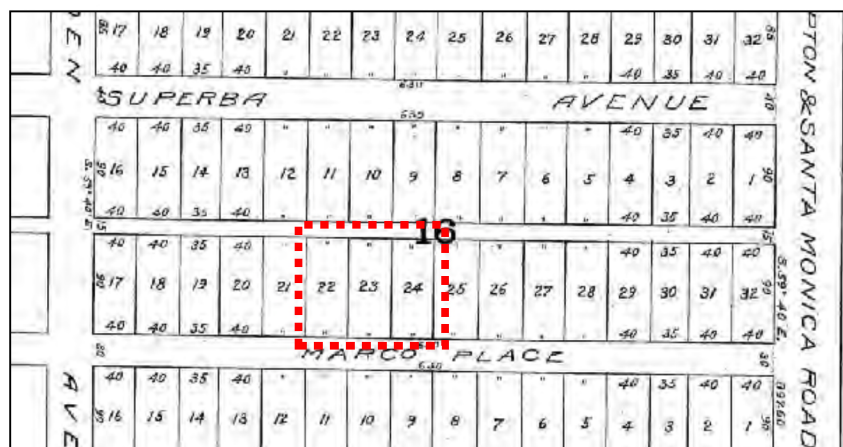


Figure 8. Section of the 1918 Sanborn Map, Subject Property Outlined in Red (LAPL)

The earliest available depiction of the property is the 1918 Sanborn Insurance map (Figure 9), which depicts the block of the Project Site with only two structures, the Bungalow at 925 Marco Pl and a residence next door at 923 Marco Pl, while 927 Marco Pl and many others lots remained undeveloped. However, by 1952 the majority of the neighborhood surrounding the properties at 925 and 927 Marco Pl had filled in. An aerial image depicting the property from 1952 (Figure 10), the year the Residence was constructed, shows the Venice Annex Tract developed with the exception of a few lots to the east of the Project Site. The density of

⁴⁷ Jeffery Stanton, 139.

⁴⁸ Jeffery Stanton, 143.

improvements is also represented on a 1950 Sanborn map (Figure 11). The full Sanborn maps can be found in Appendix A and B, while the Venice Annex tract maps are in Appendix C.

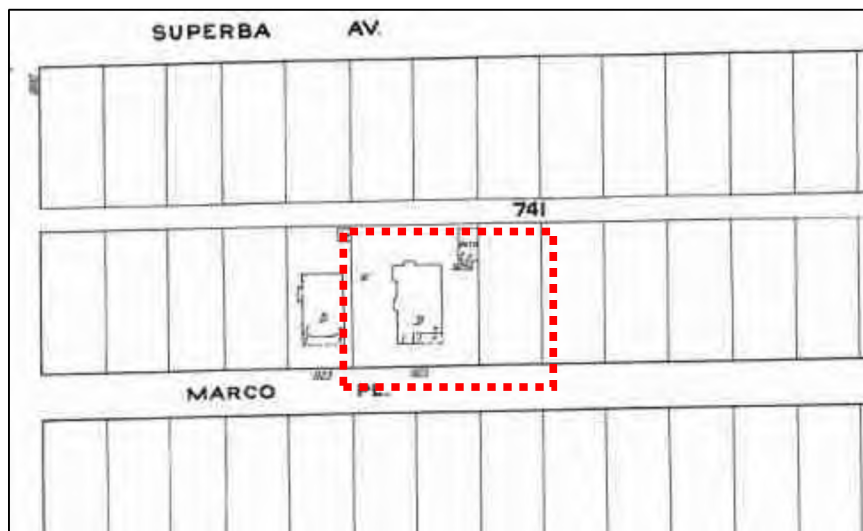


Figure 9. Section of the 1918 Sanborn Map, Subject Property Outlined in Red (Los Angeles Public Library)



Figure 10. 1952 Historical Aerial (Historicaerials.com)

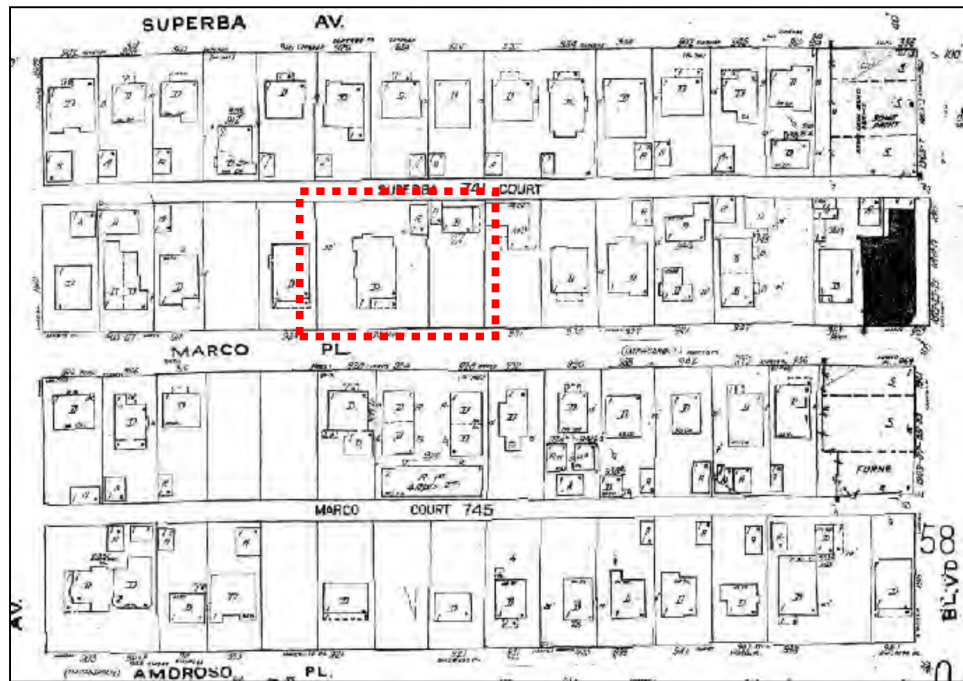


Figure 11. Section of the 1950 Sanborn Map, Subject Property Outlined in Red (Los Angeles Public Library)

5. American Craftsman Style Architecture (1905-1930)

The architectural style of the Bungalow at 925 Marco Place was derived from the Arts and Crafts Movement which originated in England during the second half of the nineteenth century as a reaction to nineteenth century industrial culture. The Arts and Crafts Movement called for a return to honesty and utility in design, handcrafted construction, and the use of natural materials. Advocates of the movement in England, including William Morris, argued that relying on handcrafted construction allowed each creation to be an individual work rather than a standardized industrial product. In the United States, the Arts and Crafts Movement included architecture, furniture, and decorative arts.

The Craftsman style was adaptable across socioeconomic categories and included both large finely crafted homes for the affluent class, and small modestly built cottages or bungalows for the working class. In contrast to earlier styles, the bungalow was intended for the servant-less household and could be built by either an unskilled builder using plans from books or with kits fully cut and shipped from mail-order houses. The Craftsman style was publicized extensively in lifestyle magazines of the period, which led to a flourishing of pattern books, some of which offered prefabricated “kit” components for on-site assembly such as products by Sears Roebuck and Company and Pacific Ready-Cut Homes. In other examples, architects and master builders used the architectural vocabulary of the Craftsman style to create complex and highly detailed residential architecture.⁴⁹

The architecture of the American Craftsman style was defined by its use of natural materials, hand craftsmanship, integration into the landscape, incorporation of the climate, and broad horizontality with multilevel eaves. Craftsman style single-family residences were once ubiquitous throughout the United States. However, because of their wide covered front porches, a key design feature that functioned as an outdoor room, Craftsman properties were especially popular in warmer areas of the country, such as Southern

⁴⁹ “Santa Monica Historical Resources Inventory,” 1985-86 Final Report.

California. The typical Craftsman residence is one to one-and-one-half stories in height. Its character defining features include: low-pitched hipped or gabled roofs; wide, overhanging eaves; exposed rafter tails; decorative brackets, knee braces or false beams under gable pitches; full- or partial-front porch with tapered wood posts and/or masonry piers; shingle, clapboard or ship-lap siding; emphasis on natural materials such as stone, handcraftsmanship; emphasis on horizontality in design; and exposed structural members, often used as ornamentation.

During the first three decades of the 20th century, the Craftsman style bungalow was common in Los Angeles and the residential neighborhoods of Santa Monica, Ocean Park and Venice. The Craftsman style has a generally recognized national period of significance of 1905 to 1930 during the time when this style was most common.⁵⁰ Craftsman single-family residences dating from 1905 to 1930 are associated with the architectural styles and culture of early 20th century residential architecture. They illustrate the broad influence of the Arts and Crafts Movement on the local architects, designers, and builders working in Los Angeles during the first few decades of the 20th century. Furthermore, they represent the identity and values of the occupants, who found in this style and method of construction a means by which to satisfactorily accommodate themselves and their families economically, and to express their individuality by selecting from and combining a wide variety of plans, window treatments, door treatments, porches, and architectural features then available.

a. Beach Cottage

Unlike most bungalows in the area, the Bungalow at 925 Marco Place appears to be the permanent residence of the Hambleton family (see directory research in next section), who resided there between 1915 and 1940. Most of the beach cottages in Venice were constructed as secondary homes for their owners or for rental use because of their proximity to the beach and Venice of America attractions. However, the Residence at 927 Marco Place was most likely one of the more common rental properties, due to the short-term residency of its occupants. Beach Cottages are derivatives of the Craftsman style, period revival styles and eclectic cottages. Cottages were constructed on a budget, which is reflected in their vernacular design and use of materials, such as wood-frame construction resting on brick foundations and minimal architectural ornamentation. Many of the houses were quickly constructed small seasonal homes that were added onto in multiple stages. The beach cottage architecture emphasized simple focal points: decorative shingling or board and batten siding exterior treatments, gables, bay windows, porches, windows and doors. Generally the residences are small scale to allow for the maximum amount of yard space, patios, and courtyards on the site promoting outdoor living.

6. Construction History and Occupancy of 925 Marco Place

a. Construction History

Located on lot 22 and 23 of block 16 in the Venice Annex Tract, the single-family Bungalow was built in 1907 and represents the first and only residence constructed on the property. The building permits on file in the City of Los Angeles were reviewed to determine the history of construction and alterations. However, no permits documenting any alterations were identified (**Table 1**). Permits on file associated with the lots' Assessor Parcel Number (4241-023-021) appear to reflect work recently completed for the residence located at 923/917 Marco Place based on a physical examination of the site. The Bungalow appears to have few if any major alterations. A portion of the porch has been enclosed but the materials used indicate this was done early in the Bungalow's history. There is no permit on file documenting the alteration.

⁵⁰ Virginia McAlester and Lee McAlester, *A Field Guide to American Houses*, New York: Alfred A. Knopf, 1990.

Table 1

925 Marco Place Building Permits

Issued	Permit#	Owner	Architect	Contractor	Engineer	Valuation	Description
No permit records regarding 925 Marco Place were found on file with the Los Angeles Department of Building and Safety							

b. Occupancy and Ownership History

The Los Angeles City Directories, Santa Monica City Directories, and the United States Census Records were reviewed to determine if the property has an association with the productive life of a historically significant person. The earliest listing found for 925 Marco Place was in the 1915-1916 Santa Monica City Directory, which identified Walter D. Hambleton as the Bungalow's occupant. Hambleton was a prominent figure in the Venice community, serving as Ocean Park's first Dentist as early as 1902. In 1887, Hambleton's father left behind the family's Iowa roots for California, settling in Modesto. Albert studies dentistry at the University of California Berkley, graduating in 1902. He immediately relocated to Ocean Park upon graduation and established his dental practice, as well as becoming heavily involved in local real estate. Prior to 1915, Hambleton and his wife Marry resided in various residences along Marco Place. From 1915 until 1940, the Hambletons occupied 925 Marco Place. Walter passed away in 1946. While no listings for 925 Marco Place were found after 1938, the 1940 United States Census shows Hambleton still living in the Bungalow. The Bungalow was not found in the *Santa Monica City Directories* after 1938. The *Santa Monica City Directories* only cover the city of Venice until 1940, after which the area was listed in the Los Angeles City directories. However, Los Angeles directories from the 1950s and 1960s failed to identify occupants of the Bungalow. The historical background research of Walter and Mary Hambleton did not reveal any information to indicate their historical significance or notability at the state or national level. However, the Hambleton's were locally involved in the early settlement of Venice.

7. Construction History and Occupancy of 927 Marco Place**a. Construction History**

927 Marco Place is located on lot 24 of block 16 in the Venice Annex Tract. The approximate date of construction identified in the assessor records for the single-family Residence is 1923. The building permits on file in the City of Los Angeles were reviewed to determine the history of construction and alterations (Table 2). However, no permits documenting any alterations were identified. Physical inspection of the Residence and comparison of the building's footprint versus historic Sanborn maps show that the Residence has been significantly modified (Figures 12 and 13). Because of the simplicity of the Residence, it appears no architect or contractors were involved.

b. Occupancy and Ownership History

The Los Angeles City Directories, Santa Monica City Directories, and the United States Census Records were reviewed to determine if the property has an association with the productive life of a historically significant person. 927 Marco Place is not listed in the directory until 1925 when Elmer and Marion Howard occupied

Table 2

927 Marco Place Building Permits

Issued	Permit#	Owner	Architect	Contractor	Engineer	Valuation	Description
No permit records regarding 927 Marco Place were found on file with the Los Angeles Department of Building and Safety							

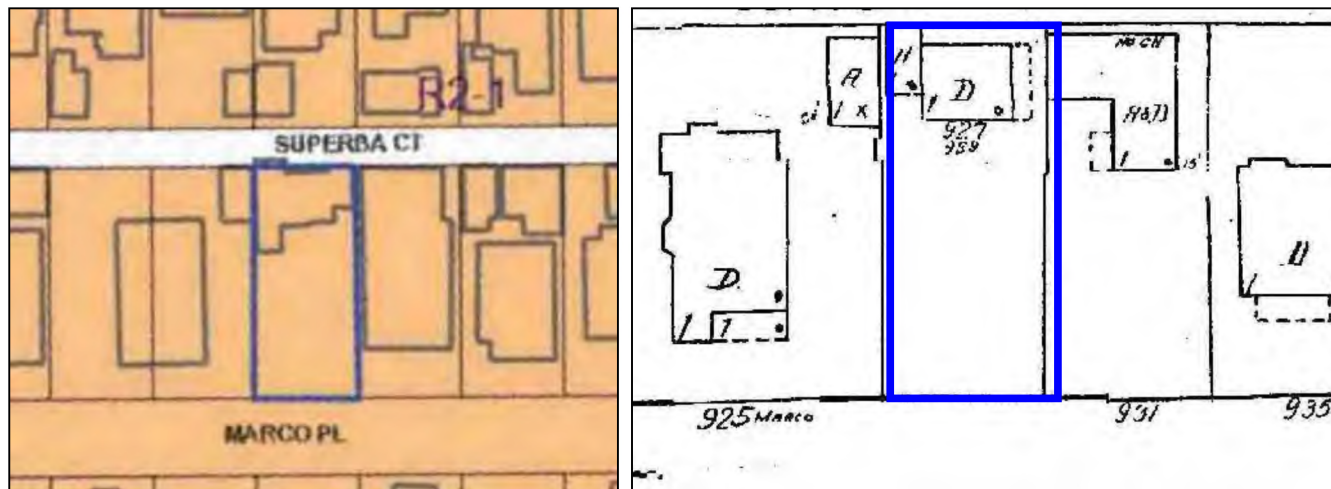


Figure 12 (Left). Image of the Residence's footprint as indicated on ZIMAS (<http://zimas.lacity.org/>)

Figure 13 (Right). Section of the 1950 Sanborn Map, Subject Property Outlined in Blue (Los Angeles Public Library)

the Residence. Census records show the Howards lived at 927 Marco Place for a short time. By 1928, the couple had moved to a home on California Avenue. The Residence was not found in *Santa Monica City Directories* after 1925. The *Santa Monica City Directories* only cover the city of Venice until 1940, after which the area was listed in the Los Angeles City directories. However, Los Angeles directories from the 1950s and 1960s failed to identify occupants of the Residence. The historical background research of Elmer and Marion Howard did not reveal any information to indicate their historical significance or notability. No evidence was found that linked the property to the productive life of a locally, statewide, or nationally known person.

IV. EVALUATION

A. PREVIOUS EVALUATIONS

1. Historical Resources in the Project Vicinity

The records search for cultural resources within the project vicinity (approximately 0.25-mile radius) involved review of previous surveys records and reports on file at the South Central Coastal Information Center (SCCIC) records center, PCR's in-house files, and SurveyLA data.⁵¹ Located within a dense, urban setting with limited visibility, the 0.25-mile radius records search was conducted to capture all known resources within the project vicinity which may have views of the project site for the purpose of analyzing potential indirect impacts. PCR also consulted the National Register, California Register, Statewide Historical Resources Inventory (HRI), California Points of Historical Interest (PHI), California Historical Landmarks (CHL), SurveyLA, and City Monument database to identify previously identified historical resources within the project vicinity.

*Fifteen properties (15) situated within a 0.25 radius of the Project Site appear eligible for the National Register (3S), California Register (3CS), and local listing (5S3) as an individual property through SurveyLA (2014-ongoing):*⁵²

- 902 Palms Boulevard: Craftsman style single-family residence constructed in 1916. Approximately 0.10 miles (521 feet) to the west of Project; no view of the Project.
- 1015 Lincoln Boulevard: The Spanish Colonial Revival style Broadway Elementary School built in 1926. Approximately 0.25 miles (1,323 feet) to the north of Project; no view of the Project.
- 1605 Lincoln Boulevard: Projecting Blade Commercial Sign built in 1960. Approximately 0.12 miles (628 feet) to the north of Project; no view of the Project.
- 1611 Lincoln Boulevard: American Colonial Revival style commercial building constructed in 1924. Approximately 0.11 miles (544 feet) to the north of Project; no view of the Project.
- 1701 Lincoln Boulevard: Projecting Blade Commercial Sign built in 1955. Approximately 0.07 miles (412 feet) to the north of Project; no view of the Project.
- 1711 Lincoln Boulevard: Vernacular commercial building constructed in 1925. Approximately 0.07 miles (361 feet) to the north of Project; no view of the Project.
- 1801 Lincoln Boulevard: Spanish Colonial Revival style commercial building constructed in 1928. Approximately 0.06 miles (342 feet) to the north of Project; no view of the Project.
- 1905 Lincoln Boulevard: Spanish Colonial Revival style commercial building constructed in 1929. Approximately 0.07 miles (394 feet) to the east of Project; no view of the Project.
- 932 Amoroso Place: Post Modern style single-family residence constructed in 1979, designed by Thom Mayne and Michael Rotondi. Approximately 0.08 miles (440 feet) to the east of Project; no view of the Project.

⁵¹ PCR reused the date from a previous records search commissioned through the SCCIC for 1141 Cabrillo in November 2014.

⁵² PCR reviewed SurveyLA data provided by the City of Los Angeles Office of Historic Resources. The SurveyLA data prepared by the Historic Resources Group in 2014, is still in working form as it has not been published or reviewed.

- 1020 Victoria Avenue: The Mid-Century Modern style Venice United Methodist Church built in 1965. Approximately 0.22 miles (1,180 feet) to the east of Project; no view of the Project.
- 821 Victoria Avenue: Craftsman style single-family residence constructed in 1906. Approximately 0.20 miles (1,080 feet) to the south of Project; no view of the Project.
- 2211 Prospect Avenue: Craftsman style single-family residence constructed in 1912. Approximately 0.25 miles (1,330 feet) to the east of Project; no view of the Project.
- 2203 Marion Place: American Foursquare style single-family residence constructed in 1904. Approximately 0.18 miles (964 feet) to the east of Project; no view of the Project.
- 839 Milwood Avenue: Craftsman Style single-family residence constructed in 1915. Approximately 0.21 miles (1,090 feet) to the west of Project; no view of the Project.
- 929 Milwood Avenue: Hipped Roof Cottage multi-family duplex constructed in 1913. Approximately 0.19 miles (1,007 feet) to the west of Project; no view of the Project.

There is one historic district that appears eligible for the California Register and local listing (3CS, 5S3) within the 1/4-mile radius:

- Milwood Venice Walk Streets Historic District, SurveyLA (2014-ongoing), for more information see below.

2. Milwood Venice Walk Streets Historic District

The subject property is located within the boundaries of the Milwood Venice Walk Streets Historic District. As part of SurveyLA's recent survey efforts in 2014, the Milwood Venice Walk Street historic district was found potentially eligible for the California Register and local listing. Located in the northern portion of Venice, the potential district is bounded by Lincoln Boulevard to the northeast, Amoroso Court to the southeast, Venice Boulevard and Electric Avenue to the southwest and west, and Palms Boulevard to the northwest. Of the 474 properties within the potential district, 173 properties were found to be contributors, 280 were found non-contributors, and 21 properties were not surveyed. SurveyLA described the significance of the district as a "unique example of early-20th century residential development oriented on walk streets in Venice."

Registration Requirements and Eligibility Standards

Eligibility Standards

- A geographically definable area composed of multiple adjacent subdivisions, or portions thereof, that have become linked over time through a shared period of development or demographic, ethnic or cultural cohesion;
- Developed as a direct result of the proximity to a streetcar line;
- Includes lots developed almost entirely with single-family residences dating from the period of significance;
- Retains a sense of place that evokes an early 20th century suburb; and
- Was developed primarily during the period of significance.

Sub-theme

- Suburban Planning and Development, 1888-1933

Period of Significance

- 1906-1939

Property Type

- Streetcar suburb

Character-Defining Features

As a whole, retains the essential physical and character-defining features from the period of significance;

- Includes intact single-family and multi-family residences that represent a collection of early 20th century housing types and styles;
- Street improvements such as curb and gutter, historic streetlights, sidewalks, parkways and street trees common;
- Uniform blocks of rectangular-shaped parcels laid out in square or rectilinear grid of streets; and
- Uniform front-yard setbacks, typically landscaped with lawns and shrubbery.

Integrity

- Retains sufficient integrity to convey significance: location, design, setting, workmanship, feeling, and association

3. Previous Evaluations of 925 Marco Place

925 Marco Place was previously identified as a contributor to the potential Milwood Venice Walk Streets Historic District by SurveyLA in 2014.⁵³ The residence was inventoried as a single-family Craftsman house with Japanese inspired elements constructed in 1907.

4. Previous Evaluations of 927 Marco Place

In 2014, SurveyLA identified the neighborhood surrounding 927 Marco Place as the potential Milwood Venice Walk Streets Historic District. Due to obscured visibility, the Residence was given the status of “not sure” in reference to its status as a contributor or non-contributor to the potential district. The survey was unable to identify an architectural style associated with the Residence, but did identify its construction date of 1923.⁵⁴

⁵³ SurveyLA, *Survey Consolidated Data Report_1062014_VEN, Consolidated “Individual Resources” as of 9/30/14, Venice (HRG)*.

⁵⁴ SurveyLA, *Survey Consolidated Data Report_1062014_VEN, Consolidated “Individual Resources” as of 9/30/14, Venice (HRG)*.

B. EVALUATION OF POTENTIAL HISTORICAL RESOURCES WITHIN THE PROJECT SITE

1. SurveyLA Registration Requirements and Eligibility Standards

Based upon the historical themes developed in Chapter III and in the Los Angeles Historic Context Statement, there are three significant SurveyLA themes associated with the properties: Pre-Consolidation of Venice (1850-1925), Streetcar Suburbanization (1888-1933), and American Craftsman Style Architecture (1905-1930).⁵⁵ The following are the eligibility standards that define what character-defining features and integrity aspects a historical resource needs to have in order to be considered eligible in association with each theme. These eligibility standards have been developed below.

a. Pre-Consolidation of Venice (1850-1925)

Eligibility Standards

- Represents a resource dating from the pre-consolidation period of Venice
- Is associated with an event or series of events important in the formation, settlement, or development of Venice

Character-Defining Features/Associative Features

- Retains most of the essential physical features from the period of significance
- Maybe associated with groups important In Venice's early ethnic history

Integrity Considerations

- Setting may have changed (surrounding buildings and land uses)
- Original use may have changed
- Alterations to a resource during the period of pre-annexation or historic changes in its use may themselves have historical, cultural, or architectural significance
- Because of the rarity of the type there may be a greater degree of alterations or fewer extant features
- Some original materials may have been altered, removed or replaced
- For local HCM may have been related within Venice for preservation purposes
- Should retain integrity of Location, Feeling, Association, and Materials from the period of significance

b. Residential Development and Suburbanization (1850-1980)

Theme: Streetcar Suburbanization (1888-1933)

⁵⁵ SurveyLA, *Los Angeles Historic Context Statement Outline, Pre-Consolidation Communities of Los Angeles, 1850-1932, Venice, 1950-1925* (January 2, 2014): 91.

SurveyLA, *Los Angeles Historic Context Statement Outline, Architecture and Engineering, 1850-1980, Mid-Century Modernism, 1945-1970* (January 16, 2014): 472-473.

Eligibility Standards

- A geographically definable area composed of multiple adjacent subdivisions, or portions thereof, that have become linked over time through a shared period of development or demographic, ethnic or cultural cohesion
- Developed as a direct result of the proximity to a streetcar line
- Includes lots developed almost entirely with single-family residences dating from the period of significance
- Retains a sense of place that evokes an early 20th century suburb
- Was developed primarily during the period of significance.

Character-Defining Features/Associative Features

- As a whole, retains the essential physical and character-defining features from the period of significance
- Includes intact single-family and multi-family residences that represent a collection of early 20th century housing types and styles;
- May include commercial and institutional properties and contributing features
- Small-scale retail/commercial and institutional properties may be peppered throughout the neighborhood or concentrated near historic streetcar stops or nodes
- Street improvements such as curb and gutter, historic streetlights, sidewalks, parkways and street trees common
- Uniform blocks of rectangular-shaped parcels laid out in square or rectilinear grid of streets
- Uniform front-yard setbacks, typically landscaped with lawns and shrubbery.

Integrity Considerations

- Alterations to individual buildings should be allowable under the eligibility standards for the particular style
- Alterations to streetscape to accommodate increased automobile use are common; may include driveways and garages added after the period of significance
- Infill development allowed if it does not disrupt the residential character
- Original streetscape features, such as street trees and lights, may be missing in limited amounts
- Should retain integrity of Feeling, Setting, Design, Location, and Association
- Some contributors may have been moved into the area
- Some widening of neighborhood streets may occur where they have become major arteries

c. American Craftsman Style Architecture (1905-1930)**Eligibility Standards**

- Exemplifies the tenets of the Arts and Crafts movement and the Craftsman style

- Exhibits quality craftsmanship
- Was constructed during the period of significance

Character-Defining Features/Associative Features

- Broad front entry porches of half for full-width, with square or battered columns, sometimes second-story sleeping porches
- Broad, overhanging eaves with exposed structural members such as rafter tails, knee braces, and king posts
- Building forms that respond to the site
- Typically double-hung windows or casement windows situated in groups
- Extensive use of natural materials for columns, chimneys, retaining walls, and landscape features
- Low-pitched gabled roofs
- One or two stories in height
- Represents an early or rare example of the style in the community in which it is located
- Retains most of the essential physical features from the period of significance
- Shingled exteriors, occasionally clapboard or stucco

Integrity Considerations

- Brick or stonework may have been painted; acceptable as it is reversible
- Building may have been moved for preservation purposes
- Craftsman style buildings that have been stuccoed are excluded from individual listing under C/3/3 if they were originally shingled or clapboarded
- Original use may have changed
- Should retain integrity of Design, Workmanship, Feeling, Setting, and Materials
- Some window replacement may be acceptable if the openings have not been resized, particularly windows associated with kitchens and bathrooms on rear and side elevations
- The enclosure of porches is an acceptable alteration so long as the features such as piers and posts have not been removed
- The most common alteration is the replacement of windows and the enclosure of porches

2. Architectural Description, Integrity Analysis, and Significance Evaluation of 925

Marco Place

a. Architectural Description

The subject properties include the Bungalow located at 925 Marco Place in the neighborhood of Venice, City of Los Angeles, California, occupying two parcels totaling approximately 7,200 square feet. The Bungalow is located near the center of the two lots and is composed of a rectangular floor plan and symmetrical façade oriented southeast toward the Marco Place walk street in the middle of the block between Lincoln Boulevard

and Linden Avenue (Figure 14). The single-story residence is a Craftsman Style beach bungalow featuring a hipped roof and unique Asian inspired rafter tails and flared eaves (Figure 15). The Bungalow consists of wood-frame construction on a concrete foundation, clad with wood clapboard siding on the primary (south) and secondary (east, west, and north) elevations. The Bungalow's primary entrance consists of a single wood, partially glazed door, centrally located beneath upon a partially enclosed, full length porch supported by masonry columns. However, the west half of the Bungalow's front porch has been enclosed to expand the interior spaces (Figures 16 and 17).



Figure 14 (Left). Primary (south) elevation, 925 March Pl., view to the northwest (PCR 2016)

Figure 15 (Right). Close-up view of the Bungalow's flared eaves (PCR 2016)



Figure 16 (Left). Enclosed porch near the southwest corner of the primary (south) elevation, view north (PCR 2016)

Figure 17 (Right). Interior view of the enclosed porch, 925 Marco Pl., view to the southeast (PCR 2016)

The west facing façade contains a canted bay window and another squared bay window near the rear of the Bungalow (Figures 18 and 19). Between the two bay windows is a new greenhouse window (alteration), a fixed window, and an exterior masonry chimney. The west side of the Bungalow features a manicured landscape and concrete path leading to the rear of the property.



Figure 18 (Left). Overview of the Bungalow's west elevation, 925 Marco Pl., view to the northeast (PCR 2016)
Figure 19 (Right). Close-up view of the rear squared bay window and greenhouse window (alteration) (PCR 2016)

The north facing façade, or rear façade, includes a wood framed, partially glazed door adjacent to a wood framed sliding window and a small stained glass window (alteration) (Figure 20). Also located near the north elevation is a detached garage, manicured lawn, and concrete walkways. The east elevation was not accessed during the site visit, however it appears to contain multiple wood framed, double hung windows that appear original (Figure 21).



Figure 20 (Left). The Bungalow's rear elevation and detached garage, 925 Marco Pl., view to the southeast (PCR 2016)
Figure 21 (Right). View of the Bungalow's east elevation, view to the northwest (PCR 2016)

The interior of the Bungalow features its original corbelled ceilings and wood built-ins. The walls are decorated with wood wainscoting. The east end of the living room is punctuated by a large picture window with stained glass transom, while the west end of the room features the masonry fireplace (Figure 22). Large French doors open up onto the enclosed portion of the front porch (Figure 23). The interior's details continue into the dining room where a built-in wood bench sits below a canted bay window (Figure 24). Wood wainscoting decorates the dining room's walls, which also feature a set of built-in cabinets and drawers (Figure 25). The Bungalow retains its original interior door surrounds, and wood flooring throughout.



Figure 22 (Left). Interior View of the living room, 925 Marco Pl., view to the east (PCR 2016)

Figure 23 (Right). Interior View of the living room, view to the west (PCR 2016)



Figure 24 (Left). Interior View of the dining room, 925 Marco Pl., view to the northwest (PCR 2016)

Figure 25 (Right). Interior View of the dining room, view to the northeast (PCR 2016)

b. Integrity Analysis

The National and California Registers have specific language regarding integrity. Both require that a resource retain sufficient integrity to convey its significance.⁵⁶ In accordance with the guidelines of the National Register of Historic Places, integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The property must retain, however, the essential physical features that enable it to convey its historic identity. Furthermore, National Register Bulletin 15 states, “A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property’s historic character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register.”⁵⁷ The California Register requires that a resource retain enough of its historic character or appearance to be recognizable as a historical resource and to convey the reasons for its significance.

⁵⁶ *National Register Bulletin 15*, p. 44.

⁵⁷ *Ibid*, 15, p. 46.

The overall appearance of the subject property, constructed in 1907, indicates that the property's integrity is high in terms of location, design, materials, workmanship, feeling, and association. As a single-family Bungalow residence in the Craftsman style, it retains much of its original design, with the only permanent alterations being the partial enclosure of the front porch. Although no building permit documenting the porch's enclosure was found, a physical inspection of the materials used indicated that the alteration occurred early in the Bungalow's history. No evidence of significant alterations were found during the site visit, therefore the Bungalow retains its integrity of design, materials, workmanship, feeling and association. Furthermore, the Bungalow remains in its original location and therefore retains integrity of location.

Although the overall neighborhood composing the Venice Annex Tract has been eroded due to infill development, the immediate area surrounding the Bungalow appears to retain a moderate level of integrity, featuring residences dating from the period of original development. Located on the south side of the Marco Place walk street is a small bungalow court at 924-928 Marco Pl, constructed in 1925. Also to the south of the Bungalow is a small beach cottage constructed in 1920 at 920 Marco Pl. However, to the west of the Bungalow is a large residence, constructed in 1912 at 923 Marco Pl. Although the residence dates from the period of development, it has been significantly altered with a two-story rear addition. To the east is 927 Marco Place described in detail in this report, below. Although 927 Marco Pl was built in 1923, it has been significantly altered and no longer retains its historical appearance.

The Bungalow is associated with Streetcar Suburbanization, the Pre-Consolidation of Venice, and American Craftsman Style Architecture. **Table 3** shows the integrity considerations suggested by SurveyLA. In summary, the Bungalow maintains a high-level of integrity in terms of design, materials, workmanship, location, feeling, and association, while its integrity of setting has moderately been compromised due to alterations to neighboring residences (see above). Despite its compromised setting, the Bungalow retains enough architectural integrity to convey its historic associations with the identified themes.

Table 3

Integrity Matrix: 925 Marco Place

Context		Retains Integrity	Lacks Integrity
Streetcar Suburbanization	Location	X	
	Association	X	
	Feeling	X	
	Materials	X	
Pre-Consolidation of Venice	Location	X	
	Setting	Moderate	
	Design	X	
	Feeling	X	
	Association	X	
American Craftsman Style Architecture	Design	X	
	Workmanship	X	
	Feeling	X	
	Setting	Moderate	
	Materials	X	

c. Significance Evaluation: 925 Marco Pl.

925 Marco Place is associated with historic themes identified in the Los Angeles' Citywide Historic Context Statement, such as the Streetcar Suburbanization (1888-1933), Pre-Consolidation of Venice (1850-1925), and American Craftsman Style Architecture (1905-1930). Constructed in 1907, the Bungalow is one of the first residences built in the Venice Annex Tract subdivided two years earlier. Although the Bungalow was constructed early in the neighborhood's history, it is not the first one built. No evidence suggesting the Bungalow played a significant role in events associated with national, state, or local history were uncovered while researching the property and its surroundings. Although Walter Hambleton, Venice's first dentist, resided in the Bungalow during the early twentieth century, he does not appear to rise to the level of significance to be considered a historic personage eligible for national, state, or local recognition. Furthermore, no other residents were found to be historically significant during the course of this assessment. Finally, despite retaining a high level of integrity, the Bungalow does not appear to be an exceptional example of its type or style nor does it appear to be the work of a notable architect or builder. Therefore the Bungalow does not appear individually eligible at the national, state, or local levels based on the criteria discussed below. However, it does appear to be a contributor to a potential historic district.

Broad Patterns of History

With regard to broad patterns of history, the following are the relevant criteria:

National Register Criterion A: *Is associated with events that have made a significant contribution to the broad patterns of our history.*

California Register Criterion 1: *Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*

Los Angeles Historic Cultural Monument Criterion: *The proposed site, building, or structure reflects or exemplifies the broad cultural, political, economic, or social history of the nation, State, or City (community).*

The Bungalow at 925 Marco Pl. reflects early-20th century residential development oriented toward the walk-streets and is associated with the Pre-Consolidation of Venice and Streetcar Suburbanization themes identified by SurveyLA. Constructed in 1907, the Bungalow was developed on two of 465 parcels in the Venice Annex Tract, subdivided in 1905. Although the Bungalow is one of the earliest constructed in the Venice Annex Tract, a bungalow located at 906 Marco Pl was built a year earlier. Furthermore, there are other bungalows constructed in the same year as 925 Marco Place. While the Bungalow retains a high level of integrity to convey its historical associations, those associations are not significant enough to warrant individual eligibility for contributions to broad patterns of history, specifically the settlement of Venice. However, SurveyLA has recently identified the Bungalow as a contributor to the potential Milwood Walk Streets Historic District. Based upon the Bungalow's integrity and construction date of 1907, it does appear eligible as a contributor to the potential District, identified under criteria A/1/1. **Therefore, while the Residence does not appear eligible for the National Register under Criterion A, the California Register under Criterion 1, or the local register as an individual resource, it does appear to be a contributor to a potential district identified within this criteria.**

Significant Persons

With regard to associations with important persons, the following are the relevant criteria:

National Register Criterion B: *Is associated with the lives of persons significant in our past.*

California Register Criterion 2: *Is associated with the lives of persons important in our past.*

Los Angeles Historic Cultural Monument Criterion: *The proposed site, building, or structure is identified with historic personages or with important events in the main currents of national, State, or local history.*

The Bungalow was the residence of Walter Hambleton, the first dentist in Venice (originally known as Ocean Park). Based on U.S. Census data, Hambleton lived on the property until at least 1940. Although Hambleton was a pioneering citizen of Venice, well regarded in social and business circles, and involved in local real estate, he does not appear to rise to a level of significance necessary for the Bungalow to be eligible under Criteria B/2/2. Aside from Hambleton, no other owners were identified in association with the Bungalow. **The Residence is not eligible for listing under the National Register Criterion B, California Register Criterion 2, or the local register for eligibility related to a historic personage or event.**

Architecture

With regard to architecture, design or construction, the following are the relevant criteria:

National Register Criterion C: *Embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.*

California Register Criterion 3: *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*

Los Angeles Historic Cultural Monument Criterion: *The proposed site, building, or structure embodies certain distinguishing architectural characteristics of an architectural-type specimen, inherently valuable for a study of a period style or method of construction; or the proposed site, building, or structure is a notable work of a master builder, designer, or architect whose individual genius influenced his age.*

The Bungalow is ineligible for designation under National Register Criterion C, California Criterion 3, and the local criterion. The Bungalow is not an exceptional, distinctive, outstanding, or singular example of a type or style. While the Bungalow does retain many of its original features, these features are not at the level of architectural quality one would associate with an individually recognized historic resource. The only feature with architectural interest is the Bungalow's flared eaves. However, the eaves are basic in design and do not embody the high level of craftsmanship typically associated with the Craftsman style. The Bungalow lacks the character defining elements usually associated with the Craftsman style, such as tapered porch columns. In this case, simple masonry columns support the Bungalow's roof. Overall the residence is lacking in architectural merit. Although the Bungalow retains a high level of integrity based on the American Craftsman style theme, it is a typical example of a Craftsman style beach cottage commonly built in Southern California

and the United States and does not demonstrate any exceptional characteristics of the Craftsman style. Furthermore, the Bungalow is not a notable work of a master builder as there is no architect on record. **Therefore, the Bungalow does not appear to satisfy National Register Criterion C, California Register Criterion 3, or the local register for eligibility related to a distinctive type, method, or period of construction, or as a work of a master.**

Archaeology

National Register Criterion D. *It yields, or may be likely to yield, information important in prehistory or history.*

California Register Criterion 4. *Has yielded, or may be likely to yield, information important in prehistory or history.*

The Bungalow is not likely to yield any information important to prehistory or history. Therefore, the Residence does not meet the above criterion at the national or state level.

3. Architectural Description, Integrity Analysis, and Significance Evaluation of 927 Marco Place

a. Architectural Description

Oriented fronting south towards the Marco Place walk street, the Residence is a one-story, single-family vernacular house located on an approximately 3,600 square foot parcel. The Residence is situated at the rear (north end) of the lot with lush overgrown landscaping occupying a majority of the property. The Residence has an irregular shaped footprint, with rectangular massing, stucco and particle-board exterior cladding (alteration) attached to a wood-frame on a concrete foundation. The roof is covered in asphalt shingles, and has overhanging boxed eaves (alteration). The entry into the Residence consists of a single wood paneled, partially glazed, door (alteration) (Figure 26). The front or south elevation has a concrete patio and walkway extending from the main body of the Residence to the property's front gate along Marco Place (Figure 27). Fenestration on the main façade consists of two large boarded-up window openings (alteration) and smaller wood framed double hung windows (Figures 28 and 29).



Figure 26 (Left). Overview of the primary (south) elevation, 927 Marco Pl., view to the north (PCR 2016)

Figure 27 (Right). Concrete patio on front elevation, view to the north (PCR 2016)



Figure 28 (Left). Oversized window openings, view to the northwest (PCR 2016)

Figure 29 (Right). Double hung windows on what appears to be an addition, view to the northeast (PCR 2016)

The east facing façade includes an overhanging eave that appears to have been extended (alteration) above a plaster wall and a pair of uneven wood frame multi-light windows (alterations) (Figure 30). Towards the rear of the Residence, there is a wood storage cabinet (alteration). The entire east elevation has been added to the Residence. Interior views of the kitchen show what used to be the external chimney (Figure 31). The west elevation of the Residence was not accessible.



Figure 30. 927 Marco Pl., view of the Residence's east elevation with altered roofline, view to the north (PCR 2016)



Figure 31. Interior view of the Residence's kitchen and one time exterior wall with chimney, view to the south (PCR 2016)

The north facing façade, or rear façade, includes a rear entrance with a single wood door and metal screen. The rear entry is situated beneath a low sloping gable with exposed roof framing (Figure 32). Fenestration along the north elevation consists of multiple window openings of different sizes and featuring different window types. Near the Residence's northwest corner, there is a large rectangular mass protruding into the rear alley. This mass appears to have once been the Residence's garage but was converted into interior living space (Figure 33).



Figure 32 (Left). The 927 Marco Pl. Residence's rear elevation, view to the southwest (PCR 2016)

Figure 33 (Right). This portion of the rear elevation may have once been the Residence's garage (PCR 2016)

An inspection of the Residence's interior exposed multiple alterations to the plan. The main living room space features large skylights in the vaulted ceiling (alterations) (Figure 34). To the east of the living room is a kitchen that appears to be a later addition, due to the location of the brick chimney (Figure 35). Figure 36 shows the interior of a bedroom that may have once been the Residence's garage (alteration).



Figure 34. Interior View of living room, view to the east (PCR 2016)



Figure 35 (Left). Interior View of the kitchen (alteration), view to the southeast (PCR 2016)



Figure 36 (Right). Interior of the converted garage now used as interior living space (PCR 2016)

b. Integrity Analysis

The National and California Registers have specific language regarding integrity. Both require that a resource retain sufficient integrity to convey its significance.⁵⁸ In accordance with the guidelines of the National Register of Historic Places, integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The property must retain, however, the essential physical features that enable it to convey its historic identity. Furthermore, National Register Bulletin 15 states, “A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property’s historic character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register.”⁵⁹ The California Register requires that a resource retain enough of its historic character or appearance to be recognizable as a historical resource and to convey the reasons for its significance.

The overall appearance of the subject property, constructed in 1923 at 927 Marco Pl., indicates that the property’s integrity is poor in terms of design, materials, workmanship, feeling, and association. The Residence no longer retains any elements of its original style or design. Alterations include significant additions to the east and west elevations, the conversion of its garage into interior living space, removal of the original exterior cladding, alterations to the roof and eaves, and new doors and windows throughout. Based on these major alterations, the Residence no longer contains integrity of design, materials, workmanship, feeling, or association. Although the overall setting of the Venice Annex Tract has been eroded by infill development, the immediate surroundings of the Residence are largely intact, with the exception of 931 Marco Pl to the west (constructed in 2000). To the west is 925 Marco Place, constructed in 1907. To the south is a small bungalow court built in 1925. In addition to its integrity of setting, the Residence appears to maintain its integrity of location.

In summary, the Residence only maintains its integrity of setting and location. Significant alterations and additions have eroded all aspects of integrity of design, materials, workmanship, feeling, and association.

Table 4

Integrity Matrix: 927 Marco Place

Context		Retains Integrity	Lacks Integrity
Streetcar Suburbanization	Location	X	
	Association		X
	Feeling		X
	Materials		X
Pre-Consolidation of Venice	Location	X	
	Setting	X	
	Design		X
	Feeling		X
	Association		X

⁵⁸ *National Register Bulletin 15*, p. 44.

⁵⁹ *Ibid*, 15, p. 46.

American Craftsman Style Architecture	Design		X
	Workmanship		X
	Feeling		X
	Setting	Moderate	
	Materials		X

c. Significance Evaluation

Although the Residence located at 927 Marco Place is associated with historic themes identified in the Los Angeles' Citywide Historic Context Statement, such as the Pre-Consolidation of Venice (1850-1925) and Streetcar Suburbanization (1888-1933), it possesses an extremely low level of integrity, no longer conveying its association with the identified themes. The Residence was constructed in 1923, within the period of significance for the Pre-Consolidation of Venice historic context. However, it retains no identifiable features dating from that period of history. Furthermore, the Residence is not an exceptional example of a particular architectural style and does not appear to be the work of a notable architect. Therefore, 927 Marco Place does not appear eligible for listing in the national, state or local registers as an individual resource. SurveyLA identified the surrounding neighborhood as a potential historic district. The survey categorized the Residence as "not sure" due to reduced visibility of the structure caused by overgrown vegetation. After conducting an extensive site visit, PCR determined that the Residence did not exhibit the characteristics associated with other contributors of the potential District due to extensive alterations and lack of integrity. Therefore, it was determined that 927 Marco Place is a **non-contributor** to the Milwood Walk Streets Historic District.

Broad Patterns of History

With regard to broad patterns of history, the following are the relevant criteria:

National Register Criterion A: *Is associated with events that have made a significant contribution to the broad patterns of our history.*

California Register Criterion 1: *Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*

Los Angeles Historic Cultural Monument Criterion: *The proposed site, building, or structure reflects or exemplifies the broad cultural, political, economic, or social history of the nation, State, or City (community).*

Although the Residence was constructed in 1923, two years prior to Venice's consolidation with Los Angeles, the building lacks the necessary integrity to convey any potential historic associations it might have. Significant alterations to the Residence's exterior cladding, doors, windows, and roof as well as additions to the primary (south) and east elevation have left few if any features related to its original date of construction (1923). The Residence is located in a potential historic district recognized for its association with Streetcar Suburbanization and the early settlement patterns of Venice; however in its current condition there is little remaining fabric that would associate the structure with those themes. **Therefore, the Residence does not appear eligible for the National Register under Criterion A, the California Register under Criterion 1, or the local register.**

Significant Persons

With regard to associations with important persons, the following are the relevant criteria:

National Register Criterion B: *Is associated with the lives of persons significant in our past.*

California Register Criterion 2: *Is associated with the lives of persons important in our past.*

Los Angeles Historic Cultural Monument Criterion: *The proposed site, building, or structure is identified with historic personages or with important events in the main currents of national, State, or local history.*

The Residence is not identified with historic personages or events in the main currents of national, state, or local history. The Residence does not show any historical importance in association with various owners, and the occupancy history could not be fully established. Research regarding building owners uncovered one group of occupants, Elmer and Marion Howard, who lived in the Residence for a brief period in 1925. United States Census records and city directories confirmed that the couple moved to another location by 1928. Research on the Howard family did not reveal any historic associations significantly linking these individuals to important events in history. **The Residence is not eligible for listing under the National Register Criterion B, California Register Criterion 2, or the local register for eligibility related to a historic personage or event.**

Architecture

With regard to architecture, design or construction, the following are the relevant criteria:

National Register Criterion C: *Embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.*

California Register Criterion 3: *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*

Los Angeles Historic Cultural Monument Criterion: *The proposed site, building, or structure embodies certain distinguishing architectural characteristics of an architectural-type specimen, inherently valuable for a study of a period style or method of construction; or the proposed site, building, or structure is a notable work of a master builder, designer, or architect whose individual genius influenced his age.*

The Residence is ineligible for designation under National Register Criterion C, California Criterion 3, and the local criterion. The Residence maintains a very low level of integrity with significant alterations to its exterior cladding and roof as well as large additions to the primary (south) and east elevations. The residence lacks any features characterizing any architectural styles and no longer retains any of its original features associated with its original date of construction (1923). The Residence is not a notable work of a master builder or architect as no original building permits were identified. **Therefore, the Residence does not appear to satisfy National Register Criterion C, California Register Criterion 3, or the local register for eligibility related to a distinctive type, method, or period of construction, or as a work of a master.**

Archaeology

National Register Criterion D. *It yields, or may be likely to yield, information important in prehistory or history.*

California Register Criterion 4. *Has yielded, or may be likely to yield, information important in prehistory or history.*

The Residence is not likely to yield any information important to prehistory or history. Therefore, the Residence does not meet the above criterion at the national or state level.

C. CONCLUSION

Both 925 and 927 Marco Place are associated with the Pre-Consolidation of Venice and Streetcar Suburbanization themes developed by SurveyLA. However, extensive research and physical examinations of the buildings revealed no significant associations with these themes for the individual residences. Research of the occupants did not reveal any personages significantly related to national, state, or local history. Furthermore, neither structure appears to be the work of a master architect or builder, nor do they exhibit distinctive characteristics of a type, period, region, or method of construction. Therefore, the Bungalow located at 925 Marco Place and the Residence at 927 Marco Place do not appear individually eligible for the National Register, California Register or local designation.

SurveyLA recently identified a potential historic district in the immediate area. The District, known as the Milwood Walk Streets Historic District, represents “unique example of early-20th century residential development oriented on walk streets in Venice.” SurveyLA found that the Bungalow at 925 Marco Place qualified as a contributor to the District, while the Residence at 927 Marco was not visible from the public-right-of-way and therefore given the designation of “not sure.” PCR’s examination of both properties revealed that SurveyLA correctly identified 925 Marco Place as a contributor. However 927 Marco Place is significantly lacking in integrity and maintains few, if any of the features associated with its original construction in 1923. Because of these findings, PCR recommends assigning the 925 Marco a CHR status code of 5D2, “contributor to a district that is eligible for local listing or designation” and 927 Marco a CHR status code of 6Z, “found ineligible for National Register, California Register, or local designation through survey evaluation.” Because 925 Marco Place has been identified as a contributor to the Milwood Walk Streets Historic District, PCR completed a direct and indirect impacts analysis in the following chapter.

V. CEQA IMPACTS ANALYSIS

A. SIGNIFICANCE THRESHOLDS

The thresholds for determining the significance of environmental effects on historical resources identified below are derived from the CEQA Guidelines as defined in §15064.5 and the City of Los Angeles CEQA Thresholds Guide. Pursuant to this guidance, a project that would physically detract, either directly or indirectly, from the integrity and significance of the historical resource such that its eligibility for listing in the National Register, California Register or as a City Monument would no longer be maintained, is considered a project that would result in a significant impact on the historical resource. Adverse impacts, that may or may not rise to a level of significance, result when one or more of the following occurs to a historical resource: demolition, relocation, conversion, rehabilitation, or alteration, or new construction on the site or in the vicinity.⁶⁰

1. CEQA Guidelines

According to the State *CEQA Guidelines*, Section 15064.5(b) a project involves a “substantial adverse change” in the significance of the resource when one or more of the following occurs:

- Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- 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 PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, 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.

⁶⁰ L.A. *CEQA Thresholds Guide*, Section D.3. *Historical Resources*, City of Los Angeles, 2006, p. D.3-1 (<http://environmentla.org/programs/Thresholds/D-Cultural%20Resources.pdf>, accessed 6/04/2013)

The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on a significant resource if it would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State *CEQA Guidelines* when one or more of the following occurs:

- Demolition of a significant resource that does not maintain the integrity and significance of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings ("Standards"); or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.⁶¹

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource. The Standards were developed as a means to evaluate and approve work for federal grants for historic buildings and then for the federal rehabilitation tax credit (see 36 Code of Federal Regulations ("CFR") Section 67.7). Similarly, the Los Angeles Cultural Heritage Ordinance provides that compliance with the Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to City Monuments (see Los Angeles Administrative Code Section 22.171.14.a.1). Therefore, the Standards are used for regulatory approvals for designated resources but not for resource evaluations.⁶² Similarly, CEQA recognizes the value of the Standards by using them to demonstrate that a project may be approved without an EIR. In effect, CEQA has a "safe harbor" by providing either a categorical exemption or a negative declaration for a project which meets the Standards (see State *CEQA Guidelines* Section 15331 and 15064.5(b)(3)).

Based on the above considerations, the factors listed in the *L.A. CEQA Thresholds Guide* have been reviewed and refined for this analysis.⁶³ As such, the Project would have a significant impact on historic resources, if:

HIST-1 The Project would demolish, destroy, relocate, or alter a historical resource such that eligibility for listing on a register of historical resources would be lost (i.e., no longer eligible for listing as a historic resource); or

HIST-2 The Project would reduce the integrity or significance of important resources on the Project Site or in the vicinity.

⁶¹ *L.A. CEQA Thresholds Guide*, Section D.3. Historical Resources, City of Los Angeles, 2006, p. D.3-1 (<http://environmentla.org/programs/Thresholds/D-Cultural%20Resources.pdf>, accessed 6/04/2013)

⁶² *Century Plaza Hotel EIR*, Appendix IV.D-3, *Historic Thresholds Letter*, from Michael J. Logrande, Director of Planning and Ken Bernstein, Manager, Office of Historic Resources, City of Los Angeles, to Bruce Lackow, President, Matrix Environmental, Los Angeles, California, December 15, 2010.

⁶³ As documented in the Assessment Report in Appendix F-3 of this Draft EIR, the refinements to the factors listed in the *L.A. CEQA Thresholds Guide* were concurred with by the City Planning Department's Office of Historic Resources.

B. ANALYSIS OF PROJECT IMPACTS

1. Project Description

The Project includes both the demolition of the existing Vernacular Residence located at 927 Marco Place, constructed circa 1923, and the onsite relocation of the Craftsman style Bungalow located at 925 Marco Place. The contributing Bungalow, currently occupying two lots, would be moved within the Project Site, onto Lot 24 in Block 16 of the Venice Annex Tract and expanded with a rear addition. A plan review amendment for an addition to the original bungalow upon relocation is currently being prepared by ESA. Relocation of the contributing Bungalow will allow for the redevelopment of two out of the three parcels (4241-023-021 and 4241-023-022)(Figure 37). The two parcels will be redeveloped with Contemporary style two-story residences that are compatible with the District as discussed below. Lot 22, will be improved with a two story contemporary residence totaling approximately 2,522 square feet (Figure 38). The new residence will consist of an integrated garage oriented toward Superba Court at the rear of the property, an open plan living room and kitchen on the first floor, and three bedrooms and three bathrooms on the second floor. Lot 23, occupied by the Residence at 927 Marco Place, will be improved with a two-story contemporary residence of approximately 2,509 square feet (Figure 39). The new residence will feature a similar open plan on the first floor as the previously discussed residence, with four bedrooms and three bathrooms on the second floor. The Project plans are included in Appendix F.



Figure 37. Site plan for Lots 22, 23, and 24, including relocation of contributing Bungalow



Figure 38. Rendering of the contemporary residence for 925 Marco Pl (Lot 22), view to the north



Figure 39. Rendering of the contemporary residence for 927 Marco Pl (Lot 23), view to the north

2. Direct Impacts

PCR found the two structures currently located on the Project Site lack historical significance, and integrity for individual listing under any of the applicable federal, state or local eligibility criteria. However, the Project would result in relocation of the Bungalow (925 Marco) identified by SurveyLA as a contributor to the proposed Millwood Walk Streets Historic District. PCR confirmed the SurveyLA findings in the evaluation chapter of this Report on pages 29-40. Constructed in 1907, the Bungalow's scale, massing, architectural style and property type contributes to the feeling of the proposed district and therefore is accurately identified as a district contributor.

The Project proposes to relocate the existing contributor, currently occupying two lots, within the Subject Property, moving it east onto a single lot (Lot 24). Although the relocation would be an adverse impact to a contributing historical resource, the adverse effect would be less-than-significant because the Bungalow would continue to be eligible as a contributor, remaining within its historic setting and preserving the integrity of the District.

3. Indirect Impacts

Indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity of the resources and their immediate surroundings that would detract from the significance of historical resources within the Project vicinity. SurveyLA has identified the associated neighborhood setting as a potential historic district known as the Milwood Walk Streets Historic District, and 925 Marco Place has been identified as a district contributor.

The character-defining features of the potential Milwood Walk Streets Historic District include intact one- and two-story single-family residences that represent a collection of early 20th century housing types and styles. The district setting includes narrow concrete Walk Streets which are lined with front yard walls, fences, and mature vegetation (Figure 39), while the drive streets throughout the District feature street improvements such as curb and gutter, historic streetlights, sidewalks, parkways and street trees common. The district contributors (169 of 471 parcels or 36%) have the following character-defining features:

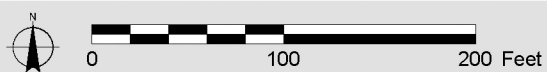
- vernacular Craftsman or Period Revival style bungalows;
- one- to two- stories;
- modest;
- covered by low-pitch gable or hip roofs; and clapboard or stucco siding.

A historic district must have both integrity *and* significance to be considered eligible as a historical resource. Within the district, there are 471 parcels and of those parcels there are 169 contributors and 281 non-contributors that have been extensively altered or fall outside the period of significance. Therefore, 36% of the parcels contribute to the potential District, which is a very low percentage of contributing properties. Generally, the integrity of a historic district is determined by the number and location of identified contributors; usually a majority of contributors is required. To be considered potentially eligible, a district usually must have a majority of contributors which are located contiguous to one another in an identifiable grouping. In this case, the potential district as a whole does not appear to have sufficient integrity due to the low, insufficient number of contributors and their dis-contiguous locations sprinkled through the neighborhood with only small pockets of groupings here and there. However, what appears to be significant

about the potential district is the overall settlement pattern and layout of the Venice Annex Tract including its unique configuration of walk streets and drive streets, which create a sense of time and place related to the early development of Venice.

PCR conducted a viewshed analysis of the visibility of the Project Site from contributors and also analyzed conjunctive views within the Indirect Impacts Study Area. Because of the density of the built environment and overgrown trees and bushes, the Indirect Impacts Study Area is defined as the properties that flank Marco Place between Linden Avenue and Lincoln Boulevard. The map presented in Figure 40 shows the subject properties are located among a row of non-contributing residences and residences that were not identified due to a lack of visibility. The Indirect Impacts Study Area consists of 9 contributing properties, 12 non-contributing residences, and five (5) “not sure” residences (Figure 40). Roughly 35% of the 26 residences were identified as contributors by SurveyLA with a majority of the contributing residences located on the opposite side of the street (Marco Place) from the Project Site.

The Project Site is located within a row of seven (7) non-contributing or “not sure” parcels. Although relocation of the Bungalow at 925 Marco Place would result in a potential adverse impact to the Bungalow by its physical relocation, the Project would have no adverse impact on the District because the Bungalow would remain within the District, and the Project would therefore preserve the setting and spatial relationships of the District. While the Project would also introduce two new contemporary residences to the District, the District setting has already been substantially altered by infill development. To the west of the Project site is 917 Marco Place featuring a large two-story addition (Figure 41). To the east of the Project Site is 931 Marco Place, a large two-story contemporary residence constructed in 2000 (Figure 42). Furthermore, the contiguous grouping of contributors would remain intact along the south side of the Marco Place walk street. Therefore, the changes to the District and setting caused by the Project would have no adverse effect on the eligibility of the potential District nor would it affect the eligibility of contributing resources in the area. Furthermore, primary character-defining features of the potential district, including the walk-street layout, mature vegetation, and uniform setbacks would be retained under the Project. The relocation of the Bungalow would not be a significant impact under CEQA because it would not materially impair the significance of the contributing Bungalow or the District’s historical setting such that the District would be rendered ineligible for local listing.



Indirect Impacts Study Area

925 and 927 Marco Place, Venice, Los Angeles
Source: Google Maps (Aerial) 2015; PCR Services Corporation, 2016.

FIGURE

40



Figure 41. View of 917 Marco Place, west of the Project Site (PCR 2016)



Figure 42. Two-Story contemporary residence at 931 Marco Place, viewed through the overgrown vegetation on the Project Site (927 Marco Pl) (PCR 2016)

Due to the location of the Project Site within a potential historic district, it is recommended the Project be designed to conform to Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation regarding related new construction. As described in the following section the Project is compatible in massing, size, scale and architectural features with the historic setting of the potential Milwood Walk Streets Historic District, conforming to Standard 9. If the new contemporary residences proposed in the Project were removed, the district would retain its form and integrity. Therefore, the project conforms to Standard 10.

C. SECRETARY OF THE INTERIOR'S STANDARDS REVIEW

As mentioned above, under CEQA, a project that follows *the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or *the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the Historical Resource.⁶⁴

Standard 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.

The Project would relocate the existing contributor, which currently occupies two lots (22 and 23) within Block 16 of the Venice Annex Tract. The Project would not result in any significant changes to distinctive materials or features. While the relocation of the Bungalow would alter its spatial relationship with its surroundings, its unusually large parcel consisting of two lots is not a distinctive feature of the district. Therefore, the Project would conform to Standard 1.

Standard 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 Project would retain the existing contributing Bungalow and would not result in the removal of any distinctive features. The Bungalow's spatial relationship will be altered but as stated under Standard 1, the unusually large parcel consisting of two lots is not a distinctive feature of the district. Furthermore, the Bungalow will remain in the District and thus remain in its historical setting. Therefore, the Project would conform to Standard 2.

Standard 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.

There are no conjectural features as part of the Project, nor does the Project create a false sense of history. Therefore, the Project meets Standard 3.

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

The Project does not intend to physically alter the contributing Bungalow in any way. The only potential alteration identified was the enclosure of a portion of the front porch. Although it is not documented in building permits, the alteration appears to have occurred early in the Bungalow's history and within the District's period of significance (1904-1939). However, the Project does not propose to alter or remove this feature or any other features associated with the Bungalow, and therefore, conform to Standard 4.

⁶⁴ California Environmental Quality Act, 15064.5 (3).

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

The project will not remove or alter any distinctive materials, features, finishes, or examples of construction techniques or craftsmanship during the Bungalow's relocation. Therefore, the Project meets Standard 5.

Standard 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.

The Project does not seek to repair or replace any distinctive features. However, where the severity of deterioration requires replacement of a distinctive feature, the new feature would match the old in design, color, texture, and, where possible, materials. Therefore, the Project meets Standard 6.

Standard 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 Project does not propose any chemical or physical treatments to the contributing Bungalow. Therefore, the Project would comply with Standard 7.

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

The potential to encounter archaeological or Native American resources is considered remote. Therefore, the Project meets Standard 8.

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

In regards to the potential Milwood Walk Streets Historic District, the Project differentiates itself from the nearby early-twentieth century bungalows and the District's historic setting while at the same time relating to the overall Modern character of later infill development due to its contemporary design, including a flat roof profile and modern aesthetics. Conversely, the Project is compatible with the District contributors in massing, size, scale, and architectural features. The Project is modest in scale proposing two, two-story single-family residences that are compatible in scale with the District's contributors, which range between one- to two-stories in height. Table 5 below shows contributing residences in the potential Milwood Walk Streets Historic District with similar scale and massing as the single family residences proposed by the Project. The Project will use natural materials for exterior cladding, such as wood siding, stone, and masonry, similar to the exterior features of the District's contributing residences. Additionally, the Project is set back fifteen-feet from the front property line, the same set-back as the contributors, and will feature front yard walls and landscaped front lawns,

which are character defining features of the District. Venice based architecture firm, Electric Bowery conducted a relative height study on the 900 block of Marco Place comparing the new construction proposed by the Project with the existing residences along both sides of Marco Place (Figure 43). The study revealed that the new residences are similar in height and width as other residences along the walk street. The full relative height study diagram is included in this report in Appendix G. The new residences are not excessive in scale or massing and are therefore compatible with their surroundings. Furthermore, the front yard walls will obscure the public view of the new contemporary residences and therefore the new construction will not overshadow the surrounding historic setting. Therefore, the Project's proposed construction of two contemporary single-family residences conforms to Standard 9.

Table 5

Examples of Two-Story contributing residences in the Milwood Walk Streets Historic District

Address	Year Built	Architectural Style	SurveyLA Photograph
1649 S. Crescent Place	1921	American Foursquare	
834 E. Palms Boulevard	1930	Mediterranean Revival	

Table 5(Continued)

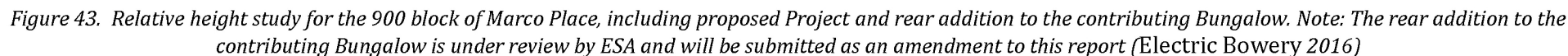
Examples of Two-Story contributing residences in the Milwood Walk Streets Historic District

Address	Year Built	Architectural Style	SurveyLA Photograph
807 E. Superba Avenue	1907	Dutch Colonial Revival	
838 E. Superba Avenue	1909	Craftsman	
1634 S. Electric Avenue	1908	Craftsman	

Table 5 (Continued)

Examples of Two-Story contributing residences in the Milwood Walk Streets Historic District

Address	Year Built	Architectural Style	SurveyLA Photograph
754 E. Marco Place	1921	Craftsman	



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

If the contemporary residences proposed by the Project were removed in the future, the essential form and integrity of the District and its contributors in the Project vicinity would be unimpaired. The proposed project would conform to Standard 10.

D. CONCLUSION

PCR assessed the structures located at 925 and 927 Marco Place for historic significance. While both structures were associated with themes related to the early settlement of Venice, neither of them exhibited the necessary significant associations and they were found ineligible for individual distinction. SurveyLA recently identified the area as the potential Milwood Walk Streets Historic District and found the Bungalow located at 925 Marco Pl to be a contributor to the potential District. SurveyLA could not evaluate the Residence at 927 Marco Pl due to the dense vegetation and large fence surrounding the property. While the Bungalow at 925 appears to be a District contributor, the 927 Marco Place Residence has been altered beyond recognition and does not contribute to the District. Based on these findings, the proposed Project was reviewed to determine its impact to the 925 Marco Place Bungalow, surrounding District and nearby contributors. The Project would result in the demolition of the Residence at 927 Marco Place (Non-Contributor) and the relocation of 925 Marco Place (Contributor) within the existing lot. The Project will preserve and add a two-story rear addition to the Bungalow at 925 Marco Place. Although the Project would have a potential adverse effect to a contributing historical resource, the adverse effect would be less-than-significant. After Project completion, the Bungalow would retain its eligibility as a contributor, the eligibility of the potential district would be protected, and the eligibility of any other individual resources in the area would be preserved. Furthermore, the relocation and addition to the Bungalow and the construction of two new Modern/Contemporary residences under the Project would have no indirect adverse impacts to the potential district because the Project conforms to the Standards, as discussed above, and would respect the distinctive character of the District and associated project setting. Therefore, the Project would result in a less than significant impact under CEQA because the Bungalow would be preserved and the Milwood Walk Streets Historic District would retain eligibility as a potential district after Project completion.

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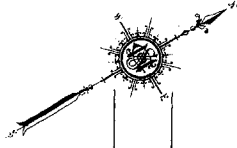
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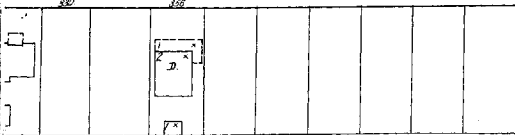
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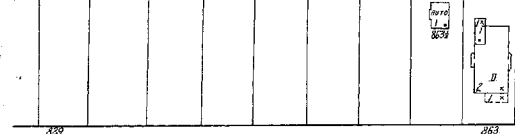
Appendix A – Sanborn Map 1918



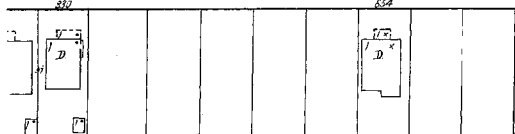
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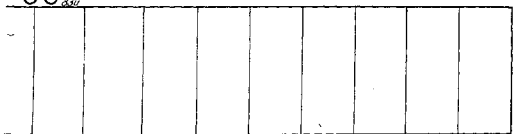
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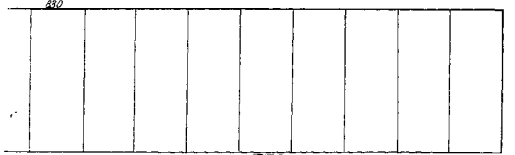
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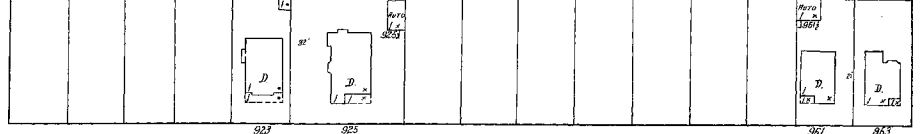
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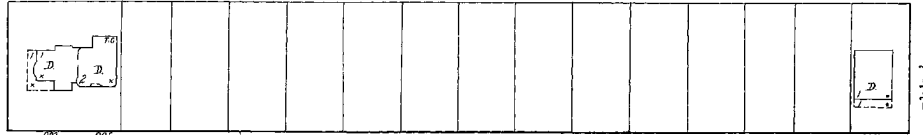
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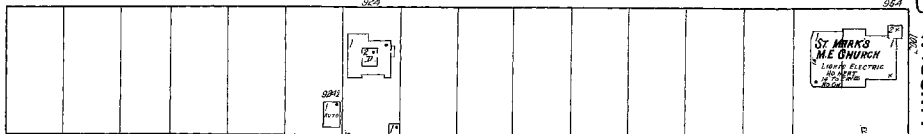
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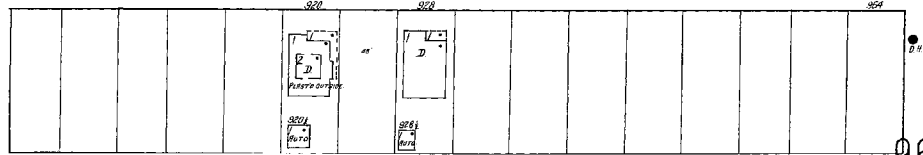
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754



758



VENEZIA AV.

VICTORIA AV.

AV.

LINDEN

AV.

AV.

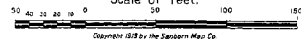
BLVD.

LINCOLN

AV.

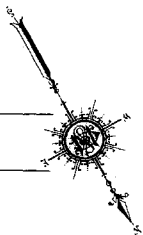
96

Scale of Feet.



Copyright 1933 by the Standard Map Co.

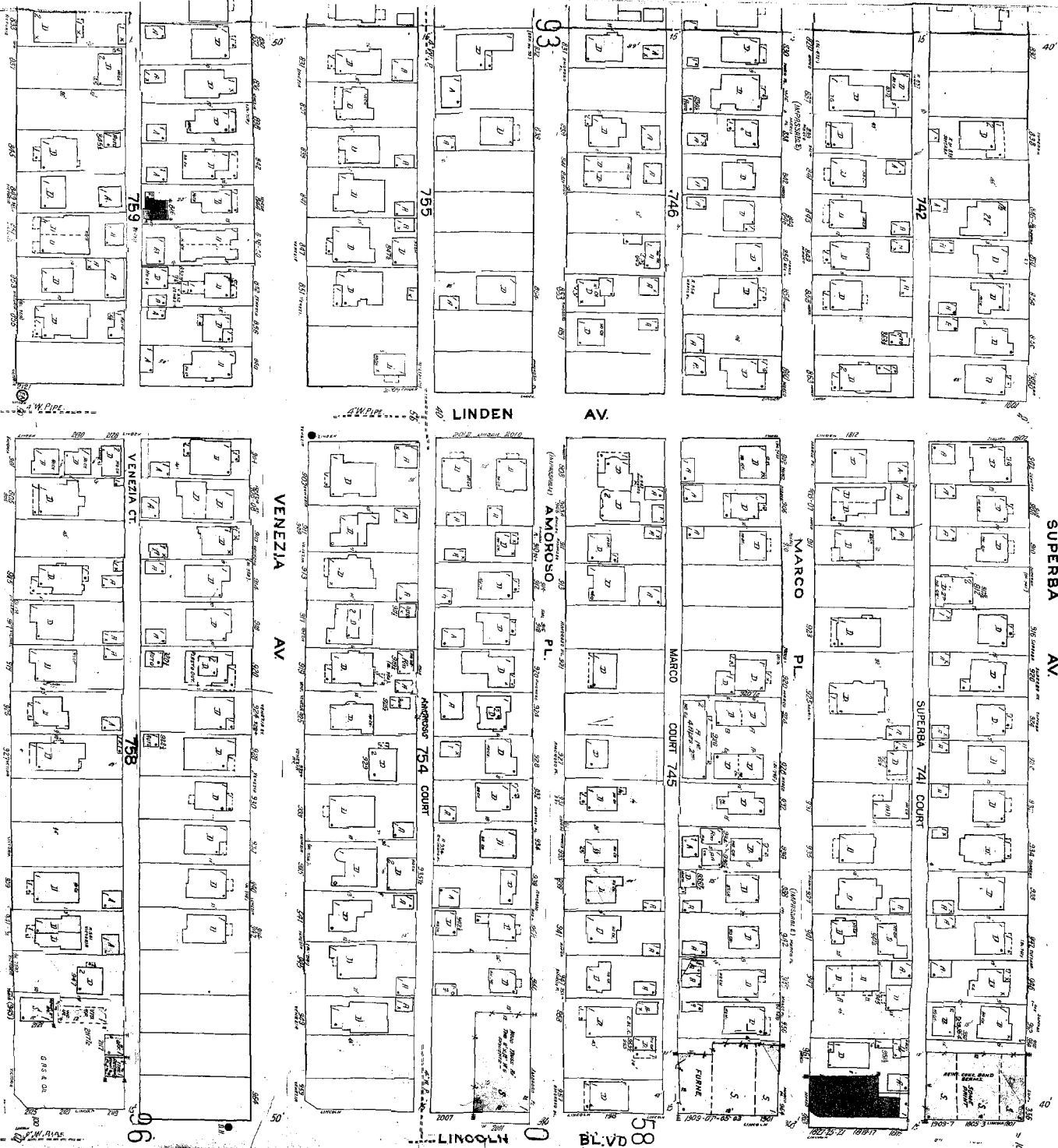
Appendix B – Sanborn Map 1950



92

SUPERBA AV.

CAL. 0059
LOS ANGELES CAL.
VENICE DIST.
94



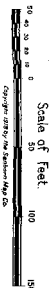
MEADE PL.

MARIN PL.

VENEZIA CT.

AV.

96



Appendix C – Venice Annex Tract Map

Map of VENICE ANNEX.

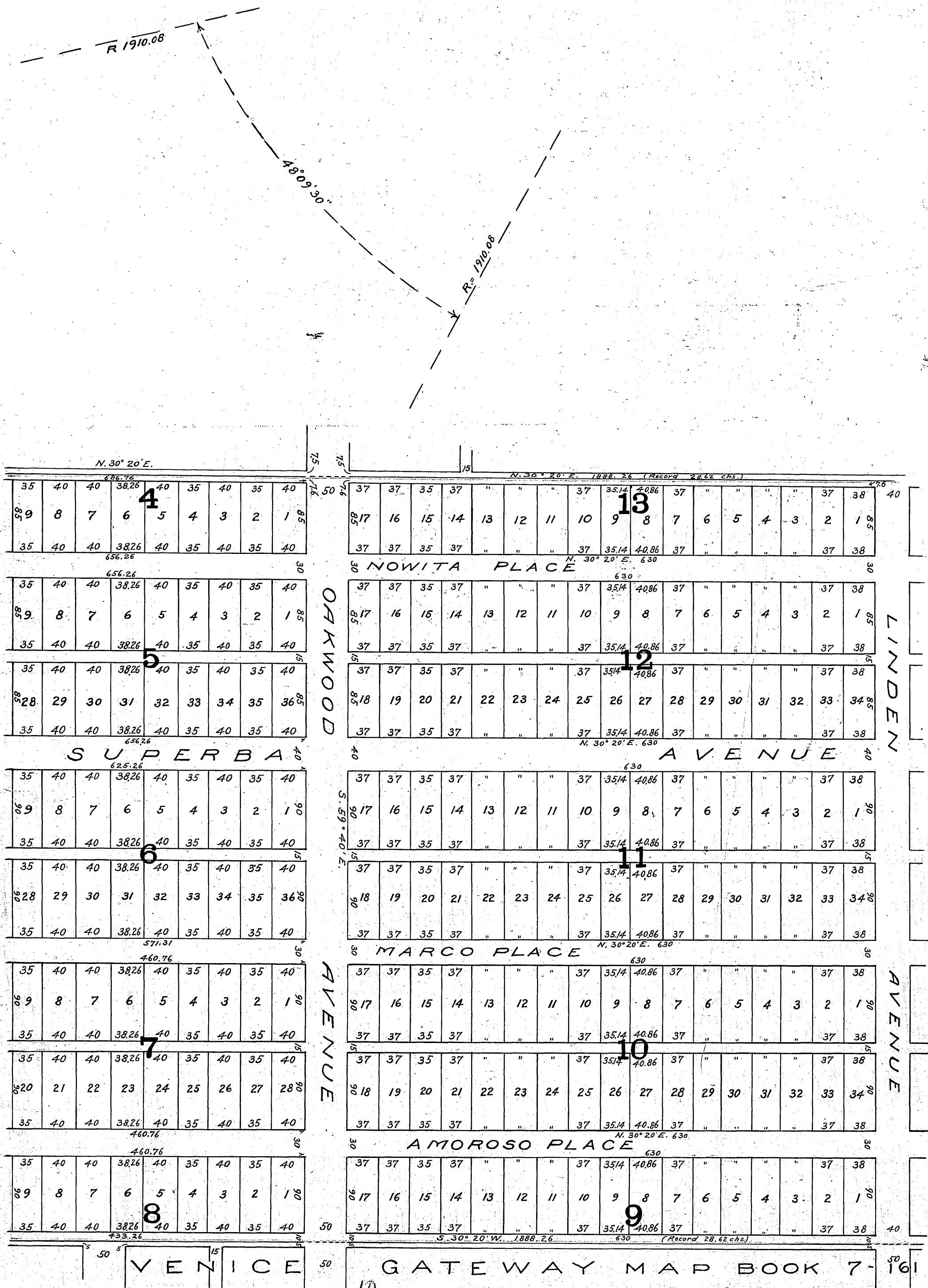
Ocean Park, Los Angeles County, California.

Being a re-subdivision of a portion of Lot 1, and all of Lots 2 & 3, as shown on map of Subdivision of the Jose Juan Machado 53.93 Acre Allotment, Ro. La Ballona, (Sup. Court Case No. 14797) as recorded in Map Book 1-30, Also a re-subdivision of Lots 1 to 8, inclusive, in Block 3, Venice Park Tract, as per map recorded in Map Book 5, page 187.
Surveyed August 1905, by Philip Schuyler, C.E.
Courses True. Scale:-100ft. = 1 inch.



- Alley in Blk. 2 named Electric Court D:53-130 Ord. 962
- Alley in Blk. 3 changed to Rialto Ct. D:44-145 Ord. 1053
- Compton Road changed to Lincoln Blvd. Ord. 497 D:18-175
- Electric Ave. from Ely line of Venice Annex to inter. of Electric Ave. with St. Mark's Boulevard ord. 525 D:18-176
- Deed to open Rialto across rt. of way D.M. 6064-56
- " " " Pico Blvd. " " " " D.M. 6064-59
- Pico Blvd. changed to Venice Blvd. Ord. 567 D:18-218
- Certain Alleys numbered by Ord. 363 D:25-52
- Lots 9-13 incl. Blk. 8. to city of Ocean Park. D:59-136 D:2942-46.
- Opening Naples Ave. across R.R. R/W D:61-102 O.R. 6726-98
- Venice Blvd., Electric Ave. names established - Ord. 63082

Comp. atty



Alley in Blks - 7 - 18 - 17 - chd. to Marco Ct. D:33-100 Ord. 787
 " " " 1 chd. to "Crescent Ct." D:33/100 Ord. 793
 " " " 4 & 13 changed to Rialto Ct. D:44-145 Ord. 1046 D:53-135 Ord. 1046
 " " " 5 " Nowita Ct & Shell Ct. D:44-145 Ord. 1046 - D:53/135
 Amorsoso Court & Oakwood Court, names established D:53-119 Ord. 932
 Superba Court and Shell Court, names estab. D:53-123 Ord. 938 - D:53-131 Ord. 976 A, B - 2
 Amorsoso Court name established - Ord. 60246 I.M. 23-A, B - 2
 A-137 Sht. 23, A-573

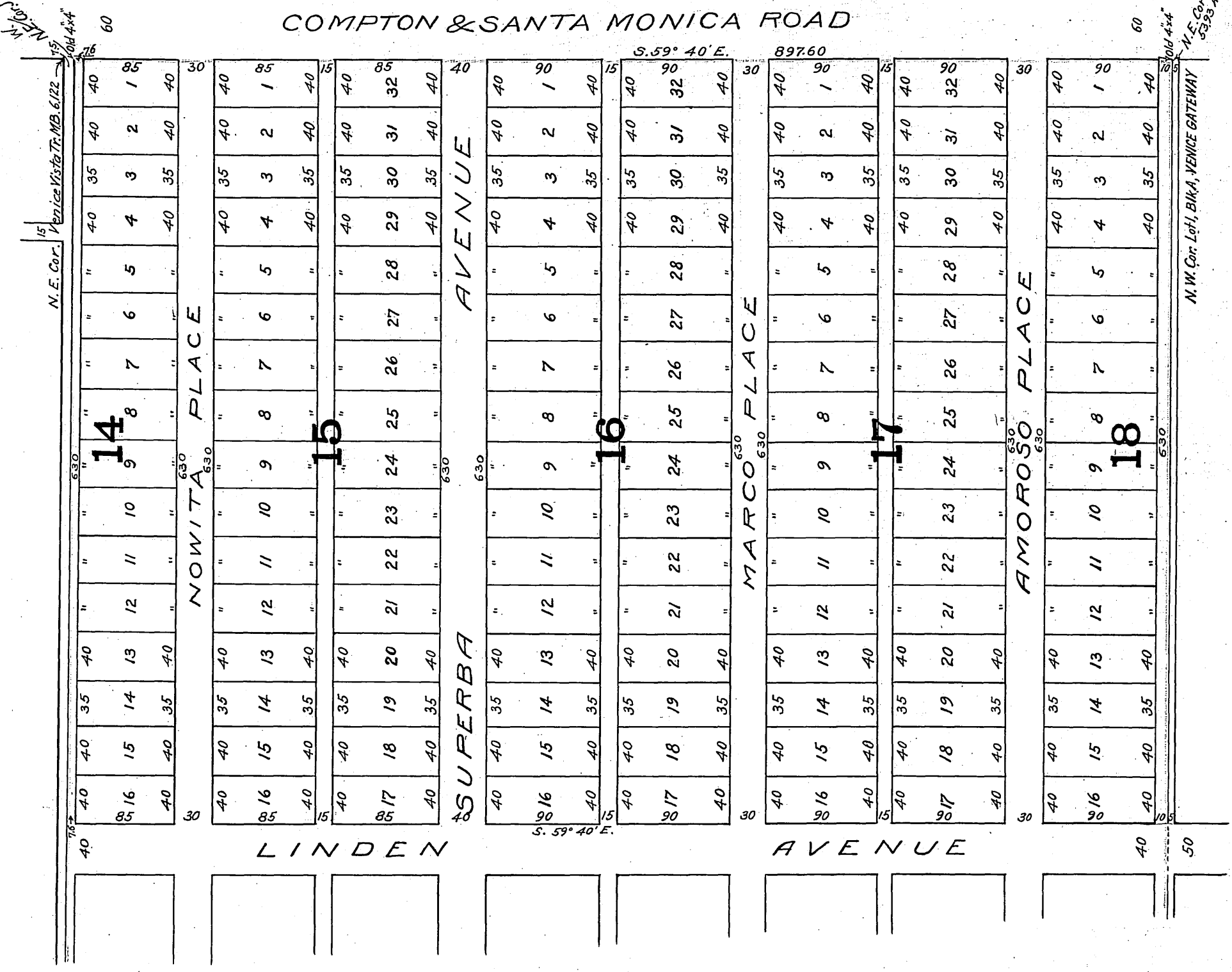
109

200
ST-7-10
Casson Park
H-137

109

N. E. Cor. Venice Vista Tr. MB. 6122
Neg. J. L. Michels 539.3 Acre Allotment

Alley No 94 in Bk. 14 changed to Rialto Ct. D: 44-145 Ord. 1046
For State Hwy (Lincoln Blvd.) see C.F. 1836



Owners in The Union Trust Company.
by J. W. Brady, President.
John R. Emanuel, Assistant Secretary.
Dana Burke.

Recorded Sept. 12, 1905.

23-A, B-27
Sht. 23, A-573

Sht. 10 - A-137

Appendix D – Tax Assessor Index and Map

4241

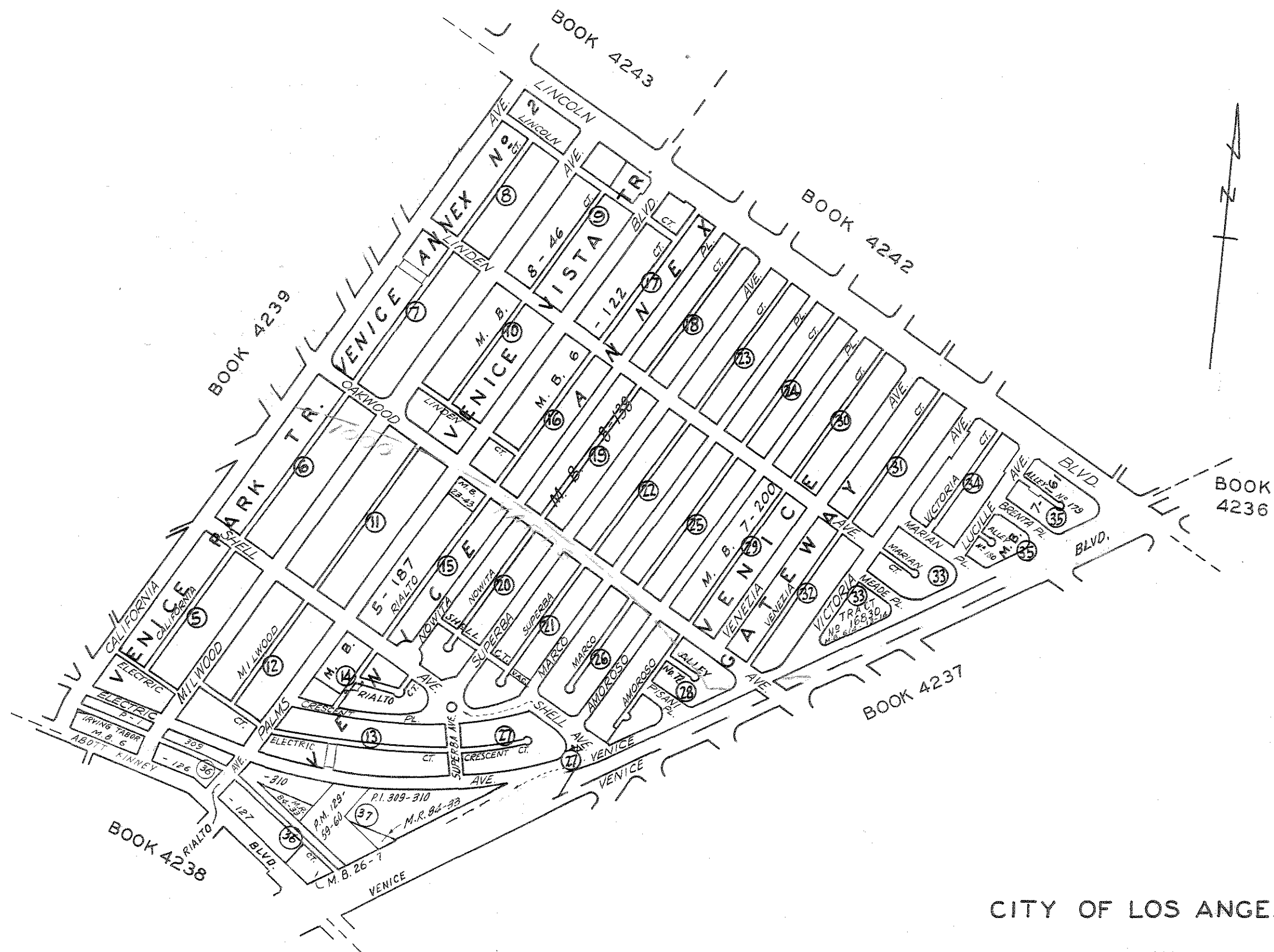
INDEX - 4241

SCALE 1 IN. = 400 FT.

SCALE 1" = 400'

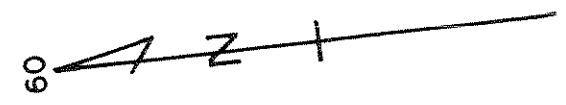
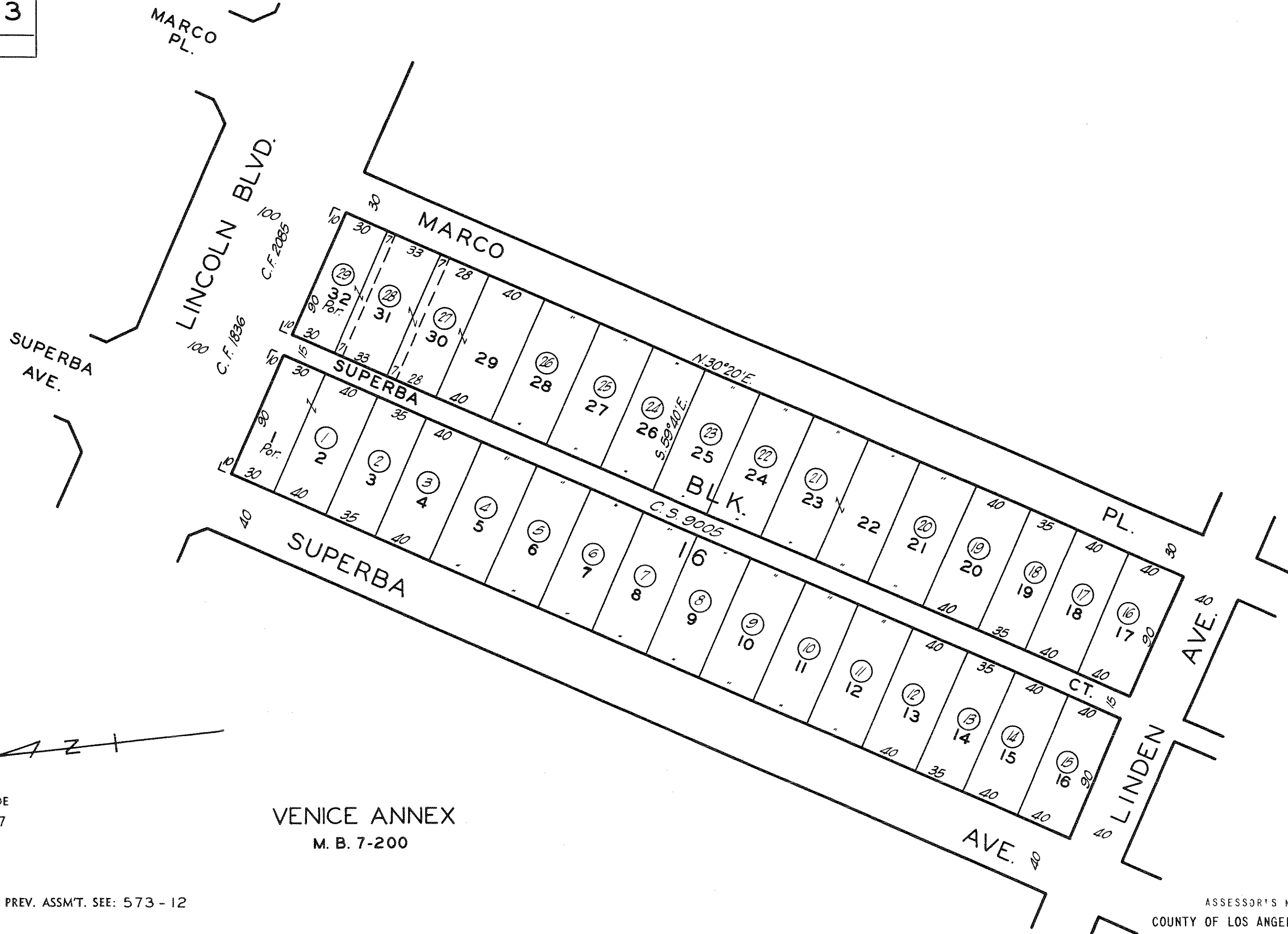
2010

Revised 661107
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 9-28-62
 4-26-63
 12-18-63
 9-21-64
 680712
 790308
 900523 801124
 910702
 E005100603
 2009042907



CITY OF LOS ANGELES

ASSESSOR'S MAP
 COUNTY OF LOS ANGELES, CALIF



CODE
67

VENICE ANNEX
M. B. 7-200

FOR PREV. ASSM'T. SEE: 573 - 12

Appendix E – DPR Form (2016)

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 5D2

Other Listings
Review Code

Reviewer

Date

Page 1 of 3

*Resource Name or #: 925 Marco Place, Venice

P1. Other Identifier:

*P2. Location: ☐ Not for Publication ☐ Unrestricted

*a. County: Los Angeles

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

*b. USGS 7.5' Quad:

Date:

T ; R ; ¼ of ¼ of Sec ; M.D. B.M.

c. Address: 925 Marco Place

City: Los Angeles

Zip: 90291

d. UTM: Zone: 10 ; mE/ mN (G.P.S.)

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

Oriented with the primary (south) elevation facing south toward Marco Place. Located on the north side of Marco Place. Venice Annex Tract, Lots 22 and 23, Block 16, APN# 4241-023-021

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

The subject properties include the Bungalow located at 925 Marco Place in the neighborhood of Venice, City of Los Angeles, California, occupying two parcels totaling approximately 7,200 square feet. The Bungalow is located near the center of the two lots and is composed of a rectangular floor plan and symmetrical façade oriented southeast toward the Marco Place walk street in the middle of the block between Lincoln Boulevard and Linden Avenue. The single-story residence is a Craftsman Style beach bungalow featuring a hipped roof and unique Asian inspired rafter tails and flared eaves. The Bungalow consists of wood-frame construction on a concrete foundation, clad with wood clapboard siding on the primary (south) and secondary (east, west, and north) elevations. The Bungalow's primary entrance consists of a single wood, partially glazed door, centrally located beneath upon a partially enclosed, full length porch supported by masonry columns. However, a portion of the Bungalow's front porch has been enclosed to expand the interior spaces.

*P3b. Resource Attributes: (List attributes and codes) (HP2) single family property

*P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District

☐ Element of District ☐ Other (Isolates, etc.)

P5b. Description of Photo: (View, date, accession #) Primary Elevation, view north, 3/25/2016

*P6. Date Constructed/Age and Sources:

☒ Historic
☐ Prehistoric ☐ Both
1910 (LA County Assessor)

*P7. Owner and Address:

Ron Harel
6015 Washington Boulevard
Culver City, California 90232

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

Christian Taylor, PCR Services, 201 Santa Monica Boulevard, Suite 500, Santa Monica, CA 90401

*P9. Date Recorded: 4/20/2016

*P10. Survey Type:

Historic Resources Assessment

*P11. Report Citation:

PCR Services. Historic Resources Assessment. Prepared for Mr. Harel. April 2016.

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

DPR 523A (1/95)

*Required information



BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 3

*NRHP Status Code 5D2

*Resource Name or # (Assigned by recorder) 925 Marco Place

B1. Historic Name: 925 Marco Place

B2. Common Name: 925 Marco Place

B3. Original Use: Single-Family Residential

B4. Present Use: Single-Family Residential

*B5. Architectural Style: Craftsman Beach Bungalow

*B6. Construction History: (Construction date, alterations, and date of alterations)

Located on lot 22 and 23 of block 16 in the Venice Annex Tract, the single-family Bungalow was built in 1907 and represents the first and only residence constructed on the property. The building permits on file in the City of Los Angeles were reviewed to determine the history of construction and alterations. However, no permits documenting any alterations were identified. Permits on file associated with the lots' Assessor Parcel Number (4241-023-021) appear to reflect work recently completed for the residence located at 923/917 Marco Place based on a physical examination of the site. The Bungalow appears to have few if any major alterations. A portion of the porch has been enclosed but the materials used indicate this was done early in the Bungalow's history. There is no permit on file documenting the alteration.

*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date:

Original Location: Yes

*B8. Related Features:

None.

B9a. Architect: Unknown

b. Builder: Unknown

*B10. Significance: Theme: Abbot Kinney (1850-1920); Pre-Consolidation of Venice (1850-1925); and American Craftsman Style Architecture (1905-1930)

Area: Venice

Period of Significance: 1907

Property Type: Single-Family Craftsman Residence

Applicable Criteria: A/1/1

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

925 Marco Place is associated with historic themes identified in the Los Angeles' Citywide Historic Context Statement, such as the Streetcar Suburbanization (1888-1933), Pre-Consolidation of Venice (1850-1925), and American Craftsman Style Architecture (1905-1930). Constructed in 1907, the Bungalow is one of the first residences built in the Venice Annex Tract subdivided two years earlier. Although the Bungalow was constructed early in the neighborhood's history, it is not the first one built. No evidence suggesting the Bungalow played a significant role in events associated with national, state, or local history were uncovered while researching the property and its surroundings. Although Walter Hambleton, Venice's first dentist, resided in the Bungalow during the early twentieth century, he does not appear to rise to the level of significance to be considered a historic personage eligible for national, state, or local recognition. Furthermore, no other residents were found to be historically significant during the course of this assessment. Finally, despite retaining a high level of integrity, the Bungalow does not appear to be an exceptional example of its type or style nor does it appear to be the work of a notable architect or builder. Therefore the Bungalow does not appear individually eligible at the national, state, or local levels based on the criteria discussed below. However, it does appear to be a contributor to a potential historic district.

B11. Additional Resource Attributes: (List attributes and codes)

*B12. References:

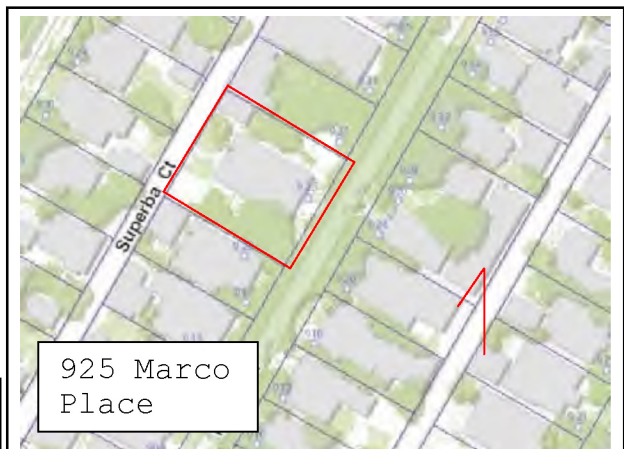
Sanborn Maps, LA Building Permits, LA Times, The Daily Outlook, Secondary Sources

B13. Remarks:

*B14. Evaluator: Christian Taylor, PCR Services, 201 Santa Monica Boulevard, Suite 500, Santa Monica, CA 90401

*Date of Evaluation: 4/20/2016

(This space reserved for official comments.)



State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary #
HRI#
Trinomial

Page 3 of 3

*Resource Name or # (Assigned by recorder) 925 Marco Place, Venice

*Recorded by: Christian Taylor, PCR Services

*Date: 4/20/2016

☒ Continuation

☐ Update

P3a. Description (cont):

The west facing façade contains a canted bay window and another squared bay window near the rear of the Bungalow. Between the two bay windows is a greenhouse window (alteration), a fixed window, and an exterior masonry chimney. The west side of the Bungalow features a manicured landscape and concrete path leading to the rear of the property. The north facing façade, or rear façade, includes a wood framed, partially glazed door adjacent to a wood framed sliding window and a small stained glass window (alteration). Also located near the north elevation is a detached garage, manicured lawn, and concrete walkways. The east elevation was not accessed during the site visit, however it appears to contain multiple wood framed, double hung windows that appear original. The interior of the Bungalow features its original corbelled ceilings and wood built-ins. The walls are decorated with wood wainscoting. The east end of the living room is punctuated by a large picture window with stained glass transom, while the west end of the room features the masonry fireplace. Large French doors open up onto the enclosed portion of the front porch. The interior's details continue into the dining room where a built-in wood bench sits below a canted bay window. Wood wainscoting decorates the dining room's walls, which also feature a set of built-in cabinets and drawers. The Bungalow retains its original interior door surrounds, and wood flooring throughout.

B10. Significance (cont):

The Bungalow at 925 Marco Pl. reflects early-20th century residential development oriented toward the walk-streets and is associated with the Pre-Consolidation of Venice and Streetcar Suburbanization themes identified by SurveyLA. Constructed in 1907, the Bungalow was developed on two of 465 parcels in the Venice Annex Tract, subdivided in 1905. Although the Bungalow is one of the earliest constructed in the Venice Annex Tract, a bungalow located at 906 Marco Pl was built a year earlier. Furthermore, there are other bungalows constructed in the same year as 925 Marco Place. While the Bungalow retains a high level of integrity to convey its historical associations, those associations are not significant enough to warrant individual eligibility for contributions to broad patterns of history, specifically the settlement of Venice. However, SurveyLA has recently identified the Bungalow as a contributor to the potential Milwood Walk Streets Historic District. Based upon the Bungalow's integrity and construction date of 1907, it does appear eligible as a contributor to the potential District, identified under criteria A/1/1. Therefore, while the Residence does not appear eligible for the National Register under Criterion A, the California Register under Criterion 1, or the local register as an individual resource, it does appear to be a contributor to a potential district identified within this criteria.

The Bungalow was the residence of Walter Hambleton, the first dentist in Venice (originally known as Ocean Park). Based on U.S. Census data, Hambleton lived on the property until at least 1940. Although Hambleton was a pioneering citizen of Venice, well regarded in social and business circles, and involved in local real estate, he does not appear to rise to a level of significance necessary for the Bungalow to be eligible under Criteria B/2/2. Aside from Hambleton, no other owners were identified in association with the Bungalow. The Residence is not eligible for listing under the National Register Criterion B, California Register Criterion 2, or the local register for eligibility related to a historic personage or event.

The Bungalow is ineligible for designation under National Register Criterion C, California Criterion 3, and the local criterion. The Bungalow is not an exceptional, distinctive, outstanding, or singular example of a type or style. While the Bungalow does retain many of its original features, these features are not at the level of architectural quality one would associate with an individually recognized historic resource. The only feature with architectural interest is the Bungalow's flared eaves. However, the eaves are basic in design and do not embody the high level of craftsmanship typically associated with the Craftsman style. The Bungalow lacks the character defining elements usually associated with the Craftsman style, such as tapered porch columns. In this case, simple masonry columns support the Bungalow's roof. Overall the residence is lacking in architectural merit. Although the Bungalow retains a high level of integrity based on the American Craftsman style theme, it is a typical example of a Craftsman style beach cottage commonly built in Southern California and the United States and does not demonstrate any exceptional characteristics of the Craftsman style. Furthermore, the Bungalow is not a notable work of a master builder as there is no architect on record. Therefore, the Bungalow does not appear to satisfy National Register Criterion C, California Register Criterion 3, or the local register for eligibility related to a distinctive type, method, or period of construction, or as a work of a master.

The Bungalow is not likely to yield any information important to prehistory or history. Therefore, the Bungalow does not appear to satisfy National Register Criterion D or California Register Criterion 4.

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 1 of 3

*Resource Name or #: 927 Marco Place, Venice

P1. Other Identifier:

*P2. Location: ☐ Not for Publication ☐ Unrestricted

*a. County: Los Angeles

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

*b. USGS 7.5' Quad:

Date:

T ; R ; ¼ of ¼ of Sec ; M.D. B.M.

c. Address: 927 Marco Place

City: Los Angeles

Zip: 90291

d. UTM: Zone: 10 ; mE/ mN (G.P.S.)

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

Oriented with the primary (south) elevation facing south toward Marco Place. Located on the north side of Marco Place. Venice of America Tract, Lot 24, Block 16, APN# 4241-023-022

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

Oriented fronting south towards the Marco Place walk street, the Residence is a one-story, single-family vernacular house located on an approximately 3,600 square foot parcel. The Residence is situated at the rear (north end) of the lot with lush overgrown landscaping occupying a majority of the property. The Residence has an irregular shaped footprint, with rectangular massing, stucco and particle-board exterior cladding (alteration) attached to a wood-frame on a concrete foundation. The roof is covered in asphalt shingles, and has overhanging boxed eaves (alteration). The entry into the Residence consists of a single wood paneled, partially glazed, door (alteration). The front or south elevation has a concrete patio and walkway extending from the main body of the Residence to the property's front gate along Marco Place. Fenestration on the main façade consists of two large boarded-up window openings (alteration) and smaller wood framed double hung windows.

*P3b. Resource Attributes: (List attributes and codes) (HP2) single family property

*P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District

☐ Element of District ☐ Other (Isolates, etc.)

P5b. Description of Photo: (View, date, accession #) Primary Elevation, view north, 3/25/2016

*P6. Date Constructed/Age and Sources:

☒ Historic

☐ Prehistoric

☐ Both

1910 (LA County Assessor)

*P7. Owner and Address:

Ron Harel

6015 Washington Boulevard

Culver City, California 90232

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

Christian Taylor, PCR Services, 201 Santa Monica Boulevard, Suite 500, Santa Monica, CA 90401

*P9. Date Recorded: 4/20/2016

*P10. Survey Type:

Historic Resources Assessment

*P11. Report Citation:

PCR Services. Historic Resources Assessment. Prepared for Mr. Harel. August 2016.

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

DPR 523A (1/95)

*Required information



BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 3

*NRHP Status Code 6Z

*Resource Name or # (Assigned by recorder) 927 Marco Place

B1. Historic Name: 927 Marco Place

B2. Common Name: 927 Marco Place

B3. Original Use: Single-Family Residential

B4. Present Use: Single-Family Residential

*B5. Architectural Style: Vernacular Beach Bungalow

*B6. Construction History: (Construction date, alterations, and date of alterations)

927 Marco Place is located on lot 24 of block 16 in the Venice Annex Tract. The approximate date of construction identified in the assessor records for the single-family Residence is 1923. The building permits on file in the City of Los Angeles were reviewed to determine the history of construction and alterations. However, no permits documenting any alterations were identified. Physical inspection of the Residence and comparison of the building's footprint versus historic Sanborn maps show that the Residence has been significantly modified. Because of the simplicity of the Residence, it appears no architect or contractors were involved.

*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date:

Original Location: Yes

*B8. Related Features:

None.

B9a. Architect: Unknown

b. Builder: Unknown

*B10. Significance: Theme: Abbot Kinney (1850-1920); Pre-Consolidation of Venice (1850-1925)

Area: Venice

Period of Significance: 1923

Property Type: Single-Family Vernacular Residence

Applicable Criteria: none

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

Although the Residence located at 927 Marco Place is associated with historic themes identified in the Los Angeles' Citywide Historic Context Statement, such as the Pre-Consolidation of Venice (1850-1925) and Streetcar Suburbanization (1888-1933), it possesses an extremely low level of integrity, no longer conveying its association with the identified themes. The Residence was constructed in 1923, within the period of significance for the Pre-Consolidation of Venice historic context. However, it retains no identifiable features dating from that period of history. Furthermore, the Residence is not an exceptional example of a particular architectural style and does not appear to be the work of a notable architect. Therefore, 927 Marco Place does not appear eligible for listing in the national, state or local registers as an individual resource. SurveyLA identified the surrounding neighborhood as a potential historic district. The survey categorized the Residence as "not sure" due to reduced visibility of the structure caused by overgrown vegetation. After conducting an extensive site visit, PCR determined that the Residence did not exhibit the characteristics associated with other contributors of the potential District due to extensive alterations and lack of integrity. Therefore, it was determined that 927 Marco Place is a non-contributor to the Milwood Walk Streets Historic District.

B11. Additional Resource Attributes: (List attributes and codes)

*B12. References:

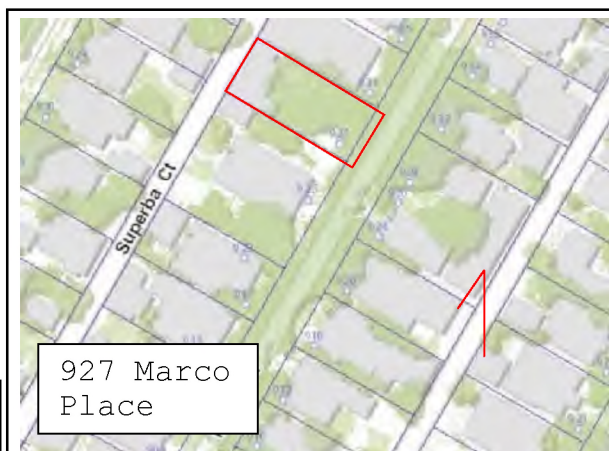
Sanborn Maps, LA Building Permits, LA Times, The Daily Outlook, Secondary Sources

B13. Remarks:

*B14. Evaluator: Christian Taylor, PCR Services, 201 Santa Monica Boulevard, Suite 500, Santa Monica, CA 90401

*Date of Evaluation: 4/20/2016

(This space reserved for official comments.)



State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary #
HRI#
Trinomial

Page 3 of 3

*Resource Name or # (Assigned by recorder) 927 Marco Place, Venice

*Recorded by: Christian Taylor, PCR Services

*Date: 4/20/2016

☒ Continuation

☐ Update

P3a. Description (cont):

The east facing façade includes an overhanging eave that appears to have been extended (alteration) above a plaster wall and a pair of uneven wood frame multi-light windows (alterations). Towards the rear of the Residence, there is a wood storage cabinet (alteration). The entire east elevation has been added to the Residence. Interior views of the kitchen show what used to be the external chimney. The west elevation of the Residence was not accessible. The north facing façade, or rear façade, includes a rear entrance with a single wood door and metal screen. The rear entry is situated beneath a low sloping gable with exposed roof framing. Fenestration along the north elevation consists of multiple window openings of different sizes and featuring different window types. Near the Residence's northwest corner, there is a large rectangular mass protruding into the rear alley. This mass appears to have once been the Residence's garage but was converted into interior living space. An inspection of the Residence's interior exposed multiple alterations to the plan. The main living room space features large skylights in the vaulted ceiling (alterations). To the east of the living room is a kitchen that appears to be a later addition, due to the location of the brick chimney.

B10. Significance (cont):

Although the Residence was constructed in 1923, two years prior to Venice's consolidation with Los Angeles, the building lacks the necessary integrity to convey any potential historic associations it might have. Significant alterations to the Residence's exterior cladding, doors, windows, and roof as well as additions to the primary (south) and east elevation have left few if any features related to its original date of construction (1923). The Residence is located in a potential historic district recognized for its association with Streetcar Suburbanization and the early settlement patterns of Venice; however in its current condition there is little remaining fabric that would associate the structure with those themes. Therefore, the Residence does not appear eligible for the National Register under Criterion A, the California Register under Criterion 1, or the local register.

The Residence is not identified with historic personages or events in the main currents of national, state, or local history. The Residence does not show any historical importance in association with various owners, and the occupancy history could not be fully established. Research regarding building owners uncovered one group of occupants, Elmer and Marion Howard, who lived in the Residence for a brief period in 1925. United States Census records and city directories confirmed that the couple moved to another location by 1928. Research on the Howard family did not reveal any historic associations significantly linking these individuals to important events in history. The Residence is not eligible for listing under the National Register Criterion B, California Register Criterion 2, or the local register for eligibility related to a historic personage or event.

The Residence is ineligible for designation under National Register Criterion C, California Criterion 3, and the local criterion. The Residence maintains a very low level of integrity with significant alterations to its exterior cladding and roof as well as large additions to the primary (south) and east elevations. The residence lacks any features characterizing any architectural styles and no longer retains any of its original features associated with its original date of construction (1923). The Residence is not a notable work of a master builder or architect as no original building permits were identified. Therefore, the Residence does not appear to satisfy National Register Criterion C, California Register Criterion 3, or the local register for eligibility related to a distinctive type, method, or period of construction, or as a work of a master.

The Residence is not likely to yield any information important to prehistory or history. Therefore, the Residence does not appear to satisfy National Register Criterion D or California Register Criterion 4.

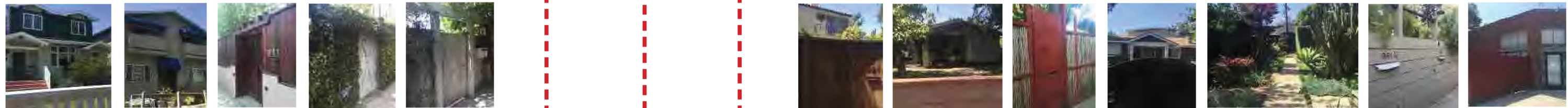
*Appendix F Excluded
from Digital Copy*

Appendix G – Relative Height Study

- Contributor, per Survey LA
- Fence at Walkstreet



- 925, 927 & 929 Marco Place, Venice
- Proposed development stretches between Lots 22, 23 & 24 on the 900 block of Marco Place
 - Front portion of the existing historic contributor will be moved from lot 22 to Lot 24, rehabilitated/restored with an addition at the rear half of the property, resulting in a 2335 SF SFD, Designed by Electric Bowery, Ltd
 - Two new construction 2-story SFD developments are proposed for Lots 22 & 23, each ~2,500 sf as designed & submitted to the City by Client's Architect Abramson Tieger
 - Open front yards with a maximum 42" fence at the Walkstreet will be maintained; all proposed developments/renovations to be in compliance with Venice Specific Plan



1947 structure, 2nd-story addition approved 2005

1921 structure, 2nd-story addition date unknown

1912 structure, 2nd-story addition date unknown

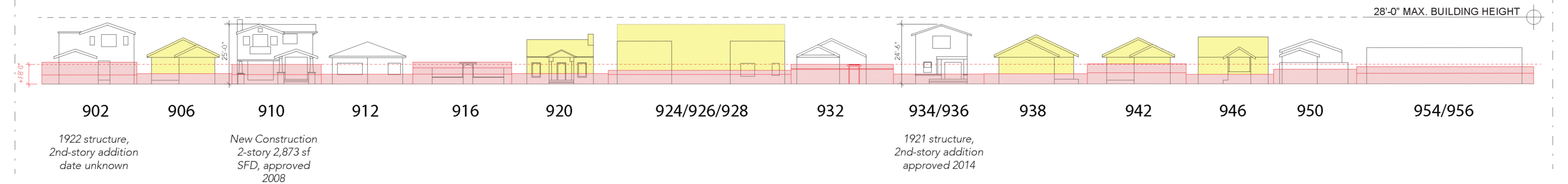
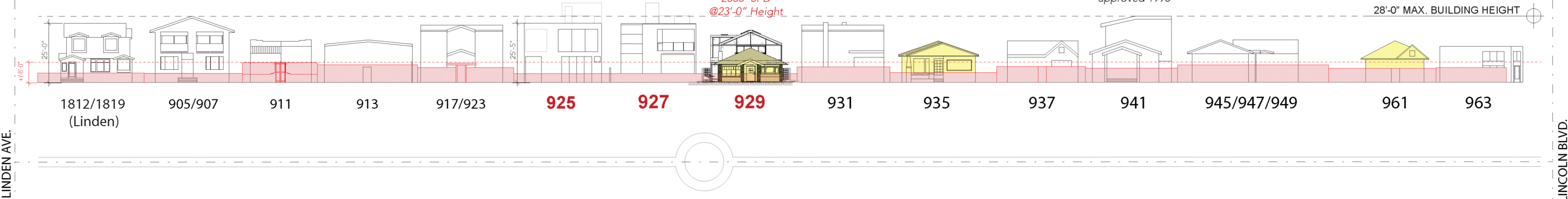
Proposed New Construction 2,509 sf SFD

Proposed New Construction 2,485 SFD

1907 structure, 2nd-story addition @ rear half of lot, design in progress 2335- SFD @23'-0" Height

1924 structure, 2nd-story addition date unknown

1922 structure + detached 2-story 2bed/2bath structure, approved 1995





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February 9, 2018

Ron Harel
M.E. Development, Inc.
6015 Washington Boulevard
Culver City, CA 90232

Subject: Historical Resources CEQA Impacts Analysis for 925 Marco Place, Los Angeles, California

Dear Mr. Harel:

Environmental Science Associates (ESA) appreciates the opportunity to submit this letter report to Ron Harel (Client) which summarizes and documents the results of a Historical Resources CEQA Impacts Analysis (Letter Report) for the proposed project (Project) located at 929 Marco Place within the neighborhood of Venice in the City of Los Angeles, California (Project Site), assessor parcel number (APN) 4241-023-022. The Project Site is situated in the Venice Annex Tract, Block 16, Lot 24 and is improved with a Craftsman style single-family bungalow (Bungalow) constructed circa 1907 which appears to be a contributor to the potential Milwood Venice Walk Streets Historic District (District).

The Letter Report was conducted by ESA's architectural historians, including Margarita C. Jerabek, Ph.D., Director of Historic Resources and Christian Taylor, M.H.P., Senior Architectural Historian, both of which meet and exceed the Secretary of the Interior's Professional Qualification Standards in history and architectural history. Professional qualifications are provided in Attachment A.

On August 31, 2016, ESA conducted an intensive pedestrian survey to document the existing conditions of the Project Site and vicinity and conducted an archival records search to identify known historical resources in the vicinity that may be indirectly impacted visually by the Project. ESA authored a Historical Resources Assessment and Environmental Impacts Analysis Report ("HRA") assessing potential impacts to historical resources (i.e. the District) that may be caused by demolition of the non-contributing building, relocation of the contributing Bungalow within the Project Site, and construction of two new residences on the Project Site. In the HRA, the Bungalow was recommended as not eligible as an individual resource under the Criteria of the National Register of Historic Places, California Register of Historical Resources, or local listing as a Los Angeles Historic Cultural Monument. However, the Bungalow was found eligible as a contributor to the potential Milwood Venice Walk Streets Historic District. ESA recommended the Bungalow be assigned a California Historic Resource status code of 5D2, "contributor to a district that is eligible for local listing or designation" in the HRA.



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In the previous HRA, potential impacts to historical resources were found to be less than significant because the contributing Bungalow would be retained and relocated within the Project Site and the new construction would not materially detract from the eligibility of the historic District. However, since that time a rear addition to the contributing Bungalow has been added to the Project. Therefore, this Letter Report is required to document our findings with regard to potential impacts to historical resources (i.e. the District) that may result from the two-story rear addition. This Letter Report is an amendment to the previously completed HRA, assessing the potential impacts to the proposed District caused by the construction of a two-story rear addition onto the contributing Bungalow.

Project Description

Upon relocation of the existing Bungalow to the adjacent lot with the new address of 929 Marco Place (APN: 4241-023-022), this new Project seeks to add a two-story rear addition and remodel the Bungalow's interior spaces. The Project will retain approximately 20'-0" of the relocated Bungalow's original footprint, extending from the front elevation back. After relocation, the Bungalow will be repaired and refurbished and/or rebuilt (as required) to return the structure to its original condition, and retain all of the important character-defining features of the 1907 home and District. The covered porch, as well as the enclosed sun room will remain, including existing windows, as well as the chimney (retrofitted to meet current Code and house a gas fireplace within the existing brick enclosure), front elevation brick pillars, and the pitched hip-roof with iconic flared eaves. The placement of the Bungalow on the new site maintains the two mature trees on the lot, one 18" tree at the front yard, and one 24" tree at the western property line, which are part of the District's character defining landscape features. Further, the proposed rear addition connects and extends the relocated Bungalow to create an expanded ground floor plan and a second story. The addition features modern materials like metal siding and large glass windows, differentiating it from the original Bungalow. The addition is setback from the Bungalow's front elevation, beyond the peak of the original roofline, retaining the historic appearance of the contributing single-story massing of the original Bungalow at the street front. Project plans developed by Electric Bowery, Ltd. are included in Attachment B.

Milwood Venice Walk Streets Historic District

The subject property is located within the boundaries of the Milwood Venice Walk Streets Historic District. As part of SurveyLA's recent survey efforts in 2014, the District was found potentially eligible for the California Register of Historical Resources ("California Register") and local listing. Located in the northern portion of Venice, the District is bounded by Lincoln Boulevard to the northeast, Amoroso Court to the southeast, Venice Boulevard and Electric Avenue to the southwest and west, and Palms Boulevard to the northwest. Of the 474 properties within District, 173 properties were found to be contributors, 280 were found non-contributors,

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and 21 properties were not surveyed. SurveyLA described the significance of the District as a “unique example of early-20th century residential development oriented on walk streets in Venice.” 925 Marco Place was previously identified as a contributor to the potential Milwood Venice Walk Streets Historic District by SurveyLA in 2014. The Bungalow was inventoried as a single-family Craftsman house with Japanese inspired elements constructed in 1907.

Character-Defining Features of the potential Milwood Venice Walk Streets Historic District

The character-defining features of the potential District include intact one- and two-story single-family residences that represent a collection of early 20th century housing types and styles. The District setting includes narrow concrete walk streets which are lined with front yard walls, fences, and mature vegetation, while the drive streets throughout the District feature street improvements such as curb and gutter, historic streetlights, sidewalks, parkways and street trees common. The District contributors have the following character-defining features:

- Vernacular Craftsman or Period Revival style bungalows
- One- to two- stories in height
- Modest construction methods and materials
- Low-pitch gable or hip roofs
- Clapboard or stucco siding

The District reflects the unique settlement pattern of the Venice Annex Tract including its configuration of walk streets and drive streets, which create a sense of time and place related to the early development of Venice.

CEQA Analysis

The thresholds for determining the significance of environmental effects on historical resources identified below are derived from the CEQA Guidelines as defined in §15064.5 and the City of Los Angeles CEQA Thresholds Guide. Pursuant to this guidance, a project that would physically detract, either directly or indirectly, from the integrity and significance of the historical resource such that its eligibility for listing in the National Register of Historic Places (“National Register”), California Register or as a City Monument would no longer be maintained, is considered a project that would result in a significant impact on the historical resource. Adverse impacts, that may or may not rise to a level of significance, result when one or more of the following occurs to a historical resource: demolition, relocation, conversion, rehabilitation, or alteration, or new construction on the site or in the vicinity.¹

¹ L.A. CEQA Thresholds Guide, Section D.3. Historical Resources, City of Los Angeles, 2006, p. D.3-1 (<http://environmentla.org/programs/Thresholds/D-Cultural%20Resources.pdf>, accessed 6/04/2013)

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A. Significance Thresholds

The thresholds for determining the significance of environmental effects on historical resources identified below are derived from the CEQA Guidelines as defined in §15064.5 and the City of Los Angeles CEQA Thresholds Guide. Pursuant to this guidance, a project that would physically detract, either directly or indirectly, from the integrity and significance of the historical resource such that its eligibility for listing in the National Register, California Register or as a HCM would no longer be maintained, is considered a project that would result in a significant impact on the historical resource. Adverse impacts, that may or may not rise to a level of significance, result when one or more of the following occurs to a historical resource: demolition, relocation, conversion, rehabilitation, or alteration, or new construction on the site or in the vicinity.²

1. CEQA Guidelines

According to the State *CEQA Guidelines*, Section 15064.5(b) a project involves a “substantial adverse change” in the significance of the resource when one or more of the following occurs:

- Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- 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 PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, 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.

² L.A. CEQA Thresholds Guide, Section D.3. Historical Resources, City of Los Angeles, 2006, p. D.3-1 (<http://environmentla.org/programs/Thresholds/D-Cultural%20Resources.pdf>, accessed 6/04/2013)

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The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on a significant resource if it would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State *CEQA Guidelines* when one or more of the following occurs:

- Demolition of a significant resource that does not maintain the integrity and significance of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings ("Standards"); or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.³

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource. The Standards were developed as a means to evaluate and approve work for federal grants for historic buildings and then for the federal rehabilitation tax credit (see 36 Code of Federal Regulations ("CFR") Section 67.7). Similarly, the Los Angeles Cultural Heritage Ordinance provides that compliance with the Standards is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to City Historic-Cultural Monuments (see Los Angeles Administrative Code Section 22.171.14.a.1). Therefore, the Standards are used for regulatory approvals for designated resources but not for resource evaluations.⁴ Similarly, CEQA recognizes the value of the Standards by using them to demonstrate that a project may be approved without an EIR. In effect, CEQA has a "safe harbor" by providing either a categorical exemption or a negative declaration for a project which meets the Standards (see State *CEQA Guidelines* Section 15331 and 15064.5(b)(3)).

Based on the above considerations, the factors listed in the L.A. CEQA Thresholds Guide have been reviewed and refined for this analysis.⁵ As such, the Project would have a significant impact on historic resources, if:

³ L.A. CEQA Thresholds Guide, Section D.3. Historical Resources, City of Los Angeles, 2006, p. D.3-1 (<http://environmentla.org/programs/Thresholds/D-Cultural%20Resources.pdf>, accessed 6/04/2013)

⁴ Century Plaza Hotel EIR, Appendix IV.D-3, Historic Thresholds Letter, from Michael J. Logrande, Director of Planning and Ken Bernstein, Manager, Office of Historic Resources, City of Los Angeles, to Bruce Lackow, President, Matrix Environmental, Los Angeles, California, December 15, 2010.

⁵ As documented in the Assessment Report in Appendix F-3 of this Draft EIR, the refinements to the factors listed in the L.A. CEQA Thresholds Guide were concurred with by the City Planning Department's Office of Historic Resources.

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- HIST-1** The Project would demolish, destroy, relocate, or alter a historical resource such that eligibility for listing on a register of historical resources would be lost (i.e., no longer eligible for listing as a historic resource); or
- HIST-2** The Project would reduce the integrity or significance of important historic resources on the Project Site or in the vicinity such that their eligibility for listing on a register of historical resources would be lost (i.e., no longer eligible for listing as a historic resource).

B. Analysis of Project Impacts

1. *Direct Impacts*

The Project seeks to relocate, rehabilitate and remodel the existing Bungalow by adding a rear two-story addition to the Bungalow after its relocation within the Project Site. The Project would restore and rehabilitate the front 20' of the Bungalow, retaining the important character defining features of the residence that contribute to the surrounding District. While the Project would modify the existing Bungalow with a rear addition, it would not remove or alter any of the Bungalow's features that contribute to the District. Furthermore, the Project's addition to the Bungalow's north (rear) elevation would be set back and would retain the Bungalow's original single-story massing along the street front elevation.

The Project would also result in alterations to the Bungalow's interior spaces to accommodate a new floorplan. However, SurveyLA's description of the District lists its character defining features as one- and two-story single-family residences, narrow concrete Walk Streets lined with front yard walls, fences, and mature vegetation, drive streets that feature street improvements such as curb and gutter, historic streetlights, sidewalks, parkways and street trees common. The interior spaces of the contributing residences are not identified as character defining features of the District.

The Bungalow's existing primary (south) elevation that is currently visible from the public right-of-way, would remain intact after project completion. The Bungalow's character defining single-story massing would be retained and its features and materials would be preserved and restored to their original appearance. Thus, the Bungalow would remain eligible as a contributor in the District and would continue to contribute to the District's significance as a collection of early 20th century housing types and styles. The Project would have no adverse impact on the District which would remain eligible after project completion. Furthermore, the Project conforms to the Secretary of the Interior's Standards (discussed in the following section.). Therefore, the impacts to historic resources on the Project Site would be less than significant.

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2. Indirect Impacts

ESA conducted a view-shed analysis of the visibility of the Project Site from nearby contributors and also analyzed conjunctive views within the Indirect Impacts Study Area. Because of the density of the built environment and overgrown trees and bushes, the Indirect Impacts Study Area is defined as the properties that flank Marco Place between Linden Avenue and Lincoln Boulevard. The Indirect Impacts Study Area consists of nine contributing properties, 12 non-contributing residences, and five “not sure” residences. Roughly 35% of the 26 residences were identified as contributors by SurveyLA with a majority of the contributing residences located on the opposite side of the street (Marco Place) from the Project Site.

The Project seeks to add a two-story addition to the rear of the contributing Bungalow, which would conform to the scale and massing of the surrounding contributing and non-contributing residences. The new addition would be setback from the relocated Bungalow’s street front elevation, preserving the character of this Bungalow and surrounding District. Although the Project’s alterations of the contributing Bungalow would result in a potential adverse impact to the District, the impact would be less than significant because the Bungalow’s contributing features would be retained and the Bungalow would remain eligible as a contributor upon project completion. Because the District would not lose a contributor despite the alterations proposed by the Project, the District would remain intact and retain its historic eligibility.

The Project would minimally alter the setting of the District, by increasing the existing massing of the contributor to two-stories at the rear. However, the addition has been setback to preserve the original single-story massing at the street front. Furthermore, the District’s setting has already been substantially altered by infill development. To the west of the Project site is 917 Marco Place featuring a large two-story addition. To the east of the Project Site is 931 Marco Place, a large two-story contemporary residence constructed in 2000. The contiguous grouping of contributors would remain intact along the south side of the Marco Place walk street. Therefore, the changes to the District and setting caused by the Project would have no adverse effect on the eligibility of the potential District nor would it affect the eligibility of contributing resources in the area. The primary character-defining features of the potential District, including the walk-street layout, mature vegetation, and uniform setbacks would be retained under the Project. The rear addition to the Bungalow would not be a significant impact under CEQA because it would not materially impair the significance of the contributing Bungalow or the District’s historical setting such that the District would be rendered ineligible for local listing.

Secretary of the Interior’s Standards Reviews

As mentioned above, potential impacts resulting from relocation of the Bungalow under another Project were addressed in the previous HRA. The rehabilitation and addition to the Bungalow as proposed in the new Project was analyzed in this Letter Report for conformance with the

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Secretary of the Interior's Standards for Rehabilitation ("Standards"), as discussed below. Under CEQA, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the Historical Resource.⁶ It is important to note, new construction adjacent to a historical resource is considered "related new construction" and numbers nine (9) and ten (10) of the Standards apply to this Project. Therefore, the Project was also assessed for conformance to Standards nine and ten regarding "related new construction" constructed adjacent or in the vicinity of other historical resources.

Standard 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.

The subject property would continue to be used as a Bungalow as it was historically. As discussed above, construction of the new rear addition would result in the removal of portions of the Bungalow's exterior walls and roof, while retaining the front 20' of the side and front elevations, which contribute to the District. The portions of the Bungalow that would require demolition are not visible from the public right-of-way and do not contribute to the District. Therefore, the proposed demolition of the rear portions of the Bungalow would be minimal and would not have a negative effect on the District's eligibility. The second floor addition incorporates a dramatic setback, only affecting the rear of the Bungalow, preserving the distinctive materials (exterior cladding), features (unique flared eaves), spaces, and spatial relationships (single story massing along the street front) of the Bungalow that contribute to the District. While the Bungalow would be altered by the Project, it would not be substantially changed or materially impacted and would still retain the important characteristics that make it a contributor to the District after project completion, and therefore its eligibility would be unchanged by the Project. The Project would conform to Standard 1.

Standard 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 character of the District has been defined as "unique example of early-20th century residential development oriented on walk streets in Venice." The Project would retain and preserve the historic character of the District, by retaining and preserving the contributing features of the Bungalow and stepping back the second floor addition so that the character-defining streetscape of the District would be protected. The proposed setback of the new addition

⁶ California Environmental Quality Act, 15064.5 (3).

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preserves the District's characteristic scale of single story residences, while also preserving key elements of the Bungalow's Craftsman style (the distinctive low sloping roofline, clipped side gables, attic vents, overhanging eaves, and clapboard exterior cladding). Thus the removal of distinctive materials, features, spaces and spatial relationships that characterize the Bungalow and District would be avoided. Upon project completion, the Bungalow would continue to display a single story profile, preserving the historic streetscape and spatial relationship to neighboring residences, and the historic character of the District would be retained and preserved. The Project would conform to Standard 2.

Standard 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.

The Project recognizes the distinctive historic and architectural character of the Bungalow and retains the majority of its character-defining features associated with the surrounding District, including the single-story scale and massing along the street front, low sloping roofline, and Craftsman materials and details that cause the property to be recognized as a contributor to the District. No conjectural features would be added and changes that create a false sense of historical development would be avoided. The new addition proposed by the Project is differentiated from the historic Bungalow by the use of modern materials and design elements and would not create a false sense of historical development. Therefore, the Project conforms to Standard 3.

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

Review of the Bungalow's current condition and building permits did not reveal any significant changes made to the structure throughout its history. The Project does not propose to remove or alter any changes that were made to the Bungalow which have attained additional significance. As such, the Project conforms to Standard 4.

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

Under the scope of work, the distinctive character-defining materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the Bungalow as a contributor from the District's period of significance (1904-1939) would be retained and rehabilitated. Some of these features include the masonry columns, wood clapboard siding, wood framed windows, low-sloping roofline, and unique rafter tails. The Project would retain the Bungalow's original single-story massing at the street front, preserving the character of the potential District. The proposed Project meets Standard 5.

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Standard 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.

The Project would retain and rehabilitate the Bungalow's exterior features that contribute to the District, some of which are visibly deteriorated and would require restoration, specifically the Bungalow's exterior wood clapboard siding, wood framed windows, and roof sheathing. Where the severity of deterioration requires replacement of a distinctive feature, the new feature would match the old in design, color, texture, and, where possible, materials. Replacement of missing features would be substantiated by documentary and physical evidence. Therefore, the proposed Project meets Standard 6.

Standard 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.

Rehabilitation work on the Bungalow would be undertaken using the gentlest means possible and would not damage any historic materials. It is recommended that the Project follow the guidelines presented in the National Parks Service's Preservation Briefs including, Preservation Brief 2: Repointing Mortar Joints in Historic Masonry Buildings, Preservation Brief 4: Roofing for Historic Buildings, Preservation Brief 9: The Repair of Historic Wooden Windows, and Preservation Brief 10: Exterior Paint Problems on Historic Woodwork. The proposed Project would conform to Standard 7.

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

The Project seeks to rehabilitate the existing Bungalow and therefore any potential to encounter archaeological or Native American resources is considered remote, in the unlikely event resources are encountered during Project implementation, those resources would be documented, protected, and preserved in place in accordance with the Standards. Should it be determined necessary to disturb the archaeological resources, mitigation measures would be developed and implemented. The proposed Project meets Standard 8.

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

The Project includes a two-story addition to the Bungalow's north (rear) elevation, expanding the interior spaces to accommodate a new floorplan. While Standard 9 requires additions like the one

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proposed by the Project to be compatible with the existing building's size, scale, massing, and architectural features, it also requires additions to be differentiated from the historic building. The purpose of Standard 9 is to prevent new construction from being mistaken as part of the original building, presenting a false sense of history. Compatibility and differentiation can be accomplished in a combination of ways, including combining similar design characteristics from the original building with modern materials or using materials that are similar to the historic building in a more modern architectural style.

The proposed second story addition included in the Project is designed as a contemporary interpretation of the Bungalow's original Craftsman style, reflecting the angle of the original roofline while incorporating subdued modern materials. The Craftsman architectural style is characterized by its use of natural materials like stone and wood. However, the contemporary addition incorporates modern man-made materials like steel and glass, ensuring it is recognized as an alteration and not part of the original Bungalow. As such, the new addition complements the historic features of the Bungalow, while ensuring that the original Bungalow and its architectural features remain the focal point.

Although the project will result in an increase to the Bungalow's height, the change is compatible with the characteristics of the District which includes one- and two-story residences. With regard to compatibility in scale and massing, nationally established industry standards in historic preservation recommend new second story additions are pushed back to the rear of the residence behind the roof ridge and stepped back to minimize views of the addition from the street. The Project follows these industry standards and incorporates a significant setback from the front elevation of the Bungalow, behind the point where the roof's front facing hip meets its ridge board. Because of this, the proposed setback preserves the Bungalow's original single-story scale, hipped roofline, and character at the street front where it contributes to the District. The overall height of the new second story will not exceed 23'-0" at its highest elevation, minimizing the overall mass and scale of the new addition so as not to overpower the existing scale of the Bungalow or surrounding District and nearby contributors. The Project Site is surrounded by non-contributing residences on both sides, and a district contributor on the opposite side of Marco Place. The contributing residence to the south is a one-story multi-family residence. By dramatically stepping back the two-story addition to the Bungalow, the Project retains its original one-story massing at the street front elevation, minimizing the impact to the District contributor on the opposite side of the street. Therefore, the Project is in conformance to Standard 9.

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



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If the elements of new construction were removed in the future, the essential form and integrity of the potential District, and other potential historical resources in the Project vicinity would be unimpaired. The Project proposes alterations to historic materials, as discussed previously in the direct impacts analysis and discussion under Standard 1. However, the Project would retain all elements along the front elevations and the one-story massing and roof shape that contribute to the historic character of the District. The portions of the Bungalow that would require demolition are not visible from the public right-of-way and do not contribute to the District. The portions of the Bungalow visible to the public would be left intact and would be restored as a result of the Project. Therefore, if the new addition would be removed in the future, the essential form and integrity of the historic District and its environment would be unimpaired. The features that make the Bungalow a contributor to the District would remain intact, including its one-story massing, modest construction methods and materials, low-pitched hip roof, and wood clapboard siding. The proposed Project conforms to intent of Standard 10.

Conclusion

The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on a significant resource if it would cause a substantial adverse change in the significance of a historical resource. In this case, the HRA resulted in recommending the Bungalow individually ineligible for listing under the applicable federal, state, and local criteria. However, it was recommended eligible as a contributor to the Milwood Venice Walk Streets Historic District. As such, the Bungalow is considered a contributor to the potentially eligible District, and the District is considered the eligible historical resource under CEQA. The potential impacts from the Project to the District's eligibility were therefore assessed in this Letter Report.

As discussed above, the Project appears to conform with the Standards and therefore would not materially impair the significance of either the Bungalow as a District contributor, or the District as a whole as a historical resource. After Project completion, the Bungalow would retain the character defining scale, massing, materials and features associated with its Craftsman style and its spatial relationships and it would continue to convey its historic association as a contributor to the District. The Bungalow would remain eligible as a contributor to the proposed historic District and the District would retain its character defining features, making it eligible as a historic resource. Therefore, pursuant to CEQA, the Project would have a less than significant impact on historical resources. It is therefore recommended that a Certificate of Appropriateness be issued for the Project, as it has been shown "that there is no substantial evidence, in light of the whole record before the agency, that the Project may have a significant effect on the environment."

Should you have any questions or require additional information please feel free to contact me at (310)-451-4488 or via email at mjerabek@esassoc.com. Thank you for allowing ESA the opportunity to carry out the preservation consultation services for this important Project.



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Sincerely,
ESA PCR

A handwritten signature in black ink, reading "Margarita C. Jerabek".

Dr. Margarita C. Jerabek
Director of Historic Resources

LIST OF ATTACHMENTS

Attachment A: Professional Qualifications

Attachment B: Project Plans

Attachment A

Professional Qualifications



Margarita Jerabek, PhD

Historic Resources Director

EDUCATION

Ph.D., Art History,
University of California,
Los Angeles

M.A., Architectural
History, School of
Architecture, University
of Virginia

Certificate of Historic
Preservation, School of
Architecture, University
of Virginia

B.A., Art History, Oberlin
College

30 YEARS EXPERIENCE

AWARDS

2014 Preservation
Award, The Dunbar
Hotel, L.A. Conservancy

2014 Westside Prize, The
Dunbar Hotel, Westside
Urban Forum

2014 Design Award:
Tongva Park & Ken
Genser Square, Westside
Urban Forum

2012 California
Preservation Foundation
Award, RMS Queen Mary
Conservation Management
Plan, California
Preservation Foundation

PROFESSIONAL AFFILIATIONS

California Preservation
Foundation

Santa Monica Conservancy

Los Angeles Conservancy

Society of Architectural
Historians

National Trust for
Historic Preservation
Leadership Forum

American Institute of
Architects (AIA), National
Allied Member

Margarita Jerabek has 30 years of professional practice in the United States with an extensive background in historic preservation, architectural history, art history and decorative arts, and historical archaeology. She specializes in Visual Art and Culture, 19th-20th Century American Architecture, Modern and Contemporary Architecture, Architectural Theory and Criticism, Urbanism, and Cultural Landscape, and is a regional expert on Southern California architecture. Her qualifications and experience meet and exceed the Secretary of the Interior's Professional Qualification Standards in History, Archaeology, and Architectural History. Margarita has managed and conducted a wide range of technical studies in support of environmental compliance projects, developed preservation and conservation plans, and implemented preservation treatment projects for public and private clients in California and throughout the United States.

Relevant Experience

Margarita has prepared a broad range of environmental documentation and conducted preservation projects throughout the Los Angeles metropolitan area and Southern California. She provides expert assistance to public agencies and private clients in environmental review, from due diligence through planning/design review and permitting and when necessary, implements mitigation and preservation treatment measures on behalf of her clients. As primary investigator and author of hundreds of technical reports, plan review documents, preservation and conservation plans, HABS/HAER/HALS reports, construction monitoring reports, salvage reports and relocation plans, she is a highly experienced practitioner and expert in addressing historical resources issues while supporting and balancing project goals.

She is an expert in the evaluation, management and treatment of historic properties for compliance with Sections 106 and 110 of the NHPA, NEPA, Section 4(f) of the Department of Transportation Act, CEQA, and local ordinances and planning requirements. Margarita regularly performs assessments to ensure conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and assists clients with adaptive reuse/rehabilitation projects by providing preservation design and treatment consultation, agency coordination, legally defensible documentation, construction monitoring and conservation treatment.

Margarita is a regional expert on Southern California architecture. She has prepared a broad range of environmental documentation and conducted preservation projects throughout the Los Angeles metropolitan area as well as in Ventura, Orange, Riverside, San Bernardino and San Diego counties. Beyond her technical skill, she is a highly experienced project manager with broad national experience throughout the United States. She currently manages PCR's on-call preservation services with the City of Santa Monica, County of San Bernardino Department of Public Works, City of Hermosa Beach, Los Angeles Unified School District, and Long Beach Unified School District.



Christian Taylor

Senior Architectural Historian

EDUCATION

Master's Degree,
Historic Preservation,
University of Southern
California, Los Angeles

B.A., History, University
of Oklahoma, Norman

5 YEARS EXPERIENCE

PROFESSIONAL AFFILIATIONS

California Preservation
Foundation

Society of Architectural
Historians

Association for
Preservation
Technology

Christian Taylor is a historic resources specialist with academic and professional experience in assessing historic structures and contributing to California Environmental Quality Act (CEQA)-level documents. Throughout the course of his career, Christian has developed an interest in Los Angeles' industrial, economic, and transportation related history. Christian continues to hone his skills in management of rehabilitation and restoration projects, preparation of historic contexts, the use of non-invasive material investigation methods and advanced methods of documentation, and historic resource assessments.

Christian has completed and co-authored a wide range of architectural investigations including historic resources assessment and impacts analysis reports for compliance with CEQA, character-defining features reports, plan reviews, investment tax credit applications, Section 106 significance evaluations, and HABS/HAER documentations. He has also performed extensive research, survey work, and prepared landmark and preliminary assessment reports as a part of ESA's On-Call Historic Preservation Contract with the City of Santa Monica.

Christian has contributed to the research, site inspections, and report preparation of a number of historic resources assessments in the Los Angeles metropolitan area for compliance with CEQA. He has evaluated a number of different types of potential historical resources, including single-family and multi-family residences, factories and industrial properties, commercial buildings, and schools, in West Hollywood, Venice, Los Angeles, Culver City, and Santa Monica.

Project Experience

Rocketdyne Historic American Engineering Record, Los Angeles, CA.

Architectural Historian. ESA prepared a Historic American Engineering Record (HAER), documenting the former home of Rocketdyne in Canoga Park, Los Angeles, California. The HAER included a thorough investigation of the site's history, description of the various buildings and their uses, historic images, plans, and HAER level photography of the site. The report has been compiled and is currently being reviewed for submission to the Library of Congress in compliance with mitigation required for the redevelopment of the site. Chris was responsible for preparing the HAER.

344 8th Street, Long Beach, CA. *Architectural Historian.* ESA prepared a historic resources analysis for the 344 8th Street project. This project included a physical inspection of a small corner store constructed in the early twentieth century. The building was recorded and evaluated on Department of Parks and Recreation (DPR) record forms based on relevant historic contexts surrounding its development. Recommendations for restoration treatments of the building were provided as a result of the investigation. Chris was responsible for conducting the site survey, archival research and preparing the DPR forms and restoration treatment recommendations.

Attachment B
Project Plans

*Attachment B Excluded
from Digital Copy*

*Attachment C Excluded
from Digital Copy*