

Appendix C

Historic Resources Technical Report

3822 S. Figueroa Street
(3822-3838 S. Figueroa Street and 3801-3833 ½ S.
Flower Drive)
Los Angeles, California



KTGY, June 12, 2024

Historical Resources Technical Report



EXECUTIVE SUMMARY

The purpose of this Historical Resource Technical Report (HRTR) is to analyze whether a proposed project (Project) would impact historical resources as defined by the California Environmental Quality Act (CEQA). GPA Consulting (GPA) was retained to:

- Identify historical resources on the Project Site;
- Identify historical resources in the vicinity of the Project Site within the Area of Potential Impact (Impact Area);
- Assess potential impacts the Project may have on identified historical resources;
- Recommend mitigation measures if applicable.

The Project is located in the South Los Angeles Community Plan Area (CPA) of the City of Los Angeles and consists of nine parcels on S. Figueroa Street and S. Flower Drive between W. 38th Street and W. 39th Street (Project Site). Existing uses on the Project Site include seven two-story apartment buildings along S. Flower Drive and one two-story apartment building on S. Figueroa Street. The proposed Project would involve demolition of all existing buildings on the Project Site and construction of a seven-story multi-family building for student and affordable housing across all nine parcels.

Identification of Historical Resources on the Project Site

The 1921 apartment building on the Project Site at 3822 S. Figueroa Street is not currently listed under national, state, or local landmark or historic district programs and has not been previously identified in any historic resource surveys of the area, including SurveyLA. As it is over 45 years of age, GPA evaluated its potential eligibility for listing in the national, state, and local registers. GPA concluded that 3822 S. Figueroa Street does not appear to be eligible for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), or designation as a Los Angeles Historic-Cultural Monument (HCM) due to a lack of historic and architectural significance. Therefore, it does not appear to be a historical resource for the purposes of CEQA.

The Project Site is partially within the boundaries of the Flower Drive Historic District. The Flower Drive Historic District was determined eligible for listing in the California Register by the State Historical Resources Commission (SHRC) in 2008. Six of the buildings on the Project Site are contributing resources to the district. As such, the district as a whole and each of its contributors are considered historical resources for the purposes of CEQA.

Identification of Historical Resources in the Project Vicinity

Based on the location of the proposed Project and inconsistent size of surrounding parcels, the Impact Area for this HRTR was established as a 250-foot radius from the Project Site. This Impact Area encompasses the city block on which the Project is located and resources on adjacent parcels. The Impact Area does not include most of the extremely large parcel opposite the Project Site to the west that includes the Los Angeles Memorial Coliseum and BMO Stadium. While the Los Angeles Memorial Coliseum is a historical resource listed in the National Register and California Register, it is physically and visually separated from the proposed Project Site by S. Figueroa Street and a setback of over 800 feet. This HRTR analyzes the Project's potential impacts on all other historical resources that intersect with the Impact Area, even if they are only partially located within the 250-foot radius, including project-level and cumulative impacts on the entire Flower Drive Historic District.

The Impact Area also does not extend past the I-110 (Harbor Freeway), which is adjacent to the Project Site on the opposite side of S. Flower Drive and creates a physical and visual separation between the Proposed project site and any historical resources east of the freeway.

Previously identified historical resources within the Impact Area include the Zobelein Estate/Zobelein Courtyard Apartments and the California African American Museum. The Zobelein Estate was determined eligible for listing in the National Register through the Section 106 process and listed in the California Register in 1990. In 1993, the same property was designated an HCM called the Zobelein Estate. The California African American Museum (CAAM) was identified as a potentially eligible historical resource during the development of the African American History Context for the *Los Angeles Citywide Historic Context Statement*. While the CAAM has not been formally evaluated as a historical resource, it appears to meet the eligibility standards and integrity considerations established in the *LACHCS* for properties associated with the history of African American visual arts. As such, out of an abundance of caution, CAAM is treated as a historical resource for the purposes of this HRTR.

Assessment of Project Impacts

The proposed Project was analyzed for potential direct, indirect, and cumulative impacts to the Flower Drive Historic District, Zobelein Courtyard Apartments/Zobelein Estate, and CAAM.

Direct

There would be no direct impact to the Zobelein Courtyard Apartments/Zobelein Estate or the CAAM.

The contributing resources within the Flower Drive Historic District proposed to be demolished are considered historical resources in and of themselves and, in any event, their demolition meets the criteria for a material impairment under CEQA. Therefore, **the direct impact caused by the proposed Project would be significant, regardless of whether the remaining contributors remain eligible for listing, which is addressed further in Section 6.2.4.**

Indirect

The proposed Project would introduce a new visual element within the vicinity of the Zobelein Courtyard Apartments/Zobelein Estate and the CAAM. Broader setting is not an essential aspect of integrity for either property and there would be no change to the physical characteristics of their immediate setting; therefore, the indirect impact to the Zobelein Courtyard Apartments/Zobelein Estate and the CAAM caused by the proposed Project would be less than significant.

Cumulative

Four related projects were considered in the cumulative impacts analysis:¹ the 3801 South Grand Mixed-Use Project, the 3851 South Grand Mixed-Use Project, the CAAM Renovation Project, and the Fig Project, 3900 S. Figueroa Street, Los Angeles (Fig Project).

The 3801 and 3851 South Grand Mixed-Use Projects consist of constructing new mixed-use buildings on vacant lots. As lead agency, the City determined that the projects would not result in substantial adverse changes to historical resources; therefore, there is no potential for significant cumulative impacts to historical resources. Additionally, the two mixed-use projects are located on the opposite side of the I-110 and are thus physically and visually separated from the Project Site by the freeway, and there are no shared or common resources between them.

¹ Related in terms of geographic area and/or potential impact, not by project type, proponent, or other similarities.

The CAAM Renovation Project consists of renovation and expansion of the existing museum. As lead agency, the California Science Center determined that the project would not result in significant impacts to the environment and a mitigated negative declaration (MND) was prepared, which determined that the renovation project would not negatively impact the CAAM's eligibility for listing as a historic resource. Because the Project would similarly have no effect on the CAAM's eligibility for listing, there is no potential for significant cumulative impacts to the CAAM.

The Fig Project consists of demolishing existing apartment buildings within the Flower Drive Historic District to construct a new mixed-use building. As lead agency, the City of Los Angeles determined that the direct impacts to the Flower Drive Historic District would be significant, and although mitigation measures would be required, they would not reduce the impacts to a less-than-significant level and the impacts would remain significant and unavoidable. The direct impacts to the Flower Drive Historic District would be significant for both projects, and these impacts would be compounded when considered together; **therefore, the cumulative impact to the Flower Drive Historic District from the Fig Project and the Project would also be significant.**

Notwithstanding the significant cumulative impact, it appears that the remaining contiguous Flower Drive Historic District contributors would have the potential for continued eligibility as a district for California Register listing under Criteria 1 and 3, based on a review of the Multi-Family Residential Historic District eligibility standards in the *LACHCS*. The potential continued eligibility of the remaining contiguous contributors as a district does not, however, eliminate or reduce the significant project-level and cumulative impacts on the district to a less-than-significant level.

Mitigation

Under CEQA, the lead agency is required to identify potentially feasible measures to mitigate or avoid significant impacts that are fully enforceable, such as through permit conditions.

Mitigation measures carried out as part of the Fig Project included Historic American Building Survey (HABS)-like recordation of the entire district; as such, additional recordation would be redundant and is not recommended as mitigation for the proposed Project.

During preparation of this HRTR, GPA and the Project Applicant met with California Office of Historic Preservation (OHP) staff for an informal discussion regarding appropriate timing for updates to the existing Flower Drive Historic District documentation, should a California Register listing based on the prior determination be pursued. OHP staff advised that submissions should reflect the appearance of the resource at the time of submittal and that any revisions should be adequately justified, such as by physical changes to the resource. In short, documentation supporting nominations or determinations of eligibility cannot be amended based on hypothetical future conditions or assumptions, and could only be updated and submitted for consideration after physical changes occur. OHP thus confirmed they do not issue opinion letters or advice based on the potential impacts of future development, but instead only consider amendments to prior nominations based on current conditions. Based on the analysis in **Section 6.2.4**, it appears that the remaining grouping of contiguous contributors would have the potential for continued eligibility for California Register listing under Criteria 1 and 3 as a multi-family residential historic district with the Project and Fig Project in place; however, OHP and the SHRC could not render a formal decision until after the Project and Fig Project are constructed.

Based on the above, the following mitigation measures are recommended:

1. Interpretive Display

- a. The Applicant shall prepare an interpretive display consisting of at least one panel and install the display(s) in a location visible from the public right-of-way along Flower Drive between W. 38th Street and W. 39th Street.
 - b. The interpretive display shall include a brief history of the area as well as the district and its significance within the context of multi-family residential housing development.
 - c. The text of interpretive display shall be accompanied by photographs of the district, such as those prepared for the HABS-Like documentation, and other available visual ephemera, such as historic maps and aerials.
 - d. The interpretive display shall be professionally written and designed. The written content shall be prepared by a person or persons meeting the Secretary of the Interior's Professional Qualifications Standards for history and/or architectural history.
 - e. Prior to fabrication and installation of the interpretive display, a digital draft shall be made available to the City of Los Angeles Office of Historic Resources staff for review and comment.
 - f. The finished interpretive display shall be installed prior to the issuance of the final Certificate of Occupancy.
2. Updated California Register Nomination
- a. The Applicant shall cause the preparation of an updated California Register historic district nomination for the contributing buildings remaining after construction of the project.
 - b. The nomination shall be prepared in accordance with OHP instructions by a person or persons meeting the Secretary of the Interior's Professional Qualifications Standards for history and/or architectural history.
 - c. The photographic documentation shall be carried out only after framing and exterior finishes, at a minimum, of the proposed multi-family building are complete, in order to convey a full understanding of any changes to feeling and setting.
 - d. This mitigation measure shall be completed prior to the issuance of the final Certificate of Occupancy.
 - e. This mitigation measure will be considered complete when the Applicant ensures the nomination is prepared and submitted to OHP for consideration.

Implementation of the recommended mitigation measures would not reduce the direct project-level and cumulative impacts on the Flower Drive Historic District to a less-than-significant level; however, they are recommended to document and interpret the history of the district. The only way to reduce the impact on Flower Drive Historic District would be to redesign the Project to preserve all contributing buildings, the feasibility of which is addressed in the Environmental Impact Report (EIR) for the Project.

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Appendix B: 3822 S. Figueroa Street DPR Form Set

Appendix C: Concept Design Plan Set (KTGY, June 12, 2024)

1. INTRODUCTION

1.1 Project Location and Description

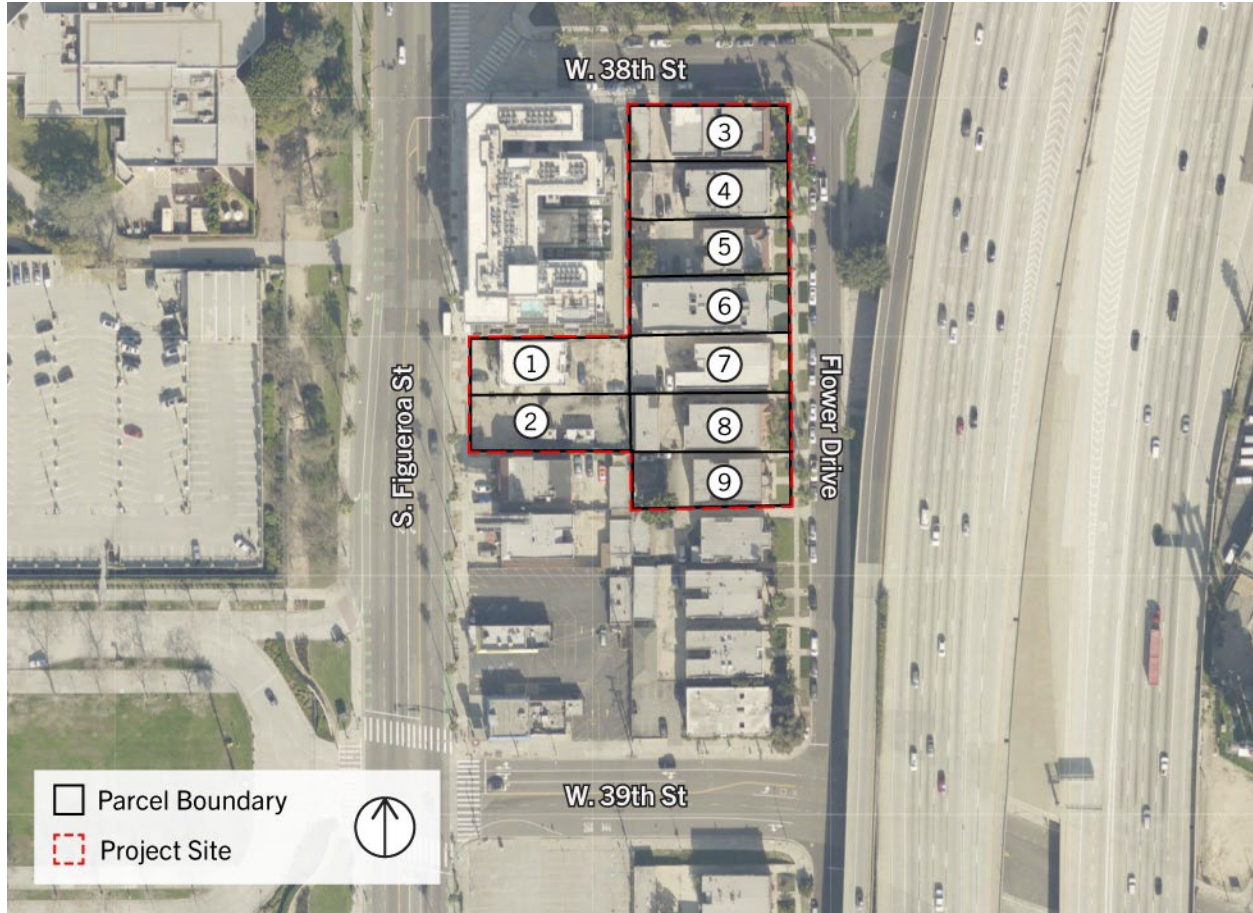


Figure 1: Project Location. (Base Map: Los Angeles County GIS.)

The Project involves the development of a seven-story student and multi-family affordable housing development that includes 209 multi-family apartment units, inclusive of 42 covenanted affordable multi-family housing units, 2,705 square feet (sf) of ground level commercial uses, and interior ground level wrapped parking (Project). The Project is located within nine parcels located along South Figueroa Street and South Flower Drive at 3822-3838 South Figueroa Street and 3801-3833 ½ South Flower Drive (Project Site, see **Figure 1**) in the City of Los Angeles (City). The Assessor Parcel Numbers (APN) of the Project Site are listed in **Table 1** below.

#	Address	APN	Year Built	Description
1	3822 S Figueroa St	5037-031-015	1922	Two-story fourplex
2	N/A	5037-031-016	N/A	Vacant, parking lot
3	3801 Flower Dr (468 W. 38th St)	5037-031-001	1923	Two-story apartment house
4	3809 Flower Dr	5037-031-002	1921	Two-story fourplex

Table 1: Parcels on the Project Site

#	Address	APN	Year Built	Description
5	3813 Flower Dr	5037-031-003	1922	Two-story fourplex
6	3819 Flower Dr	5037-031-004	1924	Two-story apartment house
7	3821 Flower Dr	5037-031-005	1924	Two-story fourplex
8	3825 Flower Dr	5037-031-006	1927	Two-story apartment house
9	3831 Flower Dr	5037-031-007	1920	Two-story fourplex

Existing uses on the Project Site include seven two-story apartments along South Flower Drive and a two-story apartment and surface parking lot along South Figueroa Street. Currently, 51 multi-family units are located on the Project Site. The Project would remove the existing multi-family dwelling units and surface parking lot to construct the Project. The Project's 209 units would consist of 34 studios, 43 one-bedroom units, 45 two-bedroom units, 34 three-bedroom units, and 53 four-unit bedroom units. The Project would include 32 units for Very Low-Income Households (15 percent) and 10 units (5 percent) for Low Income Households.

The Project would include 22,840 sf of code defined open space in addition to 287 sf of additional non-required code defined open space throughout the Project. Open space would consist of 300 sf of private patios, 14,865 sf of courtyard areas on the first and second floors, two roof decks on the seventh floor (2,252 sf) and 5,710 sf of various indoor amenities such as a club room, fitness room and lounge area.

The Project would include 34 residential parking stalls and 6 commercial parking stalls on the ground level in a wrapped, fully enclosed garage. The Project would also include 128 long-term bicycle parking spaces and 14 short-term bicycle parking spaces on the first floor for residents of the Project Site. Additionally, the Project would provide two (2) long-term commercial bicycle spaces and two (2) short-term commercial bicycle spaces.

1.2 Impact Area

Chapter 4 of the City's CEQA Guide, "Guide to Preparation of Impact Analyses – Cultural Resources – Historical Resources" indicates that the impact area for projects that differ in scale from the existing setting should typically include the entire city block on which the project site is located, adjacent parcels, and parcels on opposite block faces.²

Based on the location of the proposed Project and inconsistent size of surrounding parcels, the Impact Area for this HRTR was established as a 250-foot radius from the Project Site (see **Figure 2**, next page).

This Impact Area encompasses the city block on which the Project is located and resources on adjacent parcels while omitting most of APN 5037-031-002, the extremely large parcel opposite the Project Site to the west that includes the Los Angeles Memorial Coliseum and BMO Stadium. While the Los Angeles Memorial Coliseum is a historical resource listed in the National Register and California Register, it is physically and visually separated from the proposed Project Site by S. Figueroa Street and a setback of over 800 feet. As such, there is no potential for indirect impacts to the stadium. This HRTR also analyzes the Project's potential impacts on all other historical resources that intersect with the Impact Area, even if they are only partially located within the 250-foot radius,

² City of Los Angeles Department of City Planning (LADCP), "Chapter 4. Guide to Preparation of Impact Analyses – Cultural Resources – Historical Resources," in CEQA Guide, 3, July 2024, accessed July 2025, [https://planning.lacity.gov/odocument/a3c69b8d-8d02-4e43-9d1a-a393347ee3cd/CEQA%20Guide%20-%20Guide%20to%20Preparation%20of%20Impact%20Analysis%20-%20Cultural%20Resources%20-%20Historic%20Resources%20\(Dec%202023\).pdf](https://planning.lacity.gov/odocument/a3c69b8d-8d02-4e43-9d1a-a393347ee3cd/CEQA%20Guide%20-%20Guide%20to%20Preparation%20of%20Impact%20Analysis%20-%20Cultural%20Resources%20-%20Historic%20Resources%20(Dec%202023).pdf).

including project-level and cumulative impacts on the entire Flower Drive Historic District (see **Sections 3.3** and **6**).

The Impact Area does not extend past the I-110 (Harbor Freeway), which is adjacent to the Project Site on the opposite side of S. Flower Drive and creates a physical and visual separation between the Proposed project site and any historical resources east of the freeway.

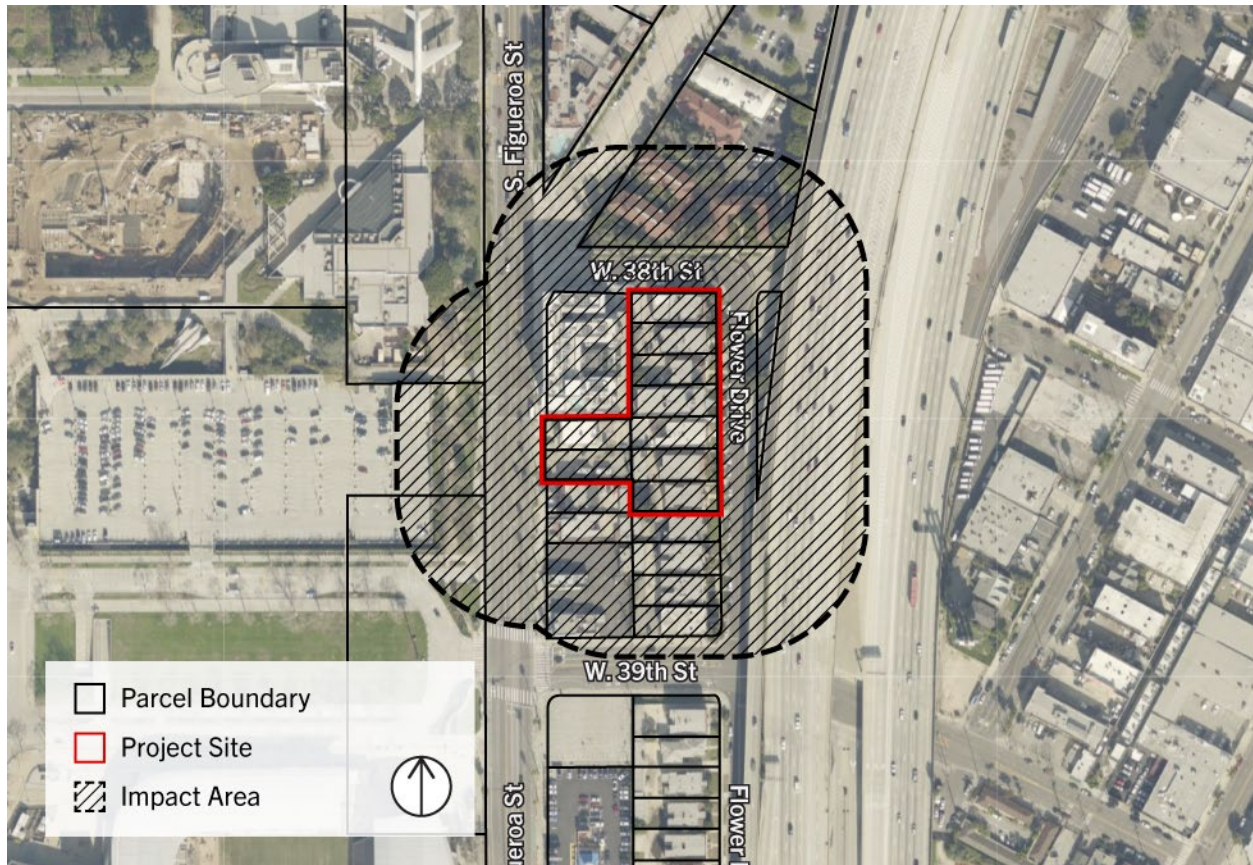


Figure 2: Project Impact Area. (Base Map: Los Angeles County GIS.)

1.3 Methodology

In preparing this report, GPA Consulting (GPA) performed the following tasks:

1. Reviewed existing information to determine if there are any previously identified or designated historical resources on the Project Site or within the Impact Area:
 - a. Consulted the Built Environment Resources Directory (BERD) maintained by the State Office of Historic Preservation (OHP) to determine whether any properties on the Project Site and within the Impact Area have been previously identified or evaluated as a historical resource, or designated as an individual resource or part of a historic district under national or state programs. The BERD includes information on cultural and historical resources reviewed for eligibility to the National Register and the California Historical Landmarks (CHL) programs through federal and state environmental compliance procedures and resources listed under federal and state registration programs. While the BERD may not include all mapped data on historical or cultural resources filed with the South Central Coastal Information Center (SCCIC), it includes information on previously evaluated properties.

- b. Consulted the Los Angeles Historic Resources Inventory website, HistoricPlacesLA, to determine if the Project Site or Impact Area contain any properties designated as Los Angeles Historic-Cultural Monuments (HCM) or within a designated HPOZ.
 - c. The results of this research and descriptions of the historical resources on the Project Site and within the API can be found in **Section 3.3**.
2. Conducted a field survey of the Project Site and Impact Area, during which GPA assessed the general condition and physical integrity of the buildings. Digital photographs of the building were taken during the field inspection.
3. Conducted research into the history of the extant resources on the Project Site. Sources referenced included building permit records, city directories, historic aerial photographs, prior survey data, Sanborn Fire Insurance maps, local history databases, and various newspaper archives.
4. Consulted the Context/Theme/Property Type (CTP) eligibility standards formulated for the *Los Angeles Citywide Historic Context Statement (LACHCS)* to identify the relevant CTPs under which to evaluate 3822 S. Figueroa Street.
5. Reviewed and analyzed the June 12, 2024 conceptual design plan set prepared by KTGy to assess whether the Project would have an impact on identified historical resources under CEQA (see Appendix C for Project Concept Plans).

1.4 Qualifications of Preparers

Amanda Yoder Duane, Senior Architectural Historian, and Emma Haggerty, Associate Architectural Historian, were responsible for the preparation of this report. Jenna Kachour, Senior Associate Architectural Historian, was responsible for reviewing this report for quality assurance and quality control. They each fulfill the qualifications for a historic preservation professionals outlined in Title 36 of the Code of Federal Regulations, Part 61.

Ms. Haggerty, Associate Architectural Historian, practiced in California between 2018 and 2024. She earned her Bachelor of Arts degree in Planning and Public Policy at Rutgers University, and her Master of Science degree in Historic Preservation from the University of Vermont.

Résumés for Ms. Duane and Ms. Kachour are included in Appendix A.

2. REGULATORY FRAMEWORK

2.1 Federal Regulations

2.1.1 National Register of Historic Places

The National Register of Historic Places (NR, National Register) is “an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”³

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:⁴

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

Context

To be eligible for listing in the National Register, a property must be significant within a historic context, meaning it represents an important aspect of an area’s history or prehistory. “National Register Bulletin 15” states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.”⁵

Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in National Register Bulletin 15 as “the ability of a property to convey its significance.”⁶ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

³ Title 36 Code of Federal Regulations Part 60.2.

⁴ Title 36 Code of Federal Regulations Part 60.4.

⁵ Patrick Andrus and Rebecca Shrimpton, eds., (National Register Bulletin 15) *How to Apply the National Register Criteria for Evaluation* (US Department of the Interior, National Park Service, Cultural Resources: 1997), 8-9, accessed July 2025, https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf.

⁶ National Register Bulletin 15, 44-45.

2.2 State Regulations

2.2.1 California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register of Historical Resources (California Register, CR). The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.⁷

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

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion on the California Register.⁸

Criteria and Integrity

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

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous regarding the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.⁹

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all the following criteria:¹⁰

1. The survey has been or will be included in the State Historic Resources Inventory;

⁷ Public Resources Code §5024.1 (a).

⁸ Public Resources Code §5024.1 (d).

⁹ Public Resources Code §4852.

¹⁰ Public Resources Code §5024.1.

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

Office of Historic Preservation Survey Methodology

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

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

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

2S2	Individually determined eligible for NR by consensus through Section 106 process. Listed in the CR.
2CS	Individually determined eligible for CR by the State Historical Resources Commission (SHRC).
2CD	Contributor to a multi-component resource determined eligible for CR by the SHRC.
5S1	Individually listed or designated locally.
6CX	Determined ineligible for CR by the SHRC.
QQQ	May be eligible; additional research needed. ¹¹

¹¹ For the purposes of SurveyLA, this status code was developed in consultation with OHP.

2.3 Local Regulations

2.3.1 Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating HCMs. The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. A monument is any site, building, or structure of particular historic or cultural significance to the City of Los Angeles and may be designated if it meets at least one of the following criteria:

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

3. ENVIRONMENTAL SETTING

3.1 Brief History of the Area

3.1.1 Development of Present-Day South Los Angeles

The property at 3822 S. Figueroa is located in the Exposition Park/University Park area of the South Los Angeles Community Plan Area (CPA). The early development of this area of the CPA was shaped by the establishment of railroad and streetcar lines as well as the University of Southern California (USC).¹²

In the late nineteenth century, University Park emerged as an early and affluent suburb of Downtown Los Angeles. Three residents of the area donated land to establish the original USC campus, and the wealthiest among this population gradually moved further west from Downtown to fashionable new neighborhoods such as Windsor Square and Hancock Park as the city continued to grow. In the following decades, development in the University Park neighborhood was influenced by USC, including postwar campus expansion and conversion of a number of early residential buildings for university use.¹³

This early suburbanization followed a typical pattern of development, with neighborhood commercial uses emerging along major thoroughfares, single-family residential neighborhoods along smaller streets, and multi-family buildings dispersed throughout. Institutional resources such as schools and religious buildings were established as the communities grew, and industrial uses were concentrated around railroad lines.¹⁴

During the 1920s, Los Angeles experienced a population boom that created a dramatic increase in housing demand, particularly in the areas surrounding Downtown. While single-family residences had been the dominant and preferred housing type for decades, housing density inevitably had to increase to accommodate the influx of new residents. Multi-family housing was also seen as a lucrative investment opportunity, with duplexes and fourplexes among the most popular and profitable property types to construct. Multi-family buildings were constructed as infill development, but entire multi-family neighborhoods also emerged in previously underdeveloped areas like the Figueroa Street corridor within the Impact Area.¹⁵

Before World War II, the Exposition Park area, along with Jefferson Park and Adams-Normandie, was home to a diverse population of white, Black, Hispanic, Japanese American, and Jewish residents. This diversity was notable during an era of strictly enforced racially restrictive covenants and discriminatory housing practices throughout Los Angeles.¹⁶ White opposition grew fiercer as the Black and African American population in particular increased in South LA; white homeowners of Sugar Hill in West Adams mounted a legal battle that culminated in the California Supreme Court ruling that racially restrictive covenants could not be enforced. Loren Miller, the attorney representing the Black homeowners in Sugar Hill, went on to join the legal team that took the *Shelley vs. Kraemer* case before the United States Supreme Court, leading to the historic decision that racially restrictive covenants were unenforceable nationwide.¹⁷

¹² Architectural Resources Group (ARG), *Historic Resources Survey Report: South Los Angeles Community Plan Area* (City of Los Angeles Office of Historic Resources, March 2012), 9, accessed July 2025, https://planning.lacity.gov/odocument/903e27ff-c991-4b73-a9ac-d0b3a8aa558d/S_LA_report_HPLAEdit.pdf.

¹³ ARG, *Survey Report: South Los Angeles*, 9.

¹⁴ ARG, *Survey Report: South Los Angeles*, 10-12.

¹⁵ Peter Moruzzi, "Flower Drive District," California Department of Parks and Recreation Form Set, PCR Services Corp, Los Angeles, California, 10.

¹⁶ ARG, *Survey Report: South Los Angeles*, 9-10.

¹⁷ ARG, *Survey Report: South Los Angeles*, 9-10; City of Los Angeles Department of City Planning, "Sugar Hill Historic District, West Adams," accessed July 2025, <https://planning.lacity.gov/blog/sugar-hill-historic-district-west-adams>.

Despite the ruling, housing discrimination persisted. As the Black, Latino, and Hispanic population of South LA increased, patterns established through pre-war practices like redlining were entrenched by disinvestment and policies like slum clearance and freeway planning. The construction of the I-10, I-110, and I-105 freeways through the South LA CPA in the 1950s and 1960s displaced families and bisected communities that were already destabilized by poverty, violence, and systemic racism.¹⁸

3.2 Property Description and History

3.2.1 3822 S. Figueroa Street

Description

The property located at 3822 S. Figueroa Street is within the portion of the Project Site that fronts onto Figueroa Street. The property is developed with a two-story multi-family residential building completed in 1922 in the Mission Revival style. The four-unit building was designed by architect E. B. Rust for owner-resident Leo J. Minkner and features a rectangular plan with a flat roof and heavily textured stucco cladding. Fenestration consists of double-hung and fixed wood windows. Landscaping is limited to a mature tree and small shrubs that surround the primary entry staircase while the remainder of the property is covered in concrete hardscaping. The property is surrounded to the north, south, and east by multi-family residential buildings and has a shallow setback from Figueroa Street to the west.

The primary elevation faces west and is accessed from Figueroa Street by a concrete driveway (see **Figure 6** and **Figure 7** on page 16). The elevation is symmetrical in form and features a single plane with a flat awning and raised parapet with a centrally located, inset entryway along the first story. The entryway doors are surrounded by decorative plaster supports and accessed by a circular concrete stoop. A pair of double-hung windows covered with metal security bars flank either side of the inset entrance. The second story consists of three pairs of double-hung windows. The smaller pair of windows located in the center of the elevation are surrounded by an extension of the decorative wood surround around the main entryway.

The south (side) elevation faces a concrete driveway and is a two-story flat plane (see **Figure 7** and **Figure 8** on pages 16-17). Ornamental details are limited to a capped parapet and two square metal roof drains in the upper corners of the plane. Fenestration is limited to six double-hung windows along the first story covered by metal security bars and seven double-hung windows along the second story. A single entryway is located at the east end of the elevation.

The center of the east (rear) elevation is recessed, forming an alcove for four entrances (see **Figure 9** on page 17). There are two entrances on the first story and two on the story floor that are accessed by a wood staircase. There is a single window on either side of the alcove on both the first and second stories.

The north (side) elevation has a shallow setback from the neighboring property to the north (see **Figure 10** on page 18). The elevation mimics the design of the south elevation and consists of a two-story flat plane. Ornamental details consist of two square metal roof drains and a capped parapet. Fenestration is limited to six double-hung windows along the first floor covered by metal security bars and seven double-hung windows along the second floor.

¹⁸ ARG, *Survey Report: South Los Angeles*, 12; Jamie Tijerina, "The Legacy of Redlining in Los Angeles: Disinvestment, Injustice, and Inefficiency; Finding a Path Forward in 2019," March 16, 2019, accessed July 2025, https://clikrep.lacity.org/online/docs/2019/19-0600_misc_5-6-19.pdf; Giovanni Perez, "The Los Angeles Freeway and the History of Community Displacement," *The Toro Historical Review* 3, no. 1 (2017), accessed July 2025, <https://journals.calstate.edu/tthr/article/download/2670/2339>.

Construction History

The property is located in Zobelein's Tract in the South Los Angeles CPA (see **Figure 3**). George Zobelein, owner of the Los Angeles Brewing Company, lived north of the present-day location of 3822 S. Figueroa and owned the large tract adjacent to present-day Exposition Park.¹⁹ In the 1920s, Zobelein and his stepson subdivided his land holdings into smaller tracts, including Zobelein's Tract. Separate parcels within Zobelein's Tract were advertised as potential income properties within a "fine rental district" and sold off individually.²⁰

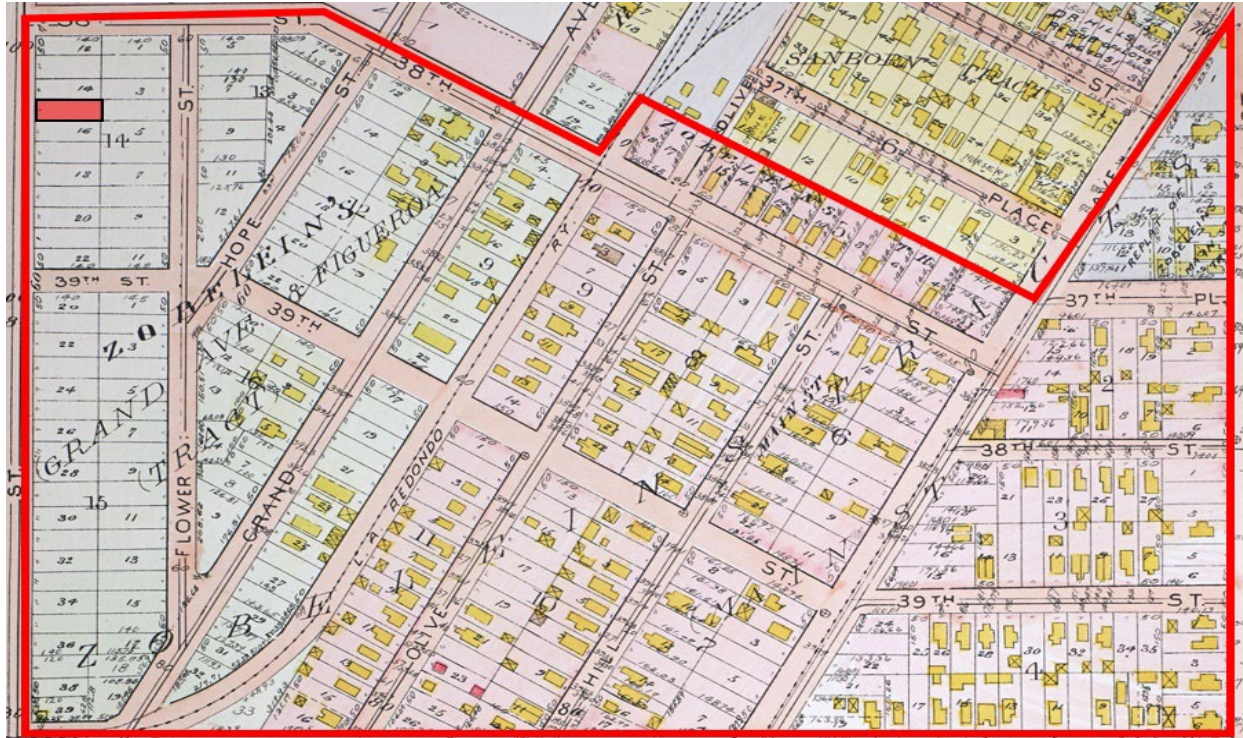


Figure 3: 1914 Baist's Insurance Map of Zobelein's Tract, outlined in red. 3822 S. Figueroa Street shaded and outlined in black, top left. Source: FIMO.

Sanborn Maps from the 1920s through 1950s indicate that apartment houses, including duplexes, triplexes, and fourplexes, were a common type of multi-family construction in Zobelein's Tract between W. 38th Street and W. 39th Street. These building types were typically two stories in height with symmetrical, rectangular plans arranged in the center of their respective lots (see **Figure 4** and **Figure 5**).

¹⁹ "Value Depends on the Deal," *Los Angeles Times*, July 12, 1916, 18.

²⁰ "City Lots for Sale," *Los Angeles Evening Express*, January 15, 1921, 26.

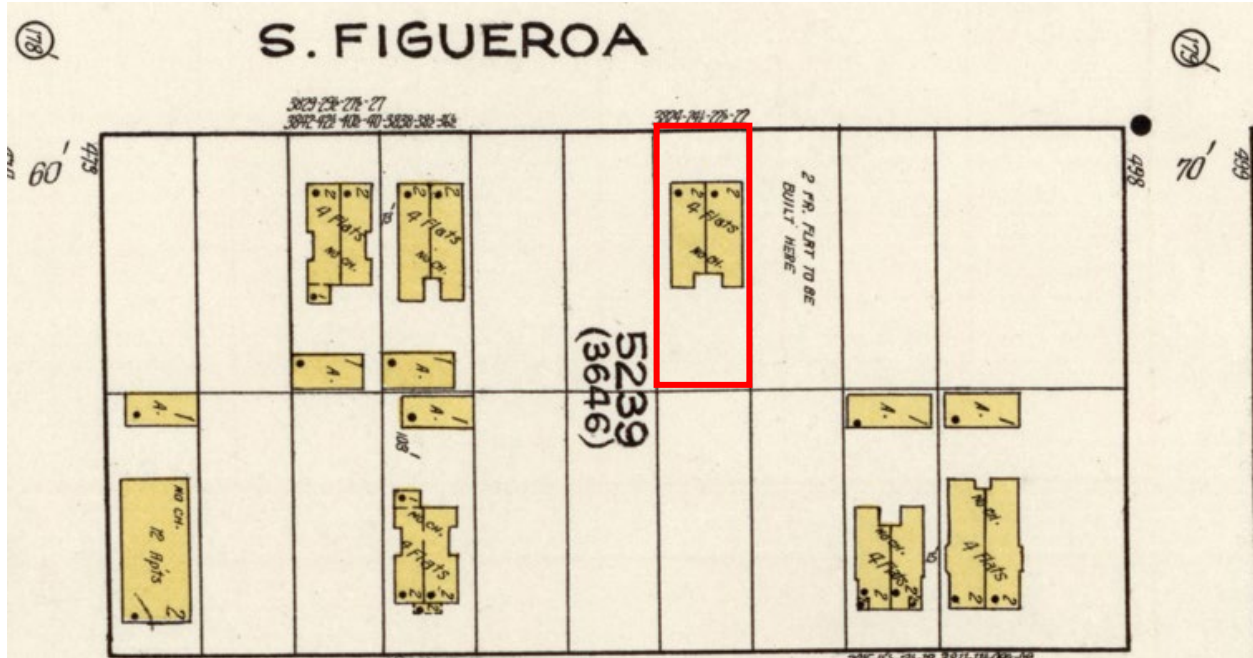


Figure 4: 1922 Sanborn Map, 3822 S. Figueroa Street outlined in red. Source: FIMO.

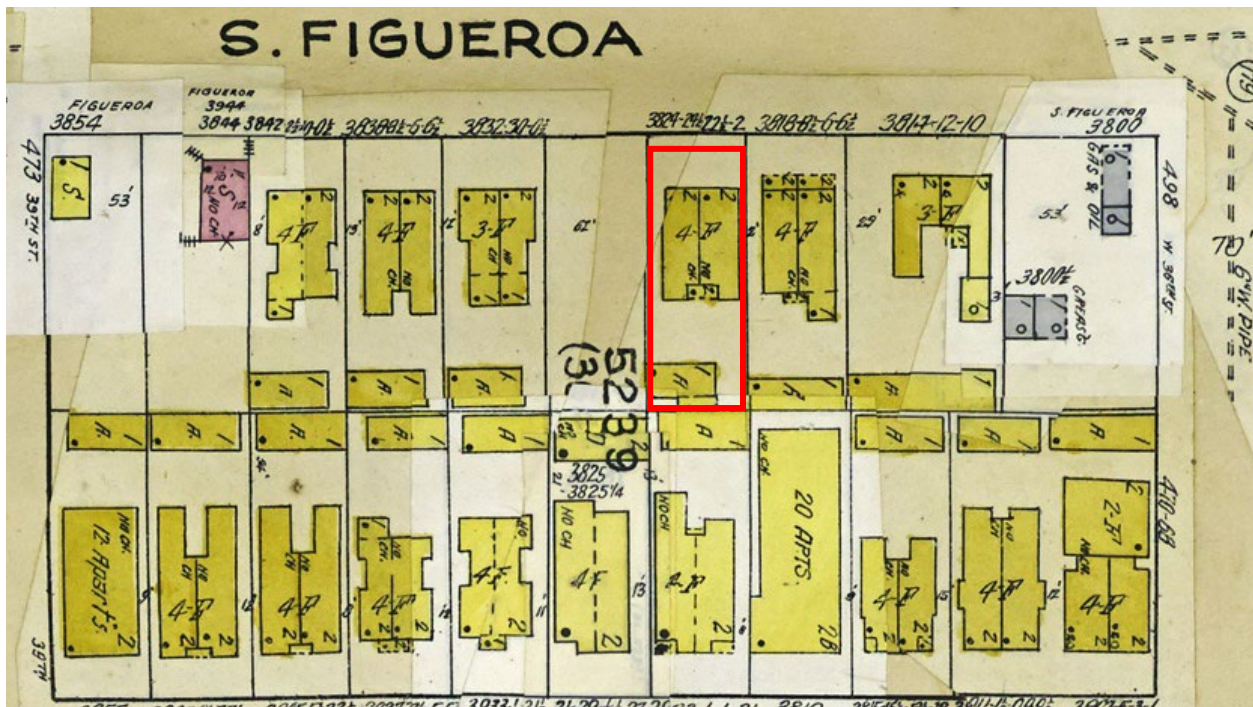


Figure 5: 1950 Sanborn Map, 3822 S. Figueroa Street outlined in red. Source: FIMO.

The four-unit, sixteen-room multi-family residence located at 3822 S. Figueroa Street was constructed for owner-resident Leo J. Minkner and designed by architect E.B. Rust per the 1921 permit.²¹ In 1922, Minkner applied for

²¹ City of Los Angeles Department of Building and Safety (LADBS), Building Permit No. 28755, October 25, 1921.

a permit for garage that was located at the rear of the parcel (demolished).²² In 1938, the property underwent repairs to remedy termite damage; the location of the damage was not identified.²³ The building was re-roofed in 1944 and the landscape around the building was paved in 1958.²⁴ A newspaper article from 1970 identifies that the garage, which by that time included an apartment, was demolished after a fire.²⁵ No additional building permits were on file for the property and a review of historic aerials did not identify any major changes to the building footprint.

Ownership/Occupant History

The property at 3822 S. Figueroa Street is made up of four units: 3822, 3822½, 3824, and 3824½ S. Figueroa Street. The property has been occupied by numerous individuals since its initial construction and experienced a high turnover of residents between the 1920s and 1950s. The original owner, Leo J. Minkner, was identified as a merchant and later worked in real estate.²⁶ He resided at 3822 S. Figueroa Street with his wife Louisa until 1948. Research did not reveal additional information about the Minkners apart from their twenty-seven-year association with the property.²⁷

The other owners and residents associated with the building were typically not associated with the building for an extended period. Research compiled from newspaper archives, census data, and voter registration records revealed basic biographical information and their current employment, if any. The majority of the tenants worked in various middle- and working-class occupations such as housekeepers, laborers, secretaries, and salespeople. All tenants identified through this research are listed in **Table 2**, below.

Table 2: Ownership Information				
Date	Address	Name	Occupation	Source
1921	Owner / Resident 3822 (1921-1948)	Leo John Minkner	Merchant / Real estate	1921 Building Permit, 1948 Los Angeles County Voter Registration
		Louisa H Minkner	Housewife	
1922	3822½	Charles Cook	Salesman	1922 Los Angeles County Voter Registration
		Julia Cook	Housewife	
1924	3824 (1924-1930)	Clyde E. Mustoe	Pharmacist	1924 Los Angeles County Voter Registration; 1930 Los Angeles County Voter Registration
		Belle H. Mustoe	-	
		Ralph E. Mustoe	Lawyer	
1928	3822½	Herman Weinrich	Retired	1928 Los Angeles County Voter Registration
	3824½ (1928-1936)	Joseph Clifford Griffin	Manufacturer	
		Bertha Amelia Griffin	Housewife	
1936	3824	Catherine Cates	Housewife	
1937	3824	S P Hart	Laborer , Harbor Department	1937 Los Angeles City Directory
1938	3822	Sara Jones	Housekeeper	1938 Los Angeles County Voter Registration
	3822½	Gladyce M. Armstrong	Buyer	
		Guile Barber	Laborer	

²² LADBS, Building Permit No. 2824, January 1, 1922.

²³ LADBS, Building Permit No. 19898, June 29, 1938.

²⁴ LADBS, Building Permit No. 19669, November 1, 1944; LADBS, Building Permit No. 98784, April 24, 1958.

²⁵ "Garage Blaze Destroys Car," *Southwest Tropics-Wave*, July 23, 1970, 1.

²⁶ 1924 California Voter Registration, accessed July, 2024; 1948 California Voter Registration, accessed July, 2024.

²⁷ 1948 California Voter Registration, accessed July, 2024.

Table 2: Ownership Information

Date	Address	Name	Occupation	Source
		Inez I Barber	Housewife	
1940	3822½	Ben H. Read	Public Health League secretary	1940 Los Angeles County Voter Registration; 1940 Census
		LeNeven Read	-	
		Keith Read	Radio Engineer	
	3824	Oscar S Albertson	Physician	
		Kate Albertson	Housewife	
		William J. Albertson	-	
	3824½	Harry F. Robinson	Clothing Store Manager	
		Wijlonah Robinson	-	
		Thomas Ellis	Electrotyper	
1942	3824	Violet C. Griffin	Salesperson	1942 Los Angeles County Voter Registration
		Clifford B. Tyler	Retired	
		Malinda Tyler	Housewife	
	3824½	Vinton W. Bacon	Engineer	
		Margaret P. Bacon	Housewife	
1944	Owner	Ruth Shover	-	1944 Los Angeles County Voter Registration
	3822½ (1944-1948)	Ruth W. Goulding	Housewife	
		George E. Goulding	Salesman	
1946	3824	Thomas Prendergast	Salesman	1946 Los Angeles County Voter Registration
		Violet C. Prendergast	-	
1948	3822 (1948-1950)	John W. Goulding	Car Painter	1948 Los Angeles County Voter Registration
	3822½	Mary O. Goulding	-	
		Robert E. Goulding	-	
	3824½	Ray F. Goodwill Jr.	Elevator Operator	
		Susie V. Goodwill	Upholstery Machine Operator	
1950	3822½	Elizabeth Doughty	-	1950 Los Angeles County Voter Registration
		Charles R. Doughty	-	
		George E. Goulding	Musician	
1952	3822	Miriam Prussin	Housekeeper	1952 Los Angeles County Voter Registration
	3822½	Paul J. Walton	-	
	3824	Douglas Crail	-	
		Barbara Crail	Salesperson	
	3824½ (1952-1954)	Marie T. Niccoll	Drug Store Clerk	
1954	3822	Thomas C Theros	-	1954 Los Angeles County Voter Registration
		Claire J Theros	-	
	3822½	Ethel G. Walton	-	
	3824 (1954-1960)	John Hernandez	Hotel Porter	
		Jessie Hernandez	Garment Factory Worker	

Table 2: Ownership Information				
Date	Address	Name	Occupation	Source
	3824½ (1954-1956)	Adolf Heuck	-	
		Jennie Heuck	-	
		Adolph Heuck	-	
1958	Owner	Jorganson	-	1958 Los Angeles County Voter Registration
	3822 (1958-1962)	Richard F. Hare	Laborer	
	3824½	Wylma L Robinson	-	
1987	3822	Marta Ana Martinez	-	1987 Los Angeles City Directory

Photographs



Figure 6: 3822 S. Figueroa Street, west (front) and north (side) elevations, looking southeast. GPA Consulting, September 2024.



Figure 7: 3822 S. Figueroa Street, west (front) and south (side) elevations, looking northeast. GPA Consulting, September 2024.



Figure 8: 3822 S. Figueroa Street, south (side) and east (rear) elevations, looking northwest. GPA Consulting, September 2024.



Figure 9: 3822 S. Figueroa Street, east (rear) and elevation, looking west. GPA Consulting, September 2024.



Figure 10: 3822 S. Figueroa Street, north (side) elevation, looking southwest. GPA Consulting, September 2024.

3.3 Summary of Current Designations and Previous Evaluations

Following a review of existing information including the BERD, ZIMAS, and HistoricPlacesLA, one historical resource was identified on the Project Site and two were identified within the Impact Area (see **Figure 11**).

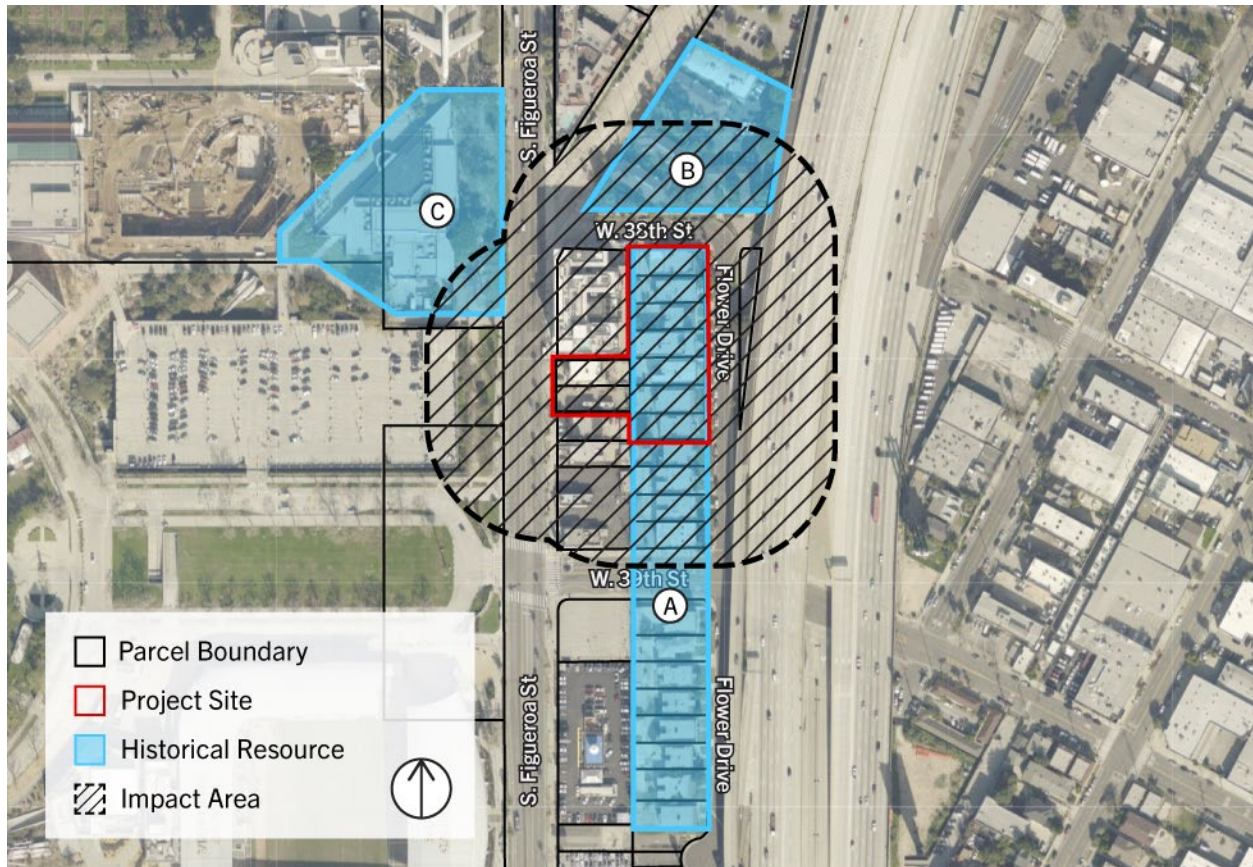


Figure 11: Historical resources within the Project Site and Impact Area. (Base Map: Los Angeles County GIS.)

3.3.1 Flower Drive Historic District (A)

The seven parcels on the Project Site along Flower Drive are within the Flower Drive Historic District. The Flower Drive Historic District was identified and evaluated as part of the Historic Resources Survey Update for the Exposition Park/University Park Redevelopment Area in Los Angeles. It was determined eligible for listing in the California Register by the State Historical Resources Commission in 2008; therefore, it is considered a historical resource for the purposes of CEQA.

Description

The district is described as follows on a 2007 Primary Record and District Record prepared by Peter Moruzzi of PCR Services Corp. Photographs of the 3800 block of Flower Drive and buildings within the Project Site are included beginning on page 23.

The Flower Drive District consists of 19 multi-family dwellings constructed on the west side of the 3800 and 3900 blocks of Flower Drive primarily between 1920 and 1927. The District includes 19 properties, 17 of which contribute to its significance. All of the contributing properties are two-story, multi-family dwellings that are rectangular in plan on 50-foot by 140-foot parcels with uniform setbacks... The two non-contributors within the district's boundaries

are a two-story vernacular Modern fourplex erected in 1939 that is outside the period of significance, and a two-story fourplex originally constructed in 1921 that has been stripped to its wooden framework and rebuilt. The Flower Drive District's boundaries contain a geographically isolated grouping of multi-family residences erected in the 1920s that embody the response to growing population pressures in the University District during that time period. The district's contributors are unified by property type, common lot size, setbacks, height, spatial arrangement, form and architectural style. The district retains a high degree of overall integrity.

Significance

The district was determined eligible for listing in the California Register by the SHRC on November 7, 2008.²⁸ The district has a status code of 2CS and contributing resources within the district have status codes of 2CD. Non-contributors have a status code of 6CX.²⁹ The SHRC's eligibility determination is as follows:

The property meets Criteria 1 and 3 at the local level of significance. [The] Flower Drive Historic District is significant under Criterion 1 for associations with events that have significantly shaped the pattern of Los Angeles' development. The district is associated with the phenomenal population growth Los Angeles experienced in the 1920s and the increased construction of high-density housing suitable for working and middle-class families. [The] Flower Drive Historic District is an intact example of multiple-family housing, primarily composed of the two-story four-plex that emerged as the most practical and profitable type of multi-family housing for the mid-level market in many parts of Los Angeles.

[The] Flower Drive Historic District is significant under Criterion 3 for embodying the distinctive characteristics [of] a type and period of construction, multi-family residences constructed in the 1920s in Los Angeles in the Mediterranean Revival style. A mixture of Spanish Colonial and Italian Renaissance styles, Mediterranean Revival was a prevalent architectural style in Los Angeles during the city's great period of economic growth, the 1920s. Contributing resources in the Flower Drive Historic District exhibit elements of both architectural styles, evident in the flat parapeted roof with boxed eaves and carved brackets, paired windows, elaborate entries, and Italian Renaissance Revival symmetry blended with the arched openings, red tile roofs, and iron work of the Spanish Colonial Revival. The Flower Drive Historic District exhibits a strong sense of historical and architectural cohesion. While each individual residence within the district's boundaries may not be architecturally significant, together this grouping of similar properties gives the Flower Drive neighborhood a strong sense of time and place.

The SHRC determination included seventeen contributing properties and two non-contributing properties (see Figure 12).

²⁸ Cynthia Toffelmier, "Flower Drive Historic District, Los Angeles, Los Angeles County, Staff Evaluation," October 23, 2008, 6-9, on file at South Central Coastal Information Center.

²⁹ Non-contributors were assigned a status code of 6C. The status codes were subsequently updated and the finding is now associated with a status code of 6CX.

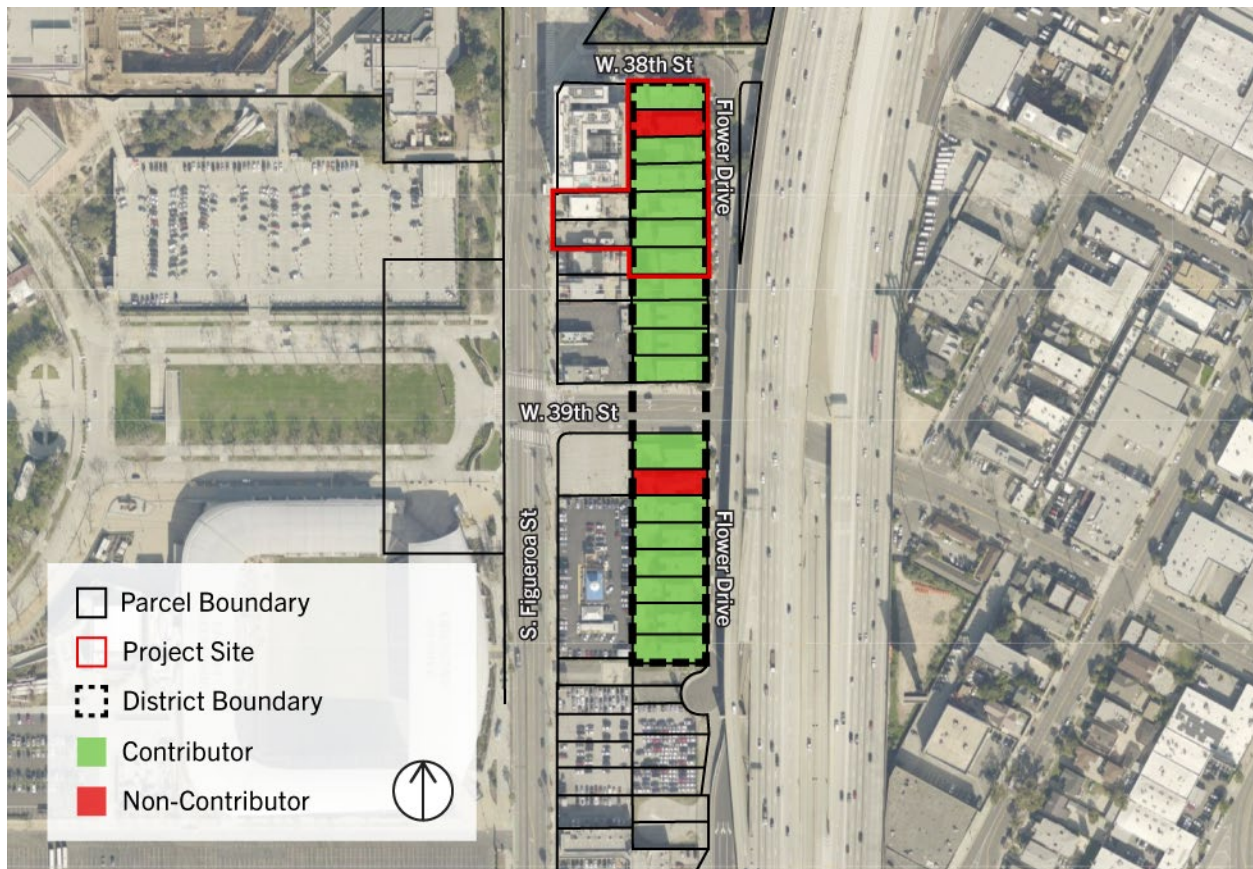


Figure 12: Contributing and non-contributing resources within the Flower Drive Historic District as determined by SHRC in 2008. (Base Map: Los Angeles County GIS.)

Character-Defining Features

The 2007 evaluation and 2008 determination do not explicitly identify character-defining features; however, the 2007 evaluation lists the unifying features of the district as:

- Consistent setback, height, massing, and spatial arrangement of multi-family residential buildings
- Common street features: front yards, concrete driveways, detached single-car garages
- Mediterranean Revival architecture

Integrity

The aspects of integrity generally considered essential for this type of resource under the relevant criteria are identified in the *LACHCS* as follows:

- Property Type: Multi-Family Residential Historic Districts
 - Criterion A/1/1 (Association with Multi-Family Residential Development)
 - Criterion C/3/3 (Embodying a Type/Style; Significant and Distinguishable Entity Whose Components May Lack Individual Distinction)
 -

- Essential Aspects of Integrity: location, design, setting, materials, and feeling. Specifically, setting refers to the relationship between buildings; the surrounding buildings and land uses may have changed.³⁰

The staff evaluation that informed the SHRC determination determined that the Flower Drive Historic District retained integrity of location, design, materials, workmanship, feeling, and association as of 2008. As such, setting was determined not essential to the Flower Drive Historic District's ability to convey its significance and justify its eligibility for listing in the California Register.³¹

Historical Resource Summary – California Register

- Map Reference: A
- Determined Eligible Date: November 7, 2008
- Boundaries: 3801-3941 Flower Drive
- Contributors: 17
- Non-Contributors: 2
- California Register Criteria: 1, 3
- Level of Significance: Local
- Period of Significance: 1920-1927
- Status Code(s): 2CS (District); 2CD (Contributors); 6CX (Non-Contributors)
- Character-Defining Features:
 - Consistent setback, height, massing, and spatial arrangement of multi-family residential buildings
 - Common street features: front yards, concrete driveways, detached single-car garages
 - Mediterranean Revival architecture
- Integrity: Retains integrity of location, design, materials, workmanship, feeling, and association.

³⁰ Historic Resources Group (HRG), "Residential Development and Suburbanization, 1880-1980: Multi-Family Residential Development, 1895-1970," *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, December 2018), 85, accessed July 2025, https://planning.lacity.gov/odocument/1a7b1647-4516-45da-9cff-db2db3b9b440/Multi-FamilyResidentialDevelopment_1910-1980.pdf.

³¹ Toffelmier, 6-9.

Photographs



Figure 13: Flower Drive Historic District, view looking southwest from 3831 Flower Drive. GPA Consulting, September 2024.



Figure 14: Flower Drive Historic District, view looking northwest from 3843 Flower Drive. GPA Consulting, September 2024.



Figure 15: 3801 Flower Drive (438 W. 38th Street, Parcel 3), view looking west. GPA Consulting, September 2024.



Figure 16: 3809 Flower Drive (Parcel 4), view looking west. GPA Consulting, September 2024.



Figure 17: 3813 Flower Drive (Parcel 5), view looking southwest. GPA Consulting, September 2024.



Figure 18: 3819 Flower Drive (Parcel 6), view looking southwest. GPA Consulting, September 2024.



Figure 19: 3821 Flower Drive (Parcel 7), view looking southwest. GPA Consulting, September 2024.



Figure 20: 3825 Flower Drive (Parcel 8), view looking southwest. GPA Consulting, September 2024.



Figure 21: 3831 Flower Drive (Parcel 9), view looking southwest. GPA Consulting, September 2024.

3.3.2 Zobelein Estate/Zobelein Courtyard Apartments (B)



Figure 22: Buildings within Zobelein Courtyard Apartments/Zobelein Estate. (Base image: Los Angeles County GIS.)

The Zobelein Courtyard Apartments were determined eligible for listing in the National Register and listed in the California Register in 1990. The site was designated an HCM in 1993; therefore, it is a historical resource for the purposes of CEQA.

Description

The Zobelein Courtyard Apartments/Zobelein Estate property is located on the east side of Flower Street between W. 38th Street and W. 37th Place (see **Figure 22** above). The property is located on land that was historically owned by George Zobelein, a German immigrant and prominent early citizen of Los Angeles who owned and operated the Los Angeles Brewing Company. The Zobelein family home was located on a large tract of land near the intersection of S. Figueroa Street and W. 38th Street. In the early twentieth century, Zobelein and his stepson, John Graf Zobelein, subdivided the land surrounding the house into several smaller tracts. In the early 1930s, the home was relocated on its parcel accommodate the extension of Flower Street, but was demolished a few years later. Between 1937 and 1938, John Graf Zobelein redeveloped the site with two apartment buildings (B1 and B2), a detached garage (B3), and a laundry building/maid's quarters. The two apartment buildings and garage are oriented toward Flower Street. In 1949, a third apartment building (B4) was added. It is oriented toward W. 38th Street. All the buildings are attributed to architect William Schmolle.

B1 and B2 are Mediterranean Revival apartment buildings (see **Figure 23** and **Figure 24** on page 32). They share many of the same architectural features except B1 is U-shaped in plan and B2 is L-shaped in plan. Both buildings are two stories in height and have hipped clay tile roofs with shallow open eaves. The exteriors are smooth stucco. Fenestration consists of multi-light casement windows arranged in pairs with and without transom windows. Ornamentation includes wood window shutters, glazed ceramic tiles, wrought iron balconies, and ornate cast stone door surrounds. The buildings are surrounded by formal landscaping including manicured lawns, hedges, shrubs, trees, and walkways.

B3, the detached garage, is one story in height and rectangular in plan (see **Figure 25** on page 33). It has a bow truss roof with a raised parapet. The exterior is smooth stucco and brick. Fenestration includes single-light wood windows, a hollow metal door, and a large metal roll up door at the center of the front elevation. Ornamentation is influenced by the Classical Revival style and includes Corinthian pilasters with bas-relief detailing and a decorative parapet wall along the front elevation with scroll motifs and an escutcheon.

B4 is similar to B1 and B2 but is a less fully realized example of the Mediterranean Revival style. It is an apartment building two stories in height and U-shaped in plan (see **Figure 26** on page 33). It has a hipped clay tile roof with shallow open eaves and exposed rafter tails. Exterior walls are smooth stucco. Fenestration consists of single-light steel casements arranged in groups. Ornamentation includes wood window shutters. The building has a landscaped courtyard with manicured lawn, central walkway, brick planters, trees, shrubs, and hedges.

The property is enclosed by a tall metal fence.

Significance

In 1990, the Zobelein Estate was determined eligible for listing in the National Register through the Section 106 process and listed in the California Register. The SHPO concurred that the property was eligible for the National Register at the local level of significance under Criterion C as a “fine example” of a Mediterranean Revival courtyard apartment building complex. In the SHPO concurrence letter, B1, B2, and B3 and the laundry building/maid’s quarters (not extant) are identified as contributing and B4 is identified as non-contributing because it was less than 50 years of age at the time.³² The property as a whole has a status code of 2S2. B1, B2, and B3 have status codes of 2D2.³³ The period of significance for the California Register listing is 1937-1939.

In 1993, the property was designated a local HCM called the Zobelein Estate. Under the HCM designation, the Zobelein Estate is significant under local criteria 1, 2, and 3 for exemplifying Mediterranean Revival courtyard housing and its association with George Zobelein. The 1993 designation included B1, B2, B3, and B4, and excluded the laundry building/maid’s quarters (not extant). The Zobelein Estate as a whole has a status code of 5S1. The period of significance for the HCM is not defined in the nomination materials, but is ostensibly 1937-1949.

Character-Defining Features

The 1990 determination of eligibility and 1993 HCM designation do not include a detailed discussion of character-defining features; however, based on a review of the materials, it can be inferred that they generally include:

- Unified development of multi-family residential buildings with a shared garage
- Stucco exteriors
- Red clay tile roofs
- Classical Revival and Mediterranean Revival design and/or ornamentation
- Landscaping

³² Kathryn Gualtieri, letter regarding FHWA900730C to Bruce E. Cannon, August 28, 1990, on file at Los Angeles Department of City Planning Office of Historic Resources.

³³ California Office of Historic Preservation, BERD, Los Angeles County, accessed July 2025, https://ohp.parks.ca.gov/?page_id=30338.

Integrity

The essential aspects of integrity for this type of resource and significance are identified in the *LACHCS* as follows:

- Criterion B/2/2 (association with George Zobelein): Location, design, feeling, and association.³⁴
- Criterion C/3/3 (embodying a type/style): Design, materials, workmanship, feeling.³⁵

The 1990 determination of eligibility and 1993 HCM designation do not include a detailed discussion of integrity; however, based on a review of associated documentation, it can safely be inferred that the property possessed integrity of location, materials, design, workmanship, feeling, and association in light of the general analysis and ultimate determination of eligibility and local designation.

Historical Resource Summary – National Register/California Register

- Map Reference: B
- Determined Eligible/Listed Date: August 8, 1990
- Boundaries: APN 5037-030-023
- Contributors: 4 (one appears to have been demolished)
- Non-Contributors: 1
- National Register/California Register Criteria: C/3
- Level of Significance: Local
- Period of Significance: 1937-1939
- Status Code(s): 2S2 (District); 2D2 (Contributors); 6Y (Non-Contributors)
- Character-Defining Features:
 - Multiple buildings on one parcel
 - Stucco exteriors
 - Red clay tile roofs
 - Classical Revival and Mediterranean Revival design and/or ornamentation
 - Landscaping
- Integrity: Retains integrity of location, materials, design, workmanship, feeling, and association.

³⁴ “Guidelines for Evaluating Resources Associated with Significant Persons in Los Angeles,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, November 2018), 5, accessed July 2025, https://planning.lacity.gov/odocument/b6560d8e-cbcc-4d66-a1bb-a78cc85218fe/GuidelinesForEvaluatingResourcesAssociatedwithSignificantPersons_0.pdf.

³⁵ Daniel Prosser, “Architecture and Engineering, 1850-1980: Mediterranean and Indigenous Revival, 1893-1948,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, November 2018), 49, accessed July 2025, https://planning.lacity.gov/odocument/097f6db5-feee-43f5-a448-fd140763de90/MediterraneanandIndigenousRevivalArchitecture_1893-1948.pdf.

Historical Resource Summary –HCM

- Map Reference: B
- Determined Eligible/Listed Date: September 21, 1993
- Boundaries: APN 5037-030-023
- Contributors: 4
- Non-Contributors: 1 (demolished)
- HCM Criteria: 1, 2, 3
- Level of Significance: Local
- Period of Significance: 1937-1949
- Status Code(s): 5S1
- Character-Defining Features:
 - Multiple buildings on one parcel
 - Stucco exteriors
 - Red clay tile roofs
 - Classical Revival and Mediterranean Revival design and/or ornamentation
 - Landscaping
- Integrity: Retains integrity of location, materials, design, workmanship, feeling, and association.

Photographs



Figure 23: Zobelein Estate/Zobelein Courtyard Apartments (B1), view looking east. GPA Consulting, September 2024.



Figure 24: Zobelein Estate/Zobelein Courtyard Apartments (B2), view looking northeast. GPA Consulting, September 2024.



Figure 25: Zobelein Estate/Zobelein Courtyard Apartments (B3), view looking southwest. GPA Consulting, September 2024.



Figure 26: Zobelein Estate/Zobelein Courtyard Apartments (B4), view looking northeast. GPA Consulting, September 2024.

3.3.3 California African American Museum (C)

Description

The California African American Museum (CAAM) is located at 600 W. State Drive within Exposition Park (see **Figure 5**). The Postmodern museum building is irregular in plan and one story in height with varied wall heights, a flat roof, and raised parapet walls. The primary elevation faces northwest toward the California Science Center. The exterior is painted brick and fenestration consists of long ribbons of tall metal fixed windows and fully glazed metal doors. The front of the museum consists of a glass atrium with a triangular plan. The atrium is framed by walls that step down in height toward the front of the building, echoing the form of a stepped pyramid. The main entrance is articulated by a decorative surround with a stepped pyramid shape that extends past the top of the atrium. The entrance is sheltered by an exaggerated semicircular portico supported by substantial concrete posts.

There is a concrete plaza at the front (northwest) of the building with wide, shallow steps, round metal handrails, and outdoor sculpture. At the west end of the plaza, there is an open pavilion consisting of horizontal beams arranged in a geometric formation and supported by substantial concrete posts. The west-facing horizontal beam reads, "CALIFORNIA AFRICAN AMERICAN MUSEM." To the south of the building there is a section of lawn with a concrete walkway and trees as well as a partially enclosed utility area adjacent to the building. A concrete driveway runs along the south edge of the building. To the east of the building, there is a planting area with ornamental trees and mulch enclosed by a metal fence, as well as a gravel walkway, lawn, and mature trees.

Significance

The CAAM was identified as a potentially eligible historical resource but not evaluated (SurveyLA Status Code QQQ) during the development of the African American History of Los Angeles context of the *LACHCS*.

CAAM was identified as potentially eligible within the context of African American History of Los Angeles under the theme of Visual Arts. The museum was established in 1977 as the first museum of African American art, history, and culture supported by a state government. CAAM began operating in 1981 and was temporarily housed at the California Museum of Science and Industry (now California Science Center). A permanent building for the museum was designed by African American architects Jack W. Haywood, AIA, and Vincent J. Proby, AIA and opened in 1984, to coincide with that year's Olympic Games.³⁶

While CAAM has not been formally evaluated as a historical resource, it appears to meet the eligibility standards and integrity considerations established in the *LACHCS* for properties associated with the history of African American visual arts, which are listed below.³⁷ As such, out of an abundance of caution, CAAM is treated as a historical resource for the purposes of this HRTR.

Eligibility Standards

Criterion A/1/1:

- Was constructed or used by African Americans during the period of significance.

³⁶ GPA Consulting, "African American History of Los Angeles," *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, February 2018), 212, accessed July 2025, https://planning.lacity.gov/odocument/7db8747f-87fb-4c6f-bb95-5482be050683/SurveyLA_AfricanAmericanHCS_05242019.pdf.

³⁷ Eligibility standards, character-defining/associative features, and integrity considerations derived from GPA, "African American History of Los Angeles," 218-219.

- Is directly associated with important developments in the history of the visual arts in Los Angeles, either as the location of discrete events or cumulative activities over time.
- Property functioned as an important place for the production, display, appreciation of, or education in, the visual arts.

Period of Significance

The period of significance for the Visual Arts theme is 1940-1980; however, 1980 is the end-date for the SurveyLA study and is not meant to indicate that African American Visual Arts after 1980 do not have potential for significance. The period of significance for CAAM would likely begin in 1984, the date it opened.

Character-Defining/Associative Features

- Retains most of the essential character-defining features from the period of significance
- May be associated with a particular group or institution significant in the cultural history of African Americans
- May have served as a gathering place for African American artists
- For National Register, properties associated with events that date from the last 50 years must possess exceptional importance

Integrity Considerations

- Should retain integrity of Location, Feeling, and Association from the period of significance
- Original use may have changed
- Adjacent setting may have changed
- Some original materials may have been altered or removed

Photographs



Figure 27: CAAM entrance, view looking southwest. (GPA, September 2024.)



Figure 28: CAAM plaza pavilion with signage, view looking northeast. (GPA, September 2024.)

4. HISTORIC CONTEXTS

The significance of a property must be evaluated within its historic context(s). Historic contexts are those patterns or trends in history by which a specific property is understood. Because the property is located within the City of Los Angeles, the relevant CTPs from the *LACHCS* were used as a framework for evaluating the building as potential historical resource.

As a multi-family residential building within the South Los Angeles Community Plan Area (CPA), the most applicable context for evaluating the significance of 3822 S. Figueroa Street under Criterion A/1/1 is the development history of South Los Angeles. The property was also evaluated under Criterion A/1/1 and Criterion C/3/3 within the context of Residential Development and Suburbanization, 1880-1980, and theme of Multi-Family Residential Development, 1895-1970, and sub-theme of Apartment Houses, 1895-1970. Lastly, the property was evaluated under Criterion C/3/3 within the context of Architecture and Engineering, 1850-1980 under the theme of Mediterranean and Indigenous Revival Architecture, 1893-1948 and sub-theme of Mission Revival, 1893-1948.

No specific context was identified for evaluating the property under Criterion B/2/2 as research did not identify any potentially significant individuals with an important association with the property.

4.1 Apartment Houses, 1895-1970

The Apartment Houses sub-theme addresses resources that represent one of the most common building types that flourished during the twentieth century to accommodate full- and part-time residents and tourists in Los Angeles. Apartment houses range from duplexes, triplexes, fourplexes as well as mid- and high-rise apartment buildings and reflect a variety of architectural styles. The following summary of significance is excerpted from the Apartment Houses sub-theme of the Multi-Family Residential Development, 1895-1970 theme in the *LACHCS*.

The apartment house can best be defined in contrast to the bungalow court and other forms of courtyard housing that were being constructed in the early twentieth century. Unlike courtyard housing, the apartment house is designed to maximize lot coverage, with little or no lot area land dedicated to useable open space. And unlike courtyard housing, which is typically oriented onto a central common space, apartment houses are oriented toward the street, with architectural detailing concentrated on the street-facing façade. Apartment houses vary widely in terms of density, from one-story duplexes to high-rise luxury apartment towers. They can accommodate a variety of architectural styles, and therefore often reflect the dominant residential styles of the period in which they were constructed. Due to their versatility, apartment houses were built throughout the twentieth century and in nearly every part of Los Angeles...

Apartment houses of all sizes grew in popularity as developers sought higher-density solutions to the population boom. Some were smaller, typically two stories in height, with three or four units. The “four-flat” buildings more closely resembled their duplex cousins than their higher-density descendants. The typical four-flat, or fourplex, was symmetrical in plan and façade, and consisted of a pair of units on each of two floors. Perhaps its most notable feature was its clustering of the four separate entrance doors within a single, large front porch or entry portal—creating the impression of a large single-family dwelling. As a result, four-flats, like duplexes, could be integrated into existing single-family neighborhoods with greater success than larger buildings, which were more likely to be located in more urban areas. Like the duplex they were designed in the prevailing architectural styles of day...

Larger apartment houses from this early period could range anywhere from two to six stories in height, with four or more units. Early examples constructed during the 1910s were mostly modest vernacular structures constructed of brick or wood frame, while into the 1920s they began to take on more decorative, even fanciful, stylistic elements. Their comparative affordability and the ability to pack as many units onto a lot as possible made the two-story apartment building a particularly attractive investment for both novice and seasoned developers. As many as a dozen or more two- and-three room-units could be fit into this simple type, greatly increasing the potential rate of return relative to outlay for construction. . .

Apartment house construction expanded following World War I as newcomers continued to stream into the city. The higher-density buildings, termed apartment towers, often eclipsed surrounding existing development due to their height, transforming the urban landscape. However, builders and developers were still restricted by the 150-foot height limit, which allowed for roughly thirteen stories in building height. The solution to the constraint was to build outward – often all the way to the lot line. Gish explains the impact of this move on the streetscape:

In the years before setback regulations, some developers built to the front and side lot lines, maximizing lot coverage and, hence, rentable units. On the occasion that many neighboring builders chose to do this, the overall effect was of a continuous street wall fifty feet high or more. In dense concentrations. . . this kind of residential development worried planners, and led to a 1935 ordinance requiring yards on all sides of residential buildings.

Both apartment houses (two to six stories in height) as well as apartment towers (six stories or more) were constructed during this period. In terms of size, buildings of four to six stories in height prevailed, with over 400 such buildings constructed between 1921 and 1930; by comparison, thirty-seven buildings of seven stories or more were constructed during the same period. In the 1920s, the Westlake area exemplified the trend in development of smaller apartment buildings of three to five stories; individual proprietors and investors constructed hundreds of these properties in the area during the 1920s and 1930s, many in the proximity of streetcar lines for easy access to Downtown. In some cases (such as on Rampart Boulevard and Union Avenue), an entire block of moderately-priced apartment buildings went up within the span of a year or two, instantly creating a dense multi-family community in an area originally subdivided for residences. Similar concentrations of apartment houses were constructed along major traffic corridors such as Wilshire Boulevard and Sixth Street, as well as throughout Hollywood and Hancock Park. Examples constructed in the 1920s and 1930s largely reflected the popular Period Revival styles of the time, such as Spanish Colonial Revival, Mediterranean Revival, and French Revival. Later examples were also constructed in Art Deco or Streamline Moderne styles.³⁸

³⁸ Excerpted from HRG, “Multi-Family Residential Development,” 24-29.

4.1.1 Eligibility Standards

The eligibility standards for Apartment Houses, 1895-1970 outlined in the *LACHCS* are included in **Table 3**, below.

Table 3: Apartment Houses, 1895-1970	
Context: Residential Development and Suburbanization, 1880-1980	
Theme: Multi-Family Residential Development, 1895-1970	
Sub-theme: Apartment Houses, 1895-1970	
Associated Property Type No. 2: Apartment Houses	
Property Type: Residential – Multi-Family	
Area of Significance: Community Planning and Development; Architecture	
Criteria: A/1, C/3	
Period of Significance: 1895-1970	
Eligibility Standards	
- Is two or more stories in height - Is an excellent example of the type - Was constructed during the period of significance - Was originally constructed as an apartment house	
Character-Defining/ Associative Features	
- Retains most of the essential character-defining features from the period of significance - Designed to maximize lot coverage - Two or more stories; may be up to five or six stories - Typically, three or more units (flats or apartments). Triplex examples occur but are not common - Generally rectangular in plan, often with one or more light wells - Oriented toward the street, with architectural detailing on the street-facing façade - Early examples are often vernacular in design (wood or brick), and may not exhibit the features of a particular architectural style - May have a single common building entrance with unit entrances opening onto interior corridors, or multiple ground-floor entries - May have central landscaping or other feature, but it is not a focus of the design - May also be significant as a good to excellent example of an architectural style from its period and/or the work of a significant architect or builder - Associated architectural styles may include, and not be limited to: American Foursquare, Shingle, Craftsman, Art Deco, Spanish Colonial Revival, Mediterranean Revival, American Colonial Revival, Tudor Revival, French Revival, Classical Revival, Renaissance Revival, Mid-Century Modern	
Integrity Considerations	
- Should retain integrity of Location, Design, Materials, and Feeling - Some original materials may have been altered or removed - Replacement of some windows may be acceptable if the openings have not been changed or resized - Security bars may have been added - Parapets may have been removed to comply with seismic regulations - If it is a rare surviving example of its type, or is a rare example in the community in which it is located, a greater degree of alteration or fewer character-defining features may be acceptable. - Surrounding buildings and land uses may have changed - Where this property type is situated within a grouping of multi-family residences, it may also be significant as a contributor to a multi-family residential district. A grouping may be composed of a single property type or a variety of types.	

4.2 Mission Revival

The following summary of significance is excerpted from the Mission Revival sub-theme of the Mediterranean & Indigenous Revival Architecture, 1893-1948 theme in the *LACHCS*.

By the early 1890s a distinct Mission Revival style had emerged. It was based on such common mission characteristics as solid white walls, low-pitched red-tiled roofs, and arcaded porches. But it made extensive use of two character-defining features, both of which can be seen at the Mission San Luis Rey de Francia in northern San Diego County.

The first character-defining feature is the *espadaña*, the extension of the gabled end wall above the roof line to form a curved or scalloped parapet. This feature became the identifying mark of the Mission Revival style, found in every example. It is historically appropriate for Los Angeles, in that a modest *espadaña* originally fronted the Plaza Church (L.A. Historic-Cultural Monument No. 3), according to a drawing by William Rich Hutton made in 1847.

The second character-defining feature is the tower. The towers of the original missions were stepped and topped by domes. The Mission Revival occasionally reproduced this form intact, but more often took liberties. The tower became broader in proportion and was capped with a roof that drew as much from the Queen Anne as from the Mediterranean tradition, in a hipped, conical, or bell-shaped form.

Aiding in the emergence of the Mission Revival style were changes in construction techniques for exterior walls. Until the 1890s architects generally had two choices. They could use wood siding on wood frame for most residential and for smaller commercial structures. Alternatively, they could use solid masonry – almost universally brick in Southern California – for large commercial, industrial, and occasionally residential buildings.

In many cases, a Mission Revival look was accomplished simply by plastering over the traditional brick wall. But two new techniques presented themselves. The first was a cement-based stucco applied directly to lath, first wood and later wire mesh, attached to a wood frame. While seen as too flimsy for other climates – although Frank Lloyd Wright would employ it in his Prairie Houses of the upper Midwest – it was considered durable in Southern California. The second was poured-in-place concrete. Both fit well the Mission Revival ideal of expanses of solid wall finished in [white] plaster...

This widespread use of the Mission Revival came from the fact that it was essentially a form of surface decoration. The various building types retained the massing, interior arrangement, and fenestration patterns that they had when dressed in other styles. Residences kept the irregular silhouettes of the Queen Anne, or the rigidly symmetrical facades of the Neoclassical. Apartment buildings were Renaissance Revival in layout, as were larger commercial and institutional buildings. Industrial buildings simply attached *espadañas* to the ends of their standard factory forms.

The enthusiasm for the Mission Revival faded after the first decade of the twentieth century, and the style was eclipsed by the Spanish Colonial Revival after 1915. It lingered into the 1930s

and even later, more as a variant of the Spanish Colonial, particularly in modest forms such as the bungalow court.³⁹

4.2.1 Eligibility Standards⁴⁰

The eligibility standards for Mission Revival, 1893-1948 outlined in the *LACHCS* are included in **Table 4**, below.

Table 4: Mission Revival, 1893-1948	
Context: Architecture and Engineering, 1850-1980	
Theme: Mediterranean & Indigenous Revival Architecture, 1893-1948	
Sub-theme: Mission Revival, 1893-1948	
Property Type: Residential- Multi-Family	
Area of Significance: Architecture	
Criteria: C/3/3	
Period of Significance: 1893-1948	
Eligibility Standards	
- Constructed during the period of significance - Exemplifies the character-defining features of the Mission Revival style - Is an excellent example of the style and/or the work of a significant architect or builder	
Character-Defining/ Associative Features	
- Retains most of the essential character-defining features of the style - Espadañas (shaped Mission roof parapet) - Stucco exterior - Bell towers and domes - Tile-covered roofs - Rounded arches and arcades - Verandas, patios, and courtyards - General lack of ornamentation or use of Moorish-inspired decoration	
Integrity Considerations	
- Should retain integrity of Design, Materials, Workmanship, and Feeling - Stucco repair or replacement must duplicate the original in texture and appearance - Roof replacement should duplicate original in materials, color, texture, dimension, and installation pattern - New additions should be appropriately scaled and located so as to not overwhelm the original design and massing - Original use may have changed - Setting may have changed (surrounding buildings and land uses) - For residential examples, alterations to garages may be acceptable - Limited window replacement may be acceptable	

³⁹ Prosser, "Mediterranean and Indigenous Revival," 6-8.

⁴⁰ Prosser, "Mediterranean and Indigenous Revival," 12-13.

5. EVALUATION OF ELIGIBILITY: 3822 S. FIGUEROA STREET

5.1 Criterion A/1/1

To be eligible under Criterion A/1/1, a property must have a direct association with events that have made a significant contribution to the broad patterns of history. The most applicable contexts for evaluating the property at 3822 S. Figueroa Street under Criterion A/1/1 are the development history of the South Los Angeles CPA and the *LACHCS* sub-theme of Apartment Houses, 1895-1970.

As Los Angeles expanded outward from downtown during the 1920s, new tracts like the Zobelein's Tract were developed with higher-density construction to address the demand for housing in the 1920s population boom. The property at 3822 S. Figueroa Street is a fourplex completed as part of this trend in 1922.

However, mere association with a trend is not sufficient for significance under Criterion A. The association with the trend must be important as well.⁴¹ Research did not reveal evidence to indicate that 3822 S. Figueroa Street was especially unique or important in this history of multi-family residential development. Rather, it appears to have been one of dozens of similar multi-family apartment houses constructed in the area as development continued south of downtown Los Angeles. Although the property is associated with the historic trend of multi-family residential development in the areas surrounding downtown Los Angeles in the 1920s, the association itself is not important.

Research did not reveal an association with any other historic events or trends. Therefore, for the reasons outlined above, the property does not appear to be eligible under Criterion A/1/1.

5.2 Criterion B/2/2

To be eligible under Criterion B/2/2, a property must be associated with the lives of persons significant in our past. Properties eligible under this criterion are generally those that have the strongest association with a prominent individual and best represent their historic contributions. The length of the association is also a factor, and brief associations must be consequential.⁴²

The original owner of the property, Leo J. Minkner, was a merchant who later worked in real estate and his wife, Louisa, was a housewife. The Minkers lived at 3822 S. Figueroa Street for twenty-seven years; however, research did not reveal any additional information regarding their personal history.

As noted in **Section 3.2.1**, other than the Minkner family, the building was occupied by numerous individuals since construction through the 1950s. City directories, census data, and voter registration information indicate that the other tenants and owners were typical working- and middle-class occupants who resided at the property for a short period of time. Research revealed limited information about the tenants and owners other than their names and occupations.

The limited information available is an indication that these individuals are unlikely to be historically significant. Even if a significant individual did live at the property, it is less likely the property would have an important association with their historic achievements since many individuals only resided in the property for a brief period of time; brief associations must be especially important to qualify under this criterion.

Therefore, the property does not appear to be individually eligible under Criterion B/2/2.

⁴¹ National Register Bulletin 15, 12.

⁴² National Register Bulletin 15, 15.

5.3 Criterion C/3/3

To be eligible under Criterion C/3/3, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or lastly, represent a significant and distinguishable entity whose components may lack individual distinction.

3822 S. Figueroa Street exhibits some of the characteristics of the Mission Revival style. The Mission Revival style was applied to residential, commercial, and institutional buildings in Los Angeles between 1893-1948. The style is characterized by stucco cladding, unadorned walls, decorative española-shaped parapets, clay roof tiles, and arched openings. The building possesses some character-defining features of the style such as stucco cladding, decorative parapet, minimal ornamentation, arched entry, and wood windows. However, the building does not possess more distinctive features associated with fully realized examples of the style, such as bell towers or domes; clay tile roofing; arched focal windows; and verandas, patios, or courtyards. The building is an unremarkable example of the Mission Revival style.

The property is an example of the apartment house property type, specifically a fourplex. The apartment house is one of the most common and varied property types found throughout Los Angeles. Design features common to most examples include construction to maximize lot coverage, two- to six-story height, and a generally rectangular plan. Early apartment houses were typically vernacular in design while later buildings reflected the popular architectural styles of their respective eras of construction. To be eligible for embodying the distinctive characteristics of a type of construction, a resource must be an important or influential example of said property type, such as one that had a measurable impact on future architectural development in the area.⁴³ Although the building is a fourplex, it is a typical example. There is no reason to believe it would be considered an important or influential, particularly within the large population of apartment houses throughout the city.

Architect E. B. Rust designed the property. Research indicates that Rust designed single- and multi-family residential properties in a variety of architectural styles throughout Los Angeles. While Rust appears to have been a successful architect in the Los Angeles area, it is highly unlikely that he would be widely recognized as a master within his field. Additionally, even if Rust were a master architect, 3822 S. Figueroa Street is unlikely to be an important example within Rust's body of work due to its simple design and common building materials.

The possession of high artistic values refers to a building's articulation of a particular concept of design so fully that it expresses an aesthetic ideal. A property eligible under this aspect of Criterion C would need to possess ornamentation and detail to lend it high artistic value, which is not the case for 3822 S. Figueroa Street.

The last aspect of Criterion C/3/3 is generally applied to historic districts. The property is located in the Zobelein's Tract and abuts the Flower Drive Historic District to the east (see **Section 0**). The Flower Drive Historic District was identified during a historical resources survey of the Exposition Park/University Park Redevelopment Area, which includes the block of Figueroa Street between W. 38th Street and W. 39th Street; however, the district evaluation concluded that the properties fronting S. Figueroa Street did not retain enough integrity to be part of the Flower Drive Historic District, and a separate district was not identified as part of the survey. Although the property is a multi-family residence built during the same period as the properties fronting Flower Drive, the setting along Figueroa Street has been altered through demolition and redevelopment. Therefore, 3822 S. Figueroa Street does not appear to contribute to a distinguishable entity as a potential district does not appear to exist.

Therefore, for the reasons outlined above, the property does not appear to be eligible under any aspect of Criterion C/3/3.

⁴³ National Register Bulletin 15, 18.

5.4 Criterion D/4

Criterion D/4 applies to the potential of the property to yield information important in prehistory or history. Criterion D generally applies to archaeological resources but may apply to a built resource in instances where a resource may contain important information about such topics as construction techniques or human activity. In any case, the resource must be the principal source of information. This is unlikely to be true for 3822 S. Figueroa Street. Therefore, the property does not appear to be eligible under Criterion D/4.

5.5 Integrity

It is standard practice to assess a property's integrity as part of a historic evaluation. Integrity is a property's ability to convey its historic significance through its physical features. National Register Bulletin 15 defines seven aspects of integrity: Location, design, setting, materials, workmanship, feeling, and association. In order to convey significance, a property must retain some combination of these aspects of integrity from its period of significance. The aspects of integrity that are essential vary depending on the significance of the resource.

While 3822 S. Figueroa Street does not appear to be eligible for listing in the National or California Registers, or as an HCM, it was examined against the seven aspects of integrity for further clarification.

Location: The place where the historic property was constructed or the place where the historic event occurred.

3822 S. Figueroa Street has not been moved since its construction, and therefore retains integrity of location.

Design: The combination of elements that create the form, plan, space, structure, and style of a property.

The subject building has not undergone any major alterations and is still able to convey its original function, aesthetic, and use. Therefore, it retains integrity of design.

Setting: The physical environment of the historic property.

The area surrounding the subject building has undergone substantial changes over time, including demolition of adjacent apartment buildings that were similar in size, scale, and era of construction, and redevelopment with large-scale contemporary buildings. Therefore, the subject building no longer retains integrity of setting.

Materials: 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.

Research indicates that the building has not undergone any major alterations. The stucco cladding and wood trim, windows, and ornamental details are intact, and the combination thereof is indicative of the property type and style. Therefore, the subject building retains integrity of materials.

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

Similarly, research does not indicate that the building has undergone any major alterations that would obscure the physical evidence of its 1920s construction. The extant features and construction techniques are typical and reflective of the era. Therefore, the subject building retains integrity of workmanship.

Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.

The extant physical features of the subject building continue to convey the sense of a 1920s apartment building. Therefore, the subject building retains integrity of feeling.

Association: The direct link between an important event or person and a historic property.

The integrity of association does not apply to the property as there is no historic association for the physical integrity to convey.

5.6 Summary of Evaluation

For the reasons discussed above, the property does/does not appear to be eligible for listing in the National or California Registers, or for designation as an HCM due to a lack of significance within the relevant contexts.

6. PROJECT IMPACTS

6.1 Thresholds for Impacts to Historical Resources

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

A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Title 14 CCR §15064.5(b)(1) further clarifies “substantial adverse change” as follows:

Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

Title 14 CCR §15064.5(b)(2) in turn explains that a historical resource is “materially impaired” when a project:

Demolishes or materially alters in an adverse manner those physical characteristics of an 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.

The City has adopted the State CEQA Guidelines Appendix G Environmental Checklist questions as thresholds to determine the significance of project impacts.⁴⁴ The Appendix G threshold for a significant impact on a historical resource is project that causes a substantial adverse change in the significance of a historical resource, as defined in Title 14 CCR § 15064.5 (see above).

As such, the test to determine if a proposed project will have a significant impact is, first, whether the project at issue has the potential to have any effect on a historic resource. If so, the second question is whether the project would demolish or substantially alter the physical integrity of the character defining features of the historical resource that justify its eligibility for listing at the national, state, and/or local level. In other words, the analysis looks at whether the historical resource would retain the essential aspects of integrity for the relevant property type and criteria/criterion after project completion.

⁴⁴ LADCP, “Environmental Resources,” accessed July 2025, <https://planning.lacity.gov/project-review/environmental-resources>.

6.2 Analysis of Project Impacts

The following analysis of project impacts considers direct impacts (**Section 6.2.1**, below), indirect impacts (**Section 6.2.2**, beginning on page 47), and cumulative impacts, (**Section 6.2.3**, beginning on page 48) to the Flower Drive Historic District, Zobelein Courtyard Apartments/Zobelein Estate, and CAAM.

6.2.1 Direct Impacts

Chapter 4 of the City’s CEQA Guide, “Guide to Preparation of Impact Analyses – Cultural Resources – Historical Resources” states that direct impacts are “caused by a project and occur at the same time and place. With regard to historical resources, direct impacts include the demolition of historical resources as well as the relocation or alteration of historical resources that result in a loss of integrity.”⁴⁵

A. Flower Drive Historic District

The proposed Project would include the demolition of contributing resources within the boundaries of the historic district.

The SHRC determined that the district consisted of seventeen contributors (ten on the 3800 block of Flower Drive and seven on the 3900 block of flower drive) and two non-contributors (one each on the 3800 and 3900 blocks of Flower Drive), making 89% of the district contributing. In its existing condition at the time of the initial determination of eligibility in 2008, the district retained integrity of location, design, materials, workmanship, feeling, and association (see **Section 0**).

Seven buildings on the Project Site at the north end of the district would be demolished as part of the proposed Project. Six of the buildings proposed for demolition are contributing and one is non-contributing. The contributing resources within the Flower Drive Historic District proposed to be demolished are considered historical resources in and of themselves and, in any event, their demolition meets the criteria for a material impairment under CEQA. Therefore, **the direct impact caused by the proposed Project would be significant, regardless of whether the remaining contributors remain eligible for listing, which is addressed further under Cumulative Impacts.**

B. Zobelein Estate/Zobelein Courtyard Apartments

The proposed Project occurs on a separate property and does not include any proposed physical changes to the Zobelein Courtyard Apartments/Zobelein Estate; therefore, there would be no direct impact to the historical resource caused by the proposed Project.

C. California African American Museum

The proposed Project occurs on a separate property and does not include any proposed physical changes to the CAAM; therefore, there would be no direct impact to the historical resource caused by the proposed Project.

⁴⁵ LADCP, “Chapter 4,” 11.

6.2.2 Indirect Impacts

Chapter 4 of the City’s CEQA Guide, “Guide to Preparation of Impacts Analyses – Cultural Resources – Historical Resources” states that indirect impacts are “caused by a project and occur at a different time and place. Examples of indirect impacts may include visual, auditory, and atmospheric changes to the immediate surroundings of a historical resource from construction.”⁴⁶

In determining the potential impact of adjacent new construction on the historical resources in the Study Area, the central question is whether the proposed new building would cause a "material impairment" to the significance of the nearby historical resources.⁴⁷ As stated above, material impairment occurs where a project demolishes or alters the physical characteristics that convey the significance of a historical resource and that justify its inclusion in or eligibility for inclusion in national, state, or local landmark or historic district programs pursuant to the requirements of CEQA. Such an effect would only occur if character-defining features of the historical resources in the Impact Area are demolished or otherwise negatively impaired to an extent to which they would no longer retain sufficient integrity to convey their significance.

According to *National Register Bulletin 15*, there are seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Six of the seven aspects of integrity are related to the physical characteristics of a historical resource that convey its historic significance and justify its inclusion in, or eligibility for, applicable landmark designation programs. The most relevant aspect of integrity for assessing indirect impacts is setting. Setting refers to the character of a historical resource’s broader surroundings as well as within the boundaries of an individual property or historic district. This analysis considers whether the integrity of setting of the historical resources in the Impact Area would be so diminished by the Project that they would no longer qualify as historical resources under national, state, or local landmark or historic district programs.

The analysis considers the following:

- Why is the historical resource significant?
- What are the physical characteristics of the historical resource that conveys its significance?
- Specifically, is the setting a character-defining feature of the historical resource?
- If so, is the setting intact from the historical resource’s period of significance or is the broad setting already disrupted?
- How and to what degree is the setting diminished by the visibility of the Project from the historical resource?

A. Flower Drive Historic District

The proposed Project involves activities including demolition of historical resources and alterations to the Flower Drive Historic District; therefore, impacts would be direct rather than indirect (see **Section 6.2.1**).

B. Zobelein Courtyard Apartments/Zobelein Estate

The proposed Project would introduce a new visual element south of the Zobelein Courtyard Apartments/Zobelein Estate across W. 38th Street.

⁴⁶ LADCP, “Chapter 4,” 11.

⁴⁷ Pub. Res. Code §21084.1; CEQA Guidelines §15064.5(b).

The introduction of a new visual element in the vicinity of the historical resource would not demolish or negatively impact any of the resource's defining features or diminish its significance. The integrity of immediate setting, consisting of the landscaping on the property as well as the interrelationship between buildings, would not be changed by the Project. The broader setting is not an essential aspect of integrity for the historical resource (see **Section 0**) and the Project would not affect the property's integrity of location, design, materials, workmanship, feeling, or association.

The Zobelein Courtyard Apartments/Zobelein Estate would not be materially impaired by the Project because it would retain all its character-defining features and physical characteristics that justify its inclusion in the California Register and designation as an HCM; **therefore, the indirect impact to the historical resource caused by the proposed Project would be less than significant.**

C. California African American Museum

The proposed Project would introduce a new visual element east of the CAAM across S. Figueroa Boulevard.

The introduction of a new visual element in the vicinity of the presumed historical resource would not demolish or negatively impact any of the resource's defining features or diminish its potential significance. The integrity of immediate setting, consisting of the landscaping and plaza around the museum as well as the interrelationship between the CAAM and Exposition Park, would not be changed by the Project. The broader setting is not an essential aspect of integrity for the presumed historical resource (see **Section 0**) and the Project would not affect the property's integrity of location, design, materials, workmanship, feeling, or association.

There would be no change to the physical characteristics of the CAAM or its immediate setting and it would retain its ability to meet the eligibility standards established in the *LACHCS* for the Visual Arts theme of the African American History of Los Angeles context; **therefore, the indirect impact to the presumed historical resource caused by the Project would be less than significant.**

6.2.3 Cumulative Impacts

In addition to the potential for direct and indirect impacts discussed above, CEQA requires that potential cumulative impacts also be considered. Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or compound or increase other environmental impacts. Cumulative impacts would occur if the Project and related projects⁴⁸ cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property type as those within the Project site.

GPA considered four related projects identified by the City for potential cumulative impacts.

3801 South Grand Avenue Mixed-Use Project

The 3801 South Grand Avenue Mixed-Use Project was identified as a related project in the vicinity, but outside the Impact Area defined for this HRTR. It consists of constructing a new mixed-use building on a vacant lot east of I-110. The lead agency for CEQA is the City.

The August 23, 2023 Department of City Planning Letter of Determination indicates that the City determined the project would not result in a substantial adverse change to historical resources;⁴⁹ therefore, there is no potential for significant cumulative impacts to historical resources. In addition, the project is located on the

⁴⁸ Related in terms of geographic area and/or potential impact, not by project type, proponent, or other similarities.

⁴⁹ City of Los Angeles Department of City Planning, "Case Number: DIR-2023-2487-TOC-HCA, Letter of Determination," August 23, 2023, accessed January 2026, <https://planning.lacity.gov/pdiscaseinfo/document/ODAxOQ0/fe3b456d-e5a5-4f0e-9fa7-879f1ff43502/pdd>.

opposite side of the I-110 and is thus physically and visually separated from the Project Site by the freeway, and there are no shared or common resources between the two projects.

3851 South Grand Avenue Mixed-Use Project

The 3851 South Grand Avenue Mixed-Use Project was identified as a related project in the vicinity, but outside the Impact Area defined for this HRTR. It consists of constructing a new mixed-use building on two contiguous vacant lots east of I-110. The lead agency for CEQA is the City.

The December 11, 2023 Department of City Planning Letter of Determination indicates that the City determined the project would not result in a substantial adverse change to historical resources;⁵⁰ therefore, there is no potential for significant cumulative impacts to historical resources. In addition, the project is located on the opposite side of the I-110 and is thus physically and visually separated from the Project Site by the freeway, and there are no shared or common resources between them.

California African American Museum Renovation Project

The CAAM Renovation Project was identified as a related project within the Impact Area for this HRTR. It consists of a renovation and expansion of the existing museum. The lead agency for CEQA was the California Science Center. The lead agency determined that the CAAM Renovation Project would not result in significant impacts to the environment. A mitigated negative declaration (MND) was prepared and the notice of determination (NOD) was filed in January 2010, which determined that the renovation project would not negatively impact the resource's eligibility for listing as a historical resource.⁵¹ Because the Project would similarly have no effect on the CAAM's eligibility for listing, there is no potential for significant cumulative impacts to the CAAM.

The Fig Project, 3900 S. Figueroa Street, Los Angeles

The Fig Project was identified as a related project within the Impact Area for this HRTR and Flower Drive Historic District boundary. The Fig Project originally consisted of demolishing eight existing multi-family residential buildings and constructing a new mixed-use building. The lead agency for CEQA was the City.

In the Environmental Impact Report (EIR) certified by City Council in June 2019, the City determined that (1) the Fig Project would result in a significant direct impact on historical resources, (2) mitigation measures would be required, (3) implementation of the mitigation measures would not reduce impacts to a less than significant, and (4) the impacts would remain significant and unavoidable.

Mitigation measures related to built-environment historical resources are summarized below:

- Mitigation Measure C-1: Historical American Building Survey-Like documentation of entire Flower Drive Historic District.
- Mitigation Measure C-2: Salvage and Reuse plan to identify elements and materials that could be saved prior to demolition.
- Mitigation Measure C-3: Relocation of at least three contributing resources to a suitable and appropriately zoned site within 5 miles of the Fig Project site.

⁵⁰ City of Los Angeles Department of City Planning, "Case Number: DIR-2023-5190-TOC-HCA, Letter of Determination." December 11, 2023. Accessed January 2026. <https://planning.lacity.gov/pdiscaseinfo/document/MTE2MzQ0/fe3b456d-e5a5-4f0e-9fa7-879f1ff43502/pdd>.

⁵¹ "California African American Museum Renovation Project," CEQANET, accessed July 2025, <https://ceqanet.opr.ca.gov/2009081094/2>.

As a result of legal proceedings occurring after certification of the EIR, the Fig Project was revised to include:

- Reduction in number of demolished buildings within the Flower Drive Historic District from eight to three.
- Retention of two contributing resources within the Flower Drive Historic District previously proposed for demolition.
- Relocation of 1 contributing resource to a new location within the Flower Drive Historic District boundaries, and relocation of two contributing resources to a new location outside the Flower Drive Historic District boundaries.
- Decrease in the new construction's total floor area.

The City determined that no further CEQA analysis was needed, as the changes to the project did not trigger the need for major revisions to the prior EIR due to new or increased significant impacts.⁵²

Taken together, the proposed Project and the Fig Project would result in the loss of ten buildings within the district (eight contributing, two non-contributing). Three buildings would be moved from their original locations, including one relocation within the district boundaries and two outside the district boundaries to the immediate south of the historical district boundary along S. Flower Drive (see **Figure 29** and **Figure 30**).

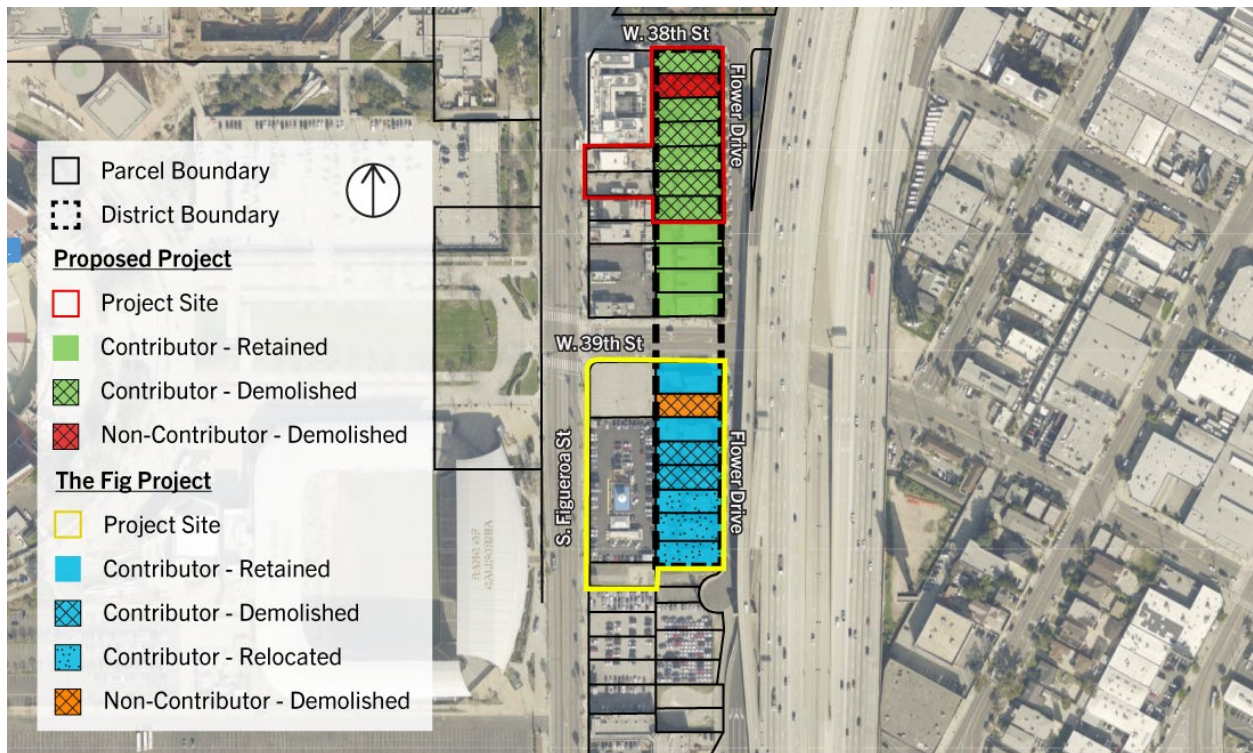


Figure 29: Changes to the Flower Drive Historic District as part of the proposed Project and Fig Project. For illustrative purposes only. (Base Map: Los Angeles County GIS.)

⁵² City of Los Angeles Department of City Planning, Case Number: CPC-2016-2658-VZC-HD-CUMCUP-ZAD-SPR, -1A, Substantial Conformance Letter, April 18, 2024, accessed July 2025, <https://planning.lacity.gov/pdiscaseinfo/document/MTYwMzg0/fe3b456d-e5a5-4f0e-9fa7-879f1ff43502/pdd>.

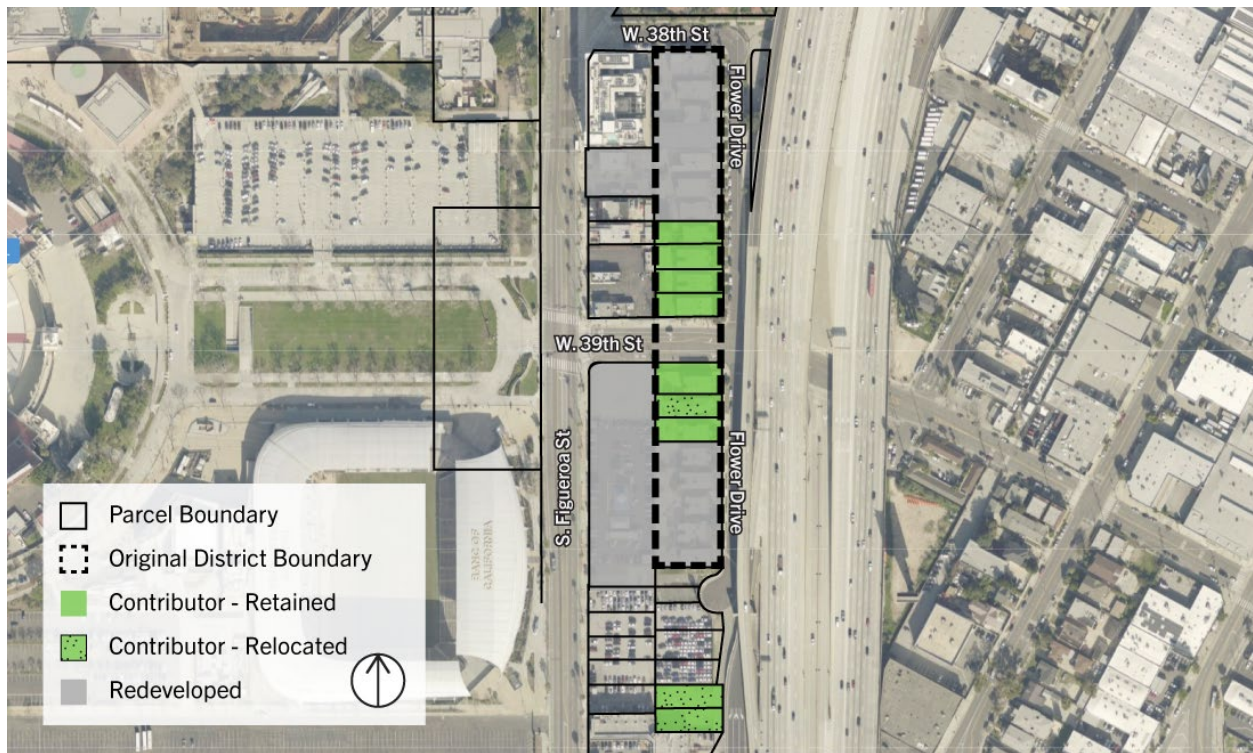


Figure 30: Anticipated configuration of Flower Drive Historic District after proposed Project and Fig Project. For illustrative purposes only. (Base Map: Los Angeles County GIS.)

The separate direct impacts to the Flower Drive Historic District caused by the proposed Project and the Fig Project would be compounded when considered together. The combined impacts would result in a more drastic change to the setting within and immediately surrounding the district, and further reduction in the number of extant contributing resources; **therefore, the cumulative impact to the Flower Drive Historic District from the Fig Project and the Project would also be significant.**

6.2.4 Potential California Register Eligibility for Remaining District Contributors Notwithstanding Cumulative Impacts

As noted above, the Project and the Fig Project would result in the demolition of a total of ten buildings within the existing Flower Drive Historic District, including eight contributors. With the two projects in place, there would be four contributors remaining in their existing configuration on the 3800 block of Flower Drive (north of W. 39th Street). There would be three contributors on the 3900 block of Flower Drive (south of W. 39th Street), including two contributors in their existing configuration and one relocated contributor; two contributors would be moved to a location outside the existing district boundary to the south, near the intersection of Flower Drive and W. Martin Luther King Jr. Boulevard (see **Figure 30**). Thus, a total of nine current contributors (seven contiguous and two outside the existing district boundary) would remain on S. Flower Drive.

When the district was determined eligible for listing in the California Register in 2008, the staff evaluation noted the following:

...The Flower Drive Historic District exhibits a strong sense of historical and architectural cohesion. While each individual residence within the district's boundaries may not be architecturally significant, together *this grouping of similar properties, with consistent set-*

*backs, two-story heights, similar spatial arrangements, architectural styling, and common street features gives the Flower Drive neighborhood its strong sense of time and place.*⁵³

Based on a review of the eligibility standards for Multi-Family Residential Housing Districts in the *LACHCS*, it appears that the remaining grouping of seven contiguous contributors would have the potential for continued eligibility for listing in the California Register under Criteria 1 and 3 by meeting the following standards:⁵⁴

Eligibility Standards for Multi-Family Residential Historic Districts

- Period of Significance:
 - 1910-1970
- Eligibility Standards:
 - Is a good to excellent representation of multi-family residential development from the period of significance
- Character-Defining/Associative Features:
 - As a whole, district retains most of the essential character-defining features from the period of significance
 - Conveys a strong visual sense of the overall historic environment from the period of significance
 - May be composed of a single multi-family residential property type or a variety of types
 - Retains original planning features including street patterns, building setbacks, and landscape or street features
- Integrity Considerations:
 - As a whole, should retain sufficient integrity of Location, Design, Setting (*the relationship between the buildings and landscapes*), Materials, and Feeling to convey significance
 - Contributors to a district may have a greater degree of alteration than individually significant properties
 - Surrounding buildings and land uses may have changed⁵⁵

The proposed Project and Fig Project would not result in the wholesale loss of all district contributors or features that made the district eligible for California Register listing in 2008. The buildings proposed to remain would be 100% contributing, and each contributor would retain its respective character-defining physical features,

⁵³ Toffelmier, 8 (emphasis added).

⁵⁴ “Guide for Professionals Using the Historic Context Statement for Property Evaluations,” *Los Angeles Citywide Historic Context Statement* (City of Los Angeles Office of Historic Resources, revised August 2020), 1-2, accessed July 2025, https://planning.lacity.gov/odocument/47865220-485f-4d69-ba8e-413d6cd68069/GuideforProfessionalsUsingtheHistoricContextStatement_Oct2017.pdf. The *LACHCS* post-dates the 2008 determination of eligibility but is now used in the evaluation of all historical resources in Los Angeles. Per the City’s guidance on using the *LACHCS*, it is intended to be used by all agencies, organizations, and professionals completing historic resource surveys for properties in Los Angeles. Each context theme includes a set of eligibility standards for associated property types, and properties “do NOT need to meet ALL eligibility standards and character-defining/associative features to be eligible.”

⁵⁵ HRG, “Multi-Family Residential Development, 1895-1970,” 84-85, (emphasis added).

including Mediterranean Revival architectural styling and two-story height. The contiguous grouping would retain the existing interrelationship between each multi-family building, the respective detached garages, and the street. Common street features that unify the buildings, including front yards, consistent setbacks, concrete sidewalks, driveways, and retaining walls would also remain fully or otherwise largely intact. The physical features and spatial relationships that made the district eligible would be retained, albeit with a smaller number of contributors, but the eligibility standards in the *LACHCS* do not identify a minimum number of contributors needed to constitute a potential historic district.

For the reasons discussed above, it appears the remaining contiguous contributors would have the potential for continued eligibility for California Register listing under Criteria 1 and 3 under the Multi-Family Residential Historic District eligibility standards in the *LACHCS*. However, the potential continued eligibility of the remaining contributors as a district does not eliminate or reduce to a less than significant level the significant project-level and cumulative impacts on the district. Accordingly, the Project's individual and cumulative impacts on the Flower Drive Historic District remain significant regardless of the potential continued eligibility of the remaining contiguous contributors for listing as a historic district.

6.2.5 Mitigation

The Project would have significant direct and cumulative impacts on an identified historical resource within the Impact Area: the Flower Drive Historic District. For compliance with CEQA, the lead agency, in this case the City of Los Angeles, is required to identify potentially feasible measures to avoid, minimize, reduce, rectify, eliminate or compensate for significant impacts and to ensure that any adopted measures to mitigate significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.⁵⁶

Mitigation measures carried out as part of the Fig Project included HABS-like recordation of the entire district; as such, additional recordation would be redundant and is not recommended as mitigation for the proposed Project.

During preparation of this HRTR, GPA and the Project Applicant met with OHP staff for an informal discussion regarding appropriate timing for updates to the existing Flower Drive Historic District documentation, should a California Register listing based on the prior determination be pursued. OHP staff advised that submissions should reflect the appearance of the resource at the time of submittal and that any revisions should be adequately justified, such as by physical changes to the resource. In short, documentation supporting nominations or determinations of eligibility cannot be amended based on hypothetical future conditions or assumptions, and would need to be updated and submitted for consideration after physical changes occurred. OHP thus confirmed they do not issue opinion letters or advice based on the potential impacts of future development, but instead only consider amendments to prior nominations based on current conditions. As discussed in **Section 6.2.4**, above, the remaining grouping of contiguous contributors would have the potential for continued eligibility for California Register listing under Criteria 1 and 3 as a multi-family residential historic district, based on a review of *LACHCS* guidance and eligibility standards for the property type; however, OHP and the SHRC could not render a formal decision until after the Project and Fig Project are in place.

Based on the above, the following mitigation measures are recommended:

1. Interpretive Display
 - a. The Applicant shall prepare an interpretive display consisting of at least one panel and install the display(s) in a location visible from the public right-of-way along Flower Drive between W. 38th Street and W. 39th Street.

⁵⁶ Title 14 CCR § 15064.5(b)(4).

- b. The interpretive display shall include a brief history of the area as well as the district and its significance within the context of multi-family residential housing development.
 - c. The text of interpretive display shall be accompanied by photographs of the district, such as those prepared for the HABS-Like documentation completed in 2021, and other available visual ephemera, such as historic maps and aerials.
 - d. The interpretive display shall be professionally written and designed. The written content shall be prepared by a person or persons meeting the Secretary of the Interior's Professional Qualifications Standards for history and/or architectural history.
 - e. Prior to fabrication and installation of the interpretive display, a digital draft shall be made available to the City of Los Angeles Office of Historic Resources staff for review and comment.
 - f. The finished interpretive display shall be installed prior to the issuance of the final Certificate of Occupancy.
2. Updated California Register Nomination
- a. The Applicant shall cause the preparation of an updated California Register historic district nomination for the contributing buildings remaining after construction of the project.
 - b. The nomination shall be prepared in accordance with OHP instructions by a person or persons meeting the Secretary of the Interior's Professional Qualifications Standards for history and/or architectural history.
 - c. The photographic documentation shall be carried out only after framing and exterior finishes, at a minimum, of the proposed multi-family building are complete, in order to convey a full understanding of any changes to feeling and setting.
 - d. This mitigation measure shall be completed prior to the issuance of the final Certificate of Occupancy.
 - e. This mitigation measure will be considered complete when the Applicant ensures the nomination is prepared and submitted to OHP for consideration.

7. CONCLUSIONS

The Project proposes to demolish a portion of the Flower Drive Historic District that was previously determined eligible for listing in the California Register. Cumulatively with the Fig Project, the district would be reduced from 19 buildings (17 contributing and 2 non-contributing) to 7 buildings (7 contributing) in a contiguous grouping, with 2 contributors relocated outside the existing district boundary to the south. The contributing resources proposed to be demolished are considered historical resources in and of themselves and their demolition meets the criteria for a material impairment under CEQA, irrespective of the potential continued eligibility of the Flower Drive Historic District. **Therefore, the direct project-level and cumulative impacts to the Flower Drive Historic District caused by the Project would be significant, and mitigation is required.**

Because of the unique and irreplaceable nature of the historic contributor buildings proposed for demolition by the Project, the implementation of the recommended mitigation measures would not reduce the direct and cumulative impacts on the historical resource to a less than significant level. However, mitigation measures are recommended to document and interpret the history of the district. The only way to reduce the impact on the historical resource would be to redesign the Project to preserve all the contributing buildings, the feasibility of which is addressed in the Environmental Impact Report (EIR).

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Appendix A: Résumés

JENNA KACHOUR



Jenna Kachour is a Senior Associate Architectural Historian/Preservation Planner at GPA. She has 15 years of diversified planning experience in the private, public, and non-profit sectors. She has been dedicated to the field of historic preservation since 2010. Trained as a planner, Ms. Kachour's work at GPA is informed by her understanding of preservation's role within the larger context of land use and decision making. Since joining GPA in 2013, she has skillfully supervised the preparation of environmental compliance documents in accordance with the California Environmental Quality Act, National Environmental Policy Act, and Section 106 of the National Historic Preservation Act for projects throughout California. Her involvement in several large-scale transportation corridor projects has entailed the management of historical resource surveys through multiple cities in Los Angeles County. Jenna is also experienced in preparing applications for Mills Act Historic Property Contracts as well as inspecting properties with existing contracts.

Educational Background:

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

Professional Experience:

- GPA Consulting, Senior Associate Preservation Planner/Architectural Historian, 2022-Present
 - Senior Preservation Planner, 2017-2021
 - Associate Preservation Planner, 2013-2016
- Pasadena Heritage, Preservation Director, 2010-2013
- Deborah Murphy Urban Design + Planning, Planner, 2009-2010
- Brown/Meshul, Inc. Land Use Consultants, Assistant Project Manager, 2006-2009

Qualifications:

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

Selected Projects:

- 1056 S La Cienega, CEQA HRR, Los Angeles, 2016
- 1102 Pacific Coast Highway, CEQA HRER, Huntington Beach, 2022
- 1500 W. Adams Boulevard, CEQA HRTR, Los Angeles, 2022-2023
- 2204 Monterey Boulevard, CEQA HRER, Hermosa Beach, 2022-2023
- 250 E. Union Street, CEQA HRTR, Pasadena, 2018
- 3008 Wilshire Boulevard, CEQA HRER, Los Angeles, 2022-2023
- 325 S. Boyle Avenue, CEQA HRTR, Los Angeles, 2022-2023
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- Mariposa Condominiums, CEQA HRER, El Segundo, 2021
- Silver Lake/Echo Park/Elysian Valley Historic Resources Survey, SurveyLA, Los Angeles, 2013-2014
- Sunset Junction CEQA HRER, Los Angeles, 2015

AMANDA DUANE



Amanda Duane is a Senior Architectural Historian at GPA. She has been involved in the field of historic preservation since 2011. Amanda graduated from Savannah College of Art and Design with a Bachelor of Fine Art degree in Historic Preservation. She has since worked in local government and private historic preservation consulting in California. Amanda joined GPA in 2012 and her experience has included the preparation of environmental compliance documents in accordance with the California Environmental Quality Act and Section 106 of the National Historic Preservation Act; Historic American Buildings Survey/Historic American Engineering Record recordation; large-scale historic resources surveys; Federal Rehabilitation Tax Credit and Mills Act applications; National Register Place nominations; local landmark applications; historic context statements; and evaluations of eligibility for a wide variety of projects and property types throughout California. She is experienced in expertly guiding property owners through the process of securing local and federal historic tax credits and working with local governments to develop design guidelines for administering local design reviews. Amanda is also highly skilled in graphic design as well as interpretation and exhibition design.

Educational Background:

- B.F.A, Historic Preservation, Savannah College of Art and Design, 2011

Professional Experience:

- GPA Consulting, Senior Architectural Historian, 2021-Present
 - Associate Architectural Historian, 2017-2021
 - Architectural Historian II, 2014-2017
 - Architectural Historian I, 2012-2014
- Architectural Resources Group, Intern, 2012
- City of Los Angeles, Office of Historic Resources, Intern, 2011-2012

Qualifications:

- Meets the Secretary of the Interior's Professional Qualification Standards for architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.
- National Preservation Institute, Section 106: An Introduction

Professional Activities:

- California Preservation Foundation Conference Programs Committee, 2017

Selected Projects:

- 1413 Michigan Avenue, Nikkei Hall, CEQA HRTR, Santa Monica, 2020
- 1500 W. Adams Boulevard, CEQA HRTR, Los Angeles, 2022-2023
- 3443 Sepulveda Boulevard CEQA HRER, Los Angeles, 2018
- 400-432 S. San Vicente Boulevard, CEQA HRER, Los Angeles, 2023
- 402-404 Pasadena, CEQA HRTR, San Clemente, 2023-2024
- 4360 Dozier Avenue, Historical Resources Technical Report, Los Angeles County, 2016
- 867 10th Street CEQA HRER, Los Angeles, 2018
- 956 Seward Street, CEQA HRER, Los Angeles, 2023
- African American Historic Context Statement, Los Angeles, 2017
- Bank of Italy Building, Tax Credit Certification, Los Angeles, 2015-2019
- Berths 148-151 CEQA HRER, Port of Los Angeles, 2019
- Exotic Revival Historic Context Statement, Los Angeles, 2015
- Jewish History of Los Angeles Context Statement, Los Angeles, 2016
- Las Palmas Senior Center, CEQA HRER, Los Angeles, 2023-2024
- Mar Vista Gardens, Los Angeles, National Register Nomination, 2018
- MGM Scenic Arts Building, CEQA HRER, Culver City, 2019
- Times Mirror Square, Historic Structure Report, Los Angeles, 2017

Appendix B: 3822 S. Figueroa Street DPR Form Set

Appendix C: Concept Design Plan Set (KTGY, June 12, 2024)