



November 4, 2025

Alicia Velasco, Planning Director
City of Cypress
5275 Orange Avenue
Cypress, California 90630

Subject: Historic Resources Assessment Addendum to the Housing Element Implementation Project to support Specific Plan 3.0 Implementation Project, Cypress

Dear Ms. Velasco:

In November 2023, LSA completed a Historic Resources Assessment (HRA), as Appendix C-1 to the Draft Environmental Impact Report (DEIR) for the Cypress Housing Element Implementation Project (Housing Implementation Project) (Attachment A). The HRA assessed the presence of historical resources in the City of Cypress and how implementation of the Housing Element could impact those resources, including the Buildout Area. The HRA found that certain buildings and features that comprise Los Alamitos Race Course (LARC) appear eligible for listing in the National Register and the California Register under Criteria A/1 and B/2. As such, these elements of LARC qualify as a “historical resource” for purposes of CEQA. The HRA also concluded that implementation of the Cypress Town Center and Commons Specific Plan 2.0 (Specific Plan)¹ would impact historical resources in the City, including LARC, although the HRA acknowledged that the specific location and configuration of future development in the Buildout Area was not yet determined and that specific impacts could not be determined without additional design information.

This Addendum serves to update and supplement the Housing Element HRA in connection with the proposed Specific Plan 3.0 Buildout Project (proposed project) character defining features and to (1) clarify the character-defining features of buildings and features that comprise LARC, as they relate to the Clubhouse and Annex/Burgart’s building, (2) identify how the proposed project will impact LARC’s eligibility as a historic resource and (3) identify feasible mitigation measures to reduce the proposed project’s significant environmental impacts to LARC.

SUMMARY OF PREVIOUS HISTORIC RESOURCES ASSESSMENT

The following provides a summary of the HRA prepared for the Housing Element Implementation Project, including the findings and recommendations.

The HRA found that LARC appears eligible for listing in the National Register of Historic Places (National Register) and California Register of Historical Resources (California Register) under Criteria A/1 and B/2. Under Criteria A/1, it was found significant for its association with the establishment and success of organized quarter horse racing in California. Under Criteria B/2, it was found

significant for its association with Frank Vessels, Sr., who played a significant role in developing quarter horse racing in California. Therefore, LARC is a “historical resource” for the purposes of CEQA. The HRA included the following conclusions regarding LARC:

- **Location:** The integrity of location is high. The chute appears to be in the same location since 1954, the location of the track has not changed since 1970 and the Grandstand is in its original 1960 location.
- **Design:** The integrity of design is moderate. The chute appears to retain the same basic design since the 1950s. Although the track appears to retain its general configuration from before 1970, including the two water features in the infield, the track’s integrity of design was somewhat diminished by the addition of the thoroughbred track to the west. The south and west elevations of the Grandstand retain a high degree of integrity of design and convey a strong association with the period of significance; however, the north elevation (track side) has sustained some alterations.
- **Setting:** The integrity of setting is low. The setting of the race course sustained alterations since 1970, primarily in the form of intensified development within and around the race course property.
- **Materials:** The integrity of materials is moderate. The race track and chute were resurfaced numerous times throughout their history and do not retain the original materials with which they were constructed; however, they do still remain as dirt tracks and the infield continues to have turf and water features that are consistent with the materials from the period of significance. Although the Grandstand appears to retain original structural materials (concrete and steel) and at least some original fenestration, alterations have resulted in installation of some new materials.
- **Workmanship:** The integrity of workmanship is moderate. The south and west elevations of the Grandstand retain a high degree of integrity of workmanship and convey a strong association with the period of significance. Although the north elevation (track side) has sustained some alterations, the workmanship that went into the overall form of the building is still evident. The workmanship that went into the race track and chute appears to remain, since neither have sustained major alterations to their pre-1970 configuration.
- **Feeling:** The integrity of feeling is moderate. The chute and race track evoke some feeling of the past, but the feeling was diminished by the post-1990 extension of the track. Because the elevations of the Grandstand mostly retain their appearance from the historic period, the Grandstand evokes a feeling of the past. Changes to the overall setting of the Race Course diminished its ability to convey a sense of feeling from its historical period and as such the integrity of feeling was compromised.
- **Association:** The integrity of association is high. The chute, racetrack and Grandstand were all built by Frank Vessels, Sr. for the specific purpose of quarter horse racing. As such, each of these essential features conveys a strong association with both quarter horse racing and Frank Vessels, Sr.

As part of the evaluation process, character-defining features were identified. These are the physical materials, design elements, and spatial relationships that express the property's historic identity or architectural style.¹ Only those essential features that retain sufficient integrity to reflect the property's period of significance are considered character-defining. The LARC period of significance is 1954, when the track was built at its current location, to 1970, which is considered the end of the golden age of horse racing. The HRA identified the Grandstand, the pre 1970s oval track and the 1954 quarter mile chute on the south side as essential features, that date to the period of significance (1954–1970), and were built by Frank Vessels, Sr. These features were found to clearly convey the property's history as a horse racing facility. The HRA did not address the Clubhouse and the Annex/Burgart's contribution as character defining features, which is what this addendum discusses below.

The HRA determined that LARC demolition would constitute a substantial adverse change to the significance of the historical resource that cannot be mitigated to a less than significant level. The HRA recommended that, if a specific project is proposed that does not involve full demolition, an impact assessment be prepared using the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and mitigation measures be recommended at that time.

CLARIFICATION ON CHARACTER-DEFINING FEATURES FOR THE LARC PROPERTY

In June 2025, as part of the environmental review process for the proposed project, additional information was requested regarding the Annex/Burgart's and Clubhouse buildings contribution as character defining features of LARC. As discussed further below, the Clubhouse and Annex/Burgart's and buildings are not character-defining features of LARC.

The following provides additional information regarding the integrity of the Clubhouse and Annex/Burgart's and buildings and conclusions regarding whether these features contribute to LARC's eligibility as a historical resource under CEQA.

Clubhouse Building

Together, the Grandstand, Annex/Burgart's, and the Clubhouse comprise the largest group of structures on the LARC property. The Clubhouse, which was originally a freestanding building, appears to be the oldest of the three, dating to the mid-1950s (NETRonline var.; Mackendrick 2022). The Grandstand was built shortly after 1959 and opened in 1960 (*Press-Telegram* 1959; Chamberlain 2000). By 1963, the Clubhouse was connected to the Grandstand by the Annex/Burgart's, which was constructed between them (NETRonline var.).

Over the years, alterations were made to the north, east, and south elevations of the Clubhouse (refer to photographs below). In 1972, a glass front was added to the north (trackside) elevation (City of Cypress var.). The south elevation was remodeled during or after the 1980s (Sherren 2022; Orange County Public Libraries n.d.). As shown in the photographs below, the windows across the

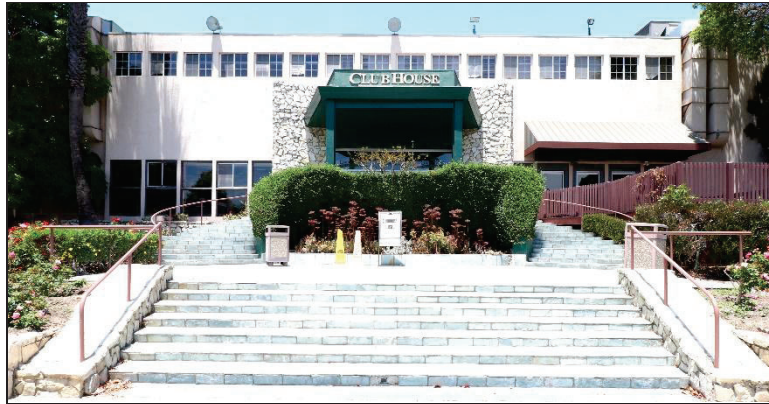
¹ California Office of Historic Preservation. Technical Assistance Series #6: California Register and National Register: A Comparison (for Purposes of Determining Eligibility). Sacramento: California Department of Parks and Recreation, 2001.

upper part of the Clubhouse were replaced, the trim between and above them was removed, and the entry statement was changed. The original flat canopy that was supported by metal poles was replaced with a more substantial structure with a sign above it. The first-floor windows have a modern feel, and a walkway and additional stairs were added at the bottom of the original staircase. The stairs on the east elevation were replaced in 1991 (City of Cypress var.). All of these alterations occurred outside the period of significance (post-1970).

To be considered character-defining, a feature must retain sufficient integrity to reflect the property's period of significance. In this case, the cumulative changes to the Clubhouse—particularly the replacement of original windows, removal of trim, and modifications to the north and south elevations—have diminished the integrity of design, materials, and workmanship associated with its original appearance. As a result, the Clubhouse is not considered a character-defining feature of LARC.



Portion of the south elevation of the Clubhouse, view slightly northwest, 1980s
(Orange County Public Libraries n.d.).



The Clubhouse, south elevation, view north, 2022.



Portion of north elevation of the Clubhouse (far left) and the Annex rooftop patio, May 1965, view south (Facebook n.d.). Note both are open air.



Clubhouse (left) and Annex (right), view south (2022). Note both are enclosed.

Annex/Burgart's Building

The Annex/Burgart's building was built between the Grandstand and the Clubhouse by 1963 (NETRonline var.). This three-story building originally had a rooftop patio which was enclosed in the 1980s (see photos, Sherran 2022). In 1976, permits were issued for alterations to the Annex/Burgart's (City of Cypress var.). More specifically, permit notes indicate that the bar and dining area were to be enlarged and a restroom and future bar were planned at ground level in the breezeway between the grandstand and clubhouse (Ibid.). Based on photographs from the 1980s and 2022 (see below), it is clear that the south elevation was extensively remodeled, including removal/replacement of all windows and enclosure of the rooftop patio. These alterations occurred outside the period of significance (post-1970). Due to the alterations and resulting low integrity of design, materials, workmanship, and feeling, the Annex/Burgart's building is not a character-defining feature of LARC.



Annex/Burgart's, view northwest, 1980s (Orange County Public Libraries n.d.). Note band of vertically oriented windows on the second floor of the south elevation. One story building is not extant.



Annex/Burgart's in 2022 (view northwest).



Annex/Burgart's in 2022 (view north). Note completely different fenestration pattern.

Proposed Project

The proposed Project consists of the reasonably foreseeable buildout of a portion of the area governed by the Cypress Town Center and Commons Specific Plan 3.0 (Specific Plan) that includes approximately 134 acres of land (Buildout Area) in the City of Cypress (City), see Figure 1, Buildout Area. The Project includes the approval of Vesting Tentative Tract Map No. 19247 (VTTM 19274) and would result in the development of 1,791 residential units and 440,000 square feet of non-residential uses within the Buildout Area. VTTM 19247 includes lots with a total land area of approximately 151.6 acres. The land subject to VTTM 19247 is greater than the Buildout Area as VTTM 19247 includes Lots 8 and 9 (17.55 acres), which are part of the existing Grace Church property, which is located outside the area governed by the Specific Plan. The environmental analyses in this Draft EIR do not consider future development on Lots 8 and 9 of VTTM 19247.

The proposed Project also includes the extension of Moody Street from Cerritos Avenue to Katella Avenue, as well as the extension of Vessels Circle from its current western terminus to intersect with the Moody Street extension, consistent with the approved Specific Plan. The Moody Street extension would traverse the Buildout Area, creating a central north-south corridor, while the extension of Vessels Circle would provide additional access to the Buildout Area. The Project also includes, consistent with the Specific Plan, the widening of Lexington Drive on the northwest side of the Specific Plan. Future development within the Buildout Area will require the construction of private driveways, accessways and/or streets that connect to the Moody Street and Vessels Circle extensions and existing public streets adjacent to the Buildout Area, but their specific locations and sizes would be determined during the design process.

In addition, the Specific Plan includes a minimum of 20 acres of public park space. This includes Lexington Park, which is approximately nine acres and has already been developed. As such, implementation of the Project includes the development of approximately 11 additional acres of

public park uses provided in one or more of the other Land Use Districts established in the Specific Plan.

The Project assumes that development of the land uses allowed by the Specific Plan within the Buildout Area will require the demolition and removal of all or a substantial portion of the existing improvements associated with LARC, including the race track and infield area, grandstand, buildings, barns and structures and two artificial lakes. That would be followed by the grading for and construction of specific development projects within discrete portions of the Buildout Area. It is possible, however, that the development of one or more discrete projects could occur prior to the improvement of the Race Course.

Project Impacts

CEQA establishes that “a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment” (Public Resources Code [PRC] §21084.1). “Substantial adverse change,” according to PRC Section 5020.1(q), “means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired.”

The proposed project includes full demolition of LARC, which constitutes a substantial adverse change to the significance of the historical resource. The contemplated demolition cannot be mitigated to a level that is less than significant. Therefore, an analysis of impacts under the *Secretary of the Interior’s Standards for the Treatment of Historic Properties* is not warranted. However, under CEQA, feasible mitigation measures must be considered and implemented to reduce the significant historical resources impact, even if it cannot be reduced to a level of less than significant.

Mitigation Measures

LSA recommends the following mitigation measures:

1. Prior to demolition activities of any character defining features, the owner of Los Alamitos Race Course, or subsequent project proponents, shall make photographs and memorabilia, including brochures, promotional flyers, marketing materials, special events announcements and the like (or copies of the same) available to a local library or an Orange County-based historical society:
 - a. For use in an exhibit(s) about horse racing, quarter horses, Frank Vessels, Sr. the Vessels family, pari-mutuel betting and/or the history of Cypress; and/or
 - b. To be part of a permanent archive for research purposes.
2. Require future development on portions of the Los Alamitos Race Course property to incorporate one or more of the following:
 - a. A historical marker that provides information about Frank Vessels, Sr. and Los Alamitos Race Course. The marker should be clearly visible and accessible to the public.

- b. The Vessels' name, the track logo, racing terminology, and/or the names or likenesses (e.g., statuary, wall or garden art, and photographs) of noteworthy Quarter Horses (such as *Clabber*, *Go Man Go*, or *Moonist*).
3. Prior to, or in conjunction with, approval of any demolition or development permits that involves the destruction of any portion of the Los Alamitos Race Course property, the project applicant should be required to commission documentation of the property in the form of Historic American Building Survey (HABS)-like documentation that complies with the *Secretary of the Interior's Standards for Architectural and Engineering Documentation* (NPS 1990), if any of the character defining features as identifies are still present. The documentation should generally follow the HABS Level III requirements and include digital photographic recordation of the complex, a detailed historic narrative report, and compilation of historic research. Photographic documentation should include:
 - General views of the site and landscape as a whole
 - Photographs of the 550-yard chute, track, and winner's circle
 - Photographs of each exterior elevation of all buildings and structures in the complex
 - Photographs of the interior of the Grandstand.

The documentation should be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History (NPS 1983). The original archival-quality documentation shall be offered as donated material to the following entities: South Central Coastal Information Center at CSU Fullerton, Preserve Orange County, the Orange County Historical Society and other repositories to be determined such as local libraries and the American Quarter Horse Association Hall of Fame.

CONCLUSION

As discussed above, the primary buildings and features that comprise LARC are eligible for listing in the National Register and California Register under Criteria A/1 and B/2 for LARC's association with the establishment and success of organized quarter horse racing in California (A/1) and Frank Vessels, Sr (B/2). LARC is therefore a "historical resource" for the purposes of CEQA. Character-defining features of LARC are the Grandstand and the oval track with the original chute. The period of significance is 1954 to 1970. The Clubhouse and the Annex/Burgart's are not part of the historical resource.

The proposed project includes the demolition of all LARC improvements and features, including all character-defining features, which constitutes a substantial adverse change to the significance of the historical resource. Even with implementation of feasible mitigation measures, the proposed project's impact on the historical resource cannot be mitigated to a less-than-significant level. However, the feasible mitigation measures described above are therefore recommended.

REFERENCES

City of Cypress

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<https://www.facebook.com/groups/1360408150727849/posts/8359863784115549/>

MackKendrick, Duane (posted by)

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- Var. Historic aerial photographs of the Los Alamitos Race Course property. Accessed online in 2022 and 2023 at: <https://www.historicaerials.com/viewer>

Orange County Public Libraries

- n.d. Photograph of the LARC Grandstand and Annex from the 1980s. Accessed online in July 2025 at: <https://cdm16838.contentdm.oclc.org/digital/collection/p16838coll1/id/3192>

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Sherran, Frank

- 2022 Personal communication with Mr. Sherran, Facilities Manager, during the field survey on June 10, 2022.