Appendix C

Historic and Cultural Reports

Kimley»Horn

HISTORIC RESOURCES GROUP

DRAFT HISTORICAL RESOURCES TECHNICAL REPORT
525 S. VIRGIL AVENUE, LOS ANGELES

NOVEMBER 2025



556 S Fair Oaks Ave, Suite 101-514
Pasadena, CA 91105

Tel 626-793-2400
historicresourcesgroup.com

prepared for

Shatto Emet QoZB LP

2219 Main Street, Suite 260
Santa Monica, CA 90405

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1.0 EXECUTIVE SUMMARY

The 525 S. Virgil Avenue Project (Project) is located at 515-525 S. Virgil Avenue in the Koreatown neighborhood within the Wilshire Community Plan Area (CPA) of the City of Los Angeles (Project Site). The Project Site comprises one parcel (Assessor Parcel Number [APN] 5077-004-030) on an approximately 42,146 square foot (sf) (0.97 acre) lot. The Project would redevelop the Project Site with an approximately 252,876 sf, eight-story self-storage facility. The property at 525 S. Virgil Avenue is currently occupied by a four-story commercial office building and associated surface parking that would be demolished as part of the Project. The purpose of this report is to identify whether the Project has the potential to impact historical resources as defined by the California Environmental Quality Act (CEQA) on or in the vicinity of the Project Site.[1] This report is intended to inform environmental review of the Project.

The four-story commercial office building at 525 S. Virgil Avenue was designed by Langdon & Wilson and constructed in 1965. The Wilshire Community Plan Area (CPA) was surveyed by SurveyLA, the City of Los Angeles' citywide historic resources survey, between December 2013 and January 2015.[2] SurveyLA identified 525 S. Virgil Avenue as potentially eligible for listing in the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and as a City of Los Angeles Historic-Cultural Monument (HCM) as an "excellent example of New Formalist commercial architecture in the Wilshire area; work of noted Los Angeles architectural firm Langdon and Wilson."[3] However, in 2019, the property was re-evaluated for potential historic significance as part of environmental review for a previous project proposed for the Project Site.[4] Following review of the additional information provided in the report, the City found that 525 S. Virgil Avenue is not eligible under any relevant contexts and themes in the SurveyLA Historic Context Statement, and does not meet the eligibility standards for designation for its architecture merit. Therefore, 525 S. Virgil Avenue is not considered a historical resource for purposes of CEQA.

The Project Site is located in the vicinity of two potential historical resources identified by SurveyLA that have a reasonably foreseeable potential to be impacted by the Project, either directly as a result of construction activity, or indirectly due to changes in the setting. These are the mixed use commercial building at 3101 W. 6th Street, which is located approximately 140 feet southwest of the Project Site across Westmoreland Avenue, and the multi-family residential building at 523 S. Westmoreland Avenue, which is located approximately 80 feet west of the Project Site across Westmoreland Avenue. SurveyLA represents a historical resources survey that meets the requirements of PRC Section 5024.1(g). Therefore, the survey findings for these two properties are accepted, and they are considered historical resources for purposes of this report. There are no other historical resources in the vicinity of the Project Site that have the potential to be impacted by the Project.

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[1] California PRC, Section 21084.1.
[2] City of Los Angeles, Department of City Planning, Office of Historic Resources, *Historic Resources Survey Report: Wilshire Community Plan Area,* prepared by Architectural Resources Group, Inc., January 2015.
[3] City of Los Angeles, "Historic Places LA," https://historicplacesla.lacity.org/report/91009367-62f2-404b-a1f7-e33b9719dfd6 , accessed November 2025.
[4] Historic Resources Group, "Phase 1: Historical Resource Assessment Report, 525 S. Virgil Avenue," September 11, 2019, https://cityclerk.lacity.org/onlinedocs/2020/20-1481_misc_9_11-12-2020.pdf, accessed November 2025.

The Project would demolish the existing four-story building on the Project Site and construct a new, eight story building in its place. The commercial office building on the Project Site is not a historical resource; therefore, its demolition would not result in a significant adverse impact to a historical resource. The Project would not demolish, destroy, relocate, or alter the two historical resources in the immediate vicinity of the Project Site. Further, both historical resources are separated from the Project Site to such an extent that there is no potential for damage due to construction activities on the Project Site. The Project would not materially alter the two historical resources in any manner, and all of the essential physical features of each historical resource would remain intact. Therefore, there would be no potential for significant adverse direct impacts to historical resources on the Project Site or in the vicinity of the Project Site as a result of the Project.

The Project would introduce an eight-story building of contemporary design on the Project Site, thereby altering the setting of the two historical resources in the immediate vicinity of the Project. However, the Project Site is located in an area that has experienced change over time, and the setting of the historical resources has already been altered. Although the Project would add height to the Project Site, the new construction would not materially impair the adjacent historical resources and would not alter the setting such that they would no longer convey their historic significance. Therefore, the Project would not result in significant adverse indirect impacts to historical resources in the vicinity of the Project Site.

A list of related projects for the Project was prepared based upon information provided by the Los Angeles Department of Transportation, Los Angeles Department of City Planning, recent case filings, and recent traffic studies (Related Projects). There are two Related Projects in the vicinity of the Project Site for which there are publicly available environmental documents: the Westmoreland Mixed Use project at 616 S. Westmoreland Avenue and the mixed use project at 550 S. Shatto Place. Neither Related Project identified potential direct or indirect impacts to historical resources on either project site or in the vicinity of either project site. Implementation of the Project, in combination with the two identified Related Projects, represents the continued redevelopment and revitalization of the surrounding area. Changes in the setting of the historical resources in the vicinity of the Project and the Related Projects would not materially impair either historical resource such that it would no longer convey its historic significance. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to historical resources would be less than significant.

The Project would not result in significant adverse direct, indirect, or cumulative impacts to historical resources on the Project Site or in the vicinity of the Project Site. Therefore, the Project would not result in a significant adverse impact on the environment as defined by CEQA.

2.0 PROJECT SUMMARY

Project Location

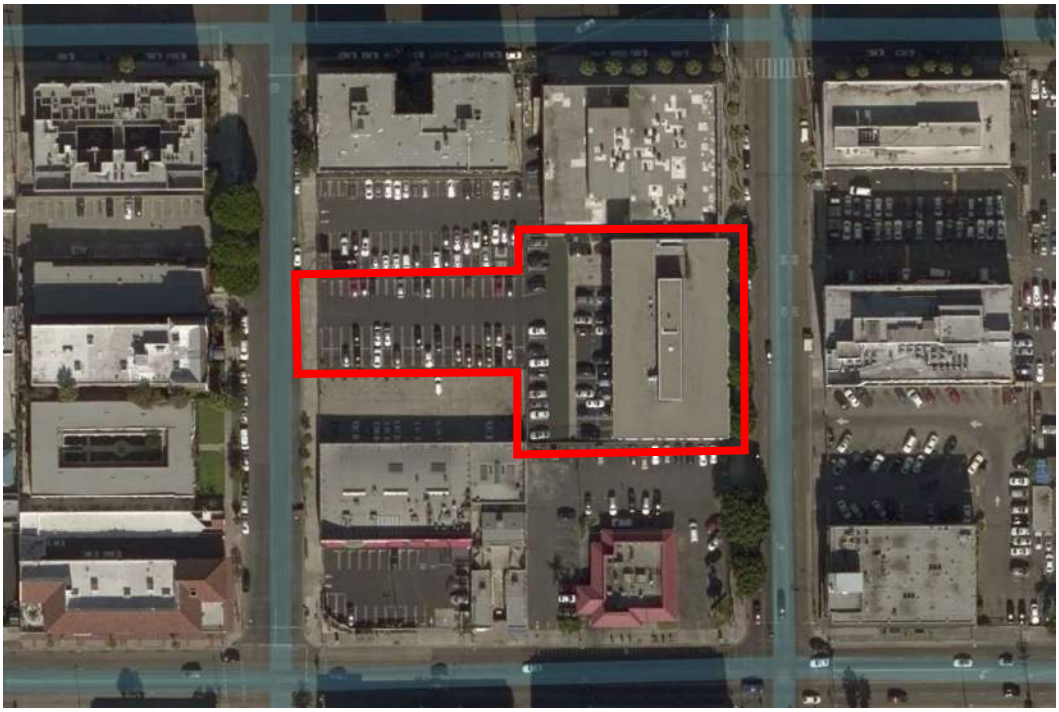
The 525 S. Virgil Avenue Project is located at 515-525 S. Virgil Avenue in the Koreatown neighborhood within the Wilshire CPA of the City of Los Angeles. The Project Site is comprised of one parcel (Assessor Parcel Number [APN] 5077-004-030) on an approximately 42,146 square foot (sf) (0.97 acre) lot. The Project Site is shown in the map in Figure 1.

Project Description

The Project proposes the demolition of the existing approximately 56,072 sf office building and associated surface parking lot and would develop an approximately 252,876 sf, eight-story self-storage facility. The Project would be approximately 90 feet, 11 inches tall and would provide self-storage of varying sizes. The ground floor of the Project would contain an office, lobby, restrooms, and long-term and short-term bicycle parking. The ground floor would also provide a street-level display window on Virgil Avenue, displaying products that the public are able to purchase on site, such as packing boxes. The remainder of the ground floor would consist of storage units. The ground floor would also include covered automobile parking spaces as well as landscaped areas. The second through eighth floors of the Project would contain self-storage units. The Project would have a floor area ratio (FAR) of approximately 6.0.

The Project proposes approximately 24 covered vehicle parking spaces provided at the ground-level parking lot and 50 bicycle parking spaces (25 long-term and 25 short-term spaces). The Project would be accessible from both S. Virgil Avenue and Westmoreland Avenue. Driveways on S. Virgil Avenue and Westmoreland Avenue would provide both ingress to and egress from the Project Site. The Project location map is in Figure 1. Project Plans are in Appendix A.

FIGURE 1. LOCATION MAP



Project Site outlined in red.

3.0 METHODOLOGY

This report assesses whether the Project has the potential to impact historical resources on the Project Site and in the Project Site vicinity. In order to identify historical resources that have the potential to be impacted by the Project, previous surveys and other evaluations were reviewed. The Project Site is located in the Koreatown neighborhood of the Wilshire CPA, which was surveyed by SurveyLA in 2015. In that survey, the commercial office building at 525 S. Virgil Avenue was identified as potentially eligible for designation at the federal, state, and local levels for its architectural merit. The survey evaluation was superseded by the findings of a subsequent analysis of the potential eligibility completed in 2019, which included additional research and comparative analysis, and found that the building did not meet the eligibility standards for designation under any relevant contexts and themes in the SurveyLA Historic Context Statement. Therefore, the building is not considered a historical resource for purposes of CEQA and it is not re-evaluated herein.

The Project vicinity spans both the Wilshire CPA, surveyed by SurveyLA, and the Wilshire Center/Koreatown Recovery Redevelopment Project Area (Wilshire Center/Koreatown CRA area), which was surveyed in 2009 on behalf of the Community Redevelopment Agency of Los Angeles (CRA/LA), a Designated Local Authority (the 2009 CRA Survey).[5] The review of the survey findings for both areas identified two historical resources in the vicinity of the Project Site that need to be considered as part of the review of the Project: the mixed use commercial building at 3101 W. 6th Street, and the multi-family residential building at 523 S. Westmoreland Avenue. Because both surveys represent historical resources surveys that meet the requirements of PRC Section 5024.1(g), the survey findings for properties in the vicinity of the Project Site are accepted, and no additional evaluation of potential historical resources is conducted as part of this report.

The identification of the physical features of the building on the Project Site, and the development history of the Wilshire CPA were informed by a review of previous studies, available building records, and on-site observation. Sources include:

- Building permits
- Sanborn Fire Insurance maps
- Historic newspaper articles
- Survey findings for the Wilshire Center/Koreatown CRA area (2009)
- SurveyLA survey findings and Survey Report for the Wilshire CPA (2015)
- Phase 1 Historical Resources Assessment Report for 525 S. Virgil Avenue (2019)
- California Built Environment Resources Directory

Research, field inspection, and analysis were performed by Christine Lazzaretto, Managing Principal, and John LoCascio, AIA, Principal Architect, both of whom meet the Secretary of the Interior's Professional Qualifications Standards in History and Architectural History. Resumes of the contributing authors are in Appendix B.

[5] City of Los Angeles, Community Redevelopment Agency, *Intensive Historic Resources Survey: Wilshire Center & Koreatown Redevelopment Area*, prepared by PCR Services Corporation. June 2009.

4.0 REGULATORY FRAMEWORK

Historical Resources Under CEQA

The California Environmental Quality Act (CEQA), codified in Public Resources Code (PRC) Section 21000 et seq., is the principal statute governing the environmental review of projects proposed in the state. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under PRC Section 21084.1, 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.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g);[6] and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

Historic Designations

Historical and cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, State, and local laws and other documents governing and influencing the preservation of historical resources of national, State, regional, and local significance include:

- The National Historic Preservation Act of 1966, as amended;
- The Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards);
- The California Environmental Quality Act (CEQA);
- The California Register of Historical Resources (California Register);
- The California Public Resources Code;
- The City of Los Angeles General Plan;
- The City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171);
- The City of Los Angeles Historic Preservation Overlay Zone Ordinance (Los Angeles Municipal Code [LAMC], Section 12.20.3); and
- The City of Los Angeles Historic Resources Survey (SurveyLA).

[6] Such resources shall be treated as significant unless the preponderance of the evidence demonstrates that they are not.

NATIONAL REGISTER OF HISTORIC PLACES

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment."[7] The National Register recognizes a broad range of historical and cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes.[8] Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.[9]

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.[10] A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district's significance and historic integrity determine its boundaries.[11]

A resource that is listed in or eligible for listing in the National Register is considered a "historic property" under Section 106 of the National Historic Preservation Act.

Criteria

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 CFR, Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

- **A.** Are associated with events that have made a significant contribution to the broad patterns of our history;
- **B.** Are associated with the lives of persons significant in our past;

[7] 36 Code of Federal Regulations (CFR) 60.2 https://www.ecfr.gov/cgi-bin/text-idx?SID=b36f494ab8c19284178b4c593eda2a8f&tpl=/ecfrbrowse/Title36/36cfr60_main_02.tpl (accessed September 2021).
[8] The identification of archaeological sites and traditional cultural properties is outside the scope of this report.
[9] United States Department of the Interior, National Park Service, "National Historic Landmarks: Frequently Asked Questions," https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm. (accessed September 2021).
[10] United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, (Washington D.C.: National Park Service, 1995), 5.
[11] United States Department of the Interior, National Register Bulletin #16: How to Complete the National Register Registration Form, 1997, Appendix IV: 2.

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. Have yielded, or may be likely to yield, information important in prehistory or history.[12]

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15, which provides guidance on evaluating properties for inclusion in the National Register, 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."[13]

Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as "the ability of a property to convey its significance."[14] According to National Register Bulletin #15, the National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.[15]

These seven aspects or qualities that comprise integrity are defined as follows:

- *Location* is the place where the historic property was constructed or the place where the historic event took place.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.[16]

[12] United States Department of the Interior, "National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation," 1997, 8. Criterion D typically applies to potential archaeological resources, which is outside the scope of this report.
[13] "National Register Bulletin #15," 7-8.
[14] "National Register Bulletin #15," 44.
[15] California Office of Historic Preservation, Technical Assistance Series #6: California Register and National Register, no date, 2.
[16] "National Register Bulletin 15," 44-45.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register of Historical Resources (California Register) is an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.[17] The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.[18] Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal 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, region 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 to the prehistory or history of the local area, California or the nation.[19]

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.[20]

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:[21]

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

[17] California Public Resources Code, Section 5024.1[a]. http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=5024.1 (accessed September 2021).
[18] California Public Resources Code, Section 5024.1[b] http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=5024.1 (accessed September 2021).
[19] Criterion 4 addresses potential archaeological resources, which is outside the scope of this report.
[20] California Office of Historic Preservation, Technical Assistance Series #6: California Register and National Register, no date, 2.
[21] California Office of Historic Preservation, "National Register of Historic Places," https://ohp.parks.ca.gov/?page_id=21237 (accessed January 2024).

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

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.

CITY OF LOS ANGELES HISTORIC-CULTURAL MONUMENTS (HCMS)

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating a Historic-Cultural Monument (HCM). The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The City of Los Angeles Cultural Heritage Ordinance states that an HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet 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;
2. The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history; or
3. The proposed HCM embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.[22]

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety "shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Check List, as specified in

[22] City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

Section 19.05 of the LAMC. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure."[23]

[23] City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.

5.0 PROJECT SITE: SUMMARY OF PREVIOUS EVALUATIONS

SurveyLA

SurveyLA is the City of Los Angeles' citywide survey that identifies and documents potentially significant historical resources that represent important themes in the City's history.[24] The survey and resource evaluations were completed by consultant teams under contract to the City and under the supervision of the Department of City Planning's Office of Historic Resources (OHR). The program was managed by OHR, which maintains a website for SurveyLA. The field surveys cumulatively covered broad periods of significance, from approximately 1850 to 1980 depending on the location, and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources are planned to be included in future survey phases). The survey identified a wide variety of potentially significant resources that reflect important themes in the City's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010-2017, were completed in three phases by Community Plan area. However, SurveyLA did not survey areas already designated as HPOZs or areas already surveyed by Community Redevelopment Agencies. All tools, methods, and criteria developed for SurveyLA were created to meet state and federal professional standards for survey work.

525 S. Virgil Avenue is located in the Wilshire CPA, which was surveyed by SurveyLA between December 2013 and January 2015.[25] The commercial building on the Project Site was identified as potentially eligible for listing in the National Register, the California Register, and as a local Historic-Cultural Monument. It was identified as significant under the context "Architecture and Engineering, 1850-1980," and the theme "Post-War Modernism, 1946-1976," as an "excellent example of New Formalist commercial architecture in the Wilshire area; work of noted Los Angeles architectural firm Langdon and Wilson."[26]

Environmental Review

As part of environmental review for a previous project at 525 S. Virgil Avenue, the property was re-evaluated for potential historic significance in 2019.[27] The 2019 study included additional research on the development history of the property, including owners and occupants, research and analysis of the work of the architectural firm Langdon and Wilson, and comparative analysis of other examples of New Formalist architecture in Los Angeles. The 2019 report found that 525 S. Virgil Avenue does not appear eligible under any relevant contexts and themes in the SurveyLA Historic Context Statement (HCS):

[24] City of Los Angeles, "Historic Resources Surveys – SurveyLA," https://planning.lacity.gov/preservation-design/historic-resources-survey, accessed November 2025.
[25] City of Los Angeles, Department of City Planning, Office of Historic Resources, *Historic Resources Survey Report: Wilshire Community Plan Area,* prepared by Architectural Resources Group, Inc., January 2015.
[26] City of Los Angeles, "Historic Places LA," https://historicplacesla.lacity.org/report/91009367-62f2-404b-a1f7-e33b9719dfd6 , accessed November 2025.
[27] Historic Resources Group, "Phase 1: Historical Resource Assessment Report, 525 S. Virgil Avenue," September 11, 2019, https://cityclerk.lacity.org/onlinedocs/2020/20-1481_misc_9_11-12-2020.pdf, accessed November 2025.

CRITERION A/1/1 (ASSOCIATION WITH EVENTS OR PATTERNS OF DEVELOPMENT)

525 S. Virgil Avenue was not identified as significant under a commercial development theme by SurveyLA. The Wilshire CPA survey report does not identify a significant trend or pattern of development from this period, other than describing the general commercial growth that occurred in Los Angeles after the war.

The commercial building at 525 S. Virgil Avenue was constructed during a period of widespread redevelopment in the Wilshire CPA and corresponds generally to the area's growth in the 1960s and 1970s. The major thoroughfare in the Wilshire CPA is Wilshire Boulevard. South Virgil Avenue was primarily a residential street until the postwar period. Between 1950 and 1990, single-family residences along South Virgil Avenue were demolished and replaced by large commercial buildings, multi-family residences, and surface parking lots. This process began at the southern terminus of Virgil Avenue, where it intersects with Wilshire Boulevard, as commercial activity spilled over from the main thoroughfare, transforming Virgil Avenue from a residential street to a commercial tributary of busy Wilshire Boulevard.[28]

As an individual example of commercial development in the Wilshire CPA from the mid-1960s, 525 S. Virgil Avenue on its own does not have an important association with the development patterns in the area, but rather was part of the general commercialization of South Virgil Avenue, which occurred during a period of intense redevelopment that characterized the neighborhood. 525 S. Virgil Avenue reflects trends in commercial development from the postwar period; however, it does not represent an important association with these development patterns. Properties that are significant for representing a pattern of development are more typically eligible for designation as part of a historic district; however, there is no identified or potential historic district that includes 525 S. Virgil Avenue as a contributor.

525 S. Virgil Avenue did not have an important impact on local, state, or national history, and therefore does not meet the established eligibility standards for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument under Criterion A/1/1.

CRITERION B/2/2 (ASSOCIATION WITH AN IMPORTANT PERSON)

The SurveyLA HCS includes a "Commercial Merchants, Leaders, and Builders" theme for evaluating properties that may be significant for their association with persons who are proven to have made important contributions to commercial growth and development in Los Angeles.

525 S. Virgil Avenue was originally owned by Stuart M. Ketchum, Jr., a prominent figure in real estate development in Southern California during the post-World War II period. Ketchum served as managing partner of the construction and development

[28] Information about the transformation of South Virgil Avenue derived from the Sanborn Fire Insurance maps of the area from 1921 and 1950, and historic aerial photographs of the area from 1948 to 2014.

firm George W. Carter Company (later Carter Company Contractors & Developers) from 1953 to 1963, as the firm developed major commercial, institutional, and industrial properties throughout Southern California, but primarily in the Wilshire CPA. In 1964, Ketchum left the Carter Company to begin his own development business.

Though this property is associated with Ketchum's productive life, Ketchum rose to prominence when he became a managing partner at Carter Company, which precedes his time as an independent developer and predates the construction of 525 S. Virgil Avenue. The commercial building at 525 S. Virgil was not Ketchum's first project as a developer, it was not among his most prominent projects, and it was not the building where he maintained his office.[29] It is not the property that best represents Ketchum's historic contributions.

Therefore, 525 S. Virgil Avenue is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument under Criterion B/2/2.

CRITERION C/3/3 (ARCHITECTURAL MERIT OR WORK OF A MASTER ARCHITECT)

525 S. Virgil Avenue was documented by SurveyLA as an excellent example of New Formalist commercial architecture. Character-defining features of New Formalist architecture include symmetrical composition and monumental appearance; flat rooflines with heavy overhanging cornices; attenuated classical elements including colonnades, plazas and elevated podiums used as compositional devices; repeating arches and rounded openings; and large screens of perforated concrete block, concrete, or metal. 525 S. Virgil Avenue exhibits only the most basic elements associated with New Formalist architecture: it is symmetrically composed; it is vertically articulated with exposed columns; and it has a flat roofline with pronounced overhanging beams and soffit. However, these features are not exclusive to New Formalist architecture; they do not overtly reference classical compositions and are minimally articulated; the columns are incorporated into the curtain wall and do not form a true colonnade; and the overhanging beams and soffit do not form a true cornice. The building does not embody any of the other character-defining features of New Formalist design. Therefore, it does not represent an excellent example of New Formalist commercial architecture.

Several examples of New Formalist commercial architecture were identified in SurveyLA, including 4835 W. Venice Boulevard (1965, Paul R. Williams), 312 N. Fairfax Ave. (Equitable Savings and Loan; 1966, Dan Saxon Palmer), and 116 N. Robertson Boulevard (1966, William L. Pereira). Still more prominent examples of the style in Southern California include the Dorothy Chandler Pavilion in Los Angeles (1964, Welton Becket); the Forum in Inglewood (1967, Charles Luckman, listed in the National Register); the Beckman Auditorium on the campus of the California Institute

[29] Ketchum's office was at 3130 Wilshire Boulevard, designed by Langdon & Wilson in 1967.

of Technology in Pasadena (1964, Edward Durell Stone); and the Von KleinSmid Center (1966, Edward Durell Stone), Waite Phillips Hall (1968, Edward Durell Stone), and the Social Sciences Building (1968, Edward Durell Stone) all on the campus of the University of Southern California, and all of which are designated as City of Los Angeles Historic-Cultural Monuments and listed in the National Register.

A table identifying New Formalist commercial properties in Southern California that are designated or have been identified as eligible for listing at the national, state, or local levels can be found in Appendix E [of the 2018 report]. These properties represent excellent examples of New Formalist architecture and are appropriately identified as eligible for designation based on their architectural merit. 525 S. Virgil Avenue does not display the quality of design and distinctive details necessary to be considered equal to the others in this collection of New Formalist architecture in Southern California.

Because the design of 525 S. Virgil does not include the overt classicism of true New Formalist buildings, it may be more appropriately classified as Late Modern in style. Character-defining features of Late Modern architecture include bold geometric volumes; large expanses of unrelieved wall surfaces; uniform use of cladding; exaggerated expression of structure; hooded or deeply set windows; and little or no applied ornament. The design of 525 S. Virgil Avenue includes large expanses of unrelieved wall surfaces, exaggerated expression of structure, and no applied ornament. However, these features are not distinctive in their design and composition, and are similar to those found on multitudes of other simple Late Modern commercial buildings constructed in Los Angeles in the 1960s and 1970s. 525 S. Virgil Avenue does not possess sufficient distinctive characteristics to fully articulate the concepts or express the aesthetic ideals of Late Modern design, or to set it apart from many other similar commercial buildings of the era.

SurveyLA also noted that 525 S. Virgil Avenue is eligible as the work of noted local architects Langdon & Wilson. According to guidance from the National Park Service, a master is a “figure of generally recognized greatness in the field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality.” In addition, “the property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft.” Not every building is eligible as the work of a master just because it was designed by a prominent architect.[30]

The firm was notable primarily for the prolific quantity of its commissions, especially along Wilshire Boulevard, rather than the overall quality of design of its catalog of works. Langdon & Wilson is not known as an innovative firm, and there is no evidence that they broke new ground or set design precedents; rather, it was a journeyman firm that was adept at applying popular architectural trends to accommodate clients’ needs in a large number and wide variety of projects.

[30] National Park Service guidance on works of a master summarized from National Register Bulletin 15.

Langdon & Wilson designed numerous commercial/office buildings during this period, and 525 S. Virgil is not one of the most distinctive buildings designed by the firm, nor does it exhibit the higher caliber of design embodied in the best examples of their work. Alone or in partnership with other architects, they were responsible for the design of 28 buildings along Wilshire Boulevard, as well as several commercial buildings in the Wilshire District on other commercial streets.

Among their more prominent commissions are the Home Savings and Loan Bank in Pomona (1962, with Millard Sheets; now Chase Bank), TWA Tower (1965; now 1545 Wilshire Boulevard Office Building), Glendale Federal Savings Building in Beverly Hills (1968; now Bank of America), and CNA Park Place Building (1972; now Los Angeles Superior Court). These buildings exhibit distinctive design, unique details, and an innovative use of building materials, distinguishing them from other, unexceptional examples of the firm's work. A table identifying additional examples of the firm's work is included in Appendix F [in the 2018 report].

525 S. Virgil Avenue is not an excellent example of New Formalist architecture; it may be more appropriately classified as Late Modernism. As noted above, it does not represent significant character-defining features of New Formalism, including the overt Classical references that are intrinsic to the style. It does not meet the eligibility standards for Late Modernism as defined by SurveyLA: it does not exhibit quality of design through distinctive features, and it is not an excellent example of the style. Further, although Langdon & Wilson were a prolific firm that designed numerous commercial buildings in Los Angeles after World War II, there is not sufficient scholarly evidence that they were master architects. 525 S. Virgil Avenue is not an excellent or unique example of their work that is distinguishable from other examples from the same period. Therefore, 525 S. Virgil is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument for its architectural merit under Criterion C/3/3.[31]

CONCLUSION

Based on the additional analysis conducted in the 2019 report, the City found that 525 S. Virgil Avenue is not eligible for historic designation at the federal, state, or local levels, and therefore it is not considered a historical resource for purposes of CEQA.[32]

Built Environment Resources Directory (BERD)

The California Office of Historic Preservation (OHP) maintains the Built Environment Resource Directory (BERD), a database of previously evaluated resources throughout the state. The BERD contains information only for cultural resources that have been processed through OHP. This includes resources reviewed for eligibility for the National Register of Historic Places and the

[31] Historic Resources Group, "Phase 1: Historical Resource Assessment Report, 525 S. Virgil Avenue," 28-32.
[32] City of Los Angeles, Office of Historic Resources, Correspondence concurring with the findings in the report, November 11, 2019. In 2021, the City Council determined that the previous project proposed for the site was statutorily exempt from CEQA. City of Los Angeles, "Director's Determination, Transit Oriented Communities Affordable Housing Incentive Program, DIR-2020-3627-TOC-SPR," February 26, 2021.

California Historical Landmarks programs through federal and state environmental compliance laws, and resources nominated under federal and state registration programs. 525 S. Virgil Avenue is not listed in the BERD.[33]

[33] California Office of Historic Preservation, "Built Environment Resource Directory: Los Angeles County," 2025.

6.0 HISTORY OF THE SURROUNDING AREA

The commercial building at 525 S. Virgil Avenue was constructed in 1965. It is located in the Koreatown neighborhood of the Wilshire CPA (known historically as the Wilshire District). The neighborhood is roughly bounded by Beverly Boulevard on the north, Wilton Place and Crenshaw Boulevard on the west, Olympic Boulevard on the south, and Virgil and Westmoreland Avenues on the east.

In 1887, Henry Gaylord Wilshire, an entrepreneur from Ohio, purchased 35 acres west of present-day MacArthur Park in partnership with his brother, William. They subdivided the land in 1895, envisioning a luxurious subdivision anchored by a wide, graveled avenue (present-day Wilshire Boulevard) that would connect present-day MacArthur and Lafayette Parks, and arranged a deal to build an intersecting boulevard (present-day Lafayette Park Place) if the City donated the land. These streets became the heart of a subdivision with generous lots, palm trees, and views of MacArthur Park and downtown Los Angeles.[34]

The Wilshire neighborhood developed steadily throughout the 1910s and 1920s, with large apartment buildings, resort hotels, and commercial buildings rising throughout the district. In the late 1920s, twenty-five blocks of Wilshire from MacArthur Park to Western Avenue were rezoned for commercial use, spurring a new era of rapid development in the eastern part of the Wilshire district. The neighborhood's commercial identity soon became one of affluence, newness, and convenience, in contrast to the older and more established downtown commercial district. The most potent symbol of the Wilshire district's glamour was the 1929 Bullock's Wilshire department store, one of the first businesses in Los Angeles designed to cater to customers arriving by car.

Large parking lots, service stations, automobile dealerships, drive-up markets, and drive-up coffee shops soon sprang up throughout the district. The neighborhood became known as Los Angeles' playground: recreational facilities were established throughout the district, and local dining and dancing institutions like the Brown Derby lured people to the Wilshire neighborhood.

The Wilshire district saw little commercial development during World War II. In the postwar years, however, Wilshire Boulevard's luxurious department stores, clubs, and restaurants were joined by office buildings housing high-profile corporations, earning Wilshire a new reputation as a business center. The 1957 lifting of the city's 150-foot height limit restriction led to towering skyscrapers, bringing a fundamental change to the built environment in the area. The postwar period saw a shift in the area's architectural identity, with many commercial and institutional buildings exhibiting sleek Modern styles rather than the more extravagant styles of previous decades.

The Wilshire District's reputation as a world-class business center continued through the 1970s, with the construction of dozens of new high-rise corporate buildings. However, this trend began to wane in the 1980s as corporations departed the area in favor of the cheaper and less congested

[34] In 1897, Wilshire Boulevard was extended to meet Vermont Avenue as it became Los Angeles' new western boundary; the road angled away from its original alignment with the downtown street grid to instead orient toward the cardinal directions. The final gap in the thoroughfare was eliminated in 1934, when Wilshire was pushed through MacArthur Park.

San Fernando Valley and Westside of Los Angeles. However, a portion of the Wilshire CPA became known as Koreatown between 1970 and 1985, when Korean Americans and Latino Americans purchased and reused existing commercial buildings in the area around Olympic Boulevard and 8th Street. This influx of Korean commercial enterprise in the area transformed it into the center of a vibrant Korean American community.[35] Present-day Koreatown is roughly bounded by Beverly Boulevard on the north, Wilton Place and Crenshaw Boulevard on the west, Olympic Boulevard on the south, and Virgil and Westmoreland Avenues on the east.

[35] Architectural Resources Group, Inc., *SurveyLA: Historic Resources Survey Report*, 6.

7.0 DESCRIPTION OF THE PROJECT SITE

Current Setting

525 S. Virgil Avenue is located in the Koreatown neighborhood of the Wilshire CPA, on the west side of Virgil Avenue, mid-block between W. 5th and W. 6th Streets. The building occupies the eastern portion of the parcel with narrow setbacks on the north, east, and south. The western portion of the parcel is occupied by a small surface parking lot at the rear of the building. The parcel is flanked to the north by a three-story commercial building; to the south by a fast-food restaurant; and to the west by a surface parking lot. The surrounding area does not have a unified architectural character. There are commercial buildings from multiple periods of development in a range of styles, from single- to multi-stories in height.

Architectural Description



525 S. Virgil Avenue, primary façade, view looking northwest. Historic Resources Group, 2025.

525 S. Virgil Avenue was designed by the architectural firm Langdon & Wilson and constructed in 1965. It is Late Modern in style and four stories in height, with a rectangular plan, simple massing, and symmetrical composition on all four façades. It has a flat roof with wide, overhanging soffits and a central mechanical penthouse. The structural system is expressed on the exterior by exposed columns and beams. The exterior wall panels are veneered in stone tile. Fenestration consists of metal-framed, vertical strip windows flanking each expressed column. The windows and wall panels on the east and west façades are recessed between the flanking columns. The primary entrance consists of a pair of frameless glass doors, offset within a symmetrical recess on the east façade. The entrance recess is paneled in slabs of black granite and is accessed by a flight of wide terrazzo steps with metal pipe handrails.

ALTERATIONS

The primary entrance doors have been replaced and metal pipe handrails have been added to the entrance steps,[36] but the building exterior otherwise appears to have undergone almost no alterations since its initial construction in 1965. The majority of the building permits are for interior alterations and improvements.

EXISTING CONDITION PHOTOGRAPHS: PROJECT SITE & SURROUNDING CONTEXT

Historic Resources Group, November 2025



View of the primary façade, facing west.

[36] No building permits were found for these alterations.



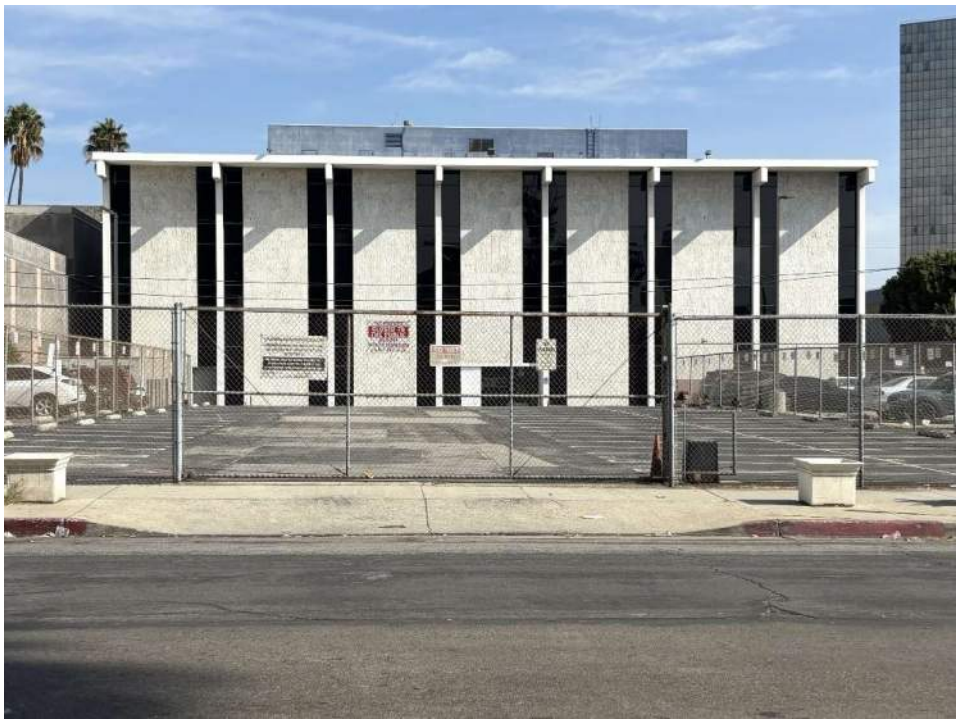
View of the primary façade, facing southwest.



Secondary (south) façade, facing north.



Secondary (south) and rear (west) façades, facing northeast.



Rear (west) façade, facing east.



Rear (west) façade, facing southeast.



Context view along S. Virgil Avenue, looking south.



Context view from the intersection of 6th Street and S. Virgil Avenue, looking northwest.



Context view from the intersection of 5th Street and Westmoreland Avenue, looking south.



Context view from the intersection of 6th Street and Westmoreland Avenue, looking north.



Context view from the intersection of 6th Street and Commonwealth Avenue, looking west.



Context view from the intersection of 6th Street and Westmoreland Avenue, looking east.

8.0 SITE HISTORY

525 S. Virgil Avenue was designed by the architectural firm Langdon & Wilson in the Late Modern architectural style and constructed in 1965.[37] It was constructed by real estate developer Stuart M. Ketchum, Jr. as a commercial office building. The building housed a variety of tenants from the mid-1960s to 1981, when the California Association of Realtors became the sole tenant.

RELATED ARCHITECTS/BUILDERS

Langdon & Wilson

The architectural firm Langdon & Wilson was founded in 1951 by Robert E. Langdon, Jr., AIA (1918-2004) and Ernest C. Wilson, Jr., AIA (1924-1992). The founding partners met at the University of Southern California School of Architecture, where Langdon was working on campus expansion projects following World War II, and Wilson, a Navy veteran, was completing his architecture degree.[38] The two began to collaborate on projects in 1949. Between 1953 and 1961, Langdon and Wilson worked for Claud Beelman & Associates to gain experience designing major office structures, after which they resumed their own practice.[39] By the mid-1960s, Langdon & Wilson primarily focused on commercial projects for corporate clients. Wilson viewed each project as a unique opportunity and made it a priority to befriend his clients.[40]

The firm followed popular trends and regularly employed the stylistic tenets of New Formalism, Late Modernism, and Postmodernism in their commercial designs. Alone or in partnership with other architects, by the 1990s, Langdon & Wilson was responsible for the design of 28 high-rise office buildings along Wilshire Boulevard.[41] Langdon & Wilson is credited with designing more office towers in Orange County than any other architectural firm and has planned communities and designed buildings throughout the United States, Canada, China, Korea, Taiwan, Spain, and Mexico.[42] The Home Savings and Loan Bank at 100 E. 2nd Street in Pomona, designed in association with artist and building designer Millard Sheets in 1962, is an early example of the firm's work after leaving Beelman's office.[43] The building was designed to be the focal point in the city's urban renewal mall project.[44] In 1968, Langdon & Wilson designed the Glendale Federal Savings Building (now Bank of America), which was the first high-rise building on Wilshire Boulevard in Beverly Hills. The building is New Formalist in style and features angular concrete columns and alternating horizontal registers of reflective glass. It has a cantilevered *dalle de verre* ("slab of glass") cornice, expressed as a concrete grid of rainbow patterned glass.[45] Other works include the CNA Park Place Building (now Los Angeles Superior Court), designed in 1972, which was the first major use of double-glazed "Solarban Twindow" reflective glass in Los Angeles, and

[37] Information in this section excerpted from Historic Resources Group, "Phase 1: Historical Resource Technical Report, 525 S. Virgil Avenue," 19-23.
[38] Myrna Oliver, "Robert Langdon Jr., 86; Designed 1st Getty Museum," *Los Angeles Times*, August 25, 2004.
[39] Oliver, "Robert Langdon Jr., 86."
[40] Iris Yokoi, "Famed Architect Ernest Clifford Wilson Jr. Dies: Death: He designed Nixon, Getty museums and is credited with changing the development face of Orange County," *Los Angeles Times*, August 20, 1992.
[41] Yokoi, "Famed Architect Ernest Clifford Wilson Jr. Dies."
[42] Yokoi, "Famed Architect Ernest Clifford Wilson Jr. Dies."
[43] "Savings Firm Sets Office in Pomona," *Los Angeles Times*, February 11, 1962.
[44] "Savings Firm Sets Office in Pomona," *Los Angeles Times*, February 11, 1962. Sheets designed mosaics and murals for both the interior and exterior of the building.
[45] Los Angeles Conservancy, "Bank of America, Beverly Hills," https://www.laconservancy.org/locations/bank-america-beverly-hills, accessed August 2018.

potentially the first all-reflective glass building in the United States.[46] In 1974, J. Paul Getty commissioned Langdon & Wilson to design the Getty Villa, a reimagining of the *Villa dei Papiri* in Herculaneum, a Roman villa buried by the eruption of Mount Vesuvius in 79 BCE.[47]

With offices in Los Angeles and Newport Beach, the firm changed its name to Langdon, Wilson & Mumper when Hans Mumper joined as a partner in 1970. It was subsequently re-named Langdon Wilson Architects.[48] Wilson died in 1992 at the age of 68; Langdon died in 2004 at the age of 86. Today, Langdon & Wilson operates under the name Langdon Wilson International.[49]

RELATED ARCHITECTURAL STYLES

Late Modernism

Although 525 S. Virgil Avenue was identified in SurveyLA as New Formalist, it also reflects characteristics of Late Modern architecture and may be more appropriately categorized as Late Modern in style. The term "Late Modern" describes the evolution of Modern architecture from the mid-1950s through the 1970s. It is typically applied to commercial and institutional buildings. Unlike the straightforward, functionalist simplicity of International Style and Mid-century Modernism, Late Modern buildings exhibit a more deliberate sculptural quality with bold geometric volumes, uniform surfaces such as glass skin or concrete, and a sometimes-exaggerated expression of structure and systems. Significant architects who produced works in the style include Marcel Breuer, Philip Johnson, Cesar Pelli, Piano and Rogers, and John Portman.

Character-defining features of Late Modernism include: bold geometric volumes; large expanses of unrelieved wall surfaces; uniform use of cladding materials including glass, concrete, or masonry veneer; exaggerated expression of structure and systems; hooded or deeply set windows; and little or no applied ornament.

New Formalism

New Formalism is a sub-type of Late Modern architecture that developed in the mid-1950s as a reaction to the International Style's strict vocabulary and total rejection of historical precedent. New Formalist buildings are monumental in appearance, and reference and abstract classical forms such as full-height columns, projecting cornices, and arcades. Traditional materials such as travertine, marble, or granite were used, but in a panelized, non-traditional form. In Southern California, the style was applied mainly to public and institutional buildings. On a larger urban design scale, grand axes and symmetry were used to achieve a modern monumentality. Primary in developing New Formalism were three architects: Edward Durrell Stone, who melded his Beaux Arts training with the stark Modernism of his early work; Philip Johnson; and Minoru Yamasaki. All three had earlier achieved prominence working within the International Style and other Modernist idioms.

Character-defining features of New Formalism include: symmetrical plan and monumental appearance; flat rooflines with heavy overhanging cornices; attenuated classical elements including colonnades, arcades, plazas and elevated podiums used as compositional devices;

[46] Terence M. Green, "Mirrors Sheathe CAN Park Place Building," *Los Angeles Times*, August 20, 1971; Yokoi, "Famed Architect Ernest Clifford Wilson Jr. Dies."
[47] Los Angeles Conservancy, "Getty Villa," https://www.laconservancy.org/locations/getty-villa (accessed August 2018).
[48] Oliver, "Robert Langdon Jr., 86."
[49] Langdon Wilson International, http://www.langdonwilson.com/ (accessed August 2018).

repeating arches and rounded openings; and large screens of perforated concrete block, concrete, or metal

OWNERSHIP/OCCUPANT SUMMARY

The commercial office building at 525 S. Virgil Avenue was constructed by real estate developer Stuart M. Ketchum, Jr., who owned the building from 1965 to c. 1980. It was occupied by a variety of tenants from the 1960s through the 1980s, including multiple insurance and financial companies. In 1981, the California Association of Realtors took up sole tenancy in the building.

Stuart M. Ketchum

Real estate developer and philanthropist Stuart M. Ketchum, Jr. (b.1926) attended the University of Southern California, graduating with a degree in finance and engineering. He entered the development and construction industry in 1946, and was a member, director, or committee head in the Associated General Contractors of America, California Real Estate Association, Los Angeles Realty Board, Wilshire Chamber of Commerce, Hancock Park Home Owners Association, and Los Angeles Chamber of Commerce.[50]

Alongside Millard Jacobs, Ketchum served as managing partner of the construction and development firm George W. Carter Company (later Carter Company Contractors & Developers) from 1953 to 1963.[51] Ketchum and Jacobs led the firm as it developed major commercial, institutional, and industrial properties throughout Southern California. During his time at the Carter Company, Ketchum was associated with the development of over 25 major office buildings in the Wilshire District (now the Wilshire Community Plan Area), primarily situated along the Wilshire corridor.[52] While at the Carter Company, Ketchum developed projects in association with various Southern California architects, including several projects with Langdon & Wilson.[53]

In 1964, Ketchum left the Carter Company to begin his own development business, establishing offices at 2600 Wilshire Boulevard.[54] Projects include 525 S. Virgil Avenue (1965, Langdon & Wilson), 3130 Wilshire Boulevard (1967, Langdon & Wilson), and the Bonaventure Hotel (1976, John C. Portman, Jr.).[55]

[50] "Ketchum Opens New Offices," *Los Angeles Times*, June 28, 1964.
[51] "Large Addition Begun for Express Agency," *Los Angeles Times*, July 25, 1954; "Wilshire Chamber Honors Building, Development Firm," *Los Angeles Times*, May 17, 1959.
[52] "Ketchum Opens New Offices."
[53] "Another Major Project Slated for Wilshire," *Los Angeles Times,* May 20, 1956.
[54] "Ketchum Opens New Offices."
[55] "L.A. Chamber Honors Developer, Lawyer," *Los Angeles Times*, June 3, 1990.

9.0 IDENTIFICATION OF HISTORICAL RESOURCES

Historical Resources on the Project Site

The four-story commercial office building on the Project Site at 525 S. Virgil Avenue was identified as potentially eligible for designation at the federal, state, and local levels for its architectural merit by SurveyLA. However, based on subsequent analysis conducted in 2019 for a previous project on the site, the City found that 525 S. Virgil Avenue does not meet eligibility criteria for historic designation. Therefore, the commercial office building at 525 S. Virgil Avenue is not considered a historical resource as defined by CEQA.

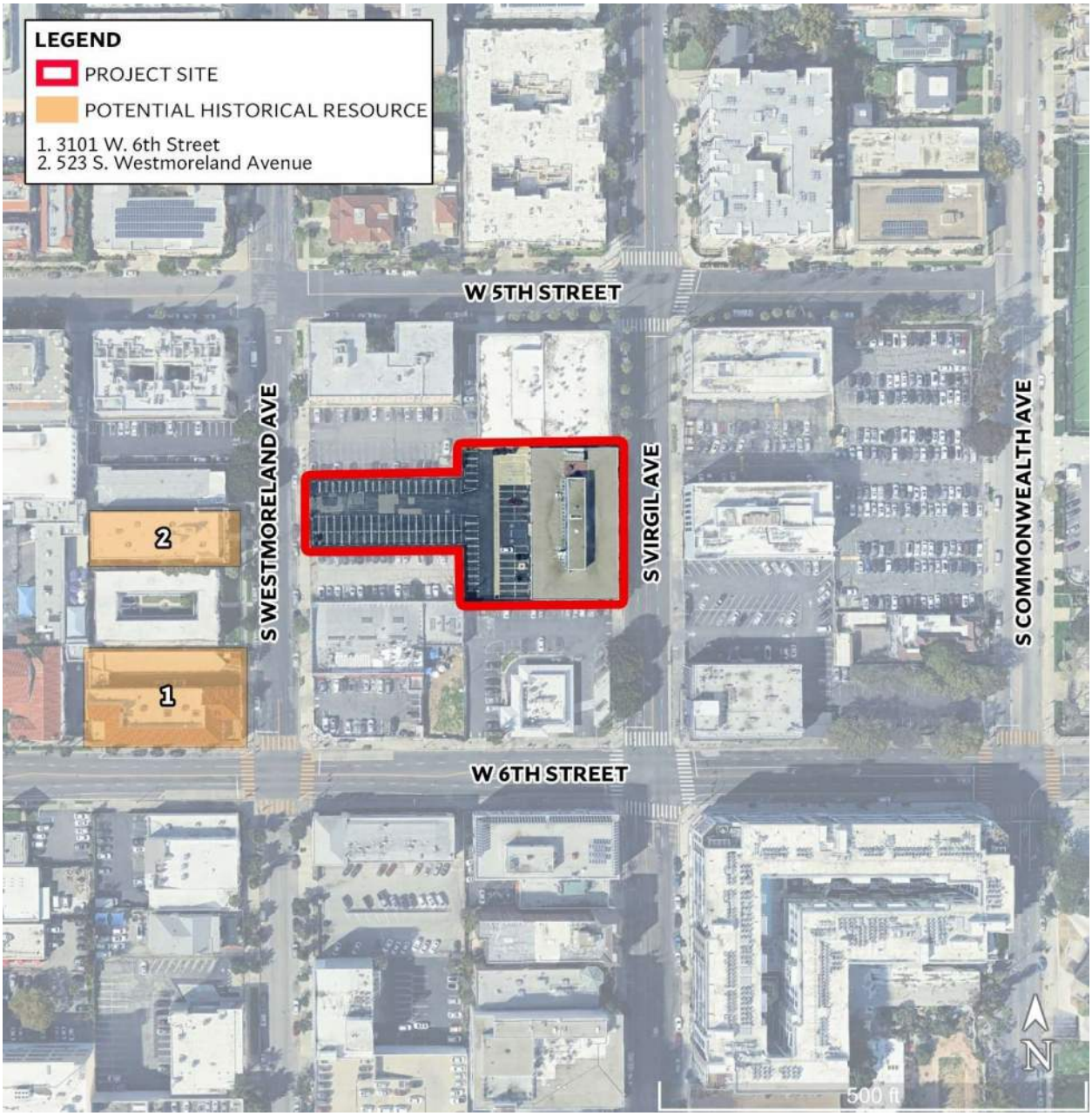
Historical Resources in the Project Site Vicinity

The Project Site is located in the Koreatown neighborhood of the Wilshire CPA, which was surveyed by SurveyLA in 2015. The area to the south of the Project Site, bounded by the south side of West 6th Street, is located in the former Wilshire Center/Koreatown CRA area, which was surveyed in 2009 on behalf of the CRA/LA.[56] Therefore, survey findings from both SurveyLA and the 2009 CRA Survey were reviewed to identify historical resources in the immediate vicinity of the Project Site that have a reasonable potential to be impacted by the Project, either directly as a result of construction activities, or indirectly due to changes in the setting. In general, historical resources that are located directly adjacent to a project site are more likely to be adversely impacted by a project, specifically by altering their immediate settings, or by construction activities that have the potential to de-stabilize them. Historical resources that are physically separated from a project site by other buildings or streets, or by additional distance, are less likely to be adversely impacted by a project due to this spatial separation.

Based on a review of the previous survey findings, two historical resources in the vicinity of the Project Site were identified that may be impacted by the Project: the mixed use commercial building at 3101 W. 6th Street, which is located approximately 140 feet southwest of the Project Site across Westmoreland Avenue, and the multi-family residential building at 523 S. Westmoreland Avenue, which is located approximately 80 feet west of the Project Site across Westmoreland Avenue. Both properties were identified as potentially eligible by SurveyLA. There were no historical resources identified in the 2009 CRA Survey that have the potential to be impacted by the Project. Because both SurveyLA and the Wilshire Center/Koreatown CRA Survey represent historic resources surveys that meet the requirements of PRC Section 5024.1(g), properties in the vicinity of the Project Site are not re-evaluated herein, and the two properties identified as potentially eligible by SurveyLA are considered historical resources as defined by CEQA for the purposes of this report. The two historical resources in the vicinity of the Project Site are shown in the map in Figure 2 and described below.

[56] City of Los Angeles, Community Redevelopment Agency, *Intensive Historic Resources Survey: Wilshire Center & Koreatown Redevelopment Area*, prepared by PCR Services Corporation. June 2009.

FIGURE 2: HISTORICAL RESOURCES IN THE VICINITY OF THE PROJECT SITE



3101 W. 6TH STREET (MAP #1)



3101 W. 6th Street, looking northwest. Historic Resources Group, 2025.

The mixed use commercial building at 3101 W. 6th Street is located at the northwest corner of 6th Street and Westmoreland Avenue. It is two stories in height and was constructed in 1924. It was identified as potentially eligible for listing at the state and local levels by SurveyLA as a "Rare intact example of early commercial development located along a former streetcar line in the Wilshire area; most examples from this period do not retain sufficient integrity. Due to alterations, including window replacement and limited window infill, the resource does not retain sufficient integrity for listing in the National Register."[57]

SAN MAR MANOR, 523 S. WESTMORELAND AVENUE (MAP #2)



523 S. Westmoreland Avenue, looking west. Historic Resources Group, 2025.

The multi-family residential building known as San Mar Manor at 523 S. Westmoreland Avenue is located on the west side of Westmoreland Avenue, mid-block between 5th and 6th Streets. It is four stories in height and was constructed in 1925. It was identified as potentially eligible for listing at the federal, state, and local levels by SurveyLA as an "Excellent example of a 1920s brick apartment house in the Wilshire area, exhibiting the essential characteristics of the type."[58]

[57] City of Los Angeles, "Historic Places LA: 3101 W. 6th Street," https://historicplacesla.lacity.org/report/458e8a49-90ce-4a4b-a6fa-0b9159656843, accessed November 2025.
[58] City of Los Angeles, "Historic Places LA: 3101 W. 6th Street," https://historicplacesla.lacity.org/report/37598b12-3c75-461d-aff3-4cc7a8d52e0f, accessed November 2025.

10.0 ANALYSIS OF POTENTIAL IMPACTS

Significance Threshold

A project would result in a potentially significant effect under CEQA if the project would result in a substantial adverse change in the significance of a "historical resource," as defined in CEQA Guidelines Section 15064.5(a). "Substantial adverse change" is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired."[59] According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

According to CEQA Guidelines Section 15064(d)(1-3), in evaluating the significance of the potential environmental effect of a project, both direct physical changes and reasonably foreseeable indirect physical changes shall be considered:

1. A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project.
2. An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment.
3. An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable.[60]

As applied to the evaluation of potential impacts to historical resources, direct impacts are those that occur during construction and would include the demolition, material alteration, relocation, or conversion of a historical resource and/or its important character-defining features. Direct impacts may also involve potential damage related to adjacent underground excavation and general construction activities that could undermine the stability of a historical resource. Indirect impacts may involve new construction that results in the alteration of the surroundings of a historical resource that could remove part or all of the associated setting of an historical resource,

[59] State CEQA Guidelines, Section 15064.5(b)(1).
[60] State CEQA Guidelines, Section 15064(d)(1-3).

remove character-defining features or spaces surrounding the historical resource, or substantially impair or obscure the ability of the resource to convey its historical significance.

Evaluation of Potential Impacts



Project rendering of the south and east façades, Ware Malcomb Architects, October 28, 2025.

The Project would demolish the existing four-story, approximately 56,072 sf office building and associated surface parking lot and develop an approximately 252,876 sf, eight-story self-storage facility. The new self-storage facility would be approximately 90 feet 11 inches in height. There is no subterranean parking proposed by the Project. The Project proposes approximately 24 covered vehicle parking spaces provided at the ground-level parking lot. The Project would be accessible from both S. Virgil Avenue and Westmoreland Avenue.

The new building would occupy the majority of the Project Site. It would be a contemporary industrial design, with exterior materials including metal storefront, corrugated metal siding, and brick accent details.

POTENTIAL IMPACTS TO HISTORICAL RESOURCES ON THE PROJECT SITE

There are no historical resources on the Project Site. Therefore, the demolition of the existing commercial office building would not result in a significant adverse impact on the environment as defined by CEQA.

POTENTIAL IMPACTS TO HISTORICAL RESOURCES IN THE PROJECT SITE VICINITY

3101 W. 6th Street

Potential Direct Impacts

The Project would not materially alter the mixed use commercial building at 3101 W. 6th Street in any manner, and all of the essential physical features that convey its significance would remain intact. The mixed use commercial building at 3101 W. 6th Street is separated from the Project Site

by S. Westmoreland Avenue. The primary (east) façade of 3101 W. 6th Street is approximately 200 feet to the southwest of the rear (west) façade of the proposed new self-storage building. The Project does not propose excavation for subterranean parking, and 3101 W. 6th Street is separated from the Project Site to such an extent that there is no potential for Project construction activities, including demolition, excavation or other ground-disturbing activities, vibration, or soil settlement to de-stabilize the adjacent property. Therefore, the Project would not result in substantial adverse direct impacts to the historical resource at 3101 W. 6th Avenue.

Potential Indirect Impacts

The mixed use commercial building at 3101 W. 6th Street is significant as an intact example of commercial development located along a former streetcar line in the Wilshire area. Its significance is expressed through its physical features, which would not be altered or obscured by any component of the Project. 3101 W. 6th Street is located across Westmoreland Avenue from the Project Site, facing toward the rear of the property that is currently occupied by surface parking. The introduction of an eight story self-storage building on the Project Site would not materially impair the mixed use commercial building at 3101 W. 6th Street such that it would no longer convey its significance. The surrounding area does not have a unified appearance, was developed over time, and the context surrounding 3101 W. 6th Street has already been altered, including with the 1965 construction of the commercial office building that currently occupies the Project Site. The proposed new construction on the Project Site would not interrupt an otherwise cohesive commercial area, and although the new construction is taller than the existing building, it would not add significant height to the skyline.

According to the Commercial Development context developed by SurveyLA, the defining characteristic of streetcar commercial development is the building's relationship to the streetcar, and the eligibility standards acknowledge that changes in setting would not impact an intact example of streetcar-related commercial development from conveying its significance.[61] The construction of the new self-storage building would not add significant height or density to the Project Site such that it would impact the setting of 3101 W. 6th Street to the extent that its significance would be impaired. Following implementation of the Project, 3101 W. 6th Street would retain its relationship with the street and proximity to the former Wilshire streetcar line. It would remain in its prominent corner location, and the primary, street-fronting façades would remain unobscured and visible to pedestrian traffic.

Therefore, the changes in setting resulting from the Project would not result in substantial adverse indirect impacts to the historical resource at 3101 W. 6th Avenue.

523 S. Westmoreland Avenue

Potential Direct Impacts

The Project would not materially alter the multi-family residential building at 523 S. Westmoreland Avenue in any manner, and all of the essential physical features that convey its significance would remain intact. The multi-family residential building at 523 S. Westmoreland Avenue is separated from the Project Site by S. Westmoreland Avenue. The primary (east) façade

[61] City of Los Angeles, Office of Historic Resources, *SurveyLA Historic Context Statement: Neighborhood Commercial Development Theme, 1880-1980*, prepared by Daniel Prosser, August 2017, 27-28.

of 523 S. Westmoreland Avenue is approximately 78 feet to the west of the rear (west) façade of the proposed new self-storage building. The Project does not propose excavation for subterranean parking, and 523 S. Westmoreland Avenue is separated from the Project Site to such an extent that there is no potential for Project construction activities, including demolition, excavation or other ground-disturbing activities, vibration, or soil settlement to de-stabilize the adjacent property. Therefore, the Project would not result in substantial adverse direct impacts to the historical resource at 523 S. Westmoreland Avenue.

Potential Indirect Impacts

The multi-family residential building at 523 S. Westmoreland Avenue is significant as an excellent example of a 1920s brick apartment house in the Wilshire area. Its significance is expressed through its physical features, which would not be altered or obscured by any component of the Project. 523 S. Westmoreland Avenue is located across Westmoreland Avenue from the Project Site, facing toward the rear of the property that is currently occupied by surface parking. The introduction of an eight story self-storage building on the Project Site would not materially impair the multi-family residential building such that it could no longer convey its significance. The surrounding area does not have a unified appearance, was developed over time, and the context surrounding 523 S. Westmoreland Avenue has already been altered, including with the 1965 construction of the commercial office building that currently occupies the Project Site. The proposed new construction on the Project Site would not interrupt an otherwise cohesive commercial or residential area, and although the new construction is taller than the existing building, it would not add significant height to the skyline.

According to the Multi-Family Residential Development context developed by SurveyLA, the apartment house is an important building type that proliferated throughout the city during most of the 20th century. Important characteristics of the apartment house are its height of two to six stories, design that maximizes lot coverage, and orientation to the street with architectural detailing on the front-facing façade.[62] The eligibility standards acknowledge that changes in setting would not impact an intact example of an apartment house from conveying its significance.[63] The construction of the new self-storage building would not add significant height or density to the Project Site such that it would impact the setting of 523 S. Westmoreland Avenue to the extent that its significance would be impaired. Following implementation of the Project, 523 S. Westmoreland Avenue would retain all of its important character-defining features as a 1920s apartment house, including the overall design and siting to maximize the lot coverage, and the Tudor Revival architectural details on the primary, street-fronting façade.

Therefore, the changes in setting resulting from the Project would not result in substantial adverse indirect impacts to the historical resource at 523 S. Westmoreland Avenue.

[62] City of Los Angeles, Office of Historic Resources, *SurveyLA Historic Context Statement: Multi-Family Residential Development Theme, 1895-1970*, prepared by Historic Resources Group, December 2018, 35.
[63] City of Los Angeles, Office of Historic Resources, *SurveyLA Historic Context Statement: Multi-Family Residential Development Theme, 1895-1970*, 37.

POTENTIAL CUMULATIVE IMPACTS

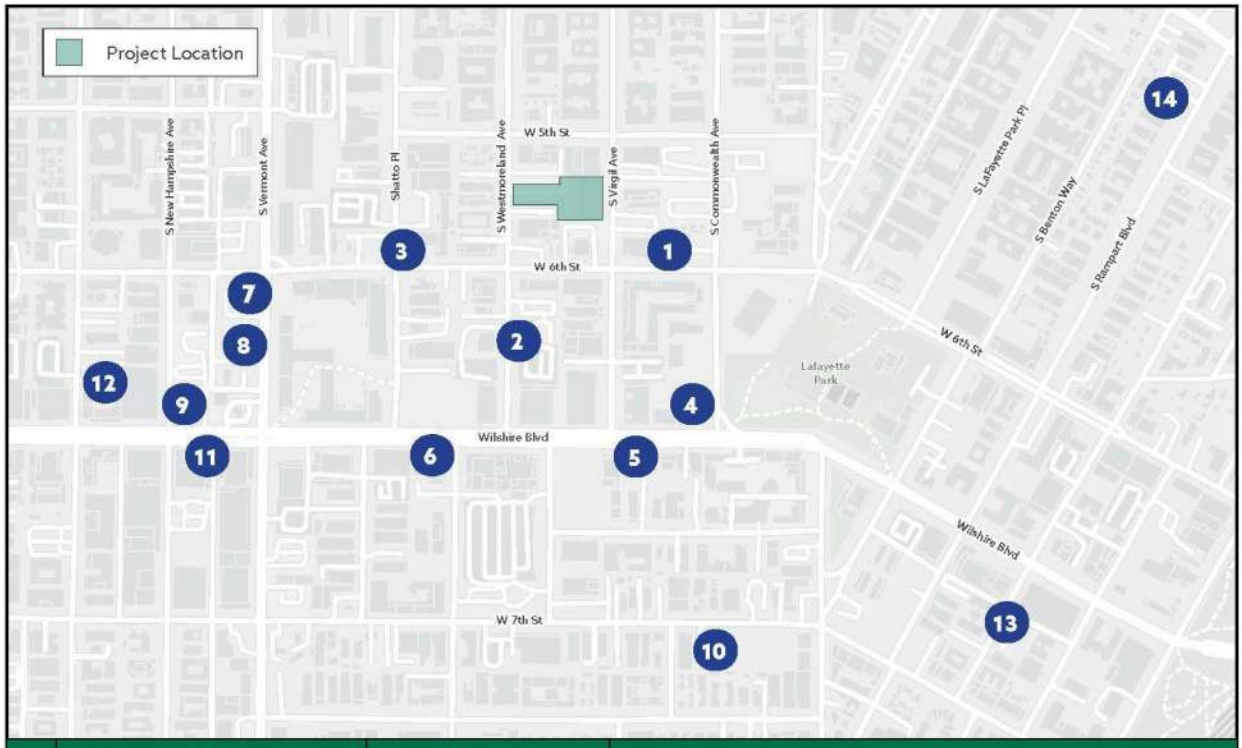
Cumulative impacts refer to two or more individual effects that are considerable when taken together, or that compound or increase other environmental impacts.[64] Development of related projects can affect historical resources if such projects adversely alter and/or demolish historical resources that may be interrelated, such as historical resources that are part of a historic district or historical resources that are significant within the same historic context, and the Project's contribution to the impact would be cumulatively considerable.

The commercial office building on the Project Site is not a historical resource. Therefore, its demolition would not result in direct impacts to historical resources on the Project Site and there would be no potential for cumulatively considerable impacts to historical resources that may be significant within the same historic context. In terms of indirect impacts, while the Project would construct a new eight-story building that is taller than the existing building on the Project Site, it would not cause a substantial material change to either 3101 W. 6th Avenue or 523 S. Westmoreland Avenue, which are both located in the immediate vicinity of the Project Site.

A list of Related Projects for the Project was prepared based upon information provided by the Los Angeles Department of Transportation, Los Angeles Department of City Planning, recent case filings, and recent traffic studies. These Related Projects are shown in the map in Figure 3. There are three Related Projects located in proximity to the Project Site that could impact the setting of the two historical resources in the vicinity of the Project Site: the hotel project at 2965 W. 6th Street (Map No. 1); the Westmoreland Mixed Use Project at 616 S. Westmoreland Avenue (Map No. 2); and the mixed use Project at 550 S. Shatto Place (Map No. 3). Of these, there are publicly available environmental documents for 616 S. Westmoreland Avenue and 550 S. Shatto Place.

[64] CEQA Guidelines, Section 15355.

FIGURE 3. RELATED PROJECTS



No	Project Name	Address	Project Type
1	Hotel & Restaurant	2965 W 6th St	99 hotel rooms
2	Mixed-Use	616 S Westmoreland Ave	77 apartment units, 2,360 sf restaurant and 745 sf retail
3	Mixed-Use	550 S Shatto Pl	283 apartment units, 35 affordable housing units and 21,842
4	Residential w/ Affordable Housing	639 S Commonwealth Ave	127 apartment units and 15 affordable housing units
5	Mixed-Use	3000 W Wilshire Blvd	190 apartment units (including 19 affordable housing units) and 867 sf retail
6	Mixed-Use	3100 Wilshire Blvd	264 residential units, 33 affordable housing units and 7,370 sf commercial
7	Mixed-Use	605 S Vermont Ave	103 apartment units and 30,937 sf Museum
8	Mixed-Use	631 S Vermont Ave	200 hotel rooms, 250 condos unit, 49,227 sf office and 21,320 sf retail
9	Fast Food with Drive-Through	3201 W Wilshire Blvd	3,865 sf of fast food with drive-through
10	Mixed-Use	2850 W 7th Street	206 apartment units and 7,500 sf retail
11	Mixed-Use	3240 W Wilshire Blvd	162 hotel rooms, 545 apartment units and 5,222 sf retail
12	Residential Complex	638 S Berendo St	163 apartment units
13	Mixed-Use	668 S Coronado St	122 apartment units and 1,182 sf retail
14	Residential Complex	329 S Rampart Blvd	53 apartment untis (including 8 affordable housing units)

FIGURE 1: Related Projects

525 SOUTH VIRGIL AVE

Kimley»Horn

Westmoreland Mixed Use Project (616 S. Westmoreland Avenue)
The Westmoreland Mixed Use project would demolish the existing building on the project site, which is not a historical resource, and construct a new, seven-story mixed use building that is a maximum of 94 feet in height. The environmental analysis included review of potential impacts to historical resources in the vicinity of the project; however, 3101 W. 6th Avenue and 523 S. Westmoreland Avenue are separated from the project site such that they were not identified as historical resources that had the potential to be impacted by the project. There were no significant adverse direct or indirect impacts to historical resources on the project site or in the vicinity of the project identified as part of the environmental review of the Westmoreland Mixed Use project.

As discussed above, the construction of the new self-storage building on the Project Site would not add significant height or density such that it would adversely impact the setting of 3101 W. 6th Avenue or 523 S. Westmoreland Avenue to the extent that the significance of these historical resources would be impaired. The Westmoreland Mixed Use project is separated from the Project Site by W. 6th Street and several intervening parcels such that there is no potential that its implementation would result in changes to the setting of 3101 W. 6th Avenue or 523 S. Westmoreland Avenue. The area developed over time, and as such represents multiple periods of development, contains a variety of building types, and does not have a unified character. Setting is not a character-defining feature or required aspect of integrity of either 3101 W. 6th Avenue or 523 S. Westmoreland Avenue, and the proposed new construction from the Project and the Related Project at 616 S. Westmoreland Avenue would not impair the ability of either historical resource such that they would no longer convey their historic significance. Therefore, changes to the setting of 3101 W. 6th Avenue and 523 S. Westmoreland Avenue from the Project and the Related Project at 616 S. Westmoreland Avenue would not be cumulatively considerable.

550 Shatto Place Mixed Use Project
The proposed mixed use project at 550 Shatto Place (which comprises 514-550 Shatto Place) would demolish the existing commercial building at 514 S. Shatto Place and the two classroom buildings and surface parking lot at 550 S. Shatto Place, none of which are historical resources; and would adapt the historic church building at 550 South Shatto Place for new use as restaurant space. The project would construct a new, eight story mixed use building that is a maximum of 96 feet in height. With the implementation of mitigation measures to protect the historical resource at 550 Shatto Place during construction, the 550 Shatto Place project would not result in significant adverse direct or indirect impacts to historical resources.

Environmental review for the Shatto Place project identified 3109 W. 6th Street (referred to as 3101 W. 6th Street in this report) and 523 S. Westmoreland Avenue as historical resources in the vicinity of 550 Shatto Place that have the potential to be impacted by the project. The construction of the Project and the 550 Shatto Place project would result in new, eight story buildings directly to the west and east of the historical resources at 3101 W. 6th Street and 523 S. Westmoreland Avenue. However, as noted, the area developed over time, and as such represents multiple periods of development, contains a variety of building types, and does not have a unified character. Setting is not a character-defining feature or required aspect of integrity of either 3101 W. 6th Avenue or 523 S. Westmoreland Avenue, and changes to the

setting resulting from the construction of two eight-story buildings, even in the immediate vicinity, would not impair the ability of either historical resource to convey its historic significance. The 550 Shatto Place project is located to the rear of the buildings at 3101 W. 6th Avenue and 523 S. Westmoreland Avenue, and the Project is separated from these historical resources by Westmoreland Avenue. Both historical resources would retain the important character-defining features of their type, which would not be altered or obscured by the Project or the Related Project at 550 Shatto Place. The primary façades of each building would remain highly visible, and both buildings would retain their relationship to the street. Therefore, changes to the setting of 3101 W. 6th Avenue and 523 S. Westmoreland Avenue from the Project and the Related Project at 550 Shatto Place would be less than significant.

Conclusion

Implementation of the Project, in combination with the two Related Projects in the immediate vicinity of the Project Site for which there are publicly available environmental documents, represent the continued redevelopment and revitalization of the surrounding area. Changes in the setting of the historical resources in the vicinity of the Project and the Related Projects would not materially impair either historical resource such that it would no longer convey its historic significance. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to historical resources would be less than significant.

Summary of Project Impacts

Analysis of the potential for direct and indirect impacts to historical resources on the Project Site and in the Project Site vicinity reveals the following:

1. The existing commercial office building on the Project Site is not a historical resource; therefore, its demolition would not result in a significant adverse direct impact to historical resources.
2. The Project Site is separated from the two historical resources in the vicinity of the Project Site such that there is no potential for significant adverse direct impacts resulting from construction activity on the Project Site.
3. New construction proposed by the Project would not result in significant adverse indirect impacts to the two historical resources in the vicinity of the Project Site due to changes in setting.
4. Potential impacts from the Project and the Related Projects would not be cumulatively considerable.

Therefore, the Project would not cause a substantial adverse change in historical resources on the Project Site or in the vicinity of the Project Site and, as such, the Project would not result in a significant adverse impact on the environment as defined by CEQA.

11.0 CONCLUSION

The Project would redevelop the Project Site with an approximately 252,876 sf, eight-story self-storage facility. The property at 525 S. Virgil Avenue is currently occupied by a four-story commercial office building and associated surface parking that would be demolished as part of the Project. 525 S. Virgil Avenue is not eligible under any relevant contexts and themes in the SurveyLA Historic Context Statement, and does not meet the eligibility standards for designation for its architecture merit. Therefore, 525 S. Virgil Avenue is not considered a historical resource for purposes of CEQA.

The Project Site is located in the vicinity of two potential historical resources identified by SurveyLA that have a reasonably foreseeable potential to be impacted by the Project, either directly as a result of construction activity, or indirectly due to changes in the setting. These are the mixed use commercial building at 3101 W. 6th Street, and the multi-family residential building at 523 S. Westmoreland Avenue. SurveyLA represents a historical resources survey that meets the requirements of PRC Section 5024.1(g). Therefore, the survey findings for these two properties are accepted, and they are considered historical resources for purposes of this report.

The Project would demolish the existing four-story building on the Project Site and construct a new, eight story building in its place. The commercial office building on the Project Site is not a historical resource; therefore, its demolition would not result in a significant adverse impact to a historical resource. The Project would not demolish, destroy, relocate, or alter the two historical resources in the immediate vicinity of the Project Site. Further, both historical resources are separated from the Project Site to such an extent that there is no potential for damage due to construction activities on the Project Site. The Project would not materially alter the two historical resources in any manner, and all of the essential physical features of each historical resource would remain intact. Therefore, there would be no potential for significant adverse direct impacts to historical resources on the Project Site or in the vicinity of the Project Site as a result of the Project.

The new construction proposed by the Project would alter the setting of the two historical resources in the immediate vicinity of the Project Site. However, the Project Site is located in an area that has experienced change over time, and the setting of the historical resources has already been altered. Although the Project would add height to the Project Site, the new construction would not materially impair the adjacent historical resources and would not alter the setting such that they would no longer convey their historic significance. Therefore, the Project would not result in significant adverse indirect impacts to historical resources in the vicinity of the Project Site.

There are two Related Projects in the vicinity of the Project Site for which there are publicly available environmental documents: the Westmoreland Mixed Use project at 616 S. Westmoreland Avenue and the mixed use project at 550 S. Shatto Place. Neither Related Project identified potential direct or indirect impacts to historical resources on either project site or in the vicinity of either project site. Implementation of the Project, in combination with the two identified Related Projects, represents the continued redevelopment and revitalization of the surrounding area. Changes in the setting of the historical resources in the vicinity of the Project

and the Related Projects would not materially impair either historical resource such that it would no longer convey its historic significance. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to historical resources would be less than significant.

The Project would not result in significant adverse direct, indirect, or cumulative impacts to historical resources on the Project Site or in the vicinity of the Project Site. Therefore, the Project would not result in a significant adverse impact on the environment as defined by CEQA.

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APPENDIX A: PROJECT PLANS

CAUTION: IF THIS SHEET IS NOT 30"x42" IT IS A REDUCED PRINT

525 VIRGIL
SELF STORAGE

515, 517, 525 & 531 S. VIRGIL AVE. & 518 & 526 S. WESTMORELAND AVE., LOS ANGELES, CALIFORNIA 90020



SHEET INDEX

TOTAL SHEET COUNT 18

ARCHITECTURAL

A001	TITLE SHEET
A010	SURVEY
A011	EXISTING PHOTOS
A100	SITE PLAN
A121	FIRST FLOOR PLAN
A122	SECOND FLOOR PLAN
A123	THIRD TO EIGHTH FLOOR PLAN
A190	ROOF PLAN
A210	EXTERIOR ELEVATIONS
A211	EXTERIOR ELEVATIONS
A310	BUILDING SECTIONS
A710	ISOMETRIC AND PERSPECTIVE VIEWS
A711	MATERIAL SPECIFICATIONS

ARCHITECTURAL SHEET COUNT: 13

CIVIL

C1.0	CONCEPT GRADING PLAN
C2.0	CONCEPT LID PLAN

CIVIL SHEET COUNT: 2

LANDSCAPE

L1.1	PRELIMINARY LANDSCAPE PLAN
L2.1	PRELIMINARY TREE DISPOSITION PLAN
L3.1	PLANT MATERIAL IMAGERY

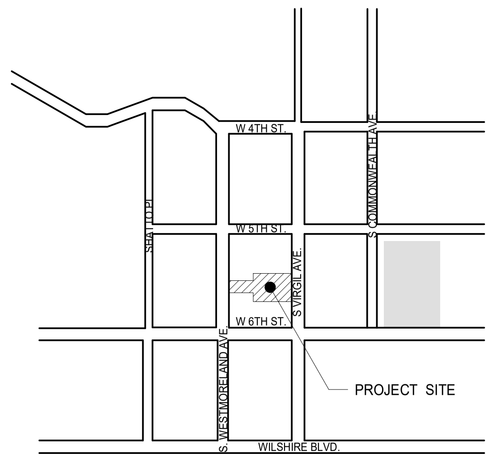
LANDSCAPE SHEET COUNT: 3

PROJECT DESCRIPTION

NEW COMMERCIAL DEVELOPMENT FOR A 252,876 SF PRIVATE SELF-STORAGE FACILITY INCLUDING EIGHT FLOORS.

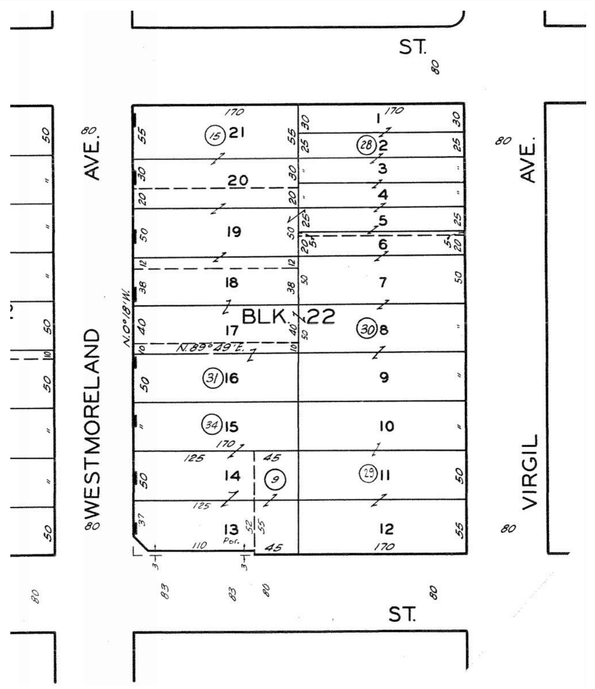
ENTITLEMENT REQUEST INCLUDES A GENERAL PLAN AMENDMENT PURSUANT TO LAMC SECTION 11.5.6, A ZONE CHANGE PURSUANT TO LAMC SECTION 12.32, A CONDITIONAL USE PERMIT (CUP) PURSUANT TO LAMC 12.24.W.50, AND PROJECT REVIEW PURSUANT TO LAMC 16.05.

VICINITY MAP



N
NOT TO SCALE

ASSESSOR'S MAP



OWNER

SHATTO EMET Q0ZB LP
2219 MAIN STREET, SUITE 260
SANTA MONICA, CALIFORNIA 90405

PRIMARY CONTACT: Spencer Kallick
PH: (310) 788-2417
EMAIL: skallick@allenmatkins.com

OWNER'S CONSULTANTS

LANSCAPE
RLA
8841 RESEARCH DR.
SUITE 200
IRVINE, CALIFORNIA 92618
(949) 387-1323

PRIMARY CONTACT: SCOTT CAREY
PH: (949) 387-1323
EMAIL: scott@ridgela.com

ARCHITECT

WARE MALCOMB
915 WILSHIRE BLVD. SUITE 2150
LOS ANGELES, CALIFORNIA 90017
PH: (310) 903-4000

PRIMARY CONTACT: ANAEL HASS
PH: (310) 259-9043
EMAIL: ahass@waremalcomb.com

CIVIL ENGINEER

WARE MALCOMB
915 WILSHIRE BLVD. SUITE 2150
LOS ANGELES, CALIFORNIA 90017
PH: (310) 903-4000

PRIMARY CONTACT: KEITH MALLOY
PH: (310) 903-4019
EMAIL: kmalloy@waremalcomb.com

PROJECT DATA

APN: 5077004030
Map Reference: M R 24-59/60, LOT 8
Lot Area Gross: 42,146 (sq ft) - 0.97ac
Lot Area Net: 41,636 (sq ft)

Jurisdiction: City of Los Angeles
Zoning: C2-2
Allowable FAR: 6.00
Allowable Zoning Area: 252,876 (sq ft)

Zoning Area

Level	Area
FIRST FLOOR	14,766 SF
SECOND FLOOR	12,848 SF
THIRD FLOOR	37,544 SF
FOURTH FLOOR	37,544 SF
FIFTH FLOOR	37,544 SF
SIXTH FLOOR	37,544 SF
SEVENTH FLOOR	37,544 SF
EIGHTH FLOOR	37,544 SF
	252,876 SF

APPLICABLE CODES:

CITY OF:	LOS ANGELES, CALIFORNIA
BUILDING:	2022 CALIFORNIA BUILDING CODE
STRUCTURE:	2022 CALIFORNIA BUILDING CODE
MECHANICAL:	2022 CALIFORNIA MECHANICAL CODE
ELECTRICAL:	2022 CALIFORNIA ELECTRICAL CODE
PLUMBING:	2022 CALIFORNIA PLUMBING CODE
FIRE/LIFE SAFETY:	2022 CALIFORNIA FIRE CODE (WITH LOCAL AMENDMENTS)
ENERGY:	2022 CALIFORNIA ENERGY CODE
ACCESSIBILITY:	2022 CALIFORNIA BUILDING CODE - ACCESSIBILITY 2023 CITY OF LOS ANGELES GREEN BUILDING CODE

USE AND OCCUPANCY:

OCCUPANCY : S-1 / STORAGE
USE: SELF-SERVICE STORAGE FACILITY

PROPOSED HEIGHT IN FEET: 90'-11"

TYPES OF CONSTRUCTION: TYPE: I-B

PARKING: NONE REQUIRED PER AB 2097

PARKING PROVIDED: 24 STALLS
ACCESSIBLE PARKING PROVIDED: 2 STALLS (1 VAN)
EV PARKING PROVIDED: 3 STALLS (1 STANDARD ACCESSIBLE, 1 VAN ACCESSIBLE)

BIKE PARKING:
LONG TERM BIKE PARKING (1 PER 10,000 SF): 25 STALLS
SHORT TERM BIKE PARKING: (1 PER 10,000): 25 STALLS

GRADING CONSISTS OF APPROXIMATELY 6,200 NET CY OF EXCAVATION. SEE SHEETS C1.0-C2.0.

LANDSCAPING WORK INCLUDES REMOVAL OF TWO STREET TREES AND INSTALLATION OF DROUGHT-TOLERANT LANDSCAPING. SEE SHEETS L1.1-L3.1.

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915 Wilshire Blvd, Suite #2150
Los Angeles, CA 90017
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ARCHITECTURE
PLANNING
INTERIORS
CIVIL ENGINEERING
BRANDING
BUILDING MEASUREMENT

525 VIRGIL
515, 517, 525 & 531 S. VIRGIL AVE. & 518 & 526 S. WESTMORELAND AVE.,
LOS ANGELES, CALIFORNIA 90020

TITLE SHEET

#	DATE	REMARKS
1	08/15/2025	Planning Set
	10/28/2025	Planning Set
	11/14/2025	Planning Set Resubmittal

PA/PM:	ANAEL HASS
DRAWN BY.:	K.E.
JOB NO.:	LAX25-0037-00

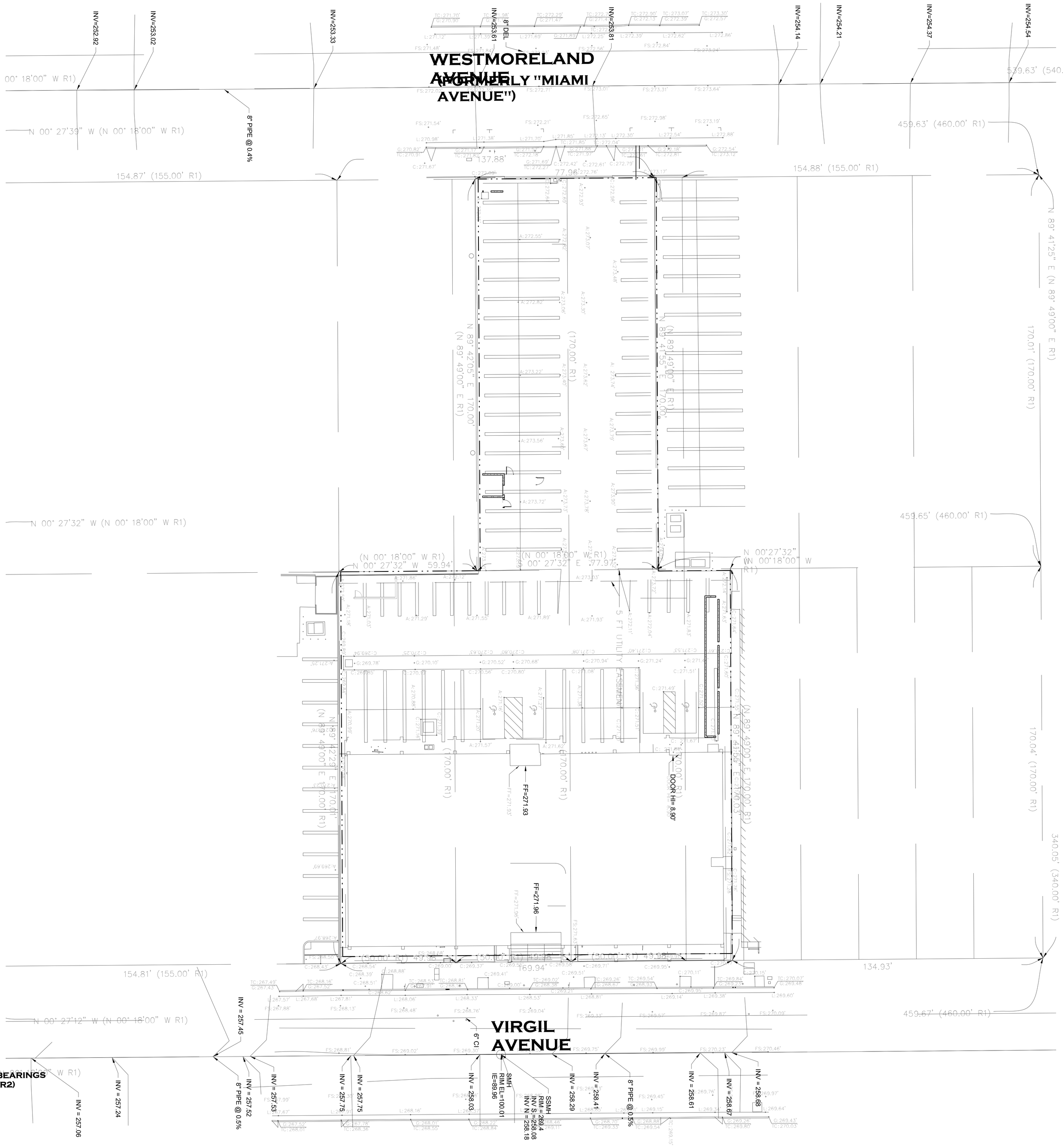
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SHEET A010

JOB NO.:	LAX25-0037-00
DRAWN BY.:	K.E.
PA/PM:	ANAEL HASS

SURVEY

	DATE	REMARKS
	08/15/2025	Planning Set
	10/28/2025	Planning Set
1	11/14/2025	Planning Set Resubmittal

525 VIRGIL

515, 517, 525 & 531 S. VIRGIL AVE. & 518 &
526 S. WESTMORELAND AVE.,
LOS ANGELES, CALIFORNIA 90020

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01 - WESTMORELAND AVE.



02 - S VIRGIL AVE



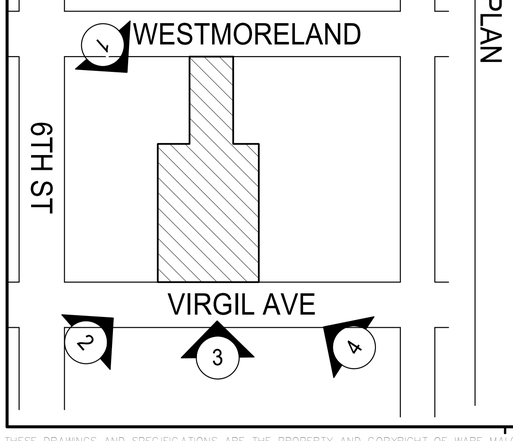
03 - S VIRGIL AVE



04 - S VIRGIL AVE



KEY PLAN



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DRAWN BY.: K.E.
PA/PM: ANAEL HASS

EXISTING PHOTOS

	DATE	REMARKS
	08/15/2025	Planning Set
	10/28/2025	Planning Set
1	11/14/2025	Planning Set Resubmittal

525 VIRGIL

515, 517, 525 & 531 S. VIRGIL AVE. & 518 &
526 S. WESTMORELAND AVE.,
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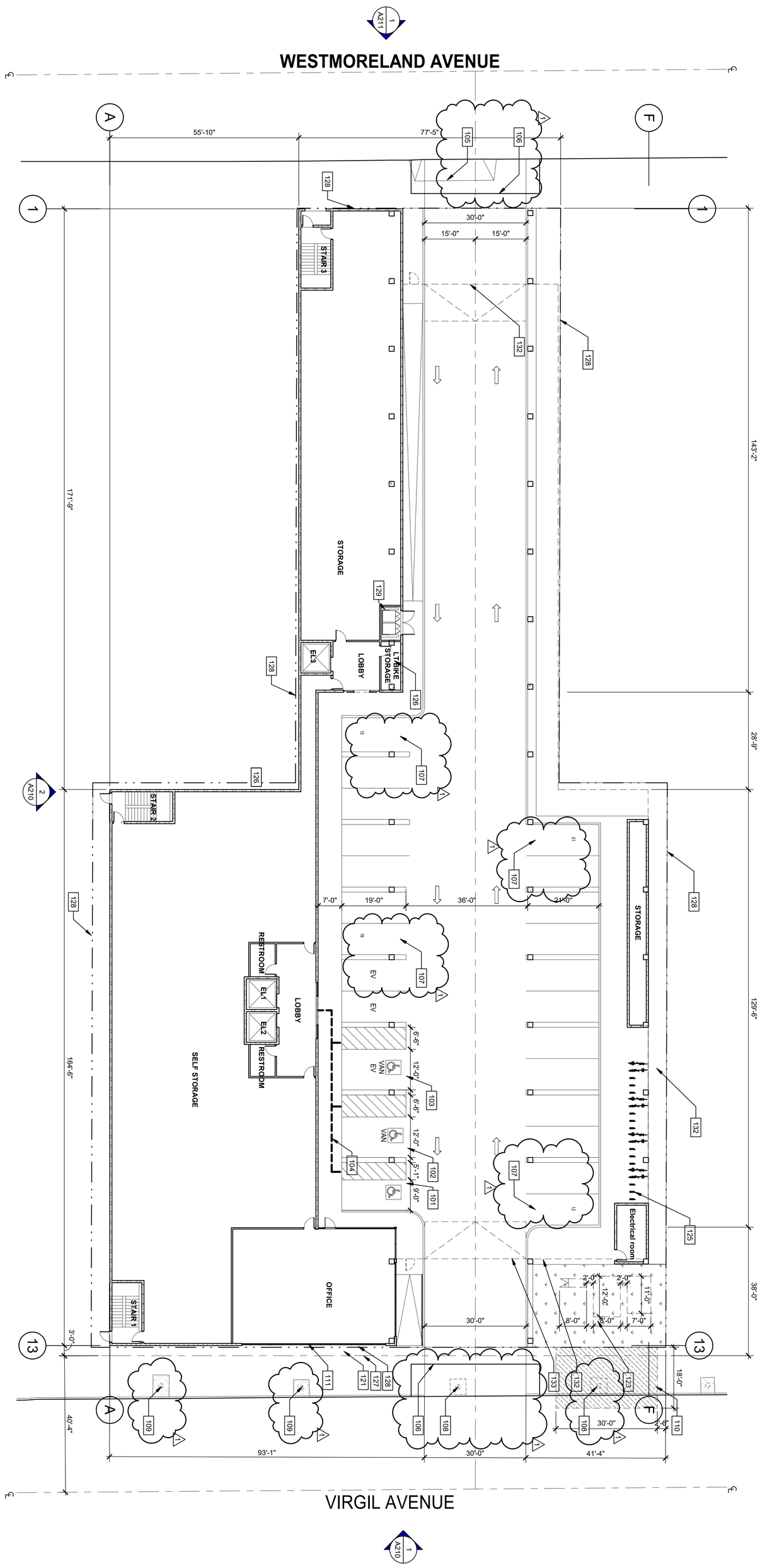
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1/16"=1'-0"
0 8' 16' 32' 64'

LEGEND

PROPOSED GREEN ROOF TRAY (LID FEATURE)

PROPOSED SOLAR PANELS

KEYNOTES: -

101 ACCESSIBLE PARKING STALL WITH SIGNAGE.
102 VAN ACCESSIBLE PARKING STALL WITH SIGNAGE
103 PAINTED PARKING STRIPING PER CITY STANDARDS
104 ACCESSIBLE PATH OF TRAVEL 1:20 MAX. SLOPE, 2% MAX. CROSS SLOPE.
105 EXISTING DRIVEWAY TO BE REMOVED AND REPLACE.
106 PROPOSED DRIVEWAY.
107 STANDARD PARKING.
108 EXISTING TREE TO BE REMOVED.
109 EXISTING TREE TO BE PROTECTED.
110 STAGING AREA 18' X 30'.
111 STREET LEVEL DISPLY WINDOW.
121 3' DEDICATION
123 TRANSFORMER LOCATION. SEE CIVIL DRAWINGS.
125 SHORT TERM BIKE PARKING (25 BIKES).
126 LONG TERM BIKE PARKING (25 BIKES).
127 PRE DEDICATED PROPERTY LINE.
128 PROPERTY LINE.
129 TRASH ENCLOSURE WITH RECYCLE BIN.
132 SECURITY FENCE.
133 VEHICULAR GATE.

SITE PLAN

SCALE: 1/16" = 1'-0"

N

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SHEET A100

PA/PM:	ANAEL HASS
DRAWN BY::	K.E.
JOB NO.:	LAX25-0037-00

SITE PLAN

	DATE	REMARKS
	08/15/2025	Planning Set
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1	11/14/2025	Planning Set Resubmittal

525 VIRGIL

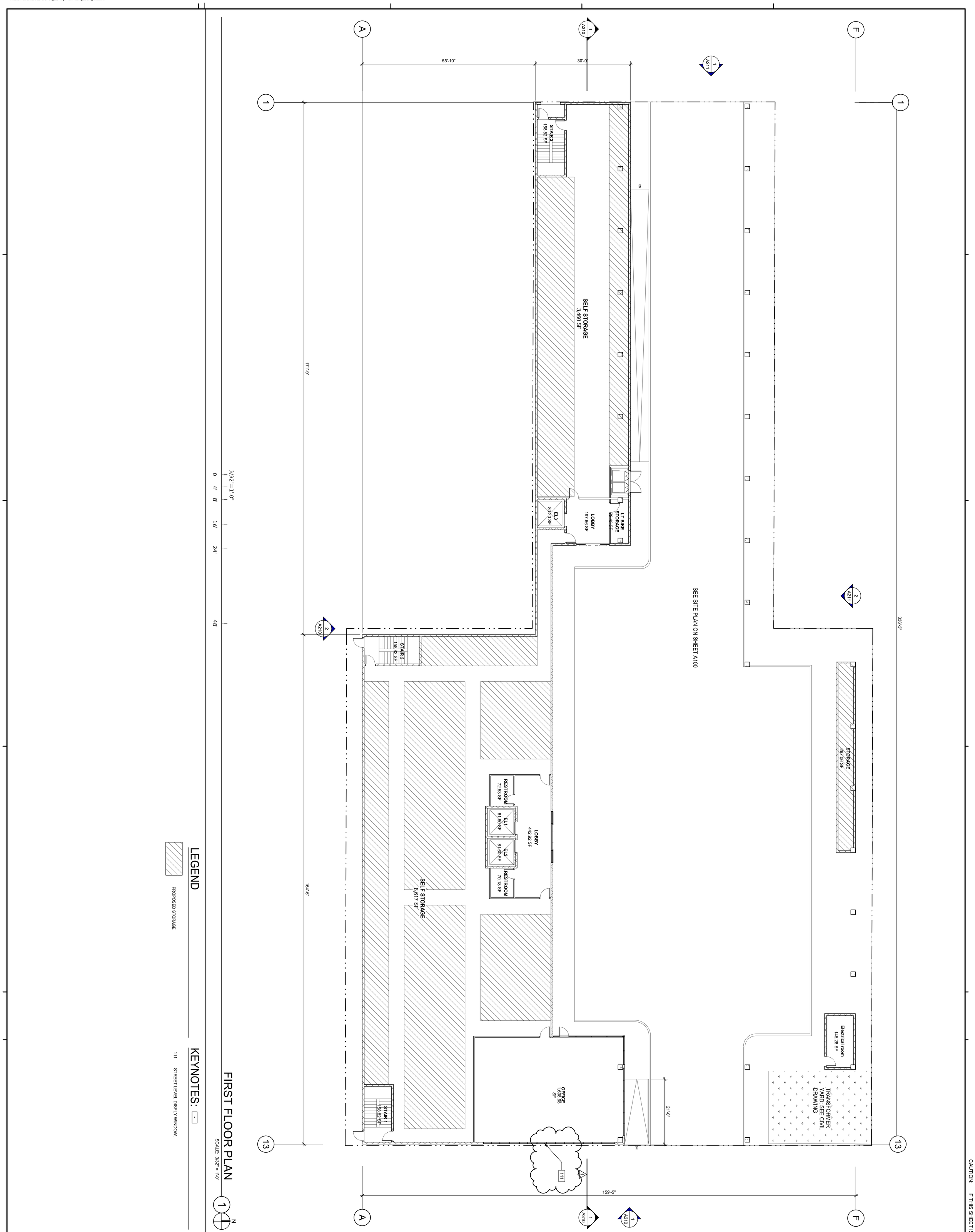
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SHEET A121

PA/PM:	ANAEL HASS
DRAWN BY:	K.E.
JOB NO.:	LAX25-0037-00

FIRST FLOOR PLAN

	DATE	REMARKS
	08/15/2025	Planning Set
	10/28/2025	Planning Set
1	11/14/2025	Planning Set Resubmittal

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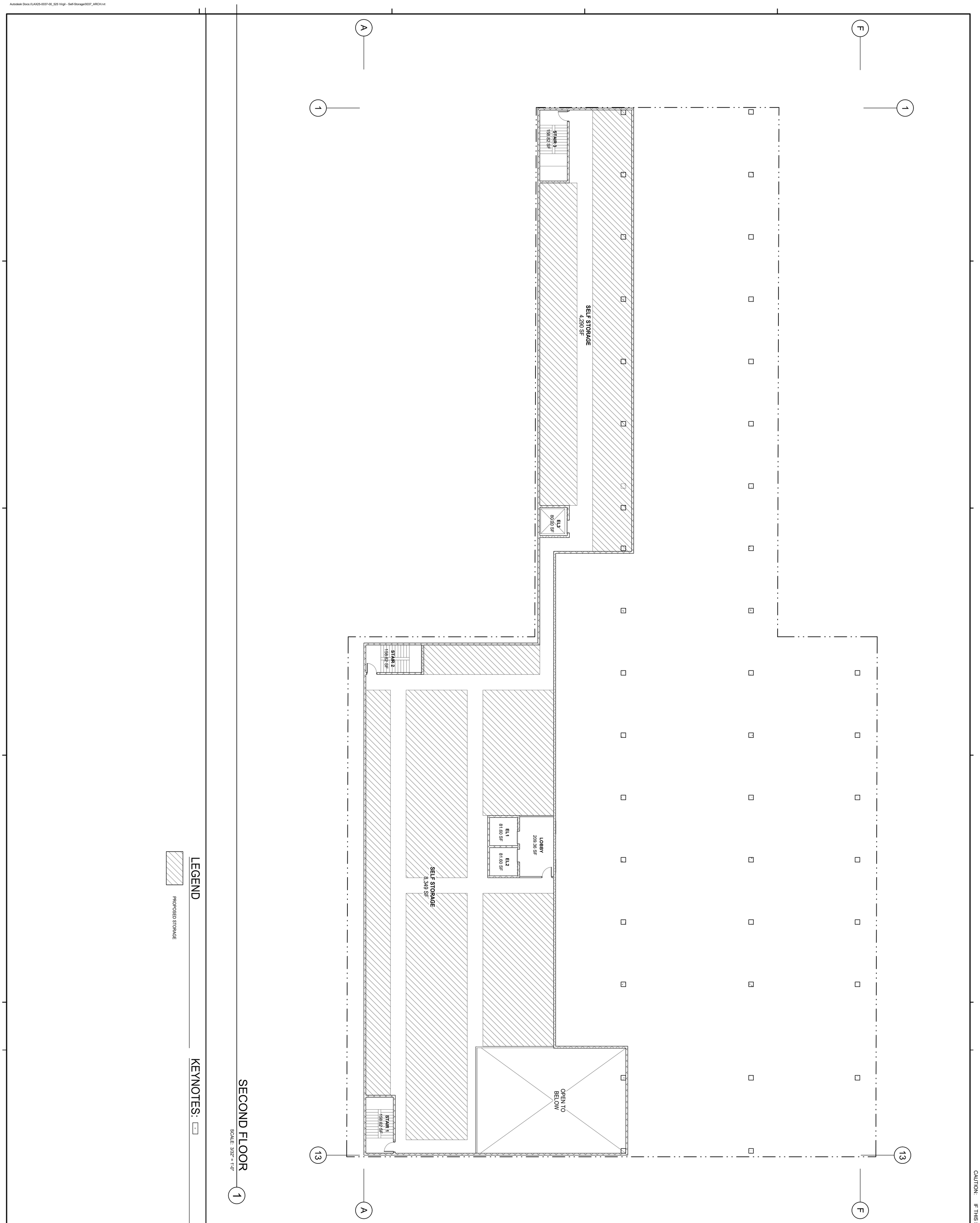
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LEGEND

PROPOSED STORAGE

KEYNOTES: -

SECOND FLOOR

SCALE: 3/32" = 1'-0"

N

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SHEET A122

PA/PM: Approver
DRAWN BY:: Author
JOB NO.: LAX25-0037-00

SECOND FLOOR PLAN

	DATE	REMARKS
1	11/14/2025	Planning Set Resubmittal

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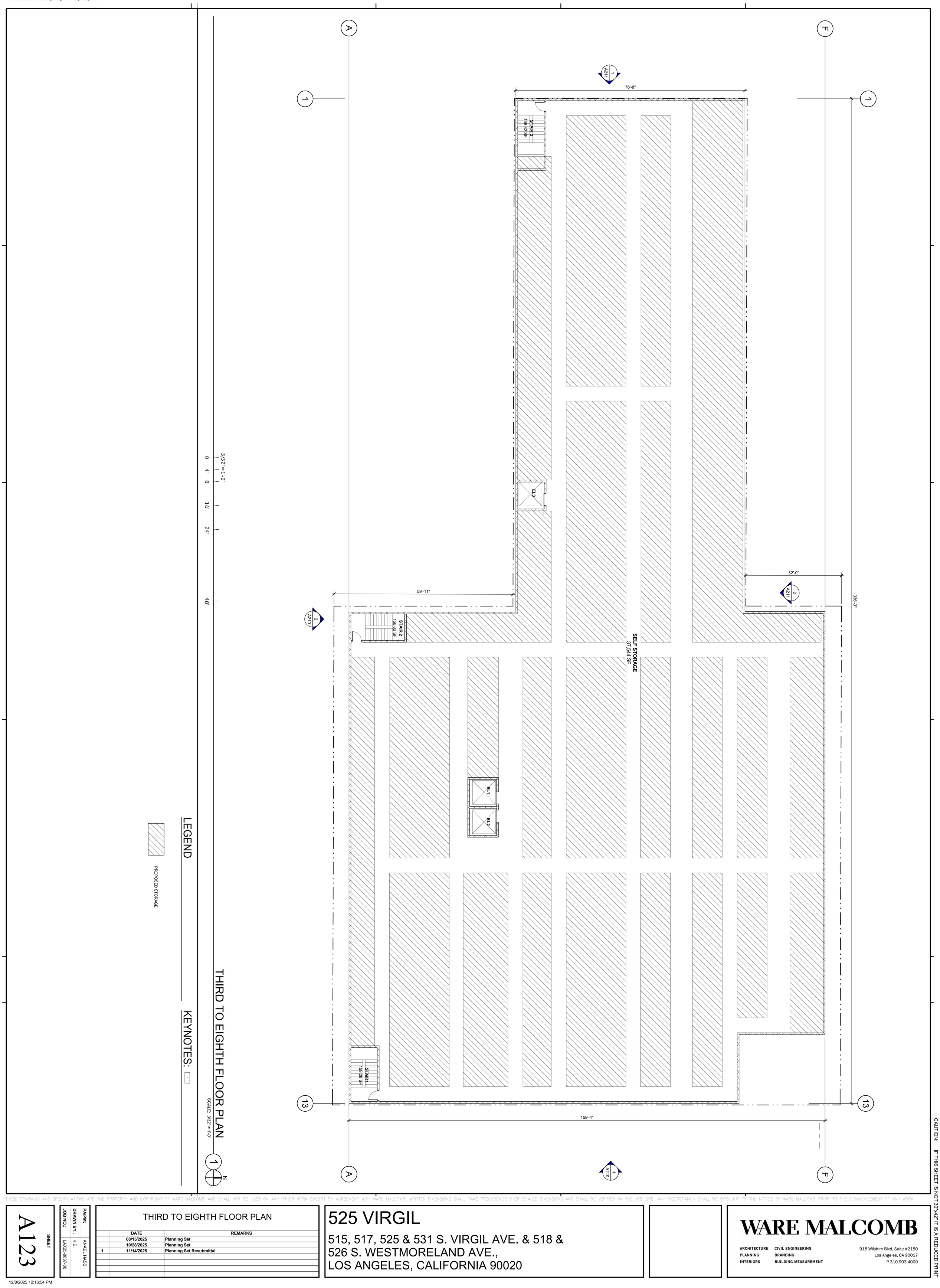
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SHEET A123

JOB NO.: LAX25-0037-00
DRAWN BY:: K.E.
PA/PM: ANAEL HASS

THIRD TO EIGHTH FLOOR PLAN

	DATE	REMARKS
	08/15/2025	Planning Set
	10/28/2025	Planning Set
1	11/14/2025	Planning Set Resubmittal

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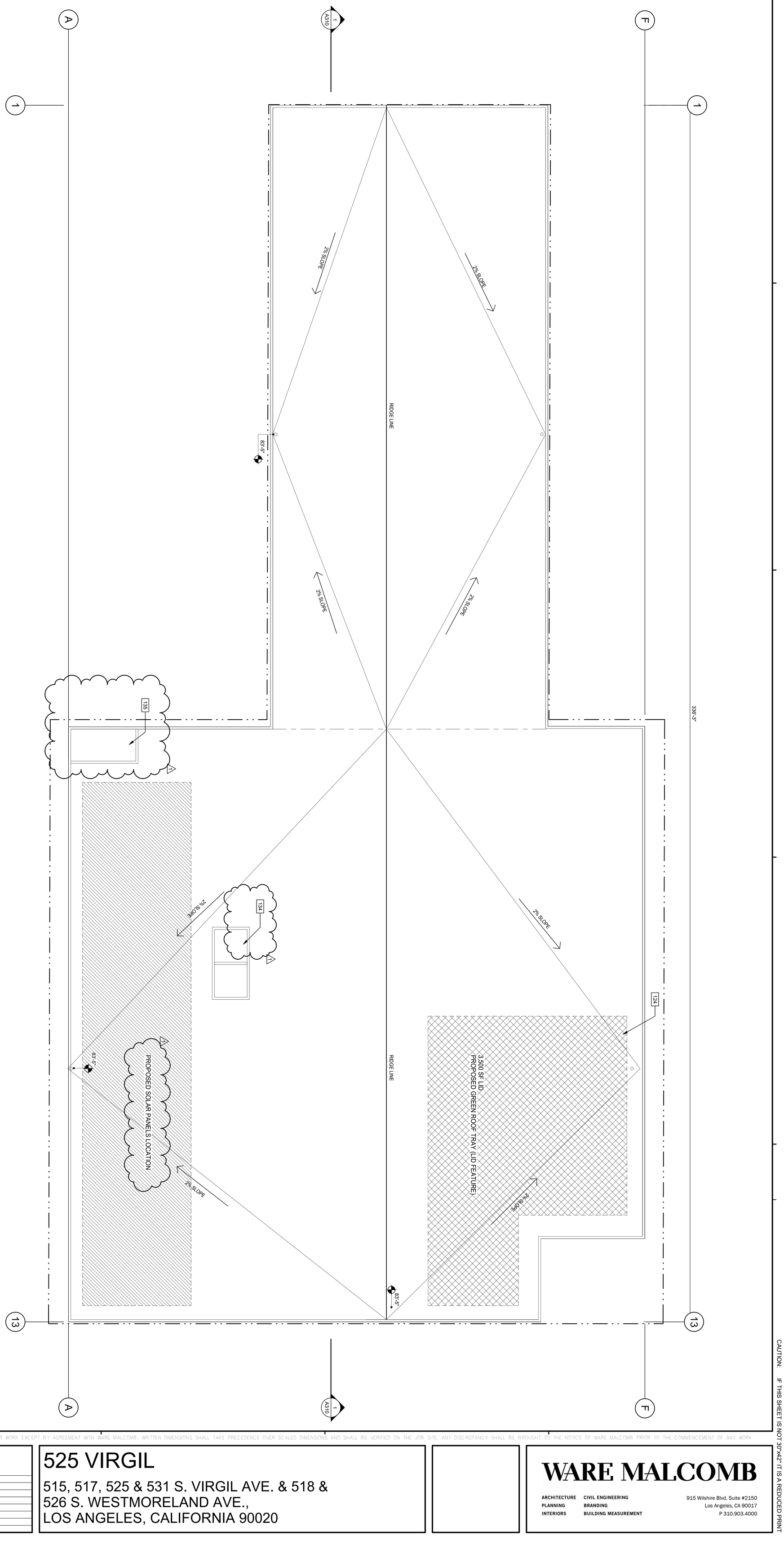
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ROOF PLAN

SCALE: 3/32" = 1'-0"

KEYNOTES:

- 124 PROPOSED GREEN ROOF TRAY (LID FEATURE). SEE CIVIL DRAWINGS.
- 134 ELEVATOR BULCKHEAD.
- 135 ROOF STAIRS BULCKHEAD.

LEGEND

- PROPOSED GREEN ROOF TRAY (LID FEATURE)
- PROPOSED SOLAR PANELS

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SHEET A190

PA/PM:	ANAEL HASS
DRAWN BY::	K.E.
JOB NO.:	LAX25-0037-00

ROOF PLAN

	DATE	REMARKS
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	10/28/2025	Planning Set
1	11/14/2025	Planning Set Resubmittal

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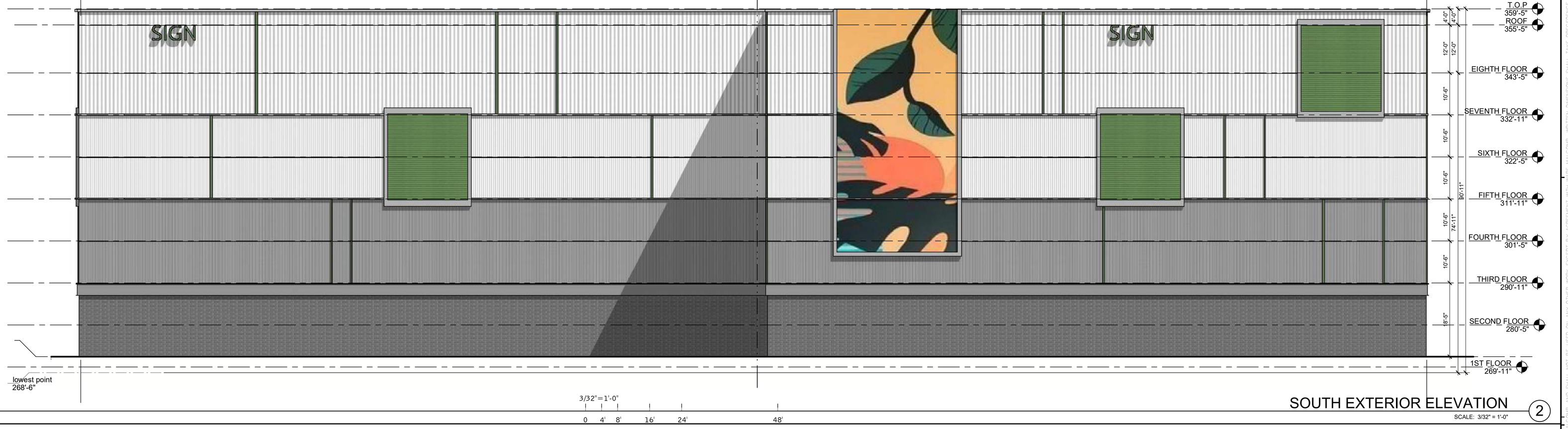
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0 4' 8' 16' 24' 48'

EAST EXTERIOR ELEVATION (1)
SCALE: 3/32" = 1'-0"



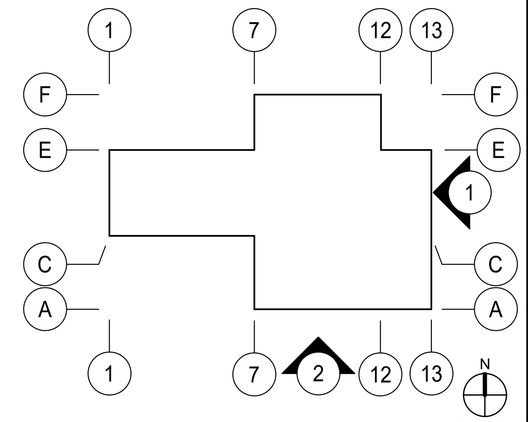
3/32"=1'-0"
0 4' 8' 16' 24' 48'

SOUTH EXTERIOR ELEVATION (2)
SCALE: 3/32" = 1'-0"

MATERIAL LEGEND

1	STOREFRONT, CLEAR GLAZING, CLEAR ANODIZED MULLIONS
2	METAL FASCIA BAND, SLATE GRAY
3	ARCHITECTURAL FIN, SAGE GREEN
4	ARCHITECTURAL LOUVERS, SILVER METALLIC
5	STEEL COLUMN, OPEN JOIST STEEL COLUMN, SLATE GRAY
6	CORRUGATED METAL, PBR, BONE WHITE
7	CORRUGATED METAL, WESTERN RIB, REGAL WHITE
8	CORRUGATED METAL, METAL SIDING, SILVER METALLIC
9	CORRUGATED METAL, RIB CORRUGATED METAL, SAGE GREEN
10	METAL PANEL, ALUCOBOND, SLATE GRAY
11	GRAY BRICK

KEY PLAN



NOT TO SCALE

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EXTERIOR ELEVATIONS

REMARKS	DATE
Planning Set	08/15/2025
Planning Set	10/28/2025
Planning Set Resubmittal	11/14/2025
1	

PA/PM:	ANAEL HASS
DRAWN BY.:	K.E.
JOB NO.:	LAX25-0037-00

SHEET
A210

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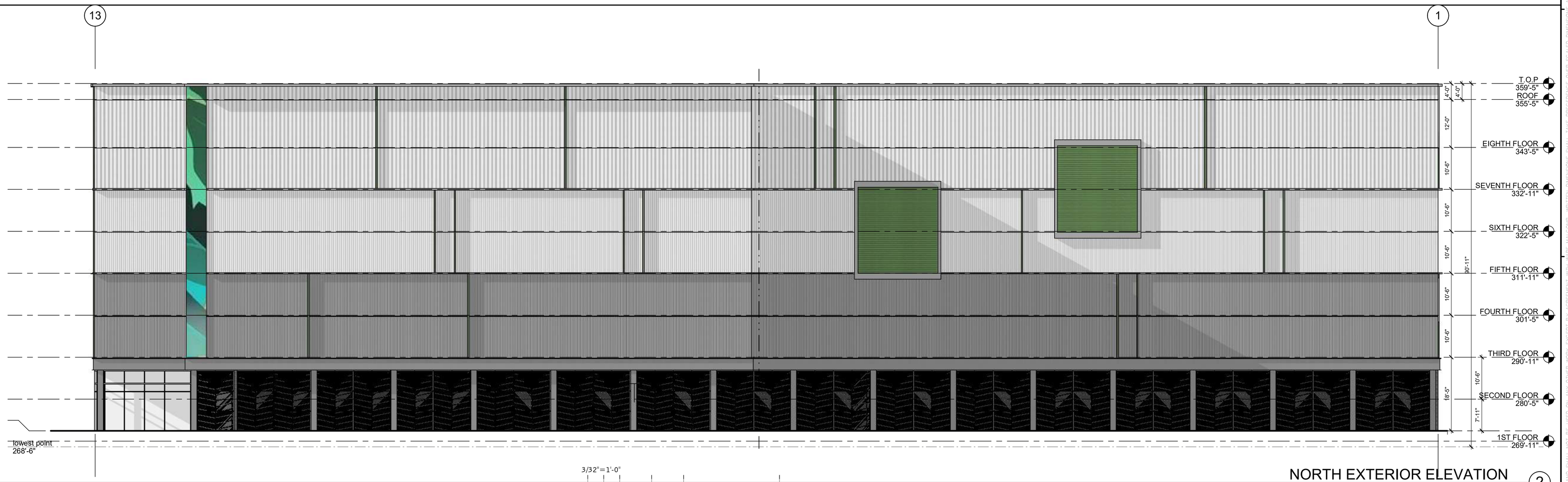
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3/32"=1'-0"
0 4' 8' 16' 24' 48'

WEST EXTERIOR ELEVATION (1)

SCALE: 3/32" = 1'-0"



3/32"=1'-0"
0 4' 8' 16' 24' 48'

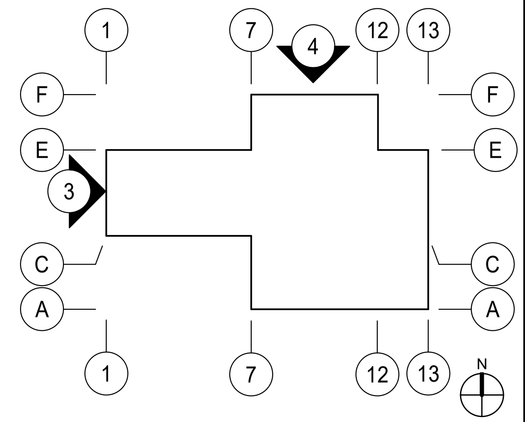
NORTH EXTERIOR ELEVATION (2)

SCALE: 3/32" = 1'-0"

MATERIAL LEGEND

1	STOREFRONT, CLEAR GLAZING, CLEAR ANODIZED MULLIONS
2	METAL FASCIA BAND, SLATE GRAY
3	ARCHITECTURAL FIN, SAGE GREEN
4	ARCHITECTURAL LOUVERS, SILVER METALLIC
5	STEEL COLUMN, OPEN JOIST STEEL COLUMN, SLATE GRAY
6	CORRUGATED METAL, PBR, BONE WHITE
7	CORRUGATED METAL, WESTERN RIB, REGAL WHITE
8	CORRUGATED METAL, METAL SIDING, SILVER METALLIC
9	CORRUGATED METAL, RIB CORRUGATED METAL, SAGE GREEN
10	METAL PANEL, ALUCOBOND, SLATE GRAY
11	GRAY BRICK

KEY PLAN



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EXTERIOR ELEVATIONS

DATE	REMARKS
08/15/2025	Planning Set
10/28/2025	Planning Set
11/14/2025	Planning Set Resubmittal
1	

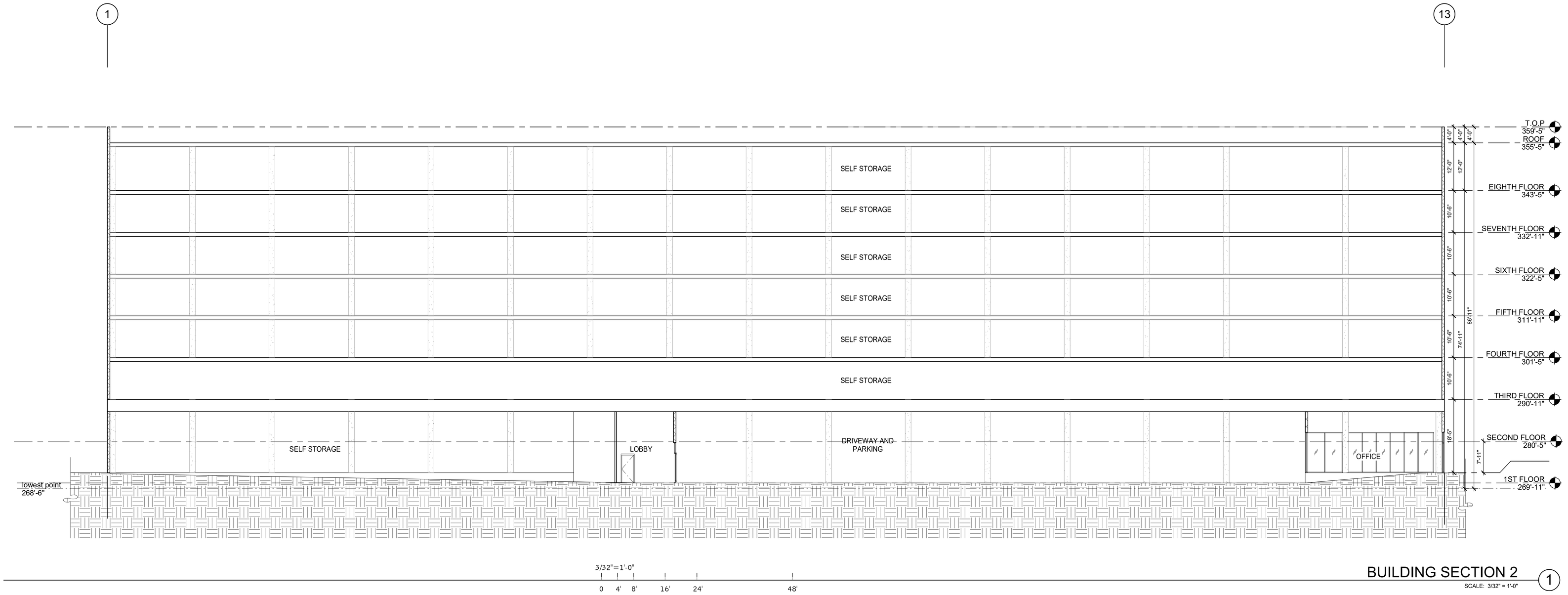
PA/PM:	ANAEL HASS
DRAWN BY.:	K.E.
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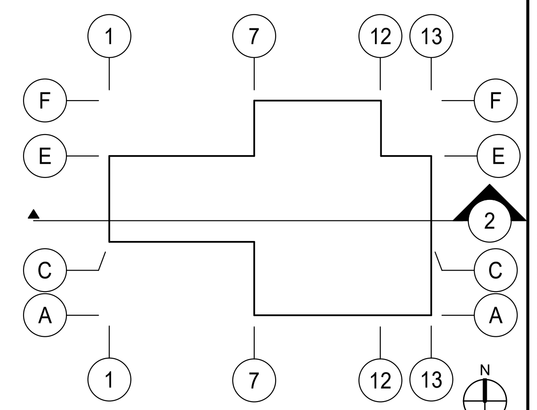
BUILDING SECTION 2

SCALE: 3/32" = 1'-0"

1

KEYNOTES:

KEY PLAN



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BUILDING SECTIONS

DATE	REMARKS
08/15/2025	Planning Set
10/28/2025	Planning Set
11/14/2025	Planning Set Resubmittal
	1

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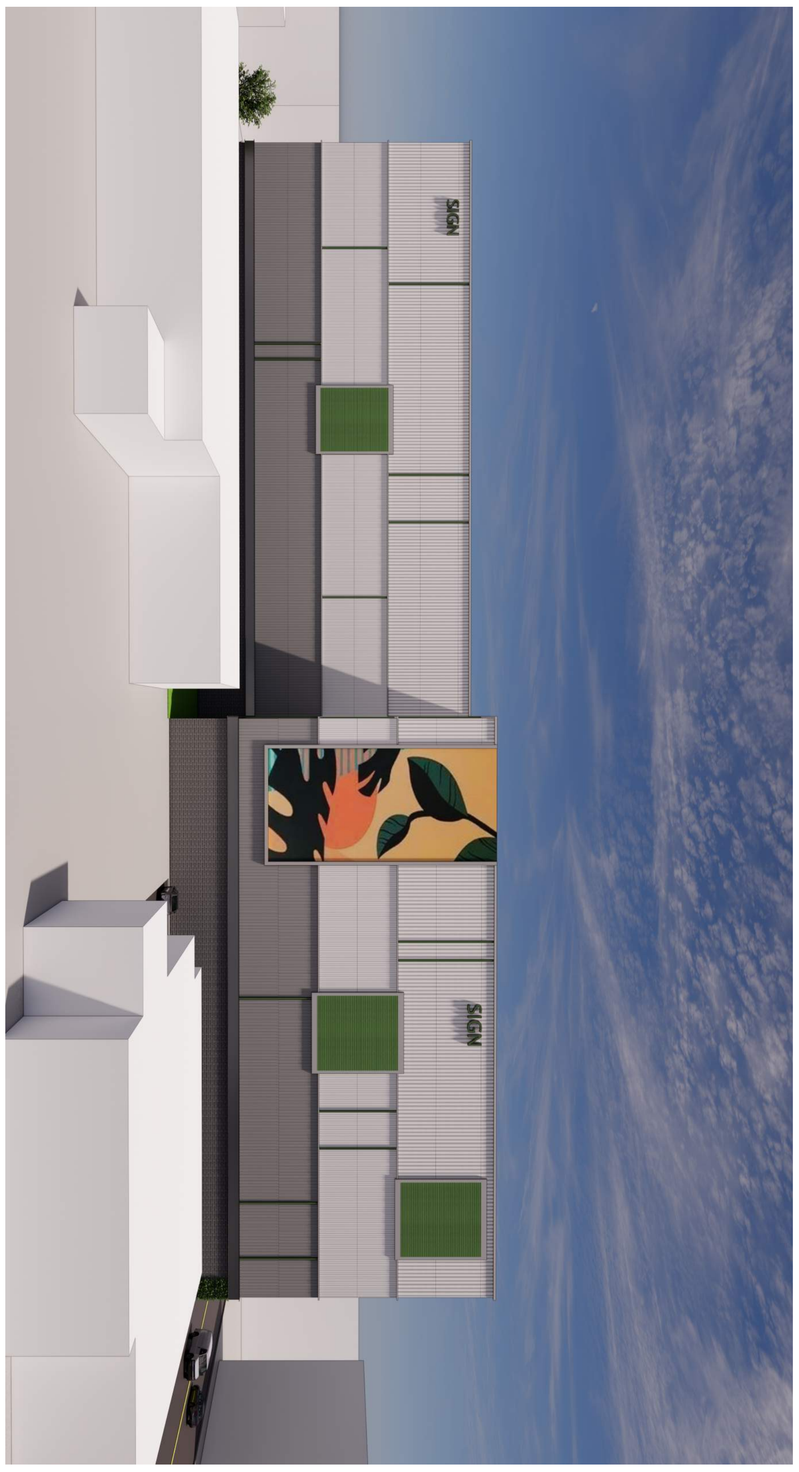
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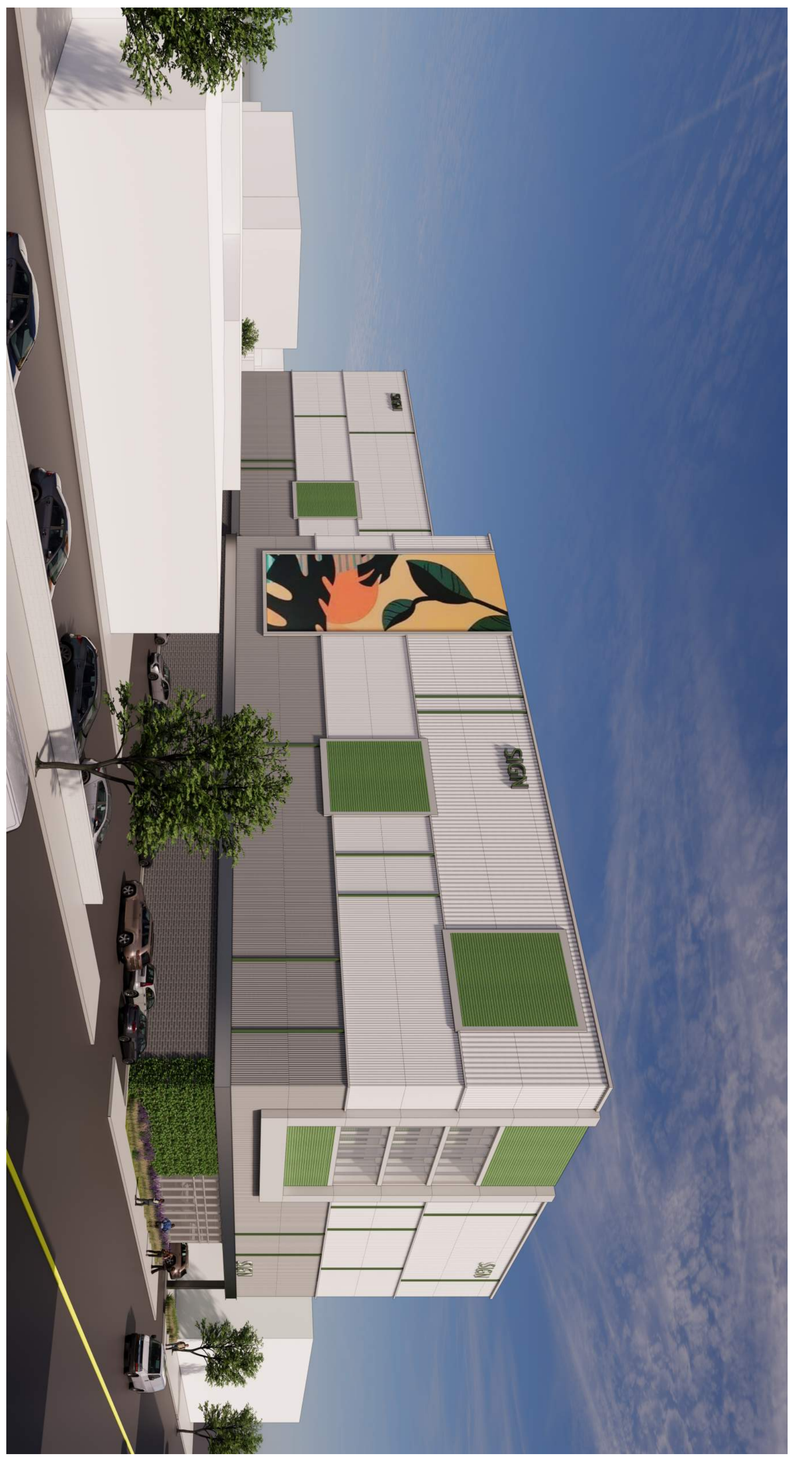
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SHEET
A710

PA/PM: ANAEL HASS
DRAWN BY:: K.E.
JOB NO.: LAX25-0037-00

ISOMETRIC AND PERSPECTIVE VIEWS

	DATE	REMARKS
	08/15/2025	Planning Set
	10/28/2025	Planning Set
1	11/14/2025	Planning Set Resubmittal

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ENLARGED EAST ELEVATION
SCALE: 1/8" = 1-0"



1 **STOREFRONT**
CLEAR GLAZING
CLEAR ANODIZED MULLIONS



2 **METAL FASCIA BAND**
SLATE GRAY



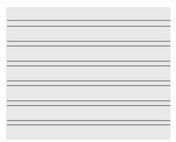
3 **ARCHITECTURAL FIN**
SAGE GREEN



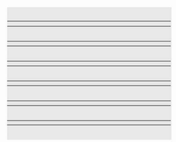
4 **ARCHITECTURAL LOUVRES**
SILVER METTALIC



5 **STEEL BEAM**
OPEN STEEL JOIST
SLATE GRAY



6 **CORRUGATED METAL**
BONE WHITE



7 **CORRUGATED METAL**
REGAL WHITE



8 **CORRUGATED METAL**
7/8" METAL SIDING
SILVER METALLIC



9 **CORRUGATED METAL**
7/8" METAL SIDING
SAGE GREEN



10 **METAL PANEL**
SLATE GRAY

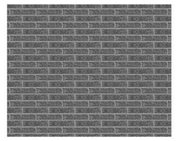




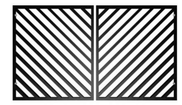








11 **GRAY BRICK**



12 **DECORATIVE GATE**

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MATERIAL SPECIFICATIONS

	DATE	REMARKS
	08/15/2025	Planning Set
	10/28/2025	Planning Set
1	11/14/2025	Planning Set Resubmittal

PA/PM:	ANAEL HASS
DRAWN BY.:	K.E.
JOB NO.:	LAX25-0037-00

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APPENDIX B: RESUMES

HISTORIC RESOURCES GROUP

556 S Fair Oaks Ave, Suite 101-514
Pasadena, CA 91105

Tel 626-793-2400
historicresourcesgroup.com



CHRISTINE LAZZARETTO

Managing Principal

Education

Master of Heritage Conservation, University of Southern California, Los Angeles

Bachelor of Arts Degree w/ High Distinction, Art History, Pennsylvania State University, State College

Phi Beta Kappa

Professional Affiliations

California Preservation Foundation Board of Trustees, President Emeritus

DOCOMOMO Southern California, Founding VP

Los Angeles Conservancy

National Trust for Historic Preservation

Society of Architectural Historians

Experience Profile

Years of Experience: 22

Christine Lazzaretto has worked in historic preservation in Southern California since 2003. She joined HRG in 2008 and has served as Managing Principal since 2017.

At HRG, Christine works on environmental review, policy development, historic resources surveys, historic context statements, and federal tax credit projects. She has worked on numerous large-scale historic resources surveys and has authored a wide range of historic context statements and successful National Register nominations. Christine also manages teams of professional colleagues on large-scale planning projects. She is a leading expert in cultural resources analysis for environmental review in California. She is a lecturer in the Heritage Conservation summer program at the University of Southern California.

Christine Lazzaretto meets the *Secretary of the Interior's Professional Qualifications Standards* in History and Architectural History.

Selected Projects

CBS Columbia Square Adaptive Reuse, Los Angeles
Climate Pledge Arena Historic Tax Credits, Seattle
City of Glendale, South Glendale Historic Context and Survey
City of Goleta Comprehensive Preservation Planning
City of Long Beach Suburbanization and Race Historic Context Statement
City of Los Angeles Citywide Historic Resources Survey (SurveyLA)
City of Riverside Modernism in Riverside Historic Resources Survey
City of Santa Monica Historic Context Statement and Survey Update
Forum Rehabilitation and Historic Tax Credits, Los Angeles
Paramount Pictures Master Plan, Los Angeles
University of Southern California Master Plan, Los Angeles

Speaking Engagements

California Preservation Foundation, Seminar Speaker
University of Southern California, Lecturer

HISTORIC RESOURCES GROUP

556 S Fair Oaks Ave, Suite 101-514
Pasadena, CA 91105

Tel 626-793-2400
historicresourcesgroup.com



JOHN LOCASCIO, AIA

Principal Architect

Professional License

California Architect C24223

Education

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

Bachelor of Architecture, University of Southern California

Honors and Awards

National Trust for Historic Preservation, Richard H. Driehaus Foundation National Preservation Award

Los Angeles Conservancy Preservation Award

California Preservation Foundation Preservation Design Award

City of Pasadena Historic Preservation Award

AIA Institute Honor Award

Experience Profile

Years of Experience: 32

John LoCascio has been with HRG since 2011, involved in historic preservation since 2002, and a licensed, practicing architect since 1993.

John's areas of focus at HRG include historic architecture and technology, building conservation, historic structure reports and federal historic rehabilitation tax credit projects. He provides technical assistance for construction documents, advises on compliance with the Secretary of the Interior's Standards and the use of the State Historic Building Code, provides construction monitoring, and paint and materials sampling and analysis services. John has worked on a wide variety of buildings and structures in California as well as in other states. He is currently advising on historic tax credit projects in Los Angeles, the San Francisco Bay area, and Washington State. In addition, John regularly provides historic architecture consultation for numerous LAUSD campus modernization projects.

John LoCascio meets the *Secretary of the Interior's Professional Qualifications Standards* in Architecture and Historic Architecture.

Selected Projects

28th Street YMCA Rehabilitation and Adaptive Reuse, Los Angeles
Academy Museum of Motion Pictures Rehabilitation, Hollywood
Angelus Funeral Home Historic Tax Credit Project, Los Angeles
CBS Columbia Square Rehabilitation and Adaptive Reuse, Hollywood
Chapman University VPO Packing House Rehabilitation, Orange
Climate Pledge Arena Historic Tax Credit Project, Seattle
Constance Hotel Historic Tax Credit Project, Pasadena
Grand Central Air Terminal Rehabilitation & Adaptive Reuse, Glendale
Los Angeles International Airport Preservation Plan and HSRs
Mayfair Hotel Historic Tax Credit Project, Los Angeles
Venice High School Comprehensive Modernization, Los Angeles

Professional Affiliations

American Institute of Architects