

## Memorandum

DATE: May 25, 2018 – revised August 3, 2018

TO: Amy Freilich  
Armbruster Goldsmith & Delvac LLP  
12100 Wilshire Blvd, Suite 1600  
Los Angeles, CA 90025

FROM: Jenna Snow

RE: 554-562 South San Pedro Street, Los Angeles, CA

A development project is proposed for the property located at 552-554 South San Pedro Street (Assessor Parcel Number 5147-024-022) in the Central City Community Plan Area within the Skid Row district of Los Angeles, California (“subject property” or “property”). The property is currently developed with one commercial building, which was constructed in 1922. The subject property has not been previously surveyed; it was not included in the City of Los Angeles’ citywide survey, SurveyLA, nor is it included in the Historic Property Data File for Los Angeles County, updated to 2011. Based on a site visit, review of building and alteration permits, and available information on the building’s history, the subject property does not appear eligible for listing in the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), or as a local City of Los Angeles Historic Cultural Monument (HCM).

The subject property is located adjacent to 511 East 6<sup>th</sup> Street, the former El Rey Hotel, which was identified in SurveyLA as appearing eligible for listing in the National and California Registers, and as a local HCM as “an excellent example of a 1920s hotel in Downtown Los Angeles, exhibiting essential characteristics of the property type; reflects early patterns of commercial development to the east of Los Angeles’ central business district.” The El Rey Hotel is considered for the purposes of this analysis a historical resource under the California Environmental Quality Act (CEQA). As the proposed project is located adjacent to a secondary elevation of the El Rey Hotel, it does not appear there will be any direct or indirect impacts of the new building on the historical resource.

The following memo first assesses the subject property for eligibility for listing in the National and California Registers as well as a local HCM, followed by an evaluation of impacts of the proposed project on the adjacent historical resource.

### **Assessment of 552-554 South San Pedro Street**

Eligibility criteria for the National Register, California Register and local HCM generally align. Properties are eligible for designation if they meet one or more four criteria. The following discusses the subject property under each of the four criteria, concluding that it does not appear eligible under any criteria.

*A/1/1 Are associated with events that have made a significant contribution to the broad patterns of our history*

The subject property is located in what is described as “Central City East” in SurveyLA. The area has been known as “Skid Row” since the late nineteenth century. The following description of the area is excerpted from SurveyLA:<sup>1</sup>

Central City East is generally located to the east of the Historic Core and to the south of Little Tokyo. Spanning a diverse area that encompasses Skid Row, the Toy District, and adjacent industrial zones, the neighborhood contains a mix of industrial and institutional uses. Notably, it contains many Single-Room Occupancy (SRO) hotels, social service facilities, and warehousing sites that are associated with food processing. Development in this area is of a notably lower scale than in other parts of the CPA....

Homelessness and other social problems were even more rampant in the area located to the east of Main Street and the Historic Core, which had become known as Los Angeles’ “Skid Row.” Since the late nineteenth century, this area had been the domain of an indigent population because of its abundance of residential hotels adjacent to early rail terminals. These hotels provided cheap, short-term accommodations and were accompanied by several missions that had long operated nearby to provide “a sermon and a cup of soup for the population of hard-drinking single men.” The area’s reputation as a bastion of urban disorder was solidified by a “policy of containment” that was adopted by the city in 1975, which sought to concentrate social service agencies and homeless individuals in an area bounded by 3<sup>rd</sup>, 7<sup>th</sup>, and Main streets and Central Avenue. Despite the best efforts of social service organizations and not-for-profit agencies such as the Skid Row Housing Trust, which has converted thousands of dilapidated Single-Room Occupancy (SRO) hotel rooms in the area into affordable housing units, Skid Row continues to house one of the largest stable populations of homeless individuals in the United States.

The pattern of development described above of generally low scale buildings that combine residential with industrial uses is evident in historic Sanborn Fire Insurance maps.

The one building at the subject property was constructed in 1922.<sup>2</sup> Since 1937, the subject property was owned by Ben Weingart; corporations controlled by Ben Weingart;<sup>3</sup> one of his favorite charities, Volunteers of America;<sup>4</sup> or a foundation that bears his name, successively. The following table shows a history of ownership:<sup>5</sup>

Year	
1922	Francesca W. Shepherd
1924	Security Trust & Savings Bank
1926	Title Insurance and Trust Company
1929	Citizens Trust and Savings Bank
1930	William H. Anderson
1936	Mortgage Guarantee Co

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<sup>1</sup> Architectural Resources Group, “Historic Resources Survey Report; Central City Community Plan Area,” prepared for the City of Los Angeles Department of City Planning, Office of Historic Resources, September 2016, 4 & 28-29.

<sup>2</sup> City of Los Angeles, Department of Building and Safety, Permit #27664, August 15, 1922.

<sup>3</sup> “Tragniew” is Weingart spelled backwards.

<sup>4</sup> John Farrell, *Ben Weingart & Weingart Foundation*, (Los Angeles, CA: Weingart Foundation, 2002), 137.

<sup>5</sup> The history of ownership is based on Los Angeles County Office of the Assessor Deeds Books as well as a chain of title prepared by First American Title Company.

Year	
1937	Consolidated Hotels, Inc
1948	Ben Weingart
1957	Tragniew Inc
1980	Volunteers of America of Los Angeles
1984	Weingart Center Association

The building was divided into at least four spaces that were leased to different tenants. For a period of at least four years, the building was divided into five spaces. The following table, based on telephone directories, lists tenants between 1925 and 1987:

Date	554 S. San Pedro	556 S. San Pedro	558 S. San Pedro	560 S. San Pedro	562 S. San Pedro
1925	William A. Winsboro Mfrs agent, h 1466 W 47 <sup>th</sup> (1923 directory: Air Compressor & Equipment Co, 504 S San Pedro)	Don Lincoln, printer h 773 Cahuenga Ave		Stewart Electric Co. (Emmett A. Stewart) Jobbers and Distributors of Electrical Supplies	Lake View Creamery Co., W. F. Sperry, v-pres and mgr (1923 directory: 805 E 8 <sup>th</sup> St)
	JJ McBride				
1930	Murry Jacobs, H C Kimes dist mgr mfrs agts Jacobs Murray Co, manufacturers agents	Merco Nordstrom Valve Co		Edwin G Nelson (electrical equipment, manufacturers agent)	William Wahl Co (William and William Wahl Jr), wholesale beverages
1935	Bassett-Lundstrom Co (A B Bassett & J T Lundstrom), belting dealer	Clinton H Smart (blue print supplies) h3522 Linda Vista ter	Far West Distributing Co, Charles Lowe manager new dealers	Cutler-Hammer, Inc (Electrical Equipment and supplies -Dealers)	J C Millett Co (winery supplies), Frank Kissling manager
	Robert L Whitham, manufacturers agent (metals)				
1940	Bassett-Lundstrom Co (A B Bassett & J T Lundstrom), manufacturers agent	Clinton H Smart (Olive C) CS [Christian Science] practitioner] 610 S Bway R324 and engravers supplies and blue prints h914 S Kingsley dr	Abrasive Products Co A E MacAfee manager	Strickland & Davis (J M Strickland & J S Davis) manufacturers agents	Frank Kissling (Liquors- Distributors)
	Robert L Whitham, manufacturers agent (metals)				
1942	Bassett-Lundstrom Co (A B Bassett & J T Lundstrom), belting dealer (Chicago Belting Co.)	Clinton H Smart (Olive C) CS pract 610 S Bway R324 and engravers supplies and blue prints r Pasadena		Strickland & Davis (J M Strickland & J S Davis) wholesale auto parts	Samuel Zane (candles)
1956		Smart Clinton H, Smart Supply Co		J.W. Lewis Co., Max Elsner	Carroll Machry
1960	Lesco Metals & Supply Co	C C Lithograph Co		J.W. Lewis Co., Max Elsner	Carroll Machry
1965	R A Schmitz	Midway Tool Supply		J J Optics	Carroll Machinery
1973	No listings				
1987	Morrison's Management Service				

Based on the above table, most tenants were agents selling a variety of industrial products. However, it does not appear any of the products were produced at the subject property.

As a low-scale, one-story building housing a variety of agents selling industrial products, the subject property appears as a typical property type in the area and it does not appear to have made any significant contributions to the broad patterns of development of the area. The subject property is therefore not eligible for designation under criterion A/1/1.

*B) Are associated with the lives of significant persons in our past*

The subject property, purchased by Ben Weingart in 1937, was one of many properties in his portfolio. Ben Weingart (1887-1980), was a real estate developer who co-founded the community of Lakewood, as well as a major stockholder in the Fedmart discount department stores. Ben Weingart arrived in Los Angeles in 1911, initially delivered laundry on Skid Row and, soon thereafter, started purchasing boarding houses on Skid Row. Beginning in 1949, Weingart, in partnership with Louis Boyer and Mark Taper, purchased 3,500 acres south of Los Angeles, and built 17,000 new homes, along with the Lakewood Shopping Center. Lakewood became the largest planned city in the United States.<sup>6</sup> The Weingart Foundation was founded in 1951 and has focused on “serv[ing] the underserved,”<sup>7</sup> since that date.

None of the tenants appear to have had an especially long tenure. The longest tenant was Clinton H. Smart, who provided blueprint and engraver supplies between 1935 and 1956. Clinton H. Smart was also listed in the directory as a Christian Science practitioner. His obituary notes that he was “president of a Los Angeles art supply company...a member of the Balboa Yacht Club and a director of the Christian Science Visiting Nurse Service.”<sup>8</sup> While Clinton Smart appears to have been an upstanding citizen, he does not appear to be a significant person in our past.

In contrast, Frank Kissling does not appear to have been an upstanding citizen. Frank Kissling, who leased a space for liquor distribution in the late 1930s-1940, was arrested for smuggling alcohol from Mexico. In addition, he was accused of cutting the alcohol. In an article appearing the *Los Angeles Times*, “officials disclosed that the breaking of the smuggling case-biggest of its kind since prohibition days-had resulted in receipt of information that much of the smuggled alcohol was distributed in the Skid Row area here in refilled liquor bottles bearing fake labels. The original supply was ‘cut’ drastically in alcoholic content and sold as domestic bourbon with the aid of synthetic flavoring, it was reported.”<sup>9</sup> Frank Kissling was later acquitted<sup>10</sup>.

Established in 1914, J.W. Lewis Co., mostly sold and leased industrial spaces. With the main office located at the Security Building,<sup>11</sup> at 510 South Spring Street, the subject property was a satellite office. The company sold properties in the vicinity of the subject property, including the El Rey Hotel, located adjacent to the subject property, as well as a property on the southeast corner of 5<sup>th</sup> and San Pedro Streets.<sup>12</sup> Max Elsner worked at J.W. Lewis Co. from as early as 1922.

Although the subject property can be associated with several individuals, specifically Ben Weingart, Clinton Smart, Frank Kissling, and Max Elsner, it does not appear eligible under criterion B/2/2 for its association with the lives of significant persons in our past. While Ben Weingart was a significant

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<sup>6</sup> Ted O. Thackery and Anne LaRiviere, “Ben Weingardt, 92, Philanthropist, Financier, Dies,” *Los Angeles Times*, December 23, 1980, A1.

<sup>7</sup> Weingart Foundation, “About Us: Foundation Overview,” [www.weingartfnd.org/Foundation-Overview](http://www.weingartfnd.org/Foundation-Overview).

<sup>8</sup> “Obituary,” *Los Angeles Times*, October 18, 1957, B2.

<sup>9</sup> “Inquiry Turns to Skid Row,” *Los Angeles Times*, July 28, 1939, A1.

<sup>10</sup> “Five Acquitted in Alcohol Case,” *Los Angeles Times*, November 4, 1939, A16.

<sup>11</sup> California State Real Estate Division, *Directory of Brokers and Salesmen, Volumes 3-4*, (Sacramento: California State Printing Office, 1922).

<sup>12</sup> “Sales in Wholesale Area,” *Los Angeles Times*, February 17, 1924, D8; “Classified Ad,” *Los Angeles Times*, May 7, 1950, A9.

person in southern California, the subject property was one of his many property holdings and is not most closely associated with his important work. Neither Clinton Smart, Frank Kissling, nor Max Elsner appear to have been significant persons in our past.

*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*



**Figure 1:** 554-562 South San Pedro Street, west façade, view southeast (Snow, 2018)

Located on the east side of South San Pedro Street, the subject property is bounded on the north by East 5<sup>th</sup> Street and the south by East 6<sup>th</sup> Street in the Skid Row area of Central City Community Plan Area of Los Angeles.<sup>13</sup> The subject property contains one building that occupies approximately half of the parcel. A driveway at the north elevation separates the building from the parcel to the north, while a narrow walkway separates the building from the El Rey Hotel, which is located on the adjacent parcel to the south.

A one-story masonry building with no discernable architectural style, the one building at the subject property has a flat roof with visible through-bolts at the parapet. The west façade, facing east toward South San Pedro Street, is five bays wide. Brick piers separate each bay. The main entrance is located in the second bay from the north, articulated by a contemporary canvas awning. The entrance is slightly inset at an angle and consists of a single, contemporary glass and metal door with a glass transom above. Three, tall, fixed sash windows are located adjacent to the main entrance above a low bulkhead. The center bay contains three, fixed, metal sash windows above a low bulkhead, flush with the infilled stucco. Three of the bays have been infilled with smooth stucco. The southern-most bay contains a contemporary tile mural and a secondary entrance. The secondary entrance is a contemporary, solid metal door. North and south side elevations are unarticulated and unadorned. The rear, east elevation has two entrances, a pair of metal doors toward the south side of the elevation and a single glass and metal door toward the north side of the elevation. The glass door is sided by a tall, fixed sash sidelight that is covered by a metal screen. A glass transom spans across the door and sidelight. It is also covered by a metal screen. A contemporary canvas awning spans the entrance and sidelight above the transom. A single window, covered by a metal screen, is located adjacent to the door. A number of additional openings along the elevation have been infilled.



**Figure 2:** 554-562 South San Pedro Street, interior, view northwest (Snow, 2018)

The interior of the building functions as a café. The south half of the interior consists of one, large open space roughly divided by thin metal posts. A skylight is located toward the center of the space. The north half consists of a large commercial kitchen. All finishes on the interior, including floor tiles and suspended ceiling are contemporary.

<sup>13</sup> For ease of description, it is assumed that South San Pedro Street runs north-south.

Constructed in 1922, the one building at the subject property has undergone substantial alterations.<sup>14</sup>  
The following table lists all available alterations permits:

Date	Permit No.	Work	Owner	Architect/Builder	Valuation
8/15/1922	27664	New building	B*** H. Jones & Francis H. Green	John M. Cooper	\$15,000
1/31/1923	4641	Located at 554 So San Pedro. No alterations. Wish to install “wood” fixtures + office partitions of wood boards and sidings 8” high. Building is cement floor + walls brick.” Building used for manufacturing + Jobing	J. W. Lewis Co., 518-519 Security Bldg		\$175
4/16/1923	16774	“Put in partition above ice box- of wood and glass – ¼ glass”	Lakeview Creamery Co	Lake View Creamery Co, 562 S. San Pedro St	\$40
3/30/1937	9766	“1 Rope Pull Up Awing Complete”	Smart Supply Company, 556 S. San Pedro St.	A. Hoegee & Sons, Inc.	\$25
2/27/1940	6995	“To build open joist construction mezzanine for storage purposes only” (556 So. San Pedro Street)	Consolidated Hotels, El Rey Hotel 6 <sup>th</sup> & San Pedro Sts	Arthur C. Munson	\$200
7/16/1942	8684	“one Rope awning complete”	The Smart Shop, 558 S. San Pedro St	D** of Soft Awning Co, 3103 So. Main St	\$35
4/25/1945	5683	Not legible. Bottom line: “to store blueprint paper”	Clinton Smart, 556 S. San Pedro		\$900
8/13/1951	12905	“Recover existing awnings. Rope pull-up (retractable) (canvas covered)	Smart Supply Co., 556 So. San Pedro		\$104
12/9/1952	48778	“parapet wall correction along S. San Pedro & alley” – 554-62 S. San Pedro, used as a store for 20 years	Consolidated Hotels, 1301 Wilshire	Lopez & Crecghton, 1257 E. 25 St	\$1100
1/11/1957	61747	“Enlarge Doors”- 562 S. San Pedro. Used as a machine shop	Consolidated Hotels, 1301 Wilshire Blvd	Kenneth Thompson	\$700
11/10/1964	81828	“Toilet rm add (interior)” – 554 S. San Pedro St. used as stores	Tragneiw Inc. 1301 Wilshire Blvd		\$800
1/27/1981	35664	“1 story 34’x76’ portion of existing 88’x84’ office/warehouse converted to a kitchen (no assembly use)	Volunteers of America, 1501 Wilshire Blvd		
4/8/1983	61612	“Generator Cover Bldg” with chain link exterior walls, metal roof, concrete floor. 554-562 S. San Pedro	Volunteers of America, 1501 Wilshire Blvd	Stuart E. Greenfield, 2300 Westwood Blvd/	\$2500
7/26/1988	5144	“Division 88 Full Compliance,” 554-62 S. San Pedro St., used as a kitchen & Dining room	Weingart Center Assn, 511 E. 6 <sup>th</sup> St, LA, CA	Engineer – Wheeler & Gray, 7462 North Figueroa St	\$48,000
2/10/1995	3118	“interior modifications for café. Change of use to dining room & deli”	Weingart Center	Terry Downing, 31220 la Baga Dr., Ste 235, Westlake Village	\$85,000

<sup>14</sup> City of Los Angeles, Department of Building and Safety, Permit #27664, August 15, 1922.



**Figure 3:** Postcard of El Rey Hotel, note subject property at far left circled and noted with red arrow (Weingart Foundation, circa 1940s)

Figure 3 shows a historic image of the subject property from the 1940s. The building appears as an unremarkable one-story building with glass storefronts along the west façade. The first notable alteration occurred in 1952 with a “parapet correction.” It is difficult to determine in the historic image if the building ever had a decorative parapet. It is possible bays on the west façade were infilled in 1981, when the building changed use from stores to a café. Through bolts were likely installed as part of the Division 88 work, completed in 1988, which required seismic stabilization of unreinforced masonry buildings. Finally, in 1995, substantial work was completed

on the interior and most, if not all, interior features appear to date from this time.

As noted in the above table of building and alteration permits, the building at the subject property was designed by John Cooper. Born in Ohio, John Montgomery Cooper (1884-1950) graduated from Yale University and worked on the Panama Canal as an engineer. He arrived in Los Angeles in 1910.<sup>15</sup> John Cooper was a noted southern California architect who was responsible for the design of the Hollywood Knickerbocker Hotel (1714 Ivar Avenue, 1929, contributing resource to a National Register-listed historic district), Grether & Grether Building (730 South Los Angeles Street, 1924, listed in the National Register), Roxie Theater (815 South Broadway, 1931, listed in the National Register), and NuWilshire Theater (1314 Wilshire Boulevard, Santa Monica, 1931, Santa Monica Landmark).

The subject property does not embody the distinctive characteristics of a type, period, or method of construction, nor does it possess high artistic values. The one building at the property has no discernible architectural style, nor does it appear that it ever was a high style building. With the parapet removed and three of the five bays infilled, the building appears as a shell of how it originally looked. While the building was designed by John Cooper, a notable architect, this is not among his important work. Therefore, the subject property does not appear eligible for designation under criterion C/3/3.

*D) Have yielded or may be likely to yield, information important in history or prehistory*

The subject property cannot be reasonably expected to yield information important in prehistory or history; therefore, it is not eligible under Criterion D/4.

<sup>15</sup> “John M. Cooper. Noted Southland Architect, Dies,” *Los Angeles Times*, May 29, 1950.



## Impacts Evaluation on 511 East 6<sup>th</sup> Street, El Rey Hotel



**Figure 4 (left):** 511 East 6<sup>th</sup> Street, El Rey Hotel, west elevation (left) and south elevation (right), view northeast (Snow, 2018)

**Figure 5 (right):** 511 East 6<sup>th</sup> Street, El Rey Hotel, west elevation (left) and south elevation (right), view northeast (USC Digital Collection, Dick Whittington Collection, 1927)

The subject property is located adjacent to the former El Rey Hotel, which was identified in SurveyLA as appearing eligible for listing in the National and California Registers, as well as a local HCM. The survey found 511 East 6<sup>th</sup> Street eligible as “an excellent example of a 1920s hotel in Downtown Los Angeles, exhibiting essential characteristics of the property type; reflects early patterns of commercial development to the east of Los Angeles’ central business district.” 566 South San Pedro Street is considered to be a historical resource under CEQA for purposes of this analysis.

The El Rey Hotel was constructed in 1925, designed by Charles F. Whittlesey with elements of Beaux Arts style.<sup>16</sup> Charles Frederick Whittlesey (1867-1941) started his professional career in Chicago, working as a draftsman for Louis Sullivan prior to opening his own practice. Around the turn of the twentieth century, Charles Whittlesey became chief architect for the Atchison Topeka and Santa Fe Railroad Company, working with noted architect Mary Colter. During that time, he designed the El Tovar Hotel at Grand Canyon National Park (1905) and Alvarado Hotel in Albuquerque, New Mexico (1904). Around the same time as he designed the El Rey Hotel, Charles Whittlesey was also responsible for the design of the Padre Hotel (1955 North Cahuenga Boulevard, 1925) and the Mayflower Hotel (now the Hilton Checkers Hotel, 535 South Grand Avenue, 1927).<sup>17</sup>

When the hotel opened in 1927, it was operated by Stillwell Hotel Company and advertised for its “strictly fireproof” construction. Its 620 rooms were available for \$1.00 a day or \$5.00 to \$10.00 a week.<sup>18</sup> The hotel appears to have been one of the inexpensive, short-term accommodations common in this area. It appears in several newspaper articles as the site of tragic suicides.<sup>19</sup>

The El Rey was one of the first hotels purchased by Ben Weingart in 1937, through a holding company named Consolidated Hotels Corporation.<sup>20</sup> The building transferred to the Weingart Foundation by 1980. When the Weingart Center opened in 1983, it was one of the first, and was the

<sup>16</sup> City of Los Angeles, Department of Building and Safety, Permit #43928, December 31, 1925.

<sup>17</sup> Pacific Coast Architecture Database, “Charles Frederick Whittlesey,” PCAD id: 102, [pcad.lib.washington.edu/person/102/](http://pcad.lib.washington.edu/person/102/); Los Angeles Conservancy, “Hilton Checkers,” [www.laconservancy.org/locations/hilton-checkers](http://www.laconservancy.org/locations/hilton-checkers).

<sup>18</sup> “Display Ad,” *Los Angeles Times*, June 12, 1927, 6.

<sup>19</sup> “Mystery Girl Takes Poison, Cuts Wrists,” *Los Angeles Times*, December 29, 1927, A12; “Photo,” *Harold Examiner*, USC Digital Library, 1951; “Man Threatens 12-Story Leap; Foiled by Police,” *Los Angeles Times*, April 9, 1964, 2.

<sup>20</sup> County of Los Angeles, Deed Books, Instrument No. 15323, Page 198.

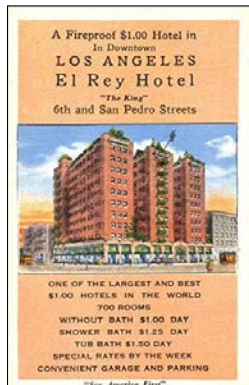


nation's largest facility at the time providing housing and services for alcoholics on Skid Row. A one-million-dollar remodeling effort was completed prior to opening as a rehabilitation center.<sup>21</sup> A new garden on the parcel east of the El Rey was dedicated in 2010 on the site of a formerly vacant lot.<sup>22</sup> The garden is enclosed along East 6<sup>th</sup> Street by a contemporary concrete block wall and fence and consists of concrete and brick walkways, raised concrete planters, a central fountain, and a variety of seating.

While the exterior of the El Rey Hotel looks very similar to how it appeared historically in 1927 (see above figures 4-5), there is little historic fabric remaining on the interior apart from the circulation system. SurveyLA identified the subject property as appearing eligible under criterion A/1/1 as a 1920s hotel, as well as for its architecture under criterion C/3/3. Character-defining features of the exterior include:

- Beaux Arts composition of a clearly delineated base-shaft-capitol composition
- Articulated corner column
- Arched bays at the ground floor
- Regularly spaced fenestration along the shaft
- Classical cornice details

A development project is proposed for the subject property, adjacent to the south elevation of the El Rey Hotel. The project includes construction of two towers, designed in a contemporary style: one 12-stories facing South San Pedro Street and the other 18-stories high to the east. New mechanical equipment, including two new electrical transformers, is proposed to be located within the garden east of the El Rey Hotel and service the two new buildings as well as the El Rey Hotel. As the subject property does not meet any of the four criteria for listing in the National or California Registers or for local designation, it is not a historical resource under CEQA. Therefore, its demolition will not be a significant impact.



**Figure 6:** Postcard showing a rendering of the El Rey Hotel (undated)

As the proposed project consists of new construction immediately adjacent to a historical resource, the El Rey Hotel, there is the potential for indirect impacts to the setting of the historical resources. In general, CEQA describes an *indirect* impact as one that results from the "...alteration of the resource or its *immediate surroundings* such that the significance of an historical resource would be materially impaired" (emphasis added - CEQA Guidelines §15064.5(b)(1)). While the setting, including the garden to the east and its associated features, of the El Rey Hotel is not a character-defining feature and does not contribute to its significance, the proposed project nevertheless does not appear to impact its setting. The proposed project is located adjacent to the north elevation, a secondary elevation. The tower adjacent to the El Rey Hotel is proposed to be 12-stories high, which is only two stories higher than the El Rey Hotel. It is interesting to note that at one time, a four-story building may have been contemplated for the subject property (see Figure 6). Although the second tower will be almost twice as tall as the El Rey Hotel, it is not located immediately adjacent to it. The proposed project would not alter the setting of the El Rey Hotel in such a manner that it would be materially impaired.

<sup>21</sup> "Alcoholism Center Gets New Owner, \$2-Million Grant," *Los Angeles Times*, November 30, 1984, D1.

<sup>22</sup> "Dedication of the Weingart Center Garden Project," Press Release July 8, 2010, Congresswoman Lucille Roybal-Allard, <https://roybal-allard.house.gov/news/documentsingle.aspx?DocumentID=198000>.

**Conclusion**

554-562 South San Pedro Street was assessed for eligibility for listing in the National and California Registers as well as an HCM. The subject property does not appear eligible for designation under any of the four criteria and therefore is not a historical resource under CEQA. A development project is proposed for the subject property. As the subject property has not been identified as a historical resource, there does not appear to be potential for direct impacts to historical resources. In addition, while the former El Rey Hotel, located adjacent to the subject property at 511 6<sup>th</sup> Street, is considered a historical resource for the purposes of this memo, the proposed project does not appear to impact the setting of the building, including the garden to the east that was dedicated in 2010. Therefore, there does not appear to be any indirect impacts to historical resources.