



March 12, 2013

Submitted by email

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**RE: James K. Hill & Sons Pickle Works Building, 1st Street Viaduct
Widening Project**

Dear Jim:

Thank you for reaching out to the Los Angeles Conservancy regarding the James K. Hill & Sons Pickle Works Building ("Pickle Works Building") and the Bureau of Engineering's proposal to demolish the building. In 2005 the Conservancy participated in the initial environmental review process for the 1st Street Viaduct Widening Project, providing comments on the bridge and impacts to this historic building.

The Pickle Works Building was built in 1888 and initially known as the California Vinegar & Pickle Company, later known as the James K. Hill & Sons Company. A variety of tenants occupied various portions of the building throughout its history. In more recent years, in the 1980s and 90s, it was known as the Citizens Warehouse and Art Dock, housing contemporary artists. As with many historic industrial buildings, the Pickle Works Building was expanded in size over time throughout several phases up until approximately 1909. The subsequent additions employed the same structural wood frame system with brick masonry walls and matching design details. In 2005 the Pickle Works Building was recognized as a historic resource eligible for the National Register of Historic Places and as a rare example of a Victorian-era brick industrial building, located in what is now referred to as the Arts District.

Through the Section 106 process, the widening project was determined to have an unavoidable adverse effect on the Pickle Works Building as well as the 1st Street Viaduct, necessitating a Memorandum of Agreement (MOA) to take those effects into account (attached). The MOA was executed in December of 2005, stating it did not foresee any further adverse effects. As part of this agreement either 30 feet (11 percent) or 50 feet (19 percent) of the south end of the Pickle Works Building was to be demolished to allow for the expansion of the immediately-adjacent viaduct. Instead 75

feet (28 percent) of the building was removed. It is unclear why more of the building was demolished and what necessitated this change, other than an understanding that there was a desire for a larger staging area and needing to sever the building at a location to ensure structural stability. The Conservancy has not seen further documentation providing greater explanation, let alone an amendment to the MOA.

The MOA outlines agreed-upon measures that the City will take to avoid, minimize, or mitigate the adverse effects. The intent was for the City to secure the building following its partial demolition and rebuild the southern façade of the Pickle Works Building, therefore minimizing the extent of the adverse effect of the overall project. Specifically the MOA states the City will replicate the existing southern façade “in a manner consistent with the design of the remaining elements of the building.”¹

The Conservancy has received and reviewed a November 2012 report by Galvin Preservation Associates regarding a re-evaluation of the Pickle Works Building for the National Register. The Galvin report provides greater research into the history of the building and its various tenants and uses. However the report appears to be immaterial as the retention of National Register eligibility was already addressed in 2005. As part of the Section 106 process, the Finding of Effect for this project fully acknowledged the removal of “a significant amount of this building would substantially alter the character-defining features of this building and, thus, affect National Register eligibility.”² The Conservancy does not question these findings as the partial demolition and an adverse effect finding was the impetus for the Section 106 process and MOA. We do, however, believe the Pickle Works Building, as it remains today, is a rare historic resource within the city of Los Angeles.

A November 7, 2012 report by Structural Focus was also provided to the Conservancy regarding findings related to the potential rehabilitation of the Pickle Works Building. We have reviewed the report and agree with its evaluation. It states that the building can be rehabilitated to comply with the provisions of the California State Historical Building Code (CHBC). In 1986 the building was seismically strengthened to meet the City’s Division 88 Code, intended for unreinforced masonry bearing wall buildings. Structural Focus identifies additional potential deficiencies and associated remedies. None of these appear to be cost-prohibitive or insurmountable in terms of an overall rehabilitation that may occur in the future. In terms of the City’s commitment to rebuild the south end wall, as stated within the MOA, the report concludes this is feasible. It suggest that a new “reinforced 10” thick, normal strength, full grouted” CMU wall be constructed to be more compatible with the existing building.

Throughout our evaluation and research into the matter, the Conservancy cannot identify a reason or a change in circumstances to warrant the demolition of the remainder of the

¹ Memorandum of Agreement Among the Federal Highway Administration and the California State Historic Preservation Officer Regarding the 1st Street Viaduct and Street Widening Project, Los Angeles, Los Angeles County, California. December, 2005.

² Finding of Effect for 1st Street Viaduct and Street Widening Project, City of Los Angeles Public Works Department, Bureau of Engineering. April 2005


Pickle Works Building at this time. The Section 106 process and resulting MOA provide a clear process for mitigating the adverse effects – the demolition of seventy-five feet of the Pickle Works Building -- that occurred as part of the 1st Street Viaduct Widening Project. The MOA states specifically that it does not foresee any further adverse effects. The remedy, then and now, as outlined and agreed to in 2005 by the City, is to construct a new wall at the south end of the Pickle Works Building. A structural engineering report commissioned by the City states this is feasible and provides recommendations for implementation.

If the City is planning to proceed with plans to amend the MOA we believe this will result in a reopening of the environmental review process and likely lead to additional time delays. The Conservancy will want to participate as a consulting party in the matter and encourage the City to convene a community meeting with residents of the Arts District to discuss preservation alternatives.

The Conservancy is happy to work with the City to help with this process and implement the terms of the MOA. Once a new south end wall is constructed, ultimately we think it would be preferable to find a new end user who will complete the full rehabilitation of the Pickle Works Building. We have suggested the City look into an RFP process to transfer ownership of the building into private hands, with conditions to ensure it is sensitively rehabilitated.

Thank you for the opportunity to provide comments. Let me know how the Conservancy can assist and work with the City to successfully close out this project. Please feel free to contact me at 213-430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, slightly slanted style.

Adrian Scott Fine
Director of Advocacy

cc: Ken Bernstein, Office of Historic Resources, City of Los Angeles
Tanner Blackman, Office of Councilmember Jose Huizar, 14th District
Natalie Lindquist, Office of Historic Preservation, CA Dept. of Parks and Recreation
Kelly Ewing-Toledo, District 7, Caltrans
Dung Tran, Bureau of Engineering, City of Los Angeles

Attachment(s)