



April 1, 2013

Submitted by email

Ms. Diana Kitching
City Planning, EIR unit
Environmental Review Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Email: diana.kitching@lacity.org

**Re: Notice of Preparation of an Environmental Impact Report
City Market of Los Angeles, ENV-2012-3003-EIR**

Dear Ms. Kitching:

On behalf of the Los Angeles Conservancy, we submit the following comments on the proposed City Market Los Angeles project. As part of the ongoing environmental review process we believe there is a need to evaluate and consider a range of preservation alternatives for the remaining historic buildings within the identified project and add areas. These historic resources were previously identified in 1992 as part of the City Market and Market Chinatown District.

I. Significance of the City Market and Market Chinatown District

The City Market and related adjoining buildings identified in the survey as the City Market Area Chinese Grouping (altogether comprising the City Market and Market Chinatown District) is culturally significant as the largest collection of pre-WWII business and community buildings associated with the Chinese community remaining in Los Angeles. The City Market was developed as a wholesale produce marketplace directly organized by a group of mostly Chinese and also Japanese vendors in 1909 and has been identified as “the key monument to the history of Chinese and Japanese produce vendors in Los Angeles.”¹ Reports indicate Chinese residents and workers were responsible for growing and distributing nearly eighty percent of the produce consumed in Los Angeles during this period through the 1930s.

The original City Market complex of buildings was constructed in 1909 and designed by the prominent Los Angeles architecture firm of Morgan and Walls. Located around the perimeter of the block bounded by San Julian, San Pedro, Ninth and Eleventh Streets, the market

¹ Eastside Industrial Area Architectural and Historical Resources Survey. Community Redevelopment Agency, Los Angeles. September, 1992.

consisted of approximately eight brick and reinforced concrete industrial buildings. Each was simple in design, with a pair of architecturally distinguished mid-block structures of two-stories and towers featuring Mission Revival detailing and corner belvederes. At the center were loading docks, some of which still remain. Additional buildings built as part of the City Market complex occupy much of the adjacent block directly south of Eleventh Street.

City Market became the focal point for the sizeable Chinese community located along the San Pedro Street corridor, and several adjacent and nearby buildings housing various uses (including religious, retail, restaurant and lodging) played a significant role in the neighborhood. This collection of buildings has been identified as the City Market Area Chinese Grouping, and contains a mix of retail structures, hotels and one church that were largely built between 1922 and 1925 to serve the emerging Chinese business district. A recent KCET feature highlights many of these buildings and the Chinese heritage, illustrating a slide show of historic images, at <http://www.kcet.org/socal/departures/chinatown/new-chinatown/the-city-market-chinese-suburbia.html>.

A potential City Market and Market Chinatown District was identified when the Community Redevelopment Agency of Los Angeles (CRA) produced the historic resource survey of the Eastside Industrial Area in 1992 (Attached). This includes the above mentioned structures associated with the Chinese wholesale and business community. At the time of the survey, each of the City Market structures was largely intact and the City Market Area Chinese Grouping consisted of twelve nearby structures (in addition to the eight buildings at the City Market) reflecting this period of significance. The survey however did note that “further remodeling and demolition pose serious threats to the buildings in this grouping.”²

In the years since the 1992 CRA survey, six of the City Market’s adjoining twelve structures identified as part of the City Market Area Chinese Grouping have been significantly altered (four) or demolished (two). This leaves just half of the original grouping intact. Two of these remaining intact buildings (1017-1019 San Julian Street and 1125 San Julian Street) are located within the proposed add area for the project and are currently proposed for demolition through potential acquisition. Demolition of these two historic resources would further compound and reduce the Chinese Grouping to only four intact contributors (leaving thirty-three percent) of those originally identified.

During the summer of 2012 and prior to the official announcement of the City Market Los Angeles project, a large grouping of the original City Market buildings was demolished. This includes buildings located within the block bounded by San Julian, San Pedro, Ninth and Eleventh Streets. Only portions of the first floor concrete frame structures remain (see Attachment A). The Conservancy was not aware of the demolition as it was taking place and has since expressed concerns about the timing of this activity in terms of CEQA and its application to the proposed project.

² Eastside Industrial Area Architectural and Historical Resources Survey. Community Redevelopment Agency, Los Angeles. September, 1992.

II. Historically and culturally significant resources should be identified and evaluated

The Conservancy strongly believes the project and add areas include culturally significant resources that should be identified and acknowledged as part of this EIR process. Despite the recent loss of the larger and most iconic structures associated with the City Market, buildings remain that are directly associated with the site's cultural significance and history. These include portions of buildings north of Eleventh Street and a grouping of intact buildings immediately south. The Conservancy has developed a map that identifies these buildings as well as others located within the project's proposed add area and the larger neighborhood illustrating the original City Market and Market Chinatown District (see Attachment B). Our preliminary analysis identifies which of these buildings remain today and, of those, which are intact in terms of overall integrity.

Unlike identified potential historic districts based on architectural significance where eligibility for listing may be diminished or jeopardized due to the cumulative loss of contributing structures, the City Market and Market Chinatown District is a thematic district based on cultural significance. While the loss of the larger City Market buildings is unfortunate, this action does not negate the significance of what remains. Rather, the significance of remaining resources may actually increase correspondingly given their rarity.

III. The Draft EIR should evaluate a range of alternatives that retain and reuse the remaining contributing structures of the City Market and Market Chinatown District

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."³ CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."⁴ Courts often refer to the EIR as "the heart" of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts."⁵

As currently envisioned, the proposed project is seeking approval to demolish all existing buildings within the project and add area boundaries. This action would result in the complete and significant loss of all remaining City Market structures and contemplates demolition of two of the remaining contributing structures within the City Market Area Chinese Grouping. Further demolition of what remains of the City Market would compound the loss that has already occurred.

³ Public Resource Code, Sec. 21001 (b), (c).

⁴ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

⁵ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

The Conservancy urges the City and the applicant to seek a range of preservation alternatives that can incorporate and adaptively reuse the remaining existing buildings for long-term preservation. New construction surrounding the historic resources can be designed to be compatible in design, materials and scale. We believe this will create a more interesting and vibrant project that can honor the rich cultural significance of this site. A preservation alternative can also, in part, mitigate the recent loss of the iconic City Market buildings.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the proposed City Market of Los Angeles project. The Conservancy hopes to work closely with the applicant's team as this project moves forward. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

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

Adrian Scott Fine
Director of Advocacy

Enclosure(s)

cc: Councilmember Jan Perry
Kent Smith, LA Fashion District
Ken Bernstein, Office of Historic Resources