



December 9, 2011

Submitted via email

Derek Jordan
Harbor Planning and Economic Analyst
Port of Los Angeles
425 S. Palos Verdes Street
San Pedro, CA 90731
djordan@portla.org

Re: Draft Port of Los Angeles Terminal Island Land Use Plan – and – Draft Built Environment Evaluation Report for Properties on Terminal Island

Dear Mr. Jordan:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Port of Los Angeles Terminal Island Land Use Plan (Plan) – and -- Draft Built Environment Evaluation Report for Properties on Terminal Island (Report). The Los Angeles Conservancy is the countywide historic preservation organization for the Los Angeles area and is the largest local historic preservation organization in the United States, with 6,500 members.

The Conservancy has long advocated for preservation priorities at Terminal Island, previously submitting comment letters in the last six years on the proposed Port Master Plan Amendment for Main Channel Deeping Project, the Southwest Marine Buildings Demolition Project, and the Pan-Pacific Fisheries Cannery Buildings Demolition Project. We have strong concerns regarding the proposed draft Plan and Report and their associated adverse impacts on historic resource(s) at Terminal Island. As the Conservancy stated in its December 2, 2008 letter to the Port, we believe there is a “pattern and practice” of needlessly demolishing historic buildings at Terminal Island without consideration of feasible alternatives.¹

Terminal Island is extraordinarily significant for its development during the later part of the 19th and early-to-mid 20th centuries, from its beginnings as a popular summer resort known as Brighton Beach, to its direct and profound role leading up to and throughout World War II. Despite changes at Terminal Island, much of the built environment dating to its primary period of significance remains today. The Conservancy wants to ensure that these historic and cultural resources are fully evaluated as part of the proposed Plan and Report processes. Further, any potential impacts specifically associated with the Plan or proposed projects should be identified early, acknowledged and evaluated for potential impacts.

¹ Californians for Native Salmon and Steelhead v. Dept of Forestry (1990) 221 Cal.App.3d 1419 re pattern and practice cause of action.

I. Environmental Evaluation Report should help guide planning at Terminal Island

With more than 2,000 acres within the Terminal Island boundaries, nine properties (some consisting of multiple buildings and structures) have been identified within the Draft Built Environment Evaluation Report as historic resources being eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or the local register. We believe further evaluation of several properties is necessary for those deemed ineligible.

We commend the Port for conducting a comprehensive historic resources survey. Historic resource surveys serve as an invaluable tool to inform the City and Port officials, property owners, stakeholders and residents about the rich built heritage of the Port and assisting in thoughtful development and environmental planning. Because significant resources are identified in advance, they can be promoted for adaptive reuse opportunities, while suitable sites for new construction with minimal or no adverse impacts to potential historic resources are likewise identified.

The Port's Report and findings should be coordinated with the Office of Historic Resources' SurveyLA, particularly in regard to developing a historic context for industrial buildings. Once the Report is completed, it should be included in the Plan as an appendix, along with a list of identified historic resources. A note should also be added that the information is current as of the effective date of the Plan and interested parties should contact the Port or the Office of Historic Resources for updated information.

In addition to compatible methodologies, we urge the Port to revise the Report and adopt a scope similar to SurveyLA's evaluation of buildings and sites up to 1980. The Report presently only evaluates resources from 1966 or earlier. Given that the Plan is anticipated to be in effect until 2030, we also recommend the inclusion of policies mandating periodic survey updates so that buildings that may become historic before then are properly identified and evaluated.

a. Tuna Street (Harbor Street Metal Works, 700-702; A. Nakamura Company Grocery Store, 712-716)

Tuna Street includes the last vestige of Terminal Island's once-thriving Japanese American community. At its height in 1940 more than 3,000 people lived and worked here, employed as fishermen and working in the canneries. Following the bombing of Pearl Harbor, Terminal Island's Japanese Americans were forcibly removed, beginning in 1942. Following their removal the Navy demolished nearly all of the residences and commercial buildings. Many of Terminal Islands' Japanese American residents were taken to Manzanar War Relocation Center internment camp, recognized today as a National Historic Site.

At least two structures remain and associated with the period of the Japanese American community, the Harbor Street Metal Works and the A. Nakamura Company Grocery Store. The Report acknowledges that these properties have a direct physical and tangible association to the former community. However, it states the surviving buildings are unremarkable and compromised integrity issues exist due to the physical loss of the Japanese American

community context, and therefore are ineligible. A site's lack of architectural significance or physical context does not, however, make it less historic. In this case, the fact that anything survives from the Japanese American community is extraordinary, exceedingly rare, and culturally rich in terms of significance.

Just as Manzanar's story is significant in portraying the experience of Japanese Americans during the war, so is Terminal Island's former Japanese American community in telling the story prior to the war. This is essentially the bookend to this national atrocity and act against human rights. And like Manzanar, which also has few if any physical reminders dating to the internment camp period, Terminal Island's Tuna Street imparts an important story, in part because so little is remaining. We request that you reevaluate these resources along Tuna Street as eligible historic resources.

b. Canner's Steam Company Plant, 249 Cannery Street

The Port requested AECOM to reevaluate the Canner's Steam Company Plant and amended its draft Report with new findings. In a July 7, 2011 letter, AECOM states the removal of interior and exterior processing equipment as part of asbestos remediation in 2011 jeopardizes its eligibility as a historic resource. Previously it was identified as "the best preserved example of built environment associated with the fishing and canning operations based at Fish Harbor from the early-to mid-20th century"² Given that so few historic resources remain that can impart Terminal Island's canning industry, the loss of some original material does not necessarily equate to loss of eligibility. Many industrial buildings have retained eligibility despite material alterations and adaptive reuse. Effective mitigation can also help convey historical significance. Canner's Steam Company Plant should be further reevaluated and its eligibility reinstated.

II. Proposed land use and infrastructure changes should be further evaluated for impacts to historic resources

Based on proposed land use identified within the Plan, and infrastructure changes (fill, roadways and railroad alignment), at least five of the nine identified historic resources will be directly impacted, most likely through demolition.

a. Southwest Marine (Bethlehem Steel Shipyard, Berth 240)

Southwest Marine, as just one example, is the last remaining link to Los Angeles Harbor's significant role in the World War II emergency shipbuilding program. Throughout the war, shipbuilding operations on Terminal Island continued at a frenzied pace. At its high point, nearly 90,000 workers were employed simultaneously at the various shipbuilding yards at the Port. The Port of Los Angeles ultimately became one of the main arteries that supplied and sustained the Allied victory. The Bethlehem Steel Shipyard in San Pedro was one of only 15 private and navy shipyards building destroyers during the war, with 26 destroyers launched from Berth 240.

² Jones & Stokes 2004, 18

Southwest Marine has been identified as an historic district eligible for listing in the National Register of Historic Places. The shipyard is remarkably intact, comprising twenty-seven buildings and structures on the site, significant primarily for the period 1941 to 1945. Thirteen buildings have been deemed eligible as contributing resources within the National Register historic district, including everything from the original hospital building and warehouses to a transformer shed and various machine shops used during WWII emergency shipbuilding operations. There are also six pre-1945 gantry cranes that contribute to the significance of the historic district.

The proposed Plan calls for the relocation of the Seaside Avenue roadway to the west and introduces a new, parallel railroad spur which will travel directly through the center of the existing Southwest Marine site. As envisioned this will require, at a minimum, the demolition of multiple buildings and impact the eligibility of Southwest Marine as an historic district. Proposed land use at Southwest Marine primarily calls for general cargo and, secondarily, maritime support. This change in use will severely limit if not outright prohibit reuse options appropriate for a former shipyard facility. Instead of planning for an appropriate reuse of Southwest Marine, the Plan's proposed infrastructure changes and land use effectively precludes consideration of less harmful alternatives. These actions by the Port will lead to the demolition and loss of Southwest Marine.

a. American Marine Corporation, Pan Pacific Cannery, StarKist, and Chicken of the Sea.

The Plan's proposed land use and infrastructure changes will adversely impact additional historic resources on Terminal Island. The American Marine Corporation, built in 1937 as the Los Angeles Yacht Club, is identified as being eligible for local designation. Consisting of a long floating concrete wharf, office building and maintenance structures, the property is the last remaining of its type on Terminal Island. The Plan will radically alter if not completely destroy this site by filling in the marina to the west of American Marine Corporation. The same can be said about Star-Kist, Pan Pacific Cannery and Chicken of the Sea facilities. It appears a proposed roadway realignment of Barracuda Street to the west will bisect these facilities and call for the demolition of multiple historic buildings.

III. Substantial evidence supports a fair argument that the Plan will cause a substantial adverse change to historical resource(s), requiring preparation of an environmental impact report.

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 impacts and analyzes a range of alternatives that reduce those impacts.³ Based on the objective analyses in the EIR, CEQA requires public agencies to deny approval of a project with significant adverse impacts when there are feasible alternatives or mitigation measures that can substantially lessen such effects.

³ *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.

A key policy under 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."⁴

The Conservancy strongly recommends that the Port fully evaluate the Plan's potential impacts on historic resources early and identify and acknowledge as part of the document. We believe this should be done before the EIR is initiated. As stewards of the public's historic resources and in accordance with its responsibilities under CEQA, we urge the Port to actively seek proposals for the adaptive reuse of the remaining historic structures at Terminal Island, similar to the Port of San Francisco's request for proposals for the historic Bethlehem Steel Shipyard at Pier 70. As stated earlier, we also ask that you reevaluate a number of resources within the Report regarding eligibility.

The Conservancy wants to work with the Port to identify viable alternatives and options for achieving Port goals and objectives. In many ways the Plan, as currently envisioned, instead plans for the destruction of significant historic resources at Terminal Island. By working together we believe we can more effectively plan for the preservation and reuse of the remaining historic resources at Terminal Island.

Thank you for the opportunity to comment on the Draft Port of Los Angeles Terminal Island Land Use Plan (Plan) – and -- Draft Built Environment Evaluation Report for Properties on Terminal Island (Report). 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

⁴ PRC §(b). (c).