

Comment Letter 19
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VIA FEDERAL EXPRESS AND E-MAIL

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Dr. Cris B. Liban
Executive Officer
Metro, Environmental Compliance and Sustainability
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012-2952
LibanE@metro.net

RE: Red/Purple Line Core Capacity Improvements Project Comment Letter

Dear Mr. Liban:

Liner LLP is counsel for Arts District Crossing Owner LLC ("ADCO"), and submits this comment letter on ADCO's behalf. ADCO is the owner of the properties located at 200-234 N. Center Street, Los Angeles, California (collectively referred to herein as the "Property"). The Property is immediately adjacent to the Los Angeles County Metropolitan Transportation Authority's ("Metro") proposed Red/Purple Line Core Capacity Improvements Project ("Project"). We submit this comment letter to voice a variety of serious concerns under the California Environmental Quality Act ("CEQA") in response to the Initial Study/Mitigated Negative Declaration ("MND") for the Project prepared and circulated by Metro.

As an initial but critical matter, Metro did not provide ADCO with legally adequate notice of the release of the MND, or of the public comment period and public hearings scheduled for the approval of the MND and the Project. Metro first mailed the legally-required notice to the wrong address, despite the fact that the correct address for ADCO is listed on the Property's title, and despite the fact that Metro had recently been in contact with ADCO's property manager regarding maintenance work at the Division 20 rail yard, indicating Metro clearly knows how to contact ADCO. Moreover, after having provided late notice to ADCO, a Metro staff person indicated to ADCO that Metro understood that the Property is vacant and abandoned. This is incorrect, and inconsistent with the aforementioned communications between Metro

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and ADCO's property manager. In fact, ADCO is presently developing a mixed-use development project on the Property, for which Metro has received prior notice (VTT-74325-CN). In light of these facts, we hereby formally object to the notice provided to ADCO by Metro, which deprived ADCO of the opportunity to fully participate in the public process associated with the Project, unlawfully curtailing ADCO's ability to conduct a full and fair review of the MND and investigation of the Project.

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Apart from Metro's failure to provide timely notice, Metro's MND completely fails to fulfill its statutory purpose as an informational CEQA document. It does not adequately describe the Project, leaving key elements unspecified and consequently unexamined. It improperly engages in a piecemeal review rather than analyzing the impacts of the entirety of the true Project, and fails to consider how the Project reviewed in the MND is a part of, or precursor to, other environmentally impactful projects planned by Metro including, without limitation, a proposed expansion of Red Line passenger service into the Arts District. The MND also unlawfully fails to address, much less analyze, the cumulative impacts from a variety of related and interconnected rail projects presently being carried out or considered by Metro in or near the site on which the Project is proposed ("Project Site").

Additionally, the analyses of the insufficiently described Project are legally invalid under CEQA. The MND includes either no analysis whatsoever or woefully insufficient analysis of virtually every checklist topic it addresses, including, without limitation, providing no technical data or studies regarding air quality, greenhouse gas emissions, traffic, geology and soils, and hazardous materials, and no mention whatsoever of designated historic cultural resources located within and immediately adjacent to the Project Site. The MND also provides absolutely *no* information about Project construction, and only hints at, yet does not describe or analyze, apparently *substantial* soil excavation. Further, it includes no mitigation where potentially significant impacts are likely, and where it does purport to provide mitigation, that mitigation either lacks substance or is unlawfully deferred to unspecified future dates. As a result, no

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substantial evidence is provided in the MND to demonstrate that the purported mitigation would reduce potentially significant impacts below applicable thresholds of significance, all in violation of CEQA.

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Perhaps Metro has chosen to attempt to so blatantly circumvent CEQA for the Project because, as explained in a January 19, 2017 motion adopted by Metro's Board of Directors, \$3.6 billion dollars of federal funding are dependent on Metro quickly upgrading turn-back capabilities at the Division 20 rail yard to meet federal train service requirements. (Ex. A, 1/19/2017 Metro Bd. Motion, at pp. 1-2.) Maintenance of federal funding is not, however, a valid excuse for disregarding the requirements of CEQA to enable Metro to proceed with the speedy construction of a major, environmentally impactful project without legally sufficient analysis and public input.

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Given its myriad failures and omissions, the MND fails to provide substantial evidence that the Project will result in no significant impacts, and does not come close to meeting the basic minimum requirements of a proper CEQA analysis. Metro is obligated by law to prepare, circulate and adopt a new, legally sufficient CEQA analysis of the entirety of the true Project before considering its approval.

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I. THE MND PROVIDES AN INADEQUATE PROJECT DESCRIPTION

"Where an agency fails to provide an accurate project description, or fails to gather information and undertake an adequate environmental analysis in its initial study, a negative declaration is inappropriate." *Lighthouse Field Beach Rescue v. City of Santa Cruz*, 131 Cal.App.4th 1170, 1202 (2005). At minimum, a project description must accurately describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. (CEQA Checklist, Appendix G.)

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The MND's Project Description omits and fails to adequately describe key elements of the Project in a manner that makes it impossible to understand what the Project actually entails. For example, there is no discussion of how the tunnel portal will be widened, how much it will be widened, where tracks will be laid, and what the proposed operator relief platforms will involve or include. The MND includes no

explanation of the extent to which the Project will increase existing line capacity or intensify the use of the Project Site, even though the MND states that the Project is proposed, at least in part, in an existing rail yard. The MND also fails to describe *any* construction scenario for the Project, including, without limitation, information relating to phasing, timing, daily hours of construction activities, excavation, and the construction equipment that would be used. This omitted information is imperative to any valid assessment of the Project's environmental impacts under CEQA, including, without limitation, impacts related to air quality, greenhouse gas emissions, noise and vibration, traffic, and hazardous materials.

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The MND also fails to include necessary facts relating to planned excavation for the Project. Indeed, excavation is not mentioned at all as a component of the Project in the Project Description. Rather, the discussion of planned excavation is buried within the Environmental Evaluation portion of the MND. Excavation is mentioned offhand as one of the proposed "ground disturbing activities" in the Cultural Resources section of the MND. (MND, at pp. 10-12.) Excavation is also mentioned as an aside in the purported analysis of Hydrology and Water Quality Impacts as being a potential source of soil erosion. (MND, at p. 13.) Yet, despite its sparse references, the MND implies that *substantial* excavation will occur as part of the Project, potentially as deep as 30 feet below ground surface or greater, stating:

Soils would be excavated only from within the Project footprint and not from any adjacent area or property. Groundwater is historically found at depths of around 30 feet in this area, and groundwater contains historical contaminants which would be accounted for during construction. (MND, at pp. 12-13.)

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Despite the fact that the Project appears to entail substantial excavation, the MND provides no information whatsoever regarding what role excavation has in the Project, i.e., whether tunnels are being dug so trains will run underground or otherwise why excavation is needed, how much excavation is planned, where excavation will occur, what equipment will be used during excavation, information related to

the timing, phasing and daily hours of excavation work, and whether shoring will be required and, if so, what shoring method or methods would be used or are being considered.

If substantial excavation is planned, shoring and ground stabilization plans must be identified in the CEQA document and any impacts they may cause must be analyzed. Such excavation would certainly also entail the use of heavy construction equipment, which is not mentioned anywhere in the MND, which could cause a variety of likely significant environmental impacts related to air quality, greenhouse gas emissions, noise, and vibration, among other areas. Further, substantial excavation would entail the need to haul excavated earth offsite, which would require potentially hundreds or thousands of truck trips to one or more disposal sites depending on the volume and hazard level of the materials excavated. Such truck trips would cause air quality and traffic impacts and require the designation of one or more haul routes, all of which must be evaluated in the Project's CEQA document, yet are not mentioned at all in the MND.

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Furthermore, unearthing and disposing of contaminated soils as indicated in the MND would require a variety of legally-required safety measures that must be affirmatively identified in the Project's CEQA document. (MND, at p. 13.) However, as discussed below, no preliminary analyses have been done for the MND related to contaminated soils, so appropriate measures have not been identified. Appropriate measures could include, at minimum, the adoption of a sampling program and a site-specific contaminated materials health and safety plan, the use of contractors licensed to remove and transport hazardous materials, proper disposal of the materials at a permitted contaminated waste disposal site, and potentially a permit from the South Coast Air Quality Management District to control emissions of contaminated vapors. To the extent the MND references future plans related to encountering contaminated soils and groundwater during excavation, it relies on unspecified future plans as mitigation without any mandatory commitments or performance standards, which is insufficient under CEQA. See *Endangered Habitats League v. County of Orange*, 131 Cal.App.4th 777, 793-794 (2005). A lead agency cannot base an MND on the presumed success of mitigation measures that have not been formulated at the time of Project

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approval. *Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296, 309 (1988). As discussed further below, the MND repeatedly and improperly defers unspecified mitigation to future plans and activities.

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References to demolition are also buried in later discussions of the MND but are not included in the Project Description or in all environmental areas where demolition could have significant impacts, including without limitation, air quality and traffic. Instead, the MND only references potential demolition impacts related to asbestos and lead paint, which are not the only impacts that may be caused by demolition. (MND, at p. 13.) The MND's Project Description and the MND as a whole also include no discussion of the installation and use of catenary wires to power trains, how the Project Site boundaries will be divided from the sidewalks or other properties, and what protections will be afforded to the immediately adjacent residential property at One Santa Fe. As discussed further below, the Project Description also omits critical portions of the Project that are planned as later phases, whose impacts must be analyzed as part of the Project or otherwise in conjunction with the Project's impacts. *Citizens Assn. for Sensible Dev. of Bishop Area v. Cty. of Inyo*, 172 Cal.App.3d 151, 165-166 (1985).

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The omissions in the Project Description carry through into each of the environmental impact discussions in the MND, rendering the analysis of each topic addressed invalid in the absence of sufficient information about the Project. Without these critical facts about the Project itself, the MND fails as an informational document. It fails to conduct a valid CEQA analysis of environmental impacts caused by the Project, and likely fails to identify potentially significant impacts. The description of the Project is the foundation of the MND. The fact that the Project Description here is fatally inadequate is sufficient to invalidate the entire MND. See *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus*, 27 Cal.App.4th 713, 729-730 (1994) (EIR set aside for failure to analyze the whole project.)

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II. THE MND ENGAGES IN IMPROPER PIECEMEALING AND FAILS TO CONSIDER CUMULATIVE AND GROWTH-INDUCING IMPACTS

The requirements of CEQA cannot be avoided by piecemeal review that results from "chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences." *Bozung v. Local Agency Formation Com.*, 13 Cal.3d 263, 283–284 (1975); *Lighthouse Field Beach Rescue v. City of Santa Cruz*, 131 Cal. App. 4th 1170, 1208 (2005). A CEQA document must define the scope of a project to include future phases or expansions where: (1) they are reasonably foreseeable consequences of the initial project; and (2) the future phase or expansion will be significant in that it will change the scope or nature of the initial project or its environmental impacts. *Laurel Heights Improvement Assoc. v. Regents*, 47 Cal.3d 376, 396 (1988).

Additionally, CEQA requires an analysis of the "cumulative impacts" from interconnected or related projects. CEQA Guidelines § 15355; *Las Virgenes Homeowners Federation, Inc. v. County of LA*, 177 Cal.App.3d 300, 306 (1986). "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project *when added to other closely related past, present, and reasonably foreseeable probable future projects*. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." *Los Angeles Unified School Dist. v. City of Los Angeles*, 58 Cal.App.4th 1019, 1024-1025 (1997) (emphasis added). CEQA also requires an analysis of "growth-inducing impacts," which deal with the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Pub. Res. Code § 21100(b)(5).

Here, the MND unlawfully ignores a variety of interconnected and related projects either currently being carried out or actively under consideration by Metro.

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The MND fails to address how the Project is, in reality, a component of the proposed expansion of Red Line passenger service into the Arts District and the construction of a new Arts District Red Line

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station. A June 16, 2010 Metro study concluded that constructing the turn-back facility and platforms contemplated by the Project would entail much of the necessary infrastructure for adding passenger service to a new Arts District Red Line station. (Ex. B, 2010 Metro Rpt., at pp. 1-2.) The 2010 study even mentions the potential use of the turn-back facility and platforms as an alternative location for the Red Line station, rather than another proposed location south of the Project Site near 6th Street. (Id., at pp. 2-3.)

A March 18, 2015 Metro report repeats that the facilities that comprise the Project can be used as a component of a future Red Line station south of the Project Site near 6th Street *or as the future station itself*, stating "[d]esigning the turn-back facility to also serve as an at-grade revenue station is a cost-effective method for expanding rail service to the eastern edge of Downtown Los Angeles and the burgeoning Arts District." (Ex. C, 2015 Metro Rpt., at pp. 1-3.) In December, 2016 – *as part of its public outreach for the Project following the issuance of the MND* – Metro staff was reported by Metro's blog The Source as stating "the tumbback project could still accommodate a possible station between 1st and 3rd streets. A station at 6th Street would present more serious challenges, among them acquiring real estate and finding a way for trains with passengers to travel through the existing subway car maintenance/storage yard." (Ex. D, Hyman 12/20/2016 Article). As recently as January 19, 2017, Metro's Board of Directors adopted a motion reiterating that the Project Site is being considered as a part of a future Arts District Red Line station *or as the station itself*, going so far as to state that "Metro should do everything possible to extend rail services to the Arts District." (Ex. A, 1/19/2017 Metro Bd. Motion, at pp. 1-2.)

Thus, it is clear that Metro has for many years and continues to contemplate incorporating the Project as either part of a future Red Line station or as the station itself, and in fact may prefer to use the Project Site as the future station due to alleged difficulties associated with using the proposed alternative location near 6th Street. The Red Line expansion is thus a reasonably foreseeable consequence of the Project described in the MND that will create new, unanalyzed and potentially significant impacts, and its exclusion from the MND constitutes unlawful piecemealing under the *Laurel Heights* test.

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The 2015 Metro Report also discusses the Project's relation to other projects that should be considered as either part of the Project itself or considered within a cumulative impacts analysis of the Project. The 2015 Report states:

In response to a growing number of planned transportation projects and facilities in and around Division 20, a cross-departmental coordination study began in April, 2014 to develop an integrated plan that accommodates the various projects, including the expansion of passenger rail service along this corridor.¹ (Ex. C, 2015 Metro Rpt., at p. 1 (emphasis added).)

Based on Metro's own report, the Project is only one of many interconnected transportation projects and new facilities being constructed in and around the Division 20 rail yard. These include the ongoing expansion of the Purple Line, for which the Project will add increased capacity (though the MND fails to include any discussion of the present capacity of the Purple Line so that the impacts related to the Project's increased capacity cannot be assessed). Additionally, the Project is *physically connected* to the Metro Emergency Security Operations Center (ESOC), which is currently undergoing environmental review and final approvals, and which may be constructed at the same time as the Project, yet also is not mentioned in the MND. The Project is also related to the soon-to-be-constructed Division 20 Maintenance Building 61S, a three-story, 86,500 square-foot maintenance facility that will service the Red and Purple lines and be connected to the existing Division 20 Yard Rail Fleet Services Maintenance Facility.

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¹ Metro did not publically release its coordination study, which was stated in the 2015 Report to have a target completion date in the Spring of 2015. If the report was prepared, we hereby request that it and any documents related to it within Metro's custody or control be included in the administrative record for the approval of the Project.

The failure of the MND to address and analyze these projects as either being part of the Project or as "closely related past, present, and reasonably foreseeable probable future projects" creating cumulative impacts is a violation of CEQA. *Los Angeles Unified School Dist.*, 58 Cal.App.4th 1024-1025.

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The MND also completely fails to address the mandatory issue of growth-inducing impacts, despite it being reasonably foreseeable here that fostering additional train ridership and enabling the creation of a new Red Line rail station would create growth-inducing impacts. At minimum, this issue must be also addressed in the MND.

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The MND analyzes a much smaller project than the whole of the true project and fails to identify potentially significant impacts of the true project. The MND's complete failure to even mention, much less analyze, the variety of closely-related Metro projects renders the MND invalid under CEQA. It is likely that, based on the projects identified above, a full Environmental Impact Report ("EIR") would be required.

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III. THE MND FAILS TO DESCRIBE AND ASSESS EXISTING BASELINE CONDITIONS

An initial study must include an analysis of the existing conditions against which the impacts of a project can be evaluated. *Taxpayers for Accountable Sch. Bond Spending v. San Diego Unified Sch. Dist.*, 215 Cal.App.4th 1013, 1048 (2013). As alluded to above, the MND completely fails to describe and assess the current baseline conditions – the current uses of the Project Site, current line capacity, and existing site conditions – or to describe in sufficient detail what intensification of use will be created by the Project.

For instance, the MND does not address how many and what type of trains are currently served by the rail yard and the number and type of additional trains or train trips the Project will enable on the Red and Purple lines, whether new trains will be put in service on these lines, whether new trains will be manufactured for these purposes, or any other facts needed to conduct an accurate assessment of the impacts the Project will have on the existing environment, to assess the level of those impacts, to determine the need for mitigation, and to determine whether mitigation will in fact reduce the Project's impacts to a less than significant level.

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Without providing baseline conditions against which impacts caused by the Project can be measured, the MND's claim that mitigation is sufficient to reduce impacts below applicable thresholds of significance is not supported by substantial evidence, as required by CEQA. This failure also completely frustrates any proper evaluation of the Project's impacts, and the MND likely fails to identify potentially significant impacts as a result. It is entirely possible, moreover, the impacts identified as less than significant are in fact potentially significant and require analysis in an EIR.

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IV. THE MND PROVIDES INSUFFICIENT ANALYSIS OF VIRTUALLY EVERY TOPIC IT ADDRESSES

A. The MND's Analyses of the Project's Air Quality, Greenhouse Gas, and Traffic and Transportation Impacts Are Legally Deficient

The MND does not contain any analysis of the Project's air quality, greenhouse gas ("GHG") or traffic and transportation impacts during either Project construction or operations. The Project appears to propose both to add new and to intensify existing heavy-industrial land uses within a few short feet of an existing residential complex, One Santa Fe, within a quarter mile of the Boyle Heights residential community, and within a close distance of other sensitive uses within the Arts District. The MND does not incorporate an air quality study or technical analysis, and includes no actual mitigation of potentially significant air quality or GHG impacts, *despite admitting in the Initial Study that the Project could result in potentially significant air quality and GHG impacts that require mitigation.* (MND, at p. 9.)

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There is thus no indication in the MND of how the Project may actually impact air quality for immediately adjacent sensitive uses that are already experiencing adverse air quality impacts. Such potential impacts include, without limitation, those from heavy diesel construction equipment emitting harmful concentrations of diesel particulate matter, a hazardous air pollutant, those from hazardous soils components or gases released during excavation, and those from Project operations that could otherwise result in air emissions that must be analyzed under CEQA. The MND also includes no analysis or technical

data regarding the GHG impacts that could result from the Project, including from on-and off-road construction equipment and vehicles, and emissions associated with any additional on-road vehicle trips that may be generated as a result of the Project during either construction or operations.

The MND also includes no traffic study, or any indication whatsoever of whether the Project's construction or operations will result in putting additional cars or trucks on the road in a manner that may impact traffic in the vicinity of the Project. No mitigation measures related to GHG emissions or traffic are proposed. Regarding air quality emissions, applicable standards and regulations of the California Air Resources Board and South Coast Air Quality Management District are not identified, and accordingly there is no acknowledgment of, much less a commitment to, follow these mandatory requirements.

The only purported air quality mitigation measure included in the MND makes reference to inadequately identified Metro programs and vague "best management practices" that are also unspecified. (MND, at p. 9.) No measures related to protecting air quality are identified, no specific requirements are made mandatory, and no standards for mitigation are set. (*Id.*) As stated elsewhere herein, reliance on unspecified programs and practices as mitigation to be adopted in the future without any mandatory commitments or performance standards is insufficient under CEQA. See *Endangered Habitats League v. County of Orange*, 131 Cal.App.4th 777, 793-794 (2005). Moreover, without having assessed the air quality, GHG or traffic impacts of the Project in the first instance due to a lack of technical studies and data, no mitigation could be identified in the MND that would be legally sufficient, and no substantial evidence could be provided that such mitigation would reduce potentially significant impacts below applicable thresholds of significance. *San Bernardino Audubon Society v. Metropolitan Water District*, 71 Cal.App.4th 382, 390 (1999). The lack of information and analysis provided in the MND on these topics renders the MND legally insufficient. These failures also leave potentially significant impacts of the Project unidentified, unanalyzed and unmitigated, thus creating a substantial possibility that, had proper analyses been conducted, an EIR would have been required.

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B. The MND Improperly Fails to Identify and Analyze Impacts to Historic Resources within its Purported Analysis of Impacts to Cultural Resources

CEQA requires a lead agency to evaluate whether a project would result in substantial adverse impacts affecting the significance of historical resources. Pub. Res. Code § 21084.1; CEQA Guidelines § 15064.5(a) and (b). These resources include resources *eligible* for listing in the California Register of Historical Resources, and those listed in local historic resource registers. See *Citizens for Responsible Development in West Hollywood v. City of West Hollywood*, 39 Cal.App.4th 490, 503-504 (1995). Additionally, special standards apply under CEQA regarding the mitigation of impacts to historic resources. See, e.g., Pub. Res. Code § 21084.1; CEQA Guidelines §§ 15064.5, 15126.4; *Citizens for Responsible Development in West Hollywood*, 39 Cal.App.4th at 500-501.

The MND completely fails to identify, much less analyze impacts to two historic resources within and immediately adjacent to the Project Site that are, respectively, (1) listed as a local historic resource in the Los Angeles Register of Historic Monuments, and (2) identified by SurveyLA as being eligible for listing in the California Register of Historic Resources. First, the First Street Bridge, City of Los Angeles Historical Monument No. 53C1166, is not identified in the MND as a CEQA-defined historic resource, and impacts to this historic resource *are not analyzed at all*. This omission is particularly egregious here, where the Project will apparently construct rail lines and related infrastructure that may run directly underneath the bridge either on the ground surface or in an underground tunnel (the Project Description is not clear regarding how the proposed rail lines will cross the bridge). Either scenario entails potentially significant impacts to a historic resource, a sensitive receptor, that must be assessed in the Project's CEQA document.

Another historic resource that could be impacted by the Project in a manner that necessitates analysis under CEQA is the National Cold Storage Facility located at 210 N. Center Street. The National

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Cold Storage Facility has been identified by SurveyLA as being eligible for listing in the California Register of Historic Resources as an "[e]xcellent and rare example of an early-20th century cold storage building in Los Angeles' primary industrial district." (Ex. E, Survey LA Draft Report, at pp. 86-87.) This facility is not only immediately adjacent to the Project Site, but also sits on a lot Metro may seek to condemn for the Project, which foreseeably would result in a variety of significant impacts on the resource.

The failure to identify these CEQA-defined historical resources in the MND, the failure to examine any impacts on these resources potentially caused by the Project, and the failure even to attempt to mitigate any potentially significant impacts on these resources constitute clear and inexcusable violations of CEQA. The Project's impacts on these resources, particularly during construction but also during operations are at least potentially, if not actually, significant, requiring the preparation of an EIR. In either event, this failure at least renders the MND invalid.

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C. The MND's Analyses of Project Impacts Related to Geology and Soils and Hazardous Materials are Legally Deficient

The MND does not contain sufficient analysis or mitigation of the Project's impacts relating to: (1) geology and soils, and (2) hazardous materials during both Project construction and operations. First, as previously stated, the MND does not reference or append a preliminary geotechnical investigation report, despite the fact that the MND states the Project is located in a liquefaction zone, and later states in its checklist that the Project poses a potentially significant risk of erosion and unstable soils. (MND, at p. 12.) The MND's statements are conflicting. On the one hand, its discussion identifies the risk of liquefaction only, yet it provides no analysis and no mitigation relating to liquefaction. On the other hand, its checklist claims no significant risk of liquefaction (despite potentially substantial excavation), but only of erosion and unstable soils. (MND, at pp. 12, 23.) Additionally, the MND concedes that industrial operations have been carried out on and in the vicinity of the Project Site that have resulted in the presence of subsurface

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contaminants in the soil and groundwater underneath the Project Site. (*Id.*, at p. 12.) Yet, the MND does not reference or append a Phase I or II analysis of subsurface hazards.

The failure to conduct a Phase I and II analysis to determine the existence, type, location and volume of subsurface contaminants is especially problematic here where an unspecified amount of excavation is part of the Project. Rather than providing the analysis for the MND so that adequate mitigation measures could be determined to reduce potentially significant impacts to a less than significant level, the MND defers the analysis of impacts, improperly identifying future analysis as a mitigation measure, which CEQA never allows. *Gentry v. City of Murrieta*, 36 Cal.App.4th 1359, 1396 (1995); *Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296, 307 (1988). Due to a lack of valid technical data, omissions in the description of the components of the Project, and improper deferral of mitigation, the Geology and Soils and Hazardous Materials sections of the MND are legally insufficient. These failures also leave potentially significant impacts of the Project unidentified, unanalyzed and unmitigated, thus creating a substantial possibility that, had proper analyses been conducted, an EIR would have been required for the Project.

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D. The MND's Analyses of Project Impacts Related to Hydrology and Water Quality are Legally Deficient

The MND does not contain any analysis of the Project's hydrological or water quality impacts during construction or operations. For example, it does not address whether excavation activities (which again are not described in the Project Description or elsewhere in the MND) will impact potentially contaminated groundwater, whether dewatering will be necessary and how it will be carried out, and how any potentially significant impacts from these activities will be mitigated. It does not address or otherwise state whether Metro and its contractors will comply with the Clean Water Act's National Pollutant Discharge Elimination System ("NPDES") program through compliance with the General Construction or General Industrial Stormwater Permits, which are requirements of law that must be included in any valid

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environmental analysis under CEQA. It does not identify the constituents of concern that are expected to be released during construction or operations or discuss in any detail the management practices and other methods that would be used to ensure that hazardous materials are not released into the environment. The MND's statement that the Project will comply with unspecified "best management practices" does not pass muster under CEQA because it fails to provide any substantial evidence whatsoever that potentially significant impacts will be adequately mitigated, in addition to constituting an improper deferral of analysis and mitigation to a future date. *Sundstrom*, 202 Cal.App.3d 307. The MND's failure to fully address these topics also leaves potentially significant impacts of the Project unidentified, unanalyzed and unmitigated, thus creating a substantial possibility that, had proper analyses been conducted, an EIR would have been required for the Project.

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E. The MND's Analyses of Project Impacts Related to Biology and Land Use and Planning are Legally Deficient

The MND does not contain a valid analysis of the Project's biological and land use impacts. The MND fails to address Project's impacts on the LA River and the City's ongoing LA River Revitalization Project, which present issues related to both biology and land use, as the Project would foreseeably have impacts on these land uses and the biological resources being developed as part of the revitalization project and otherwise present in the LA River.

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The MND also improperly fails to account for the fact that it is seeking to implement new and intensify existing heavy industrial land uses in a community that is rapidly transitioning from industrial uses to more sensitive land uses, including but not limited to impacts on the immediately adjacent One Santa Fe apartments. Metro cannot claim to be ignorant of these changes to more sensitive land uses in the vicinity of the Project. The Metro Board of Directors' January, 2017 motion regarding the need to immediately adopt the Project to maintain federal funding noted that:

The Arts District has become a widely popular arts, cultural, and shopping destination with rapid residential growth. There are over twenty development projects in the Arts District under construction entitled or in the entitlement process, including 670 Mesquit, 6AM, Row DTLA, 520 Mateo Street, the Ford Motor Factory Building, 950 E. 3rd Street, At Mateo, and others.

(Ex. A, 1/19/2017 Metro Bd. Motion, at pp. 1-2.)

Metro's failure in the MND to account for the Project's potential impacts related to biological resources and nearby sensitive land uses Metro is clearly aware of violates CEQA.

F. The MND's Technical Analyses of Noise and Vibration Impacts Are Legally Deficient

The body of the MND contains no analysis of the Project's noise and vibration impacts, but instead refers lay readers to a technical memorandum, attached as Appendix A. Not only is the technical memorandum virtually incomprehensible to lay readers, defeating CEQA's purpose of informing all members of the public, but it only analyzes operational impacts. No noise and vibration construction impacts analysis is provided, either in the technical memorandum or in the body of the MND. No mitigation of noise or vibration impacts is identified in the MND or in the Mitigation Monitoring and Reporting Program attached to the MND.

The analysis included in the technical memorandum cannot be considered valid for several reasons. First, because the MND fails to provide a full and clear description of the Project itself (including, without limitation, how many trains will run, specific information about the type of trains, the noise and vibration levels caused by the trains, and when the trains will run), the noise and vibration assumptions assigned to the Project in the technical memorandum cannot be evaluated for accuracy. It is not clear that the Project characteristics on which the technical memorandum's analyses are based are the same as those on which the MND's other environmental "analyses" are based.

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Second, the technical memorandum does not assess noise and vibration impacts related to construction activities, which would be at least potentially, if not actually significant here if heavy construction equipment must be used for both excavation and tunnel widening. Third, the technical memorandum's preparers only took ambient noise measurements at the One Santa Fe apartment building and ignored potential construction and operational impacts on the two aforementioned historic resources, which are also sensitive receptors under CEQA and the Los Angeles Municipal Code for noise and vibration purposes, and must be analyzed as such in the Project's CEQA document. Finally, ambient noise measurements were only taken on two weekdays, and not on weekend days or nights when trains would also run as part of the Project, where ambient noise levels may be lower, and thus noise and vibration impacts caused by the Project may be more substantial by comparison.

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The technical memorandum also totally fails to take into account acute noise sources that would apply to the Project such as brake squeal, gear noises, or the squealing generated by wheel friction on tracks. Furthermore, while the technical memorandum mentions train horns and bells, no mandatory mitigation measures are adopted into the MND to limit impacts from those sources on immediately adjacent sensitive uses. Given the foregoing deficiencies in the MND and the noise and vibration technical memorandum, the MND's conclusion that the Project will result in no significant noise and vibration impacts cannot be relied on. Indeed, it is highly likely that, at minimum, the Project would result in significant construction impacts on sensitive historic resources, requiring the preparation of an EIR.

19-29

V. THE MND FAILS TO MITIGATE AND PROVIDES INADEQUATE MITIGATION

An MND may only be prepared where a Project has potentially significant impacts that can be mitigated "to a point where clearly no significant effect on the environment would occur." Pub. Res. Code § 21064.5. Adequate mitigation under CEQA requires the following steps: (1) Analysis of project impacts; (2) assessment whether impacts are significant (including cumulative impacts); (3) and, if so, a determination that mitigation will reduce impacts below thresholds of significance. See, e.g., *Santa Clarita*

Org. for Planning the Env't v. City of Santa Clarita, 197 Cal.App.4th 1042, 1057 (2011). The MND fails at every step of this process. As demonstrated above, the MND fails to describe key elements of the Project and omits technical data in manner that frustrates any valid impacts analysis related to air quality, GHGs, construction, excavation, historic resources, hazardous materials, geology, hydrology, water quality, land use, traffic, noise and vibration, and biological resources, in addition to impacts from omitted components of the Project such as the proposed expansion of the Red Line into the Arts District and the variety of other Metro projects which, in conjunction with the Project, could have cumulative environmental impacts. The inability to assess the significance of such impacts eliminates the ability to determine whether mitigation measures would reduce potentially significant impacts below applicable thresholds of significance.

Furthermore, as set forth above, to the extent mitigation is included, it is legally invalid insofar as it lacks substance and relies on unspecified and unformulated future measures, practices and plans that provide no indication that they can actually reduce potentially significant impacts to less than significant levels. See *Endangered Habitats League*, 131 Cal.App.4th 793-794; *Sundstrom*, 202 Cal.App.3d 309. Improper deferral invalidates mitigation measures related to impacts Metro admits are potentially significant on the topics of air quality, soil erosion, hazardous materials, hydrology, and water quality. Moreover, the MND fails to provide any mitigation at all where the Project may result in either substantial or cumulatively considerable impacts, including in relation to traffic, GHGs, historical resources, liquefaction, biology, land uses, and noise and vibration. These failures render the MND deficient, and raise a serious question whether Metro found the Project's impacts to be significant, requiring an EIR that Metro simply refused to prepare in order to save time and \$3.6 billion dollars.

19-30

VI. THE MND DOES NOT PROVIDE SUBSTANTIAL EVIDENCE SUPPORTING ITS CONCLUSION THAT THE PROJECT WOULD HAVE NO SIGNIFICANT IMPACTS

Based on the foregoing, the MND fails to provide the requisite substantial evidence supporting the conclusion that the Project would have less than significant environmental impacts. Pub. Res. Code §

19-31

21064.5. To the contrary, based on the limited information that can be gleaned from the MND and outside information regarding unaddressed components of the Project and related Metro projects, as noted above, there is ample evidence suggesting that the Project, both individually and cumulatively, may have significant effects on the environment. As such, the MND is a legally insufficient document; a full EIR is likely required for the Project.

19-31
cont

VII. COMPLIANCE WITH THE NATIONAL ENVIRONMENTAL POLICY ACT

If the Project is being funded in any part with federal funds or otherwise requires any federal agency approval, Metro is required to comply with the National Environmental Policy Act ("NEPA"). 42 U.S.C. §§4321-4370h; 14 C.C.R. § 15220 ("NEPA applies to projects which are carried out, financed, or approved in whole or in part by federal agencies.") If NEPA does apply, Metro is obligated to ensure that its environmental review process complies with the substantive and procedural requirements of NEPA, including consultation with appropriate federal government agencies such as the Federal Transit Administration, and the designation of federal lead agency to oversee compliance with the NEPA process. See 40 C.F.R. §§ 1508.16; 1501.5(b), 1506.2(c).

19-32

The MND does not reference NEPA, nor does it make any attempt to comply with it. To the extent NEPA applies to the Project, these omissions and the failure to follow NEPA's procedures are a violation of both CEQA, which requires NEPA compliance where applicable, and NEPA itself. 14 C.C.R. §§ 15220, *et seq.*; 42 U.S.C. § 4332.

VIII. CONCLUSION

The MND fails to provide substantial evidence that the Project will result in no significant impacts, as is required for a valid MND. By omitting key information on the full scope of the Project and inexcusably failing to provide required technical data, the MND does not meet the basic minimum requirements of a proper CEQA analysis. In light of the broad scope of deficiencies in the Project's Initial Study and MND, Metro is obligated by law to start the CEQA process for the Project from square one and prepare and adopt

19-33

February 13, 2017
Page 21

a legally sufficient initial study and subsequent CEQA analysis of the entirety of the true Project. By law, these steps must be taken before Metro issues any approvals for the Project.

19-33
cont

Very truly yours,

LINER LLP

 FOR
Catherine Norian

Enclosures

cc. *All cc:s below via email only:*

John Fasana
Eric Garcetti
Shelia Kuehl
Kathryn Barger
Mike Bonin
Janice Hahn
Paul Krekorian
Ara Najarian
Mark Ridley-Thomas
James Butts
Hilda L. Solis
Carrie Bowen
Robert Garcia
Javier Hernandez
Jeffrey A. Goldberger
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Alexa Wilkins
Jerold B. Neuman, Esq.
Kyndra Joy Casper, Esq.
Noel Hyun, Esq.
Andrew Brady, Esq.
Paul Backstrom
Borja Leon
Jeanet Owens
Rick Meade

EXHIBIT A



Board Report

File #:2017-0020, **File Type:**Motion / Motion
Response

Agenda Number:41

**SYSTEM SAFETY, SECURITY AND OPERATIONS COMMITTEE
JANUARY 19, 2017**

Motion by:

Directors Garcetti, Solis and Bonin

January 19, 2017

Downtown Los Angeles Arts District Connectivity

Metro Rail service is intended to serve high-density areas and major trip generators throughout Los Angeles County. Transit service to these types of locations, such as the Wilshire Corridor, the Historic Core, North Hollywood, Santa Monica, Pasadena, Long Beach, and other thriving locations is important to meet the mobility needs of Los Angeles County.

There are several outstanding priorities in and around MTA's Division 20 rail maintenance facility in the Arts District. MTA must improve Division 20 to service the Purple Line Extension project. Additionally, there is an opportunity to extend rail service to the Arts District.

Combined, the Purple Line Extension Section 1 and Section 2 projects include over \$3.6 billion in federal funding and financing. These federal funds are predicated on specific service standards, namely, train service every four minutes.

The federal funding requirements compel MTA to improve the subway turn-back capabilities by constructing a facility at the Division 20 maintenance facility. These improvements must be completed to meet federal service requirements, maintain federal funding agreements, and to start service on the Purple Line Extension. Failure to do so could put over \$3.6 billion in federal funding at risk.

In addition, with the passage of Measure M, MTA's current plans for Division 20 must be revised to accommodate the acceleration of the Purple Line Extension Section 3 to 2024. This will require an expansion of subway vehicle storage, maintenance, and testing infrastructure.

At the same time, MTA has since 2010 studied extending the Red and Purple Lines from Union Station to the Arts District, with possible stations and 1st Street, 3rd Street, and/or 6th Street.

An Arts District Extension is a great opportunity to support the continued development of a transit-oriented community with a rapidly expanding population and a strong desire for transit service. The Arts District has become a widely popular arts, culture, and shopping destination with rapid

residential growth. There are over twenty development projects in the Arts District under construction, entitled or in the entitlement process, including 670 Mesquit, 6AM, Row DTLA, 520 Mateo Street, the Ford Motor Factory Building, 950 E. 3rd Street, At Mateo, and others. Additionally, the Arts District is the location of several major infrastructure projects that will improve the public realm, such as the 6th Street Viaduct Replacement project and MTA's LA River Waterway & System Bikepath project.

MTA's first priority for Division 20 must be to support the Purple Line Extension. However, MTA should do everything possible to extend rail service to the Arts District.

CONSIDER Motion by Garcetti, Solis and Bonin that the Board direct the CEO to:

- A. Immediately initiate a holistic assessment of MTA's long-term needs at Division 20 and accommodation of future Arts District station access, including:
 - 1. Turn-back facility improvements,
 - 2. Rail car storage, maintenance facility, and vehicle test track needs required to start service on the Purple Line Extension Section 3 in 2024 per the Measure M ordinance,
 - 3. Rail service expansion to the Arts District with station options at 1st Street, 3rd Street, and/or 6th Street, with connections into the Arts District, to MTA's LA River Waterway & System Bikepath project, and to the 6th Street Viaduct Replacement project,
 - 4. Consideration of additional property required to meet all the above needs;

FURTHER MOVE that the MTA Board direct the CEO to:

- A. Design Division 20 so as to not preclude new stations and necessary track(s) in the future if funding is identified for an Arts District station(s) on the Red/Purple Line.
- B. Work with the City of Los Angeles to develop creative strategies to establish innovative funding mechanisms dedicated to off-set the costs of new stations in the Arts District.
- C. Provide an initial report back on all the above during the April 2017 Board cycle.

EXHIBIT B



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.31
metro.net

9

**PLANNING AND PROGRAMMING COMMITTEE
JUNE 16, 2010**

**SUBJECT: FEASIBILITY AND COST OF EXTENDING THE METRO
RED/PURPLE LINE SERVICE TO 6TH STREET
ADJACENT TO THE LOS ANGELES RIVER**

ACTION: RECEIVE AND FILE

RECOMMENDATION

Receive and file this status report on the implementation of extending the Metro Red/Purple Line service from the current terminus at Union Station south to 6th Street in Downtown Los Angeles via the existing track.

ISSUE

The Board directed staff to review the conceptual feasibility of constructing and operating a Metro Red/Purple Line Station adjacent to the Metro Red/Purple Line Maintenance Yard (Division 20 or Santa Fe Yard) on the western edge of the Los Angeles River. Staff additionally reviewed a conceptual use of a potential "turn-back" facility within the rail yard as a public access station in lieu of the 6th Street location. Metro previously identified the following primary constraints to operating an at-grade station along the Los Angeles River:

Construction of a new station south of the Sixth Street bridge would require a substantial reconstruction of the eastern edge of the current Metro yard facility or the acquisition of portions of the BNSF rail rights of way east of the current Metro Yard. The same BNSF rights of way in this area are also potential alignments of the California High Speed Rail Program.

Fire life safety access parallel to the operating tracks would require relocation, removal of existing storage tracks, additional rights of way, or reducing the storage capacity of the yard. Emergency exiting of the cars would not comply with Metro fire/life/safety standards without relocation/removal of the existing storage tracks or the acquisition of a safety lane from the BNSF rights of way.

The current population density in this area is low. Approximately 4,000 people live in the immediate station area with an undetermined number of employees in the same area, but is expected to increase over the next twenty years. More significant and more intense development of the area would be required

to justify the operational/construction expense of a new stand alone station and the related service to this area.

An at-grade operation requires using the existing service tunnel at the north end of the yards. The tunnel speed coming from Union Station, under the US-101 Freeway and surfacing in the north end of the yards is between 5-10 mph. As the trains would exit the tunnel they will enter a complicated set of switches in the main yard. The switch area has an operating speed of approximately 5 mph. A separate set of existing switches would need to be dedicated to the potential station uses. This would require a reconfiguration of the existing trackage, car wash facility and roadway.

FINANCIAL IMPACT

The cost of the proposed 6th Street station and associated tail track beyond the station is estimated at \$90 million. This is a gross estimate and does not include the value of lost storage track or the potential land takes required for the tail track/safety lane expansion. The 6th Street station location is south of the area's center of residential populations, but closer to the area's center of industrial type employment. The estimated ridership for the station is 1,000-2,000 daily riders. This is a gross estimate that does not have the benefit of a full modeling study of ridership usually conducted for FTA purposes or the benefits of a bus-rail interface plan commonly conducted as part of a station/corridor study.

ALTERNATIVES

An alternative to the 6th street station location would be developing potential future public access to a conceptual turn-back facility. The turn-back facility is included in the Westside Administrative Draft EIR/S currently under Federal Transit Administration review. The turn-back facility is under consideration as a method of expediting Metro Red/Purple line trains reversing direction from East to West at the eastern end of the Red Line. Currently this function is performed at Union Station. However the Westside Extension Subway Project anticipates two minute peak service in the subway section (trunk) between Union Station and the Wilshire/Vermont Red/ Purple Line Station in 2035. "Turning back" the subway at Union Station at two minute headways may be impractical without a separate turn-back facility. An alternative turn-back facility at mid-Division 20 near the main service building north of the Fourth Street Bridge, is under consideration and has been conceptually designed as part of the Westside Extension Subway Project. This design includes the necessary revisions to track layout, relocation of some service facilities, switches, and control systems to ensure the smooth operation of revenue trains and safe separation of the yards from service tracks. This design would potentially construct half of the improvements to the 6th Street location as part of the Westside system improvements.

The mid-Division 20 turn-back location is likely a more cost effective and usable alternative for public access given the adjacency to Metro's maintenance facilities at the same location, proximity to the proposed Metro Santa Fe Joint Development Project and the existing Sci-Arc School of Architecture. Much of the basic infrastructure necessary for a future public access station would be in place as part of the turn-back facility for the Westside Extension Subway Project. However, additional improvements would be required for public use such as: improved public access bridge/escalators/elevators, landing/queuing areas fire/life safety improvements, fare vending equipment and public information/address systems. Staff will preserve potential public access options to any Westside Extension turn-back facility design.

NEXT STEPS

Staff will continue to work with FTA to complete the Westside Subway Extension EIR/S.


Staff will continue to review the need and options for a turn-back facility at Division 20 (Santa Fe Yard) as part of the ongoing EIR/S efforts.

Staff will continue to review conceptual layouts of the turn-back facility that do not preclude future public access.


ATTACHMENT A

Division 20 (Santa Fe Yard) Proposed Station Location Map

Prepared by: Robin Blair, Director, Central Area Planning
Diego Cardoso, Executive Officer, TDI



Douglas R. Failing, P.E.
Interim Chief Planning Officer



Arthur T. Leahy
Chief Executive Officer

ATTACHMENT A

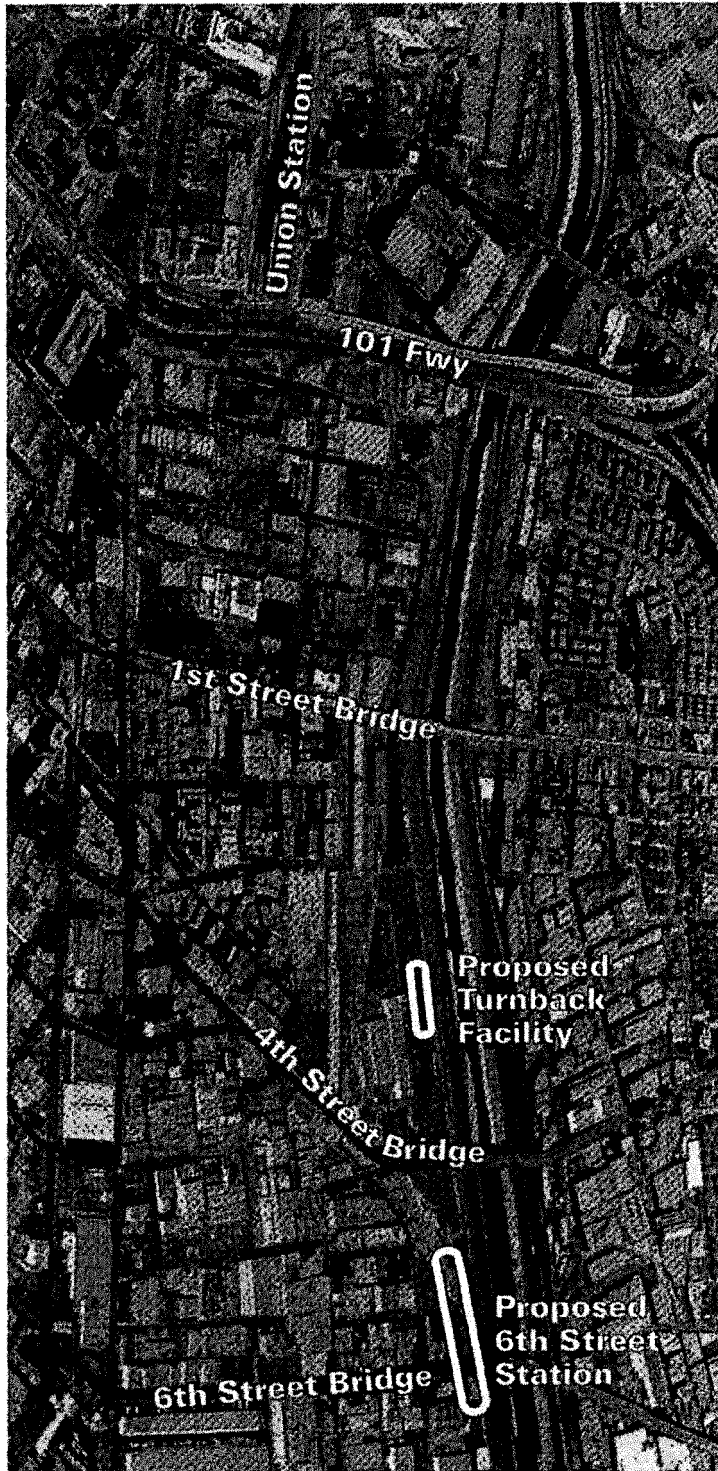


EXHIBIT C

**Metro**Los Angeles County
Metropolitan Transportation AuthorityOne Gateway Plaza
Los Angeles, CA 90012-2952213.922.2000 Tel
metro.net**PLANNING AND PROGRAMMING COMMITTEE
MARCH 18, 2015****SUBJECT: EXTENDING RED/PURPLE LINE REVENUE SERVICE TO EAST SIDE
OF DOWNTOWN LOS ANGELES/ARTS DISTRICT****ACTION: RECEIVE AND FILE****RECOMMENDATION**

Receive and file this report on the status of extending Metro Red/Purple Line service from the current terminus at Union Station to the eastern edge of Downtown Los Angeles along the west bank of the Los Angeles River to provide service to the expanding Arts District community.

ISSUE

On February 25, 2010, the Board directed staff to review the conceptual feasibility of constructing and operating a Metro Red/Purple Line Station(s) in the vicinity of the Metro Heavy Rail Maintenance Yard (Division 20) along an existing track spur that extends south to 6th Street. On June 16, 2010, the Board received a report on the preliminary feasibility and cost of extending revenue service to the area which identified the need for continued study of conceptual plans for potential passenger revenue stations in coordination with on-going planning for the Purple Line Extension (PLE) Project.

In response to a growing number of planned transportation projects and facilities in and around Division 20, a cross-departmental coordination study began in April 2014 to develop an integrated plan that accommodates the various projects, including the expansion of passenger rail service along this corridor. The purpose of the report is to provide an update on the status of this study and to identify key next steps.

DISCUSSION

In addition to potential revenue stations, accommodating expanded operations from the PLE Project and overall long-term growth of heavy rail service requires a number of modifications at Division 20 including: building a new Consolidated Maintenance of

Way/Non-Revenue Vehicle Facility (MOW/NRV); increasing rail car storage capacity for an additional 100 vehicles; accommodating a dedicated Test Track; and implementing various other yard and maintenance facility modifications. There is a scarcity of available land in this corridor to accommodate the growing rail facility needs. Specifically, the Division 20 property has very restricted right-of-way at both ends—the northern end from the heavy rail portal near Ducommun Street south to 1st Street, and the southern end from 4th Street to south of 6th Street (see Attachment A - Location Map). Furthermore, Division 20 is constrained by BNSF railroad right-of-way and the Los Angeles River to the east, and private properties to the west.

Planning for this area also requires consideration of the Southern California Regional Interconnector Project (SCRIP), High Speed Rail (HSR), and West Santa Ana Branch Transit Corridor project, three major rail initiatives with proposed alignments south of Union Station and through this corridor. Additionally, planned public investments in the immediate vicinity including the 6th Street Viaduct Replacement Project, Los Angeles River revitalization efforts, and various active transportation and streetscape initiatives must be taken into consideration, as well as the accelerating private sector development activity in the surrounding Arts District community.

The purpose of the on-going coordination study is to comprehensively examine all of the planned transportation projects and other investments in the area in order to develop an integrated plan for Metro investments that meets the programmatic, spatial and operational needs of each of the projects while optimizing utilization of limited land area. While the coordination study is expected to conclude in the spring of 2015, two near-term critical path items are emerging as necessary to support PLE operations and preserve options for long-term expansion of heavy rail service along this corridor: 1) development of a turn-back facility/revenue station; and 2) modifications to the existing heavy rail tunnel portal.

Turn-back Facility/Revenue Station

The PLE Project, which will add seven new stations west of the current terminus at Wilshire/Western, is required to support two-minute headways through Union Station (four minute service on each branch of the Red/Purple Lines) by 2024 per the Project's Full Funding Grant Agreement. Currently, Red/Purple Line trains "turn-back" at Union Station, reversing direction from east to west. The minimum headway that can be achieved at Union Station is approximately four minute service (or seven and one-half minutes on the branches).

To support increased service levels on the Red/Purple Lines and satisfy the required headways, it has been concluded that a turn-back facility consisting of three tracks and two platforms must be constructed within the Division 20 yard. Furthermore, in order to keep trains moving through Union Station, it is necessary to continue passenger revenue service through to the turn-back facility at which point trains can be cleared and sent back into service. Designing the turn-back facility to also serve as an at-grade revenue station is a cost-effective method for expanding rail service to the eastern edge of Downtown Los Angeles and the burgeoning Arts District.

Portal

Currently, non-revenue Red/Purple Line trains proceed underground south of Union Station and portal just south of the 101 Freeway before entering a complex set of switches in the main yard. To increase train speeds and reliability of operations in support of future passenger stations and revenue service, the existing tunnel portal must be widened and tracks reconfigured. Specifically, widening the portal in both directions is necessary to service the proposed turn-back facility/revenue station and preserve options for continued revenue service to 6th Street and potentially further points south. It is critical that any modifications to the portal be made in the near-term, prior to increased service levels on the Red/Purple Line which would result in operational challenges during construction.

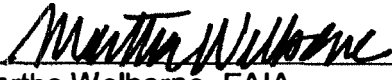
NEXT STEPS

The coordination study is scheduled to be completed in the spring of 2015 and will result in an integrated plan for the area and a roadmap for future implementation including options for two new passenger revenue stations. At that time, recommendations for necessary additional coordination and planning steps including environmental clearance and design of the near-term physical improvements will be made.

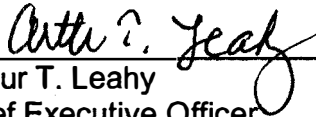
ATTACHMENTS

A. Location Map

Prepared by: Nick Saponara, Director, (213) 922-4313
David Mieger, Executive Officer, (213) 922-3040



Martha Welborne, FAIA
Chief Planning Officer



Arthur T. Leahy
Chief Executive Officer

LOCATION MAP

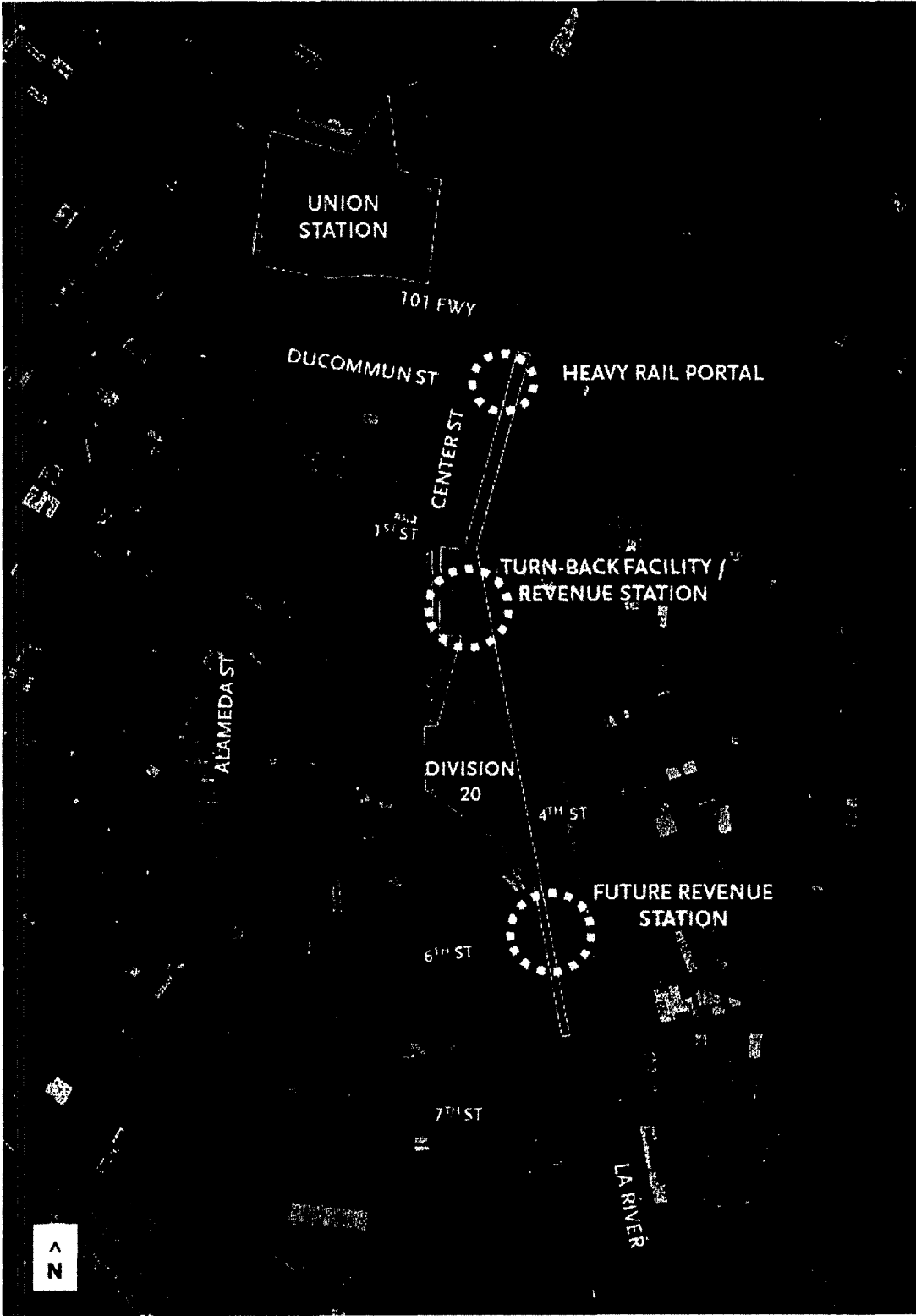


EXHIBIT D

Subway capacity project coming soon

BY STEVE HYMON , DECEMBER 20, 2016

Arts District Project Area



(http://s3-us-west-2.amazonaws.com/media.thesource.metro.net/wp-content/uploads/2016/12/20092632/map_project_arts_dist_area_2016-12.jpg)

A community meeting will be held Wednesday night at the SCI-Arc building in downtown Los Angeles from 6:30 p.m. to 7:30 p.m. to discuss the Metro Red/Purple Line Core Capacity Improvements Project (Division 20 Portal Widening & Turnback Facility). This is the project that will allow subway trains to turn around substantially quicker on the eastern side of Union Station, meaning more Red/Purple Line trains can be run in the future and the extremely annoying crawl into and out of Union Station will be eliminated.

To put it another way: at present, trains run every 10 minutes on both the Red and Purple Line during peak hours. The project would allow trains to run every four minutes on both lines. That means that trains could be running as often as every two minutes between Wilshire/Vermont (where the Red and Purple Lines split) and Union Station. To repeat: trains carrying passengers would not have to switch tracks while entering and exiting from Union Station.

We are also aware of another issue important to the community: the possibility of adding new Red/Purple Line Stations to serve the Arts District, where many new real estate projects are being built or proposed.

To emphasize: Metro staff say that the turnback project could still accommodate a possible station between 1st and 3rd streets. A station at 6th Street would present more serious challenges, among them acquiring real estate and finding a way for trains with passengers to travel through the existing subway car maintenance/storage yard. In both cases, the stations would need to be studied further, funded and approved by the Metro Board of

DIRECTORS.

The meeting on Wednesday is being held cooperation with the Historic Cultural Neighborhood Council Urban Design/Land Use Committee (HCNC UD/LUC). The info:

Wednesday, December 21, 2016

6:30 – 7:30 p.m.

Southern California Institute of Architecture (SCI-Arc)

960 E. 3rd St.

Los Angeles, CA 90013

Room 160

(Enter from the parking lot at 350 Merrick St., Los Angeles, CA 90013. State you are with the Metro Community Meeting, and enter building through the first door at the top of the ramp.)

Agenda

6:30 p.m. – Open House

7 p.m. – Presentation – *This presentation will begin at the start of the regular HCNC UD/LUC meeting scheduled to take place from 7 – 9 p.m.*

Light refreshments will be served.

The location is served by the Metro Gold Line Little Tokyo/Arts District Station. Parking is also available. Plan your trip to the meeting at [metro.net](https://nao1.safelinks.protection.outlook.com/?url=https%3A%2F%2Ft.e2ma.net%2Fclick%2Ffdwmgc%2Fnze2ou%2Fzgor4k&data=01%7C01%7Ckeinerb%40metro.net%7Caffd9b84e6b14bb70e9co8d41ee59164%7Ccab57129bdbfd4caca77fc74c40364af%7C0&) (<https://nao1.safelinks.protection.outlook.com/?url=https%3A%2F%2Ft.e2ma.net%2Fclick%2Ffdwmgc%2Fnze2ou%2Fzgor4k&data=01%7C01%7Ckeinerb%40metro.net%7Caffd9b84e6b14bb70e9co8d41ee59164%7Ccab57129bdbfd4caca77fc74c40364af%7C0&>)

sdata=XWENTIWOVUAVDg5IS%2FJWm4wrszo5eUbeInpLPTEELnUE%3D&reserved=OJ
or by calling 323.GO.METRO (323.466.3876).

All Metro meetings are held in ADA accessible facilities. Spanish and Japanese translation and other ADA accommodations can be requested by calling 213-922-4465 at least 72 hours in advance.

Here is the project description from the project's home page (<https://www.metro.net/projects/capital-projects/>) (click on the tab for Division 20):

Division 20 Portal Widening & Turnback Facility Project Summary

In order to accommodate increased service levels on the Metro Red/Purple Lines, Metro is planning critical facility improvements including a widening of the heavy rail tunnel south of the US-101 freeway (Portal Widening) and a new turnback facility (Turnback Facility) in the Division 20 rail yard. With these improvements, new tracks and switches will allow trains to turn around more quickly at Union Station.

Presently, the Metro Red and Purple Lines carry over 140,000 passengers each day and ridership is expected to grow by 49,000 when the Metro Purple Line is extended to the VA West Los Angeles Medical Center (as described in the Final Environmental Impact Statement for the Metro Purple Line Extension). Many Red/Purple Line trains switch tracks before entering Union Station, which is the reason that some trains operate more slowly coming in and out of the station. This project will allow switching to take place after riders get on or off trains. It will also help to ensure safety and reliability on the system, a sufficient capacity to serve future passengers and a more effective operation of Metro's expanding subway network.

The environmental document for the Division 20 Portal Widening & Turnback – Initial Study/Mitigated Negative Declaration (IS/MND) –

will be released for public comment on Monday, December 19, 2016. The IS/MND will be available for public review at the Metro Transportation Library at One Gateway Plaza, 15th Floor, Los Angeles, CA 90012; and at the following public library locations:

- Los Angeles Central Library, 630 W. 5th Street, Los Angeles, CA 90071
- Little Tokyo Branch Library, 203 S. Los Angeles Street, Los Angeles, CA 90012

It will also be available online at metro.net/capitalprojects

(<https://nao1.safelinks.protection.outlook.com/?url=https%3A%2F%2Ft.e2ma.net%2Fclick%2Ffdwmgc%2Fnze2ou%2Ffgor4k&data=01%7C01%7Ckeinerb%40metro.net%7Caffd9b84e6b14bb70e9c08d41ee59164%7Ccab57129bdbfd4caca77fc74c40364af%7C0&sdata=tXHaHoK14pCGfswy5pT4WUW1qO8WS%2BR4ZRg%2Fy6tY1Ro%3D&reserved=0>) under “Reports and Info”.

The deadline for public comments on the IS/MND is Thursday, January 19, 2017.

Please submit written comments to:

Dr. Cris B. Liban, D. Env., P.E., Executive Officer

Environmental Compliance and Sustainability

One Gateway Plaza, MS 99-17-2

Los Angeles, CA 90012-2952

libane@metro.net (<mailto:libane@metro.net>)

213.922.2471

For more information, visit metro.net/capitalprojects

(<https://nao1.safelinks.protection.outlook.com/?url=https%3A%2F>

[%2Ft.e2ma.net%2Fclick%2FrdwmgC%2Fnze2ou%2Fv11r4k&data=01%7Co1%7Ckeinerb%40metro.net%7Caffd9b84e6b14bb70e9co8d41ee59164%7Cab57129bdbfd4caca77fc74c40364af%7Co&sdata=ERy%2BQwemyPSfi7MC3X2yso%2F1VWZMm6J3fjPgohwpo5Q%3D&reserved=0\)](#) or contact Bronwen Keiner at keinerb@metro.net (<mailto:keinerb@metro.net>) or 213-922-4465.

And below is the Initial Study/Mitigated Negative Declaration ([pdf here for printing and download \(https://media.metro.net/projects_studies/capital_projects/images/redpurple_line_core_capacity_ismnd_2016-1215.pdf\)](https://media.metro.net/projects_studies/capital_projects/images/redpurple_line_core_capacity_ismnd_2016-1215.pdf)):

IS/MND for Metro
 Red/Purple Line Core Capacity Improvements Project

Initial Study/Mitigated Negative Declaration (IS/M Red/Purple Line Core Capacity Improvermer

Prepared For:

[View this document on Scribd](#)

Related



Highlights from the





Subway turnback, Airport Connector receive state cap-and-trade funds
August 18, 2016
In "Projects"

Regional Connector's final environmental study

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January 20, 2012
In "Projects"



Major delays on Red, Purple Line subway
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🔖 **TAGGED AS:** Arts District (<http://thesource.metro.net/tag/arts-district/>), Arts District Station (<http://thesource.metro.net/tag/arts-district-station/>), Division 20 (<http://thesource.metro.net/tag/division-20/>), downtown Los Angeles (<http://thesource.metro.net/tag/downtown-los-angeles/>), dtla (<http://thesource.metro.net/tag/dtla/>), Purple Line (<http://thesource.metro.net/tag/purple-line/>), Purple Line Extension (<http://thesource.metro.net/tag/purple-line-extension/>), Red Line (<http://thesource.metro.net/tag/red-line/>), subway maintenance yard (<http://thesource.metro.net/tag/subway-maintenance-yard/>), Union Station (<http://thesource.metro.net/tag/union-station/>)

 **10 replies** >

This is really interesting. A station at 3rd behind One Santa Fe would be sorely needed for the denser developments in that area, but it would probably only work well if Metro can squeeze an easement out of the One Santa Fe developer to connect the station to the street just south of 3rd and Santa Fe. A lot of Metro stations suffer from the problem of poor interconnectivity with surrounding neighborhoods and there's a good opportunity here to do it right.

If further studies need to be performed for the 6th street station, then those studies need to be started now.

The area around 6th street is undergoing rapid development and is very poorly served by transit. If a station is not even in the works, the development will create a hostile space and add thousands of cars to DTLA's streets. A station needs to be in the long term forecast to allow the development to count on it's opening down the road.

And, by comparison, how is the current turnback situation at the North Hollywood station?

That's a good question. I don't ride enough to NoHo to know off-hand. Any readers know?

Steve Hyman
Editor, The Source

Even if it isn't great, the purple line does not go to NoHo, so only half as many trains will ever have to use it. Union Station is more troublesome because both the purple and red line need to turn around there.

This is good

Thanks Steve, I've always HATED that crawl in/out of LAUS.

The turnback facility is desperately needed, but I hope they can find a way to do it with 3rd AND 6th street Arts District stations, which this plan does not presently accommodate.

There's an opportunity for a creative solution, as you don't need LAUS-level headways at either of those two Arts District stations, so have the red line serve one and the purple line serve the other. Then, turn one back at 3rd and turn the other back at 6th. Virtually nobody is going to be trying to go from 6th to 3rd or vice versa, and the few who do can still transfer at LAUS (and put up with two turnback operations).

A further thought; I recommend serving 3rd with the red line and 6th with the purple. 6th will directly serve the new LA CleanTech Incubator on Hewitt and Palmetto, and a purple line connection will offer nonstop connection to the WLA business/investment corridor. Just a thought.

How would trains access the 6th street station in this proposal? If they have to pass over the tracks that leave to the 3rd street station then having one line 3rd and the

either serve both isn't going to save any time or improve capacity at all.

It might be possible to have all trains serve 3rd street but then only half of them serve 6th with a pocket track for the trains that are turning around, but again it would likely need a flying WYE to get the trains going out of service out of the way.

Won't these new stations be in the way when WSAB comes out of union station (should Metro not go with the east bank)

In simple turns... The new tracks serve as a turnback slider?

EXHIBIT E

Districts

Name: Greater Chinatown Historic District

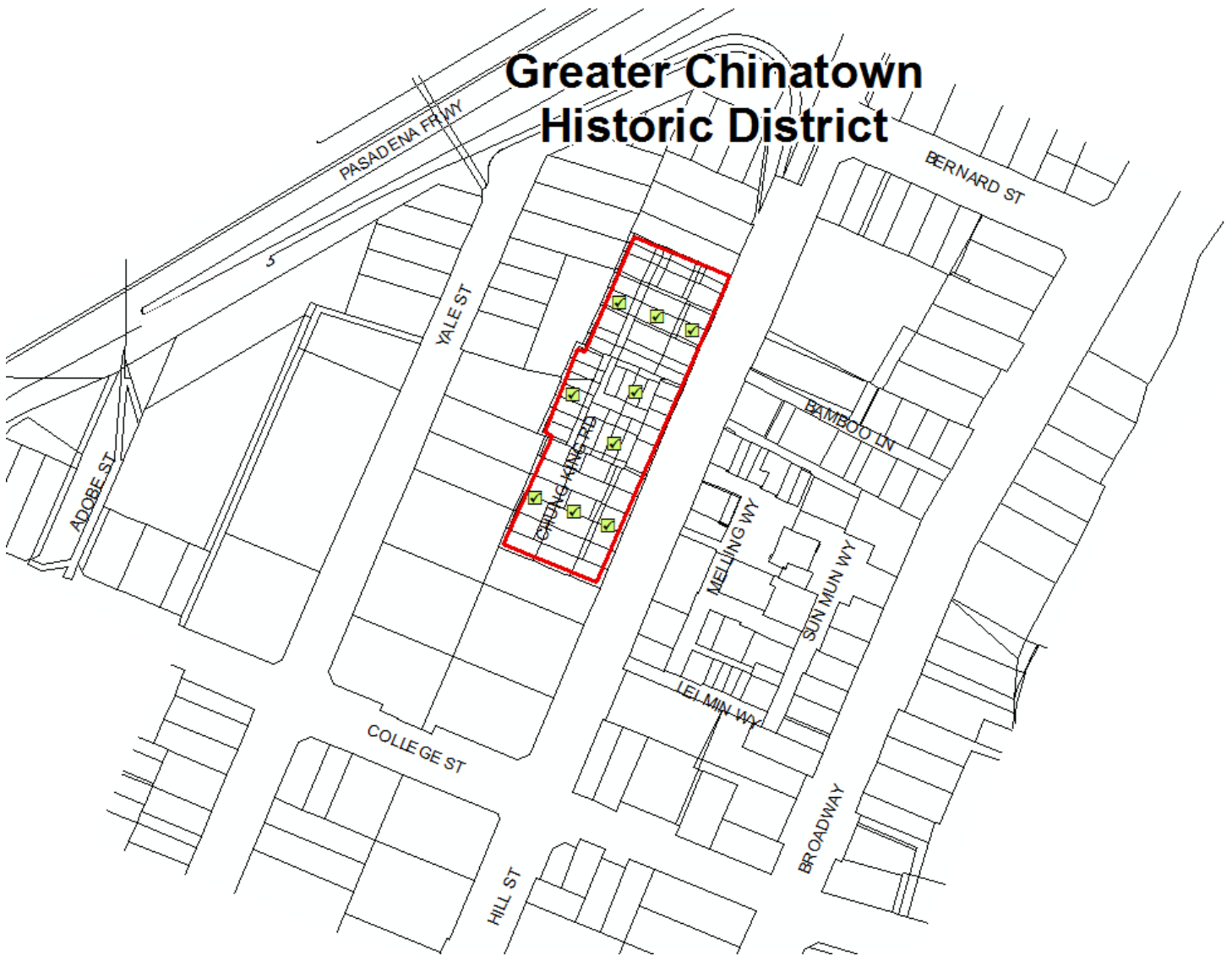


Description:

TO BE ADDED

Significance:

TO BE ADDED



Context 1:

Context:	Architecture and Engineering, 1850-1980
Sub context:	No Sub-context
Theme:	Exotic Revivals, 1900-1980
Sub theme:	East Asian Eclectic, 1938-1980
Property type:	Commercial - District
Property sub type:	No Sub-Type
Criteria:	C/3/3
Status code:	3S;3CS;5S3
Reason:	TO BE ADDED

Context 2:

Context:	Commercial Development, 1850-1980
Sub context:	No Sub-context
Theme:	Commercial Identity, 1850-1980
Sub theme:	No SubTheme
Property type:	Commercial
Property sub type:	Historic District
Criteria:	A/1/1
Status code:	3S;3CS;5S3
Reason:	TO BE ADDED

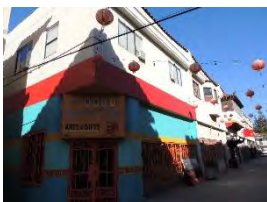
Contributors/Non-Contributors:



Primary Address: 937 N CHIANG KAI-SHEK ROAD
 Type: Contributor
 Year built: 1949
 Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
 Architectural style: Vernacular; East Asian Eclectic



Primary Address: 955 N CHIANG KAI-SHEK ROAD
 Type: Contributor
 Year built: 1947
 Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
 Architectural style: East Asian Eclectic



Primary Address: 969 N CHIANG KAI-SHEK ROAD
 Type: Contributor
 Year built: 1950
 Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
 Architectural style: Vernacular; East Asian Eclectic



Primary Address: 970 N CHIANG KAI-SHEK ROAD
Type: Contributor
Year built: 1950
Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
Architectural style: Vernacular; East Asian Eclectic



Primary Address: 940 N CHUNG KING ROAD
Other Address: 938 N CHIANG KAI-SHEK ROAD
Type: Contributor
Year built: 1949
Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
Architectural style: Vernacular; East Asian Eclectic



Primary Address: 504 W CHUNGKING ROAD
Type: Contributor
Year built: 1947
Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
Architectural style: East Asian Eclectic



Primary Address: 505 W CHUNGKING ROAD
Other Address: 503 W CHUNGKING ROAD
Type: Contributor
Year built: 1947
Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
Architectural style: East Asian Eclectic



Primary Address: 939 N HILL ST
Type: Contributor
Year built: 1949
Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
Architectural style: Vernacular; East Asian Eclectic



Primary Address: 969 N HILL ST

Other Address: 969 1/2 N HILL ST
Type: Contributor
Year built: 1950
Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
Architectural style: Vernacular; East Asian Eclectic

Name: Los Angeles Industrial Historic District

NO PHOTO

Description:

TO BE ADDED

Significance:

TO BE ADDED



Context 1:

Context:	Other Context, 1850-1980
Sub context:	No Sub-context
Theme:	Event or Series of Events, 1850-1980
Sub theme:	No SubTheme
Property type:	Industrial
Property sub type:	District
Criteria:	A/1/1
Status code:	3S;3CS;5S3
Reason:	TO BE ADDED

Contributors/Non-Contributors:



Primary Address: 602 E 1ST ST
 Other Address: 600 E 1ST ST
 604 E 1ST ST
 606 E 1ST ST
 608 E 1ST ST
 610 E 1ST ST
 612 E 1ST ST
 614 E 1ST ST
 106 S ROSE ST
 112 S ROSE ST

Type: Contributor
 Year built: 1913
 Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
 Architectural style: Commercial, Vernacular

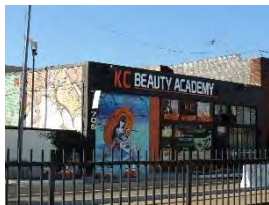


Primary Address: 620 E 1ST ST
 Other Address: 618 E 1ST ST
 618 1/2 E 1ST ST

Type: Contributor
 Year built: 1913
 Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
 Architectural style: Commercial, Vernacular



Primary Address: 622 E 1ST ST
 Type: Non-Contributor
 Year built: 1950
 Property type/sub type: Commercial-Auto Related; Auto Body/Repair
 Architectural style: No style



Primary Address: 700 E 1ST ST
 Other Address: 702 E 1ST ST
 704 E 1ST ST
 706 E 1ST ST
 106 S HEWITT ST
 112 S HEWITT ST
 Type: Non-Contributor
 Year built: 1909
 Property type/sub type: Commercial-Retail; Retail Store
 Architectural style: Commercial, Vernacular



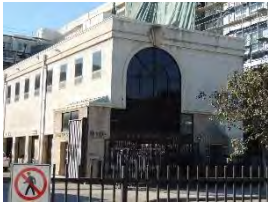
Primary Address: 700 E 1ST ST
 Other Address: 702 E 1ST ST
 704 E 1ST ST
 706 E 1ST ST
 106 S HEWITT ST
 112 S HEWITT ST
 Type: Contributor
 Year built: 1909
 Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
 Architectural style: Commercial, Vernacular



Primary Address: 712 E 1ST ST
 Type: Non-Contributor
 Year built: 1979
 Property type/sub type: Commercial-Office; Low Rise
 Architectural style: Other



Primary Address: 716 E 1ST ST
 Other Address: 720 E 1ST ST
 724 E 1ST ST
 111 S GAREY ST
 Type: Non-Contributor
 Year built: 1990
 Property type/sub type: Commercial-Office; Low Rise
 Architectural style: Other



Primary Address: 806 E 1ST ST
 Other Address: 810 E 1ST ST
 Type: Non-Contributor
 Year built: 1990
 Property type/sub type: Commercial-Office; Low Rise
 Architectural style: No style



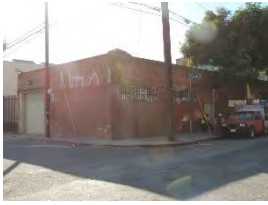
Primary Address: 830 E 1ST ST
 Other Address: 808 E 1ST ST
 880 E 1ST ST
 Type: Non-Contributor
 Year built: 2002
 Property type/sub type: Commercial-Office; Low Rise
 Architectural style: Other



Primary Address: 900 E 1ST ST
 Type: Contributor
 Year built: 1900
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 510 E 2ND ST
 Type: Non-Contributor
 Year built: 1960
 Property type/sub type: Infrastructure-Water & Power; Other
 Architectural style: No style



Primary Address: 720 E 2ND ST
 Other Address: 205 S GAREY ST
 213 S GAREY ST
 215 S GAREY ST
 204 S HEWITT ST
 206 S HEWITT ST
 208 S HEWITT ST
 212 S HEWITT ST
 218 S HEWITT ST
 226 S HEWITT ST
 230 S HEWITT ST
 Type: Non-Contributor
 Year built: 1955
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 720 E 2ND ST
 Other Address: 205 S GAREY ST
 213 S GAREY ST
 215 S GAREY ST
 204 S HEWITT ST
 206 S HEWITT ST
 208 S HEWITT ST
 212 S HEWITT ST
 218 S HEWITT ST
 226 S HEWITT ST
 230 S HEWITT ST
 Type: Non-Contributor
 Year built: 1921
 Property type/sub type: Institutional-Religious/Spiritual; Religious School
 Architectural style: East Asian Eclectic; Vernacular



Primary Address: 720 E 2ND ST
 Other Address: 205 S GAREY ST
 213 S GAREY ST
 215 S GAREY ST
 204 S HEWITT ST
 206 S HEWITT ST
 208 S HEWITT ST
 212 S HEWITT ST
 218 S HEWITT ST
 226 S HEWITT ST
 230 S HEWITT ST
 Type: Non-Contributor
 Year built: 1955
 Property type/sub type: Institutional-Religious/Spiritual; Religious School
 Architectural style: Modern, Mid-Century



Primary Address: 924 E 2ND ST

Other Address: 923 E 3RD ST
 Type: Contributor
 Year built: 1910
 Property type/sub type: Industrial-Storage; Warehouse
 Architectural style: Vernacular



Primary Address: 929 E 2ND ST
 Other Address: 939 E 2ND ST
 Type: Contributor
 Year built: 1926
 Property type/sub type: Industrial-Food Processing; Creamery
 Architectural style: Industrial, Utilitarian



Primary Address: 938 E 2ND ST
 Other Address: 940 E 2ND ST
 939 E 3RD ST
 941 E 3RD ST
 Type: Contributor
 Year built: 1906
 Property type/sub type: Industrial-Storage; Warehouse
 Architectural style: Vernacular



Primary Address: 948 E 2ND ST
 Type: Non-Contributor
 Year built: 1997
 Property type/sub type: Industrial; Other
 Architectural style: Other



Primary Address: 730 E 3RD ST
 Other Address: 722 E 3RD ST
 726 E 3RD ST
 727 E 4TH PL
 321 S HEWITT ST
 325 S HEWITT ST
 Type: Non-Contributor
 Year built: 1960
 Property type/sub type: Commercial-Auto Related; Parking Structure
 Architectural style: No style



Primary Address: 953 E 3RD ST

Type: Non-Contributor

Year built: 1910

Property type/sub type: Industrial; Other

Architectural style: No style



Primary Address: 800 E 4TH PL

Type: Contributor

Year built: 1930

Property type/sub type: Industrial; Other

Architectural style: Industrial, Utilitarian



Primary Address: 801 E 4TH PL

Other Address: 326 S HEWITT ST

Type: Contributor

Year built: 1923

Property type/sub type: Industrial; Other

Architectural style: Industrial, Utilitarian



Primary Address: 808 E 4TH PL

Other Address: 810 E 4TH PL
814 E 4TH PL
839 E 4TH ST
841 E 4TH ST
843 E 4TH ST
847 E 4TH ST
901 E 4TH ST
903 E 4TH ST

Type: Non-Contributor

Year built: 1989

Property type/sub type: Industrial; Other

Architectural style: Industrial, Utilitarian

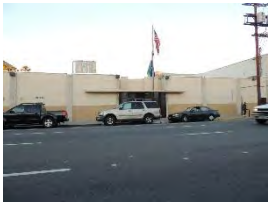


Primary Address: 813 E 4TH PL

Other Address: 817 E 4TH PL

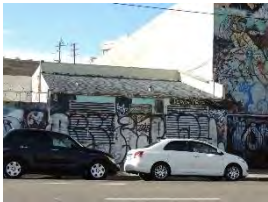
821 E 4TH PL
827 E 4TH PL
829 E 4TH PL
831 E 4TH PL
833 E 4TH PL

Type: Non-Contributor
Year built: 1967
Property type/sub type: Institutional-Government; Social Services/Welfare
Architectural style: Vernacular



Primary Address: 813 E 4TH PL
Other Address: 817 E 4TH PL
821 E 4TH PL
827 E 4TH PL
829 E 4TH PL
831 E 4TH PL
833 E 4TH PL

Type: Non-Contributor
Year built: 1967
Property type/sub type: Institutional-Government; Other
Architectural style: Modern, Mid-Century



Primary Address: 816 E 4TH PL
Type: Non-Contributor
Year built: 1946
Property type/sub type: Industrial; Other
Architectural style: Industrial, Utilitarian



Primary Address: 822 E 4TH PL
Other Address: 824 E 4TH PL
907 E 4TH ST
909 E 4TH ST
911 E 4TH ST
913 E 4TH ST
915 E 4TH ST
917 E 4TH ST

Type: Non-Contributor
Year built: 1922
Property type/sub type: Industrial; Other
Architectural style: Industrial, Utilitarian



Primary Address: 1003 E 4TH PL
Other Address: 1007 E 4TH PL

1011 E 4TH PL
 1028 E 4TH ST
 1032 E 4TH ST
 1036 E 4TH ST
 1040 E 4TH ST
 424 S MOLINO ST

Type: Non-Contributor
 Year built: 1968
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 1019 E 4TH PL
 Other Address: 1015 E 4TH PL
 1046 E 4TH ST
 1050 E 4TH ST

Type: Contributor
 Year built: 1937
 Property type/sub type: Industrial-Storage; Warehouse
 Architectural style: Industrial, Utilitarian



Primary Address: 825 E 4TH ST
 Other Address: 819 E 4TH ST
 831 E 4TH ST
 835 E 4TH ST
 350 S ALAMEDA ST
 358 S ALAMEDA ST
 360 S ALAMEDA ST

Type: Non-Contributor
 Year built: 1923
 Property type/sub type: Industrial-Storage; Public Storage
 Architectural style: No style



Primary Address: 900 E 4TH ST
 Other Address: 902 E 4TH ST
 904 E 4TH ST
 406 S COLYTON ST
 408 S COLYTON ST

Type: Non-Contributor
 Year built: 1952
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 940 E 4TH ST
 Other Address: 942 E 4TH ST

944 E 4TH ST
946 E 4TH ST
948 E 4TH ST
956 E 4TH ST
410 S HEWITT ST
416 S HEWITT ST
420 S HEWITT ST

Type: Non-Contributor
Year built: 1963
Property type/sub type: Industrial; Other
Architectural style: Vernacular

NO PHOTO

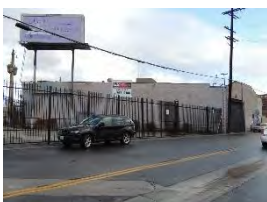
Primary Address: 947 E 4TH ST
Other Address: 953 E 4TH ST
957 E 4TH ST
Type: Contributor
Year built: 1915
Property type/sub type: Industrial-Food Processing; Other
Architectural style: Modern, Late



Primary Address: 962 E 4TH ST
Type: Contributor
Year built: 1924
Property type/sub type: Industrial; Other
Architectural style: Vernacular



Primary Address: 966 E 4TH ST
Other Address: 970 E 4TH ST
Type: Non-Contributor
Year built: 1960
Property type/sub type: Industrial; Other
Architectural style: Industrial, Utilitarian



Primary Address: 1016 E 4TH ST
Other Address: 1022 E 4TH ST

418 S MOLINO ST

Type: Non-Contributor
 Year built: 1930
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 1008 E 5TH ST
 Other Address: 500 S ALAMEDA ST
 506 S ALAMEDA ST
 501 S SEATON ST
 507 S SEATON ST

Type: Non-Contributor
 Year built: 1949
 Property type/sub type: Commercial-Auto Related; Gas/Service Station
 Architectural style: Vernacular



Primary Address: 1100 E 5TH ST
 Other Address: 506 S SEATON ST
 512 S SEATON ST
 516 S SEATON ST
 522 S SEATON ST

Type: Non-Contributor
 Year built: 1930
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 1101 E 5TH ST
 Other Address: 445 S COLYTON ST
 451 S COLYTON ST
 457 S COLYTON ST
 450 S SEATON ST
 454 S SEATON ST

Type: Contributor
 Year built: 1915
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 1168 E 5TH ST
 Type: Non-Contributor

Year built: 2006
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 1200 E 5TH ST
 Type: Contributor
 Year built: 1931
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 1209 E 6TH ST
 Other Address: 1205 E 6TH ST
 1207 E 6TH ST
 1211 E 6TH ST
 Type: Contributor
 Year built: 1912
 Property type/sub type: Commercial-Lodging; Hotel
 Architectural style: Renaissance Revival



Primary Address: 1217 E 6TH ST
 Other Address: 1219 E 6TH ST
 1221 E 6TH ST
 Type: Non-Contributor
 Year built: 1921
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 1235 E 6TH ST
 Type: Contributor
 Year built: 1901
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 1247 E 6TH ST
 Other Address: 1249 E 6TH ST
 1253 E 6TH ST

1255 E 6TH ST
1259 E 6TH ST

Type: Non-Contributor
Year built: 1912
Property type/sub type: Industrial; Other
Architectural style: No style



Primary Address: 1261 E 6TH ST
Type: Non-Contributor
Year built: 1909
Property type/sub type: Industrial-Storage; Warehouse
Architectural style: Vernacular



Primary Address: 1269 E 6TH ST
Type: Contributor
Year built: 1906
Property type/sub type: Industrial; Other
Architectural style: Vernacular



Primary Address: 1275 E 6TH ST
Type: Contributor
Year built: 1911
Property type/sub type: Industrial; Other
Architectural style: Vernacular



Primary Address: 1281 E 6TH ST
Other Address: 1285 E 6TH ST
Type: Contributor
Year built: 1922
Property type/sub type: Industrial; Other
Architectural style: Vernacular



Primary Address: 1291 E 6TH ST
Type: Contributor

Year built: 1923
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 1301 E 6TH ST
 Type: Non-Contributor
 Year built: 2009
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 1309 E 6TH ST
 Other Address: 1311 E 6TH ST
 1313 E 6TH ST
 Type: Contributor
 Year built: 1923
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 1309 E 6TH ST
 Other Address: 1311 E 6TH ST
 1313 E 6TH ST
 Type: Contributor
 Year built: 1923
 Property type/sub type: Industrial-Storage; Warehouse
 Architectural style: Vernacular



Primary Address: 1309 E 6TH ST
 Other Address: 1311 E 6TH ST
 1313 E 6TH ST
 Type: Contributor
 Year built: 1923
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 1309 E 6TH ST
 Other Address: 1311 E 6TH ST

1313 E 6TH ST

Type: Contributor
 Year built: 1923
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 1313 E 6TH ST
 Other Address: 1309 E 6TH ST
 1311 E 6TH ST

Type: Contributor
 Year built: 1923
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular

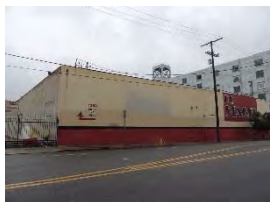
Primary Address: 1340 E 6TH ST

Other Address: 1350 E 6TH ST
 1356 E 6TH ST
 610 S MILL ST
 630 S MILL ST
 Type: Contributor
 Year built: 1924
 Property type/sub type: Industrial-Storage; Warehouse
 Architectural style: Industrial, Utilitarian



Primary Address: 1362 E 6TH ST

Other Address: 1366 E 6TH ST
 1370 E 6TH ST
 Type: Non-Contributor
 Year built: 1957
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 1379 E 6TH ST

Other Address: 1356 E FACTORY PL



1362 E FACTORY PL
1366 E FACTORY PL

Type: Non-Contributor
Year built: 1988
Property type/sub type: Industrial; Other
Architectural style: No style



Primary Address: 1380 E 6TH ST
Other Address: 1388 E 6TH ST
611 S MATEO ST

Type: Non-Contributor
Year built: 1948
Property type/sub type: Industrial-Food Processing; Other
Architectural style: Industrial, Utilitarian



Primary Address: 1381 E 6TH ST
Other Address: 595 S MATEO ST

Type: Non-Contributor
Year built: 1979
Property type/sub type: Industrial; Other
Architectural style: No style



Primary Address: 1725 E 7th St
Type: Non-Contributor
Year built: 1925
Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
Architectural style: Commercial, Vernacular



Primary Address: 1617 E 7TH ST
Other Address: 1619 E 7TH ST
1621 E 7TH ST
Type: Contributor
Year built: 1900
Property type/sub type: Industrial-Storage; Warehouse
Architectural style: Vernacular



Primary Address: 1701 E 7TH ST

Type: Non-Contributor
 Year built: 1948
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 1717 E 7TH ST
 Other Address: 1725 E 7TH ST
 Type: Non-Contributor
 Year built: 1948
 Property type/sub type: Industrial; Other
 Architectural style: No style



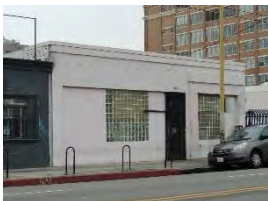
Primary Address: 1745 E 7TH ST
 Other Address: 1737 E 7TH ST
 Type: Contributor
 Year built: 1921
 Property type/sub type: Industrial-Food Processing; Other
 Architectural style: Vernacular



Primary Address: 1801 E 7TH ST
 Other Address: 1803 E 7TH ST
 1805 E 7TH ST
 680 S MILL ST
 690 S MILL ST
 Type: Non-Contributor
 Year built: 1917
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 1809 E 7TH ST
 Other Address: 1807 E 7TH ST
 Type: Non-Contributor
 Year built: 1952
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 1811 E 7TH ST
 Other Address: 1815 E 7TH ST

1901 E 7TH ST

Type: Non-Contributor
Year built: 1938
Property type/sub type: Industrial; Other
Architectural style: No style



Primary Address: 1901 E 7TH ST
Other Address: 1811 E 7TH ST
1815 E 7TH ST

Type: Non-Contributor
Year built: 1940
Property type/sub type: Industrial; Other
Architectural style: Vernacular

Primary Address: 1907 E 7TH ST

Other Address: 1911 E 7TH ST
Type: Non-Contributor
Year built: 1919
Property type/sub type: Industrial; Other
Architectural style: No style



Primary Address: 1921 E 7TH ST

Other Address: 1915 E 7TH ST
Type: Non-Contributor
Year built: 1922
Property type/sub type: Industrial; Other
Architectural style: No style



Primary Address: 100 S ALAMEDA ST

Type: Non-Contributor
Year built: 2005
Property type/sub type: Residential-Multi Family; Other
Architectural style: Other



Primary Address: 312 S ALAMEDA ST

Other Address: 710 E 4TH PL



722 E 4TH PL
 Type: Contributor
 Year built: 1930
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 330 S ALAMEDA ST
 Type: Non-Contributor
 Year built: 2001
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



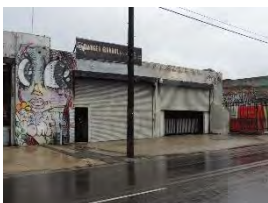
Primary Address: 400 S ALAMEDA ST
 Other Address: 408 S ALAMEDA ST
 412 S ALAMEDA ST
 416 S ALAMEDA ST
 407 S SEATON ST
 411 S SEATON ST
 417 S SEATON ST
 Type: Contributor
 Year built: 1908
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 426 S ALAMEDA ST
 Other Address: 427 S SEATON ST
 Type: Contributor
 Year built: 1921
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 436 S ALAMEDA ST
 Other Address: 438 S ALAMEDA ST
 437 S SEATON ST
 Type: Contributor
 Year built: 1940
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 440 S ALAMEDA ST
 Other Address: 441 S SEATON ST

Type: Contributor
 Year built: 1921
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 458 S ALAMEDA ST
 Other Address: 1009 E 5TH ST
 1011 E 5TH ST
 1013 E 5TH ST
 1015 E 5TH ST
 1017 E 5TH ST
 1019 E 5TH ST
 456 S ALAMEDA ST
 455 S SEATON ST

Type: Non-Contributor
 Year built: 1930
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 516 S ALAMEDA ST
 Other Address: 524 S ALAMEDA ST
 517 S SEATON ST
 523 S SEATON ST
 525 S SEATON ST

Type: Non-Contributor
 Year built: 2004
 Property type/sub type: Industrial-Food Processing; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 526 S ALAMEDA ST
 Other Address: 529 S SEATON ST
 Type: Non-Contributor
 Year built: 1981
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 542 S ALAMEDA ST
 Type: Contributor

Year built: 1930
Property type/sub type: Infrastructure-Water & Power; Utility Building (Water, Electrical Power, Natural Gas)
Architectural style: Industrial, Utilitarian



Primary Address: 558 S ALAMEDA ST
Other Address: 560 S ALAMEDA ST
568 S ALAMEDA ST
570 S ALAMEDA ST
578 S ALAMEDA ST
1215 E FACTORY PL
1233 E FACTORY PL
1114 E PALMETTO ST
1130 E PALMETTO ST

Type: Non-Contributor
Year built: 2003
Property type/sub type: Industrial; Other
Architectural style: No style



Primary Address: 580 S ALAMEDA ST
Other Address: 586 S ALAMEDA ST
590 S ALAMEDA ST

Type: Non-Contributor
Year built: 1968
Property type/sub type: Industrial; Other
Architectural style: No style



Primary Address: 640 S ALAMEDA ST
Other Address: 1206 E 6TH ST

1230 E 6TH ST
1268 E 6TH ST
1270 E 6TH ST
1272 E 6TH ST
1274 E 6TH ST
1276 E 6TH ST
1278 E 6TH ST
1308 E 6TH ST
1320 E 6TH ST
1334 E 6TH ST
1338 E 6TH ST

Type: Non-Contributor
Year built: 1963
Property type/sub type: Industrial-Agricultural; Produce Market
Architectural style: No style



Primary Address: 656 S ALAMEDA ST
Other Address: 660 S ALAMEDA ST
1525 E INDUSTRIAL ST
1549 E INDUSTRIAL ST

Type: Contributor
Year built: 1907
Property type/sub type: Industrial; Other
Architectural style: Industrial, Utilitarian



Primary Address: 690 S ALAMEDA ST
Other Address: 1511 E 7TH ST
1515 E 7TH ST
Type: Non-Contributor
Year built: 1997
Property type/sub type: Commercial-Food Service; Restaurant/Tavern
Architectural style: Other



Primary Address: 407 S COLYTON ST
Other Address: 828 E 4TH ST
411 S COLYTON ST
417 S COLYTON ST
417 1/2 S COLYTON ST
Type: Contributor
Year built: 1932
Property type/sub type: Industrial; Other
Architectural style: Vernacular



Primary Address: 414 S COLYTON ST
Type: Non-Contributor

Year built: 1947
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 417 S COLYTON ST
 Other Address: 828 E 4TH ST
 407 S COLYTON ST
 411 S COLYTON ST
 417 1/2 S COLYTON ST

Type: Non-Contributor
 Year built: 1950
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 418 S COLYTON ST
 Type: Non-Contributor
 Year built: 1960
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 421 S COLYTON ST
 Other Address: 427 S COLYTON ST
 Type: Contributor
 Year built: 1909
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 424 S COLYTON ST
 Type: Contributor
 Year built: 1930
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 428 S COLYTON ST
 Other Address: 430 S COLYTON ST

432 S COLYTON ST

Type: Contributor
 Year built: 1930
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular; Art Deco



Primary Address: 431 S COLYTON ST

Other Address: 433 S COLYTON ST
 439 S COLYTON ST
 441 S COLYTON ST
 432 S SEATON ST
 436 S SEATON ST
 440 S SEATON ST

Type: Contributor
 Year built: 1925
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 433 S COLYTON ST

Other Address: 431 S COLYTON ST
 439 S COLYTON ST
 441 S COLYTON ST
 432 S SEATON ST
 436 S SEATON ST
 440 S SEATON ST

Type: Non-Contributor
 Year built: 1930
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 436 S COLYTON ST

Type: Contributor
 Year built: 1929
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular; Art Deco



Primary Address: 441 S COLYTON ST

Other Address: 431 S COLYTON ST
 433 S COLYTON ST

439 S COLYTON ST
432 S SEATON ST
436 S SEATON ST
440 S SEATON ST

Type: Non-Contributor
Year built: 1950
Property type/sub type: Industrial; Other
Architectural style: Industrial, Utilitarian



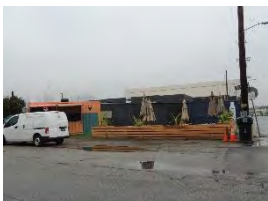
Primary Address: 442 S COLYTON ST
Other Address: 444 S COLYTON ST
Type: Non-Contributor
Year built: 1928
Property type/sub type: Industrial; Other
Architectural style: No style



Primary Address: 450 S COLYTON ST
Other Address: 1201 E 5TH ST
Type: Contributor
Year built: 1927
Property type/sub type: Industrial; Other
Architectural style: Unknown/not visible



Primary Address: 524 S COLYTON ST
Other Address: 518 S COLYTON ST
520 S COLYTON ST
522 S COLYTON ST
519 S HEWITT ST
521 S HEWITT ST
523 S HEWITT ST
525 S HEWITT ST
Type: Contributor
Year built: 1923
Property type/sub type: Industrial; Other
Architectural style: Vernacular



Primary Address: 527 S COLYTON ST
Other Address: 529 S COLYTON ST
533 S COLYTON ST
543 S COLYTON ST

547 S COLYTON ST

Type: Non-Contributor
 Year built: 2015
 Property type/sub type: Industrial; Other
 Architectural style: No style



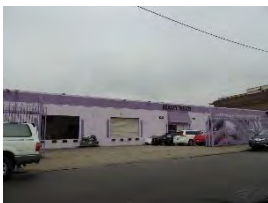
Primary Address: 527 S COLYTON ST
 Other Address: 529 S COLYTON ST
 533 S COLYTON ST
 543 S COLYTON ST
 547 S COLYTON ST

Type: Non-Contributor
 Year built: 1948
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 1206 E FACTORY PL
 Other Address: 1212 E FACTORY PL
 1218 E FACTORY PL

Type: Contributor
 Year built: 1923
 Property type/sub type: Infrastructure-Water & Power; Utility Building (Water, Electrical Power, Natural Gas)
 Architectural style: Vernacular



Primary Address: 1222 E FACTORY PL
 Other Address: 1220 E FACTORY PL
 1226 E FACTORY PL
 1232 E FACTORY PL
 1234 E FACTORY PL
 1236 E FACTORY PL

Type: Non-Contributor
 Year built: 1982
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 1245 E FACTORY PL
 Other Address: 1237 E FACTORY PL
 1255 E FACTORY PL
 1263 E FACTORY PL

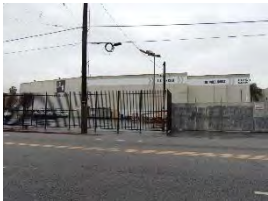
1281 E FACTORY PL
 Type: Non-Contributor
 Year built: 2003
 Property type/sub type: Commercial-Office; Low Rise
 Architectural style: Other



Primary Address: 1300 E FACTORY PL
 Other Address: 1286 E FACTORY PL
 1294 E FACTORY PL
 Type: Contributor
 Year built: 1926
 Property type/sub type: Industrial-Storage; Warehouse
 Architectural style: Vernacular



Primary Address: 1308 E FACTORY PL
 Other Address: 1314 E FACTORY PL
 1322 E FACTORY PL
 1330 E FACTORY PL
 1338 E FACTORY PL
 1344 E FACTORY PL
 1350 E FACTORY PL
 Type: Contributor
 Year built: 1923
 Property type/sub type: Industrial-Storage; Warehouse
 Architectural style: Vernacular; Spanish Colonial Revival



Primary Address: 1366 E FACTORY PL
 Other Address: 1379 E 6TH ST
 1356 E FACTORY PL
 1362 E FACTORY PL
 Type: Non-Contributor
 Year built: 1988
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 122 S GAREY ST
 Other Address: 126 S GAREY ST
 130 S GAREY ST
 136 S GAREY ST
 142 S GAREY ST

148 S GAREY ST

Type: Non-Contributor
 Year built: 2015
 Property type/sub type: Residential-Multi Family; Other
 Architectural style: Other



Primary Address: 129 S GAREY ST
 Type: Non-Contributor
 Year built: 2015
 Property type/sub type: Residential-Multi Family; Other
 Architectural style: Other



Primary Address: 209 S GAREY ST
 Other Address: 211 S GAREY ST
 Type: Contributor
 Year built: 1925
 Property type/sub type: Industrial; Other
 Architectural style: Art Deco; Vernacular

NO PHOTO

Primary Address: 210 S GAREY ST
 Other Address: 900 E 2ND ST
 918 E 2ND ST
 919 E 3RD ST
 204 S GAREY ST
 Type: Contributor
 Year built: 1910
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 210 S GAREY ST
 Other Address: 900 E 2ND ST
 918 E 2ND ST
 919 E 3RD ST
 204 S GAREY ST

Type: Non-Contributor
 Year built: 1945
 Property type/sub type: Industrial; Other
 Architectural style: No style



Primary Address: 210 S GAREY ST
 Other Address: 900 E 2ND ST
 918 E 2ND ST
 919 E 3RD ST
 204 S GAREY ST

Type: Contributor
 Year built: 1910
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 210 S GAREY ST
 Other Address: 900 E 2ND ST
 918 E 2ND ST
 919 E 3RD ST
 204 S GAREY ST

Type: Non-Contributor
 Year built: 1910
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 221 S GAREY ST
 Other Address: 823 E 3RD ST
 827 E 3RD ST
 829 E 3RD ST
 831 E 3RD ST
 833 E 3RD ST
 835 E 3RD ST
 227 S GAREY ST
 231 S GAREY ST

Type: Contributor
 Year built: 1925
 Property type/sub type: Industrial; Other
 Architectural style: Art Deco; Industrial, Utilitarian



Primary Address: 232 S GAREY ST
 Other Address: 907 E 3RD ST
 238 S GAREY ST
 Type: Contributor

Year built: 1924
 Property type/sub type: Industrial-Food Processing; Flour Mill
 Architectural style: Neoclassical



Primary Address: 111 S HEWITT ST
 Other Address: 119 S HEWITT ST
 119 1/2 S HEWITT ST
 119 3/4 S HEWITT ST
 121 S HEWITT ST
 121 1/4 S HEWITT ST
 121 1/2 S HEWITT ST
 121 3/4 S HEWITT ST
 123 S HEWITT ST
 127 S HEWITT ST

Type: Non-Contributor
 Year built: 1971
 Property type/sub type: Institutional-Religious/Spiritual; Temple
 Architectural style: East Asian Eclectic



Primary Address: 111 S HEWITT ST
 Other Address: 119 S HEWITT ST
 119 1/2 S HEWITT ST
 119 3/4 S HEWITT ST
 121 S HEWITT ST
 121 1/4 S HEWITT ST
 121 1/2 S HEWITT ST
 121 3/4 S HEWITT ST
 123 S HEWITT ST
 127 S HEWITT ST

Type: Non-Contributor
 Year built: 1970
 Property type/sub type: Institutional-Religious/Spiritual; Religious School
 Architectural style: Modern, Mid-Century



Primary Address: 116 S HEWITT ST
 Other Address: 120 S HEWITT ST
 Type: Non-Contributor
 Year built: 1920
 Property type/sub type: Industrial; Other
 Architectural style: Other



Primary Address: 122 S HEWITT ST
 Other Address: 126 S HEWITT ST
 130 S HEWITT ST
 134 S HEWITT ST
 140 S HEWITT ST

144 S HEWITT ST
 Type: Non-Contributor
 Year built: 2000
 Property type/sub type: Residential-Multi Family; Other
 Architectural style: Other



Primary Address: 232 S HEWITT ST
 Other Address: 811 E 3RD ST
 Type: Non-Contributor
 Year built: 1938
 Property type/sub type: Institutional-Religious/Spiritual; Church
 Architectural style: Spanish Colonial Revival



Primary Address: 407 S HEWITT ST
 Other Address: 411 S HEWITT ST
 417 S HEWITT ST
 423 S HEWITT ST
 Type: Non-Contributor
 Year built: 1980
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 407 S HEWITT ST
 Other Address: 411 S HEWITT ST
 417 S HEWITT ST
 423 S HEWITT ST
 Type: Non-Contributor
 Year built: 1950
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 427 S HEWITT ST
 Type: Contributor
 Year built: 1920

Property type/sub type: Industrial; Other

Architectural style: Vernacular



Primary Address: 428 S HEWITT ST

Other Address: 432 S HEWITT ST

Type: Contributor

Year built: 1904

Property type/sub type: Industrial-Manufacturing; Factory

Architectural style: Vernacular

Primary Address: 435 S HEWITT ST

Type: Non-Contributor

Year built: 1990

Property type/sub type: Industrial; Other

Architectural style: No style



Primary Address: 441 S HEWITT ST

Other Address: 440 S COLYTON ST

Type: Non-Contributor

Year built: 1980

Property type/sub type: Industrial; Other

Architectural style: Industrial, Utilitarian



Primary Address: 447 S HEWITT ST

Type: Contributor

Year built: 1920

Property type/sub type: Industrial-Automotive; Other

Architectural style: Vernacular



Primary Address: 451 S HEWITT ST

Other Address: 459 S HEWITT ST

Type: Non-Contributor



Year built: 1928
 Property type/sub type: Industrial; Other
 Architectural style: Other



Primary Address: 501 S HEWITT ST
 Other Address: 1216 E 5TH ST
 1220 E 5TH ST
 1224 E 5TH ST
 509 S HEWITT ST
 509 1/2 S HEWITT ST
 515 S HEWITT ST
 517 S HEWITT ST
 519 S HEWITT ST

Type: Non-Contributor
 Year built: 0
 Property type/sub type: Other; Vacant Lot
 Architectural style: Not Applicable



Primary Address: 510 S HEWITT ST
 Type: Non-Contributor
 Year built: 2000
 Property type/sub type: Commercial-Mixed; Mixed Use - Commercial/Office/Residential
 Architectural style: Other



Primary Address: 510 S HEWITT ST
 Type: Non-Contributor
 Year built: 2000
 Property type/sub type: Commercial-Auto Related; Parking Structure
 Architectural style: No style



Primary Address: 530 S HEWITT ST
 Type: Contributor
 Year built: 1920
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 1555 E INDUSTRIAL ST
 Other Address: 1581 E INDUSTRIAL ST
 1601 E INDUSTRIAL ST
 1701 E INDUSTRIAL ST

1717 E INDUSTRIAL ST
1719 E INDUSTRIAL ST

Type: Contributor
Year built: 1914
Property type/sub type: Industrial-Storage; Warehouse
Architectural style: Vernacular; Neoclassical



Primary Address: 1555 E INDUSTRIAL ST
Other Address: 1581 E INDUSTRIAL ST
1601 E INDUSTRIAL ST
1701 E INDUSTRIAL ST
1717 E INDUSTRIAL ST
1719 E INDUSTRIAL ST

Type: Non-Contributor
Year built: 1971
Property type/sub type: Industrial; Other
Architectural style: Industrial, Utilitarian



Primary Address: 1580 E INDUSTRIAL ST
Other Address: 1590 E INDUSTRIAL ST
Type: Contributor
Year built: 1940
Property type/sub type: Industrial; Other
Architectural style: Vernacular



Primary Address: 1581 E INDUSTRIAL ST
Other Address: 1555 E INDUSTRIAL ST
1601 E INDUSTRIAL ST
1701 E INDUSTRIAL ST
1717 E INDUSTRIAL ST
1719 E INDUSTRIAL ST

Type: Contributor
Year built: 1919
Property type/sub type: Industrial-Storage; Warehouse
Architectural style: Vernacular; Neoclassical



Primary Address: 1601 E INDUSTRIAL ST
Other Address: 1555 E INDUSTRIAL ST
1581 E INDUSTRIAL ST
1701 E INDUSTRIAL ST

1717 E INDUSTRIAL ST
1719 E INDUSTRIAL ST

Type: Contributor
Year built: 1905
Property type/sub type: Industrial-Storage; Warehouse
Architectural style: Neoclassical



Primary Address: 1717 E INDUSTRIAL ST
Other Address: 1555 E INDUSTRIAL ST
1581 E INDUSTRIAL ST
1601 E INDUSTRIAL ST
1701 E INDUSTRIAL ST
1719 E INDUSTRIAL ST

Type: Contributor
Year built: 1913
Property type/sub type: Industrial-Storage; Warehouse
Architectural style: Neoclassical



Primary Address: 1719 E INDUSTRIAL ST
Other Address: 1555 E INDUSTRIAL ST
1581 E INDUSTRIAL ST
1601 E INDUSTRIAL ST
1701 E INDUSTRIAL ST
1717 E INDUSTRIAL ST

Type: Contributor
Year built: 1906
Property type/sub type: Industrial-Storage; Warehouse
Architectural style: Neoclassical



Primary Address: 1738 E INDUSTRIAL ST
Other Address: 1734 E INDUSTRIAL ST
Type: Contributor
Year built: 1923
Property type/sub type: Industrial-Food Processing; Other
Architectural style: Vernacular



Primary Address: 1800 E INDUSTRIAL ST
Other Address: 1804 E INDUSTRIAL ST
670 S MILL ST

Type: Contributor
 Year built: 1910
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 1805 E INDUSTRIAL ST
 Other Address: 1809 E INDUSTRIAL ST
 660 S MILL ST

Type: Non-Contributor
 Year built: 1967
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 1820 E INDUSTRIAL ST
 Other Address: 1830 E INDUSTRIAL ST
 Type: Contributor
 Year built: 1925
 Property type/sub type: Industrial-Food Processing; Bakery
 Architectural style: Beaux Arts Classicism



Primary Address: 1820 E INDUSTRIAL ST
 Other Address: 1830 E INDUSTRIAL ST
 Type: Contributor
 Year built: 1906
 Property type/sub type: Industrial; Other
 Architectural style: Vernacular



Primary Address: 1828 E INDUSTRIAL ST
 Type: Non-Contributor
 Year built: 1972
 Property type/sub type: Industrial; Other
 Architectural style: Industrial, Utilitarian



Primary Address: 1855 E INDUSTRIAL ST
 Type: Contributor