SCHROEDER HALL U.S. ARMY RESERVE CENTER  
3800 EASTWILLOW STREET  
CITY OF LONG BEACH  
LOS ANGELES COUNTY, CALIFORNIA

Historic Resource Report

Prepared by:

CONSULTING

GPA

July 2013
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Appendix A: Preliminary Project Plans

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EXECUTIVE SUMMARY

The property located at 3800 East Willow Street in the City of Long Beach was determined eligible for listing in the National Register of Historic Places (National Register) by the U.S. Army Reserve & PAR Environmental Services Inc. in June 2007. It was determined eligible under Criterion C, Consideration G, as an excellent and rare example of a largely unmodified Reisner & Urbahn design adaptation for U.S. Army Reserve centers. Buildings that are listed in the National Register are automatically included in the California Register of Historical Resources (California Register). As such, the building is a historical resource subject to the California Environmental Quality Act (CEQA).

A proposed project involves the rehabilitation of the property. Projects that may affect historic resources are considered to be mitigated to a level of less than significant if they conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Standards. The Standards were issued by the National Park Service, but are also used by state and local jurisdictions throughout the country to determine the appropriateness of alterations to historical resources.

Preliminary plans for the rehabilitation of the building from July 2013 were analyzed for compliance with the Standards. The plans appear to comply with the Standards. The primary character-defining features of the property will be preserved and the integrity of the resource will be maintained. As such, the project will have a less than significant impact on the historic resource and no mitigation is required. However, because the project plans were still in a preliminary stage at the time of this review, the following measure is recommended: The City of Long Beach should retain the services of a qualified historic preservation consultant to review the plans, as well as the finish selections, periodically as the project develops to ensure that it continues to comply with the Standards.
1. INTRODUCTION

1.1 Purpose and Qualifications

The purpose of this report is to determine and set forth whether or not a proposed rehabilitation project will impact historical resources. The proposed project involves the property located at 3800 East Willow Street in the City of Long Beach. It is situated at the southeast corner of the intersection of East Willow Street and Grand Avenue and historically known as Schroeder Hall U.S. Army Reserve Center (USARC). It consists of two buildings: Schroeder Hall and the Organizational Maintenance Shop (OMS). It also includes parking areas and open space. The buildings were constructed in 1960. In 2005, the property was declared a surplus property by the U.S. Congress as a part of the 2005 Base Realignment and Closure (BRAC). In June 2007, the property was evaluated and determined eligible for listing in the National Register of Historic Places (National Register) by the U.S. Army Reserve & PAR Environmental Services Inc. It was determined eligible under Criterion C, Consideration G, as an excellent and rare example of a largely unmodified Reisner & Urbahn design adaptation for U.S. Army Reserve centers.

As part of the BRAC process in 2005, the City of Long Beach (City) was recognized as the Local Redevelopment Authority (LRA) responsible for the reuse planning for the site. In May 2006, the City provided the public notice of the pending BRAC process and published a Notice of Availability to solicit Notices of Interest. One of the two recommended uses by the BRAC was to utilize the site for an East Division Police Substation for the City. In December 2007, the recommendation by the BRAC Committee was approved by the City Council at a duly noticed public hearing. The Army determined that the disposition of the property outside of federal ownership and control constituted an adverse effect on the historic property. Therefore, the Army entered into a Memorandum of Agreement (MOA) with the California State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) to resolve the adverse effect. The City of Long Beach was invited to act as a concurring party in the MOA. The stipulations outlined in the MOA to resolve the effects on the historic property included the preparation of a Historical Covenant for the property for the purpose of ensuring that the property continues to be preserved.

Additionally, the Schroeder Hall USARC is a historic resource subject to compliance with the California Environmental Quality Act (CEQA), because it has been determined eligible for listing in the National Register. Therefore, in addition to the City’s responsibilities as a concurring party to the MOA and the Historical Covenant, the City must also determine whether any future work proposed for the property would significantly impact the property in accordance CEQA. This report has been prepared as part of the CEQA compliance process on behalf of the City.

Projects that may impact historic resources are considered to be mitigated to a level of less than significant if they conform to the Secretary of the Interior’s Standards for the Treatment of Historic Properties (Standards). Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Standards. Therefore, the project was evaluated for compliance with the Standards.

1Cultural Resources Inventory and Evaluation of the United States Army Reserve Schroeder Hall USAR Center, Long Beach, California, P-19-187956. Prepared by the Environmental Division of the office of the Deputy Chief of Staff, Engineer, 63D Regional Readiness Command, U.S. Army Reserve, with technical assistance from PAR Environmental Services, Inc. June 2007.
Andrea Galvin, Principal Architectural Historian, and Laura Vanaskie O’Neill, Senior Architectural Historian, at GPA Consulting (GPA) were responsible for the preparation of this report. Both fulfill the qualifications for historic preservation professionals outlined in Title 36 of the Code of Federal Regulations, Part 61. Résumés are available upon request.

1.2 Methodology

In conducting the analysis of potential impacts to the historic resources, GPA performed the following tasks:

1. Conducted a field inspection of the project site and surrounding area to determine the scope of the study. The study area was identified as the project site itself as it only involves the rehabilitation of property. Photographs and notes were taken during the field inspection.

2. Reviewed all existing documentation on the property.

3. Communicated with the design team and the City to develop plans that comply with the Standards.

4. Reviewed and analyzed the preliminary plans for compliance with Standards. The Standards are accompanied by Guidelines for four types of treatments for historic buildings: Preservation, Rehabilitation, Restoration, and Reconstruction. Rehabilitation was selected as the treatment for this project.

2. REGULATORY ENVIRONMENT

Generally, a lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register of Historical Resources (California Register). The California Register is modeled after the National Register. Furthermore, a property is presumed to be historically significant if it is listed in a local register of historic resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant. Schroeder Hall USARC has been determined eligible for the National Register. It is therefore also eligible for listing in the California Register and is considered a historical resource under CEQA. The National and California Register designation programs are discussed below.

2.1 National Register of Historic Places

The National Register is “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history.

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2 Public Resources Code Section 5024.1 and 14 CCR Section 4850.
3 Title 36 Code of Federal Regulations Part 60.2.
and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:  

A. Associated with events that have made a significant contribution to the broad patterns of our history; or  

B. Associated with the lives of persons significant in our past; or  

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or  

D. Yield, or may be likely to yield, information important in prehistory or history.

**Physical Integrity**

According to National Register Bulletin #15, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity.” Integrity is defined in National Register Bulletin #15 as “the ability of a property to convey its significance.” Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials.

**Context**

To be eligible for listing in the National Register, a property must also be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.” A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

### 2.2 California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and

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4 Title 36 Code of Federal Regulations Part 60.4.  
5 National Register Bulletin #15, pp. 44-45.  
6 Ibid., p. 7.  
7 Public Resources Code Section 5024.1 (a).
Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.8

The criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or

2. It is associated with the lives of persons important to local, California, or national history; or

3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or

4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.9

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:10

1. The survey has been or will be included in the State Historic Resources Inventory;

2. The survey and the survey documentation were prepared in accordance with office [OHP] procedures and requirements;

3. The resource is evaluated and determined by the office [OHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and

4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

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8 Public Resources Code Section 5024.1 (d).
9 Public Resources Code Section 4852.
10 Public Resources Code Section 5024.1.
3. ENVIRONMENTAL SETTING

3.1 Description of the Surrounding Area

The proposed project is located at 3800 East Willow Street, at the southeast corner of East Willow Street and Grand Avenue in the City of Long Beach. The site is located near three major arterial corridors (Willow Street, Lakewood Boulevard, and Redondo Avenue) and two major intersections (Redondo Avenue/Willow Street and Willow Street/Lakewood Boulevard). The project site is also in close proximity to Interstate 405 and the Long Beach Airport. The property is in a mixed-use setting, surrounded by residential, institutional, commercial, and light industrial uses.

Figure 1: Project Location. Source: Google Maps.

3.2 History and Description of 3800 East Willow Street

Overview

The subject property currently contains two existing buildings: Schroeder Hall and the OMS building. Schroeder Hall is a two-story building that was originally used for training and housed classrooms, office space, a rifle range, an assembly/drill hall, a kitchen, and both men's and women's restrooms. The OMS is a one-story, high-bay maintenance shop/garage facility that was used for routine vehicle maintenance and used oil storage. Additional facilities on site...
include a vehicle wash rack, a loading dock, volleyball/recreational area, and large paved parking areas. Landscaping includes mature trees planted along the east perimeter and a lawn along the east and northern perimeters of the property. The remainder of the facility is paved and enclosed with chain link and wrought iron fencing.

Schroeder Hall and the OMS were constructed in 1960 in the Mid-Century Modern style. The buildings represent local adaptations of the original Reisner & Urbahn design plans for Army Reserve training centers. In the late 1940s, the New York architecture firm of Reisner & Urbahn Architects were contracted to collaborate with the U.S. Army Reserve (USAR) and the US Army Corps of Engineers (USACE) to create standardized expandable plans for Army Reserve training centers and vehicle maintenance shops. When new locations for Reserve training centers became available, the standardized Reisner & Urbahn designs were utilized to expedite the construction of new Reserve training facilities throughout the United States. However, by the mid-1950s, the standardized Reisner & Urbahn design plans were becoming more and more modified in order to accommodate changing trends in architectural styles of the period.

Schroeder Hall Description

Schroeder Hall is located on the south side of East Willow Street. Its primary elevation faces north. The building is made up of three individual sections which create an L-shaped plan. These sections include: a two-story administration center located to the north, a high-bay, one-story assembly hall located to the south, and a one-story central section connecting the two taller sections.

Figure 2: Components of the property include: 1.) Schroeder Hall administration center; 2.) Schroeder Hall assembly hall; 3.) OMS building. Source: Google Maps.
The entire facility sits on a concrete slab foundation and has a reinforced concrete beam structural system with interior concrete block walls. The exterior walls are clad with brick facing. The building has very low-pitched gable roofs with slightly overhanging boxed eaves.

The primary entrance to the building is located within a recessed alcove on the north elevation. It consists of two sets of aluminum and glass paneled double doors. The doors are topped with a six-light window that stretches to the roof line. The entrance is accessed by a brick and concrete stoop with one concrete riser. There are two wall-mounted flood lights flanking the entrance. Other doors on the building include metal slab doors, typically with one small light, and a large metal roll-up door in the center of the assembly hall’s south elevation.

The majority of the windows throughout the building are one-over-one, metal-sash awning windows in which both sashes are operable. The windows are evenly spaced, exist on both the first and second stories, and have concrete sills. The top of the assembly hall has a different window type: four groups of eight metal-sash awning windows, each with two horizontal lights, along its west and east elevations.

The interior of the administration center is organized around double-loaded corridors. Offices, classrooms, a rifle range, a kitchen, and restrooms are located off the corridors. The main lobby is a double-height space with a mezzanine. Finishes throughout include: linoleum flooring; a mix of painted concrete block, painted brick, and plaster walls; a mix of plaster and T-bar ceilings,
and a mix of metal laminate slab doors. Some original light fixtures remain. They are fluorescent tube lights mounted within boxed frames.

The interior of the assembly hall is a large open space. Finishes include exposed brick walls, an exposed concrete floor, and an open ceiling. The steel roof beams and metal roof decking are exposed. The original light fixtures remain. They hang from the decking and have large, cylindrical shades.

Figure 4: Schroeder Hall, south elevation, assembly hall in foreground, administration center in background. Source: GPA, May 2013

Figure 5: Schroeder Hall, east elevation, assembly hall at left, administration center at right. Source: GPA, May 2013

Figure 6: Schroeder Hall, west elevation, administration center at left, assembly hall at right. Source: GPA, May 2013

Figure 7: Schroeder Hall, main entrance on administration center north elevation. Source: GPA, May 2013

Organizational Maintenance Shop Description

The one-story, high-bay OMS building is located southwest of Schroeder Hall. It has a rectangular plan, a reinforced concrete beam structural system, concrete block walls, and a concrete slab foundation. Its exterior walls are clad with brick facing. The building is covered by a very low-pitched gable roof with slightly overhanging eaves.
The OMS has three symmetrically spaced metal roll-up doors on the east elevation. It also has three pedestrian entrances: two on the north south elevation and one on the north elevation. Each consists of a metal slab door. Windows on the building consist of three bands of metal-sash fixed and awning windows on the west elevation.

The interior of the OMS is a large open space. Finishes include exposed brick walls, an exposed concrete floor, and an open ceiling. The steel roof beams and wood roof framing are exposed. The original light fixtures remain and consist of hanging fluorescent tube lights.

**Significance Statement**

Schroeder Hall and the Organizational Maintenance Shop were determined eligible for listing in the National Register of Historic Places under Criterion C, Consideration G, as excellent and rare examples of an unmodified adaptation of the Reisner & Urbahn design for USAR centers. A building is eligible for listing under Criterion C if it embodies the distinctive characteristics of a type, period, or method of construction, or if it represents the work of a master, possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction. Since Schroeder Hall and the OMS were not yet 50 years of age when they
were evaluated in 2006, the Army Reserve and PAR Environmental Services utilized Consideration G in preparing their report. Consideration G states that a property that is less than 50 years of age can be listed in the National Register if the property achieves significance within the past 50 years and if it is of exceptional importance. The following is excerpted from the 2007 Army Reserve and PAR Environmental Services report:11

"[Schroeder Hall and the OMS building] reflect a common construction style, using contemporary elements ubiquitous to both educational and military installations throughout the United States from this period, including simple, undecorated elevations, flat or slightly gabled roofs with boded eaves and utilitarian styling. However, they represent a local adaptation closely following the original Reisner & Urbahn design from this period, and are unaltered examples of a two-story USAR center with a brick exterior and its associated three bay concrete OMS. Although they are military facilities constructed during the Cold War era, they are not associated with significant defense elements, such as nuclear, missile, or air defense sites, which have been found to reflect the critical, significant importance of that era to American history. They do, however, reflect the growing appreciation and need for Army Reserve soldiers during the 1950s.

These building relate to the Cold War build-up of the United States Army Reserve during the 1950s. They represent an adaptation very closely following Reisner & Urbahn, Architects who designed the master USAR facility plans that were then constructed across the nation. Most of these facilities have been extensively modified with new windows, added wings or other changes. Schroeder Hall is the best remaining California example of an adaptation of Reisner & Urbahn’s 400-man armory and three-bay maintenance shop with a brick exterior treatment. Therefore, the Schroeder Hall facility (USAR Center and OMS) appears eligible for inclusion in the National Register of Historic Places under Criterion C, Consideration G as an excellent and rare example of an unmodified adaptation of the Reisner & Urbahn design for USAR centers... It is the best example of this type of plan in California and is eligible at a local level of significance."

3.3 Character-Defining Features

Character-defining features are the architectural components that contribute to a building’s sense of time and place. Preservation Brief #17: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character notes:

A complete understanding of any property may require documentary research about its style, construction, function, its furnishings or contents; knowledge about the original builder, owners, and later occupants; and knowledge about the evolutionary history of the building. Even though buildings may be of historic, rather than architectural significance, it is their tangible elements that embody its significance for association with specific events or persons and it is those tangible elements both on the exterior and interior that should be preserved.12

The character-defining features of buildings can be generally grouped into three categories: the overall visual character of a building, the exterior materials and craftsmanship, and the interior spaces, features, and finishes. The relative importance of character-defining features depends on the level of craftsmanship, visibility, and integrity. In addition, some character-defining features are more important than others in conveying the significance of the building. Thus, they

11 p. 3
12 National Register Preservation Brief #17, p. 1.
can be categorized as either "primary" or "secondary." Primary character-defining features are considered the most important elements contributing to the significance of the building, while secondary features are considered less important.

The tables on the following pages list the character-defining features of each building. The tables organize the features by type and classify them as either primary or secondary. Non-character-defining features are also listed for clarity.
## Table I: Schroeder Hall Character-Defining Features

<table>
<thead>
<tr>
<th>Type</th>
<th>Feature</th>
<th>Photo (if applicable)</th>
<th>Primary</th>
<th>Secondary</th>
<th>Not</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall Visual Character</td>
<td>Setting, including site plan, landscaping, and general surroundings</td>
<td>N/A</td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
<tr>
<td></td>
<td>L-shaped plan</td>
<td>N/A</td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Massing of one- and two-story sections</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Very low-pitched, gabled roofs with slightly overhanging eaves</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retain integrity</td>
</tr>
</tbody>
</table>

13 Photographs are of representative examples of the character-defining features outlined in the table. Every instance of every feature was not photographed or included in this table.
<table>
<thead>
<tr>
<th>Type</th>
<th>Feature</th>
<th>Photo (if applicable)</th>
<th>Primary</th>
<th>Secondary</th>
<th>Not</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Asymmetrical primary façade (north elevation)</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Primary entrance configuration, including: recessed location, aluminum and glass paneled double doors, six-light window extending to roof line, and brick and concrete stoop</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Windows on administration center</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retain integrity</td>
</tr>
<tr>
<td>Type</td>
<td>Feature</td>
<td>Photo (if applicable)</td>
<td>Primary</td>
<td>Secondary</td>
<td>Not</td>
<td>Reason</td>
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</tr>
<tr>
<td></td>
<td>Windows on assembly hall</td>
<td><img src="image1.jpg" alt="Image" /></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retain integrity</td>
</tr>
<tr>
<td></td>
<td>Metal roll-up door on assembly hall</td>
<td><img src="image2.jpg" alt="Image" /></td>
<td></td>
<td>X</td>
<td></td>
<td>Original, retain integrity, but common and not highly visible</td>
</tr>
<tr>
<td></td>
<td>Metal slab doors with single, small lights</td>
<td><img src="image3.jpg" alt="Image" /></td>
<td></td>
<td>X</td>
<td></td>
<td>Original, retain integrity, but common and not highly visible</td>
</tr>
</tbody>
</table>
### Table I: Schroeder Hall Character-Defining Features

<table>
<thead>
<tr>
<th>Type</th>
<th>Feature</th>
<th>Photo (if applicable)</th>
<th>Primary</th>
<th>Secondary</th>
<th>Not</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exterior Materials and Craftsmanship</td>
<td>Exterior brick</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Concrete window sills</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retain integrity</td>
</tr>
<tr>
<td></td>
<td>Metal window sashes</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retain integrity</td>
</tr>
<tr>
<td>Type</td>
<td>Feature</td>
<td>Photo (if applicable)</td>
<td>Primary</td>
<td>Secondary</td>
<td>Not</td>
<td>Reason</td>
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<td>-------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Interior Spaces, Features, and Finishes</td>
<td>Double-height lobby with mezzanine</td>
<td><img src="image1.jpg" alt="Image" /></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible public space, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Finishes in lobby, including linoleum flooring, exposed brick walls, and plaster ceiling</td>
<td><img src="image2.jpg" alt="Image" /></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, located in a highly visible public space, and retain integrity, but common</td>
</tr>
<tr>
<td></td>
<td>Boxed fluorescent lights in lobby</td>
<td><img src="image3.jpg" alt="Image" /></td>
<td>X</td>
<td></td>
<td></td>
<td>Non-original</td>
</tr>
<tr>
<td>Type</td>
<td>Feature</td>
<td>Photo (if applicable)</td>
<td>Primary</td>
<td>Secondary</td>
<td>Not</td>
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</tr>
<tr>
<td></td>
<td>Double-loaded corridors in administration center</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td>Original, less visible semi-public space, closed off from the public lobby by doors, retain integrity</td>
</tr>
<tr>
<td></td>
<td>Finishes in corridors, including linoleum flooring, painted concrete block walls, and plaster ceilings</td>
<td>See photo above.</td>
<td></td>
<td></td>
<td>X</td>
<td>Original, located in a less visible semi-public space, closed off from the public lobby by doors, retain integrity, but common</td>
</tr>
<tr>
<td></td>
<td>Boxed fluorescent lights in corridors</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td>Non-original</td>
</tr>
<tr>
<td></td>
<td>Double-height open space in assembly hall</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td>Original, less visible private space, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Finishes in assembly hall, including concrete floors, exposed brick walls, and open ceiling with exposed steel</td>
<td>See photo above.</td>
<td></td>
<td></td>
<td>X</td>
<td>Original, located in a less visible private space, retain integrity, but common</td>
</tr>
<tr>
<td>Type</td>
<td>Feature</td>
<td>Photo (if applicable)</td>
<td>Primary</td>
<td>Secondary</td>
<td>Not</td>
<td>Reason</td>
</tr>
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<td>-----------------------------</td>
<td>-------------------------------------------------------------------------</td>
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<tr>
<td></td>
<td>beams and decking</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cylindrical hanging lights in assembly hall</td>
<td>See photo above.</td>
<td>X</td>
<td></td>
<td></td>
<td>Original, located in a less visible private space, retain integrity</td>
</tr>
<tr>
<td></td>
<td>Rifle range</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, less visible private space, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Original finishes in rifle range, including linoleum flooring, painted concrete block and brick walls</td>
<td>See photo above.</td>
<td>X</td>
<td></td>
<td></td>
<td>Original, located in a less visible private space, retain integrity, but common</td>
</tr>
<tr>
<td></td>
<td>T-bar ceiling in rifle range</td>
<td>See Photo above.</td>
<td></td>
<td></td>
<td>X</td>
<td>Non-original</td>
</tr>
<tr>
<td></td>
<td>Interior doors</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>Mix of original and non-original. Doors are inconsistent throughout the building. Some are flush metal, some are wood laminate, some are solid, and some have lights. All are common and unremarkable. Most are located in semi-public corridors or private classrooms and offices and are not highly visible.</td>
</tr>
<tr>
<td>Type</td>
<td>Feature</td>
<td>Photo (if applicable)</td>
<td>Primary</td>
<td>Secondary</td>
<td>Not</td>
<td>Reason</td>
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<td>-------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>Lighting in all other spaces</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>Non-original</td>
</tr>
<tr>
<td></td>
<td>Finishes in all other spaces, including plaster and T-bar ceilings,</td>
<td>See photo above</td>
<td></td>
<td></td>
<td>X</td>
<td>Original, located in private spaces, not highly visible, retain integrity, but common</td>
</tr>
<tr>
<td></td>
<td>linoleum flooring, and plaster and painted masonry walls</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type</td>
<td>Feature</td>
<td>Photo (if applicable)</td>
<td>Primary</td>
<td>Secondary</td>
<td>Not</td>
<td>Reason</td>
</tr>
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<td>-----------------------</td>
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<td>-----------</td>
<td>-----</td>
<td>------------------------------------------------</td>
</tr>
<tr>
<td>Overall Visual Character</td>
<td>Setting, including site plan, landscaping, and general surroundings</td>
<td>N/A</td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Rectangular plan</td>
<td>N/A</td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
<tr>
<td></td>
<td>High-bay, one-story massing</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Very low-pitched, gabled roof with slightly overhanging eaves</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
</tbody>
</table>

14 Photographs are of representative examples of the character-defining features outlined in the table. Every instance of every feature was not photographed or included in this table.
<table>
<thead>
<tr>
<th>Type</th>
<th>Feature</th>
<th>Photo (if applicable)</th>
<th>Primary</th>
<th>Secondary</th>
<th>Not</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>Three vehicular bays</td>
<td>Have</td>
<td><img src="image.png" alt="Image of Three vehicular bays" /></td>
<td></td>
<td>X</td>
<td></td>
<td>Original, retain integrity, but common and not highly visible, not located on a street-facing elevation</td>
</tr>
<tr>
<td>Metal roll-up doors</td>
<td><img src="image.png" alt="Image of Metal roll-up doors" /></td>
<td><img src="image.png" alt="Image of Metal roll-up doors" /></td>
<td></td>
<td>X</td>
<td></td>
<td>Original, retain integrity, but common and not highly visible, not located on a street-facing elevation</td>
</tr>
<tr>
<td>Bands of fixed and awning windows</td>
<td><img src="image.png" alt="Image of Bands of fixed and awning windows" /></td>
<td><img src="image.png" alt="Image of Bands of fixed and awning windows" /></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retain integrity</td>
</tr>
<tr>
<td>Metal slab doors</td>
<td><img src="image.png" alt="Image of Metal slab doors" /></td>
<td><img src="image.png" alt="Image of Metal slab doors" /></td>
<td></td>
<td>X</td>
<td></td>
<td>Original, retain integrity, but common and not highly visible, not located on a street-facing elevation</td>
</tr>
<tr>
<td>Type</td>
<td>Feature</td>
<td>Photo (If applicable)</td>
<td>Primary</td>
<td>Secondary</td>
<td>Not</td>
<td>Reason</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>--------------------------</td>
<td>-----------------------</td>
<td>---------</td>
<td>-----------</td>
<td>-----</td>
<td>---------------------------------------------</td>
</tr>
<tr>
<td>Exterior Materials and Craftsmanship</td>
<td>Exterior brick</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Concrete window sills</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retain integrity</td>
</tr>
<tr>
<td></td>
<td>Metal window sashes</td>
<td>See photo above.</td>
<td>X</td>
<td></td>
<td></td>
<td>Original, highly visible, retain integrity</td>
</tr>
<tr>
<td>Interior Spaces, Features, and Finishes</td>
<td>Open floor plan</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, not highly visible, located in a private space, retains integrity</td>
</tr>
<tr>
<td></td>
<td>Exposed brick walls</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td>Original, not highly visible, located in a private space, retain integrity, common</td>
</tr>
</tbody>
</table>
### Table II: OMS Character-Defining Features

<table>
<thead>
<tr>
<th>Type</th>
<th>Feature</th>
<th>Photo (if applicable)</th>
<th>Primary</th>
<th>Secondary</th>
<th>Not</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concrete floor</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td>Original, not highly visible, located in a private space, retains integrity, common</td>
</tr>
<tr>
<td>Open ceiling, including steel beams</td>
<td>See photos above.</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td>Original, not highly visible, located in a private space, retains integrity, common</td>
</tr>
<tr>
<td>and wood framing</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>May or may not be original, not highly visible, located in a private space, common</td>
</tr>
<tr>
<td>Hanging fluorescent lights</td>
<td>See photos above.</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>May or may not be original, not highly visible, located in a private space, common</td>
</tr>
</tbody>
</table>
4. **PROJECT IMPACTS**

4.1 **Determining the Significance of Impacts on Historical Resources**

In enacting the California Register, the Legislature amended CEQA to clarify which properties are significant, as well as which project impacts are considered to be significantly adverse.

A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.¹⁵

A substantial adverse change means demolition, destruction, relocation, or alteration of the resource such that the significance of a historical resource is materially impaired.¹⁶

The State CEQA Guidelines include a slightly different definition of “substantial adverse change:”

Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource is materially impaired.¹⁷

The Guidelines go on to state that “the significance of a historic resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that convey its significance and that justify its inclusion in or eligibility for inclusion in the California Register, local register, or its identification in a historic resources survey.”¹⁸

Examples of activities which generally constitute a substantial adverse change to a historic resource include:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

4.2 **Secretary of the Interior's Standards**

Projects that may affect historic resources are considered to be mitigated to a level of less than significant if they conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties.¹⁹ Projects with no other potential impacts qualify for a Class 31 exemption under CEQA if they meet the Standards.²⁰ The Standards were issued by the National Park Service. They

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¹⁵ Public Resource Code Section 21084.1.
¹⁶ Public Resource Code Section 5020.1(q).
¹⁷ 14 CCR Section 15064.5(b)(2)(A).
¹⁸ 14 CCR Section 15064.5(b)(2).
¹⁹ 14 CCR Section 15126.4(b).
²⁰ 14 CCR Section 155331.
were not intended to be prescriptive, but to “...promote responsible preservation practices that help protect our Nation's irreplaceable cultural resources.” 21 The Standards are accompanied by Guidelines for four types of treatments for historic buildings: Preservation, Rehabilitation, Restoration, and Reconstruction.

The proposed project is the rehabilitation of a property consisting of two buildings at 3800 East Willow Street, Schroeder Hall and the OMS. The definition of rehabilitation assumes that at least some repair or alteration of the historic building will be needed in order to provide for an efficient contemporary use; however, these repairs and alterations must not damage or destroy materials, features or finishes that are important in defining the building's historic character.

The Standards are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

4.3 **Project Description**

The proposed project involves the rehabilitation of the Schroeder Hall building at the Schroeder Hall USARC and associated site improvements. It does not involve any changes or work on the OMS building, which would be preserved in place and used for vehicle maintenance and storage, as it was historically used. Schroeder Hall would be adaptively reused as a police substation. The exterior massing and envelope of the building would remain intact, as would the exterior materials. Changes to Schroeder Hall would be limited to reconfiguration of the floor plans within the existing envelope, limited interior finish replacement, system upgrades, and the addition of a freestanding elevator structure. Preliminary plans are included in Appendix A for reference.

The reconfigured floor plans would not affect or alter the existing double-loaded corridors in the administration center portion of the building. One new partition wall would be installed to separate the lobby from the first floor corridor for police safety reasons. Partitions dividing the spaces off of the corridors would be reconfigured to accommodate the new program. The assembly hall would be divided into two floors internally, but it would retain its exterior high-bay appearance, indicating clearly its original volume. The first floor would house locker rooms; the second floor would house a gym.

The new elevator would be located east of the one-story section of Schroeder Hall. It would be a separate structure and only connected to the original building via an open catwalk spanning the two-story sections along the one-story roof. The exterior walls of the elevator structure would be clad with a panelized material, such as trespa, swiss pearl, or alucobond, to differentiate it from the original brick portions of the building. The catwalk would be constructed of metal and open to the air; it would be enclosed only by metal railings.

Treatment of interior finishes and features in Schroeder Hall would vary based on location. Original wall finishes and ceilings in the corridors and lobby (public and semi-public spaces) would be preserved. Existing linoleum flooring would be replaced with a new, solid finish material (i.e. not carpeting). Finishes in private spaces, like the classrooms and offices, would be replaced with new finishes and features on a case-by-case basis. Some would be preserved. Exact new finishes are to be determined, but all would be compatible with original finishes. For example, a historically finished floor, such as linoleum, would remain finished with a similar material. It would not be stripped to bare concrete or replaced with wall-to-wall carpeting.

In the assembly hall, new finishes would be installed on the first floor as necessary to accommodate the new locker room use. For example, tile flooring may be installed in certain locker room locations, such as showers. The exposed brick walls and open, exposed ceiling would be preserved in the gym on the new second floor. The large light fixtures would have to be removed to create sufficient floor-to-ceiling height for the new second floor.

System upgrades would include structural, mechanical, electrical, and plumbing work. All new ducts and pipes required for the systems upgrades would be concealed in existing ceilings and floors wherever possible. Existing exterior raceways and HVAC units would be removed. Structural upgrades would be related to seismic performance and would consist of adding steel tube columns to reinforce the existing masonry pilasters in the assembly hall and strengthening the roof and second floor diaphragms in the administration center.
In addition to rehabilitating Schroeder Hall, the proposed project includes minor site work and landscaping improvements. Existing paved areas would be re-striped and trees would be added to shade the parking spaces. Existing landscaped areas would remain landscaped.

4.4 Analysis of Project Impacts

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

Schroeder Hall was designed as a USAR training facility. It consists of a two-story administration center with double-loaded corridors servicing classrooms, offices, a rifle range, a kitchen, restrooms, and storage; a high-bay assembly hall; and a one-story connecting wing with a double-loaded corridor. The proposed project would adaptively reuse the building into a police sub-station. The exterior building envelope would remain unaltered. Changes to the interior required to accommodate the new use would be limited to separating the lobby from the corridors for security reasons, altering partition walls between the spaces off of the corridors, and dividing the assembly hall into two floors.

The lobby would retain its original volume; it would just have a new partition wall at the point where it transitions to corridor space. This is necessary to provide the officers with a secure path of travel separate from the public lobby. The assembly hall would clearly retain its original high-bay volume from the exterior. The new second floor is required to provide sufficient locker and gym space. No other spaces within the building are large enough to accommodate these uses. The rifle range would retain its original volume, but its use would be changed, as a rifle range is no longer necessary for the new use.

All of the changes required to accommodate the new use are considered minor. None of the changes would affect the building’s exterior. All primary character-defining features would be preserved. Therefore, the proposed project complies with Standard #1.

2. The historic character of a property shall be retained and preserved. The removal of historic material or alteration of features and spaces shall be avoided.

Schroeder Hall’s exterior envelope, materials, and features would remain intact. Materials and features which require cleaning and/or repair would be cleaned and repaired. None would be removed.

The administration center interior would retain its double-loaded corridor organization. Some partition walls would be removed or relocated, but they are not considered character-defining. The overall volume of the lobby space would be preserved, but a new partition wall would be added at the point where it transitions to corridor space. This is a necessary and minor change, as outlined under Standard #1.

Original wall and ceiling finishes in the lobby and corridors would be preserved. Linoleum flooring would be replaced with a similar, solid material. The flooring is a common, secondary character-defining feature. Its replacement is acceptable and would not negatively impact the building’s overall historic character. Corridor lighting would be replaced, but it is non-original and non-character-defining.

22 Because the proposed project does not include any changes to the OMS building - not even change of use, this section only discusses changes to the Schroeder Hall building.
Some finishes would be removed or replaced in private spaces, such as offices, classrooms, and restrooms, on a case-by-case basis. New finishes are to be determined, but they would be compatible with existing finishes. The finishes in these locations are considered secondary character-defining features, because while they are original, they are common and not highly visible. Removing or replacing them would not negatively impact the building's overall historic character. Existing lighting would be replaced, but it is non-original and non-character-defining.

The assembly hall would be changed from a single, high-bay floor to two floors. The first floor would be occupied by locker rooms for the officers; the second floor would be occupied by a gym. Dividing this large open space is the only way to fit the building program into the existing envelope. It would remain evident that the space was originally a single, high-bay floor from the exterior due to the lack of fenestration on the first story and clerestory windows along the roof line. The space is a secondary character-defining feature which is not readily accessible or visible to the public. As such, its alteration is acceptable. The proposed project avoids major alterations to all other spaces within Schroeder Hall.

Finishes in the assembly hall would be preserved as is on the new second floor: the brick walls and roof framing would remain exposed. The first floor would require some new finishes to accomplish the new use. The new finishes are to be determined, but they would be compatible with existing utilitarian finishes. Because the space is basically unfinished as is, installing new finishes would not necessitate removing any extant finishes.

The large cylindrical lights in the assembly hall would have to be removed to create sufficient floor-to-ceiling space in the new second floor. The lights are secondary character-defining features, because they are located in a space which is not readily accessible or visible to the public. Removing some of them to accommodate the new use is acceptable as it would not negatively impact the building’s overall historic character.

Therefore, the proposed project would retain and preserve the historic character of the property, and the removal of historic material or alteration of features and spaces would be avoided to the extent possible while accommodating the new use. No primary character-defining features would be altered or removed. The proposed project complies with Standard #2.

3. Each property shall be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other buildings, shall not be undertaken.

No conjectural features would be added as part of the proposed project. The only part of the project that involves adding new elements is the elevator structure. The elevator structure would be physically separated from the building’s original massing and would be clad with a panelized material, rather than brick. The catwalk on the second floor would be open with no exterior cladding. As such, the elevator structure and its associated catwalk would employ only modern features, not conjectural features or elements. Therefore, the project complies with Standard #3.

4. Most properties change over time; those changes that have acquired significance in their own right shall be retained and preserved.

The building remains largely unaltered. It does not have any changes that have acquired significance in their own right. Therefore, there are no such changes to retain and preserve, and the project complies with Standard #4.
5. Distinctive features, finishes and construction techniques or examples of skilled craftsmanship, which characterize a historic property shall be preserved.

All of the distinctive features, finishes, and construction techniques on the building’s exterior would be preserved by the proposed project. The new elevator would connect to the building at the location of an existing door. While the door itself may have to be replaced, the opening would remain. The door is a secondary character-defining feature, because it is common and located on a secondary elevation. It is not distinctive, and its removal is acceptable.

Most of the features, finishes, and construction techniques on the building’s exterior are not distinctive. Rather, they are common and made of ordinary materials. All of the materials and features that are primary character-defining features and many of the secondary character-defining features, such as the exposed masonry walls in the lobby and corridors, would be preserved. As discussed under Standard #2, some secondary character-defining features would be removed or replaced in the building’s secondary, private spaces. Of these, the only features that could be considered distinctive are the cylindrical lights in the assembly hall. The rest are ordinary. However, while the lights are unique, they do not effectively characterize the historic property, because they are only visible from within the assembly hall and not from any public or semi-public space. Consequently, removing the lights for the sake of the new use is acceptable, and the project complies with Standard #5.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive historic feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

The building is generally in good condition. The windows are expected to need the most care, but they all appear to be serviceable and would be repaired as necessary. Therefore, the project complies with Standard #6.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The project complies with Standard #7, because it does not include any chemical or harsh treatments. The building is generally in good condition and would not require anything more than basic, gentle cleaning.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

The project would involve ground-disturbing activity at the site of the new elevator. If archeological resources should be discovered during the project, work would be halted, a qualified archeologist would be retained to assess the resources, and mitigation measures would be prepared, as necessary. Therefore, the project complies with Standard #8.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
The proposed project includes one new addition: the elevator structure. The elevator structure would not destroy materials that characterize the property. It would be located on a secondary elevation, east of the one-story connecting wing, and it would be physically separated from the building’s original massing. The structure would be clad with a panelized material, rather than brick, so it could not be confused with the original parts of the building. The catwalk on the second floor would be open with no exterior cladding, just metal railings.

In terms of massing, size, and scale, the elevator structure would have a regular, rectilinear massing and modest size and scale which would be compatible with the historic building. It would be no larger than necessary to house the appropriate elevator cab size and associated equipment. The height of the structure would be as low as possible, so it would not begin to dominate the site. In terms of architectural features, the elevator structure would have two exterior doors: one to the equipment room and one to the catwalk. The exact door material and design is still to be determined, but they would be simple and utilitarian, in keeping with the historic building’s design.

In short, the physical separation and modern materials of the elevator structure and its connecting and catwalk would clearly differentiate it from the historic building, while the modest size, scale, massing, and architectural features would allow it to be compatible. Therefore, the proposed project complies with Standard #9.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be impaired.

As discussed under Standard #10, the proposed project includes the addition of an elevator structure. The elevator would be physically separate from the historic building and connected only by an exterior catwalk. As such, it could be easily removed in the future without damaging or altering the essential form and integrity of the historic property. Therefore, the project complies with Standard #10.

5. CONCLUSION

The property located at 3800 East Willow Street, commonly known as the Schroeder Hall USARC, in the City of Long Beach has been previously determined eligible for listing in the National Register. It is therefore also listed in the California Register and is a historical resource subject to CEQA. The City proposes to rehabilitate the property for use as a police sub-station. The proposed project was analyzed for compliance with the Standards. The analysis resulted in the conclusion that the proposed project complies with the Standards. No mitigation is required. However, because the project plans were in a preliminary stage when reviewed for the production of this report, it is strongly recommended that the City retain the services of a qualified historic preservation consultant to review the plans and finish selections periodically as the project develops to ensure that it continues to comply with the Standards.
6. SOURCES


Cultural Resources Inventory and Evaluation of the United States Army Reserve Schroeder Hall USAR Center, Long Beach, California, P-19-187956. Prepared by the Environmental Division of the office of the Deputy Chief of Staff, Engineer, 63D Regional Readiness Command, U.S. Army Reserve, with technical assistance from PAR Environmental Services, Inc. June 2007.


Appendix A: Preliminary Project Plans
PROJECT DESCRIPTION

The Schroeder Hall U.S. Army Reserve Center will be renovated to serve as the Long Beach East Division PD Substation. The building was constructed in 1963. It consists of a two story wing and a one story high bay wing with a one story building connecting the two wings. The building is constructed of reinforced masonry with steel joist and concrete floors and roof.

Low Impact Development standards (LID) applicability does not apply to this project under exemption 1 and 3 of section 18.74.030.

California Green Building Standards do not apply to this project under Section 5.701 Note 2, "This division does not apply to additions and alterations of qualified historical buildings.” However, the city of Long Beach is voluntarily complying with the following items:

1. Canopy trees shall provide shade coverage at parking areas.
2. A designated area for the collection of recyclables shall be provided adjacent to the area for the collection of waste.
4. Bicycle Parking:
   - Short Term Parking within 200 feet of the visitors’ entrance.
   - Long Term Parking - Lockable, permanently anchored bicycle lockers.
6. Plumbing fixtures and fixture fittings that will reduce the overall use of potable water by 20%.
7. Water budget shall be developed for landscape irrigation.
8. Turf conversion to water conserving plants in the existing landscape area on Willow Street.
10. Environmental quality by using paints and coatings with VOC limits.
11. Environmental quality by using carpet systems that meet the testing and product requirements.
12. Environmental quality by using composite wood products that meet the requirements for formaldehyde as specified in ARB’s Air Toxics Control Measures for Composite Wood.
13. Environmental quality by using resilient flooring systems for 50 percent of floor area receiving resilient flooring, install resilient flooring complying with the VOC-emission limits.
14. Indoor Air quality, provide outside air delivery.
15. Environmental Comfort, acoustical control.
ELEVATIONS

EXTERIOR COLORS & MATERIALS

1. EXISTING BRICK
2. EXISTING FASCIA
   PAINT - COLOR: TBD
3. EXISTING METAL WINDOWS
   PAINT - COLOR: TBD
4. EXISTING METAL GUTTERS
   PAINT - COLOR: TBD
5. EXISTING METAL DOWNSPOUTS
   PAINT - COLOR: TBD

ELEVATION KEYNOTES

1. PROPOSED ELEVATOR LOCATION

NORTH ELEVATION

EAST ELEVATION

SOUTH ELEVATION

WEST ELEVATION
Appendix B: Copy of Memorandum of Agreement
Memorandum of Agreement
Between
The United States Army Reserve
And
The California State Historic Preservation Officer
For the
Disposition of the Schroeder Hall United States Army Reserve Center,
Long Beach, California

May 16, 2011

Whereas, the United States Army Reserve (USAR) plans to close the Schroeder Hall United States Army Reserve Center (USARC) located in Long Beach, California, resulting in the disposal of two buildings and structures and 5.8 acres of surplus property (the Undertaking); and

Whereas, the USAR plans to carry out the Undertaking pursuant to the Defense Base Closure and Realignment Act of 1990 (Pub. L. 101-510,) in a manner consistent with the requirements of the 2005 Defense Base Closure and Realignment Commission recommendation; and

Whereas, the Area of Potential Effect is the entire Schroeder Hall USARC (see Map at Appendix One); and

Whereas, the USAR has determined that disposal of the Schroeder Hall USARC is an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. § 470f, and its implementing regulations, 36 CFR Part 800, and that the Undertaking will have an adverse effect upon the two buildings and structures, which are historic properties that have been designated as eligible for listing on the National Register of Historic Places (National Register); and

Whereas, the USAR has consulted with the California State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. Section 470f, Section 110(f) of the same Act (16 U.S.C. Section 470h-2[f]), and Section 111 of the same Act (16 U.S.C. Section 470h-3); and

Whereas, the USAR has identified no federally recognized Indian tribes for which the property may have religious and cultural significance; and

Whereas, in accordance with 36 CFR § 800.6(a)(1), the USAR notified the ACHP of its adverse effect determination by providing the specified documentation, and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and
Whereas, pursuant to 36 CFR 800.6(c)(3) USAR has invited the City of Long Beach, California to concur in this MOA; and

Now, therefore, the USAR and the SHPO agree that the Undertaking shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties at Schroeder Hall USARC and mitigate any adverse effects, therefore satisfying the USAR's Section 106, 110, and 111 responsibilities under the NHPA at Schroeder Hall USARC.

Stipulations

The USAR will ensure that the following measures are carried out:

I. Compliance with Federal Laws and Regulations

The USAR will comply with applicable historic preservation laws and regulations in carrying out the disposal of the Schroeder Hall USARC.

II. Title Restriction

The USAR shall ensure that the title restriction entitled "PRESERVATION COVENANT FOR CONVEYANCE OF PROPERTY THAT CONTAINS HISTORIC BUILDINGS AND STRUCTURES" and attached hereto as Appendix Two is included in the transfer instrument from the USAR to the City of Long Beach and recorded in the real estate records of Los Angeles County, State of California for the transfer of the Schroeder Hall USARC. The California Office of Historic Preservation and its successors and assigns shall be identified as the covenantee.

III. Anti-Deficiency Act

Any obligation of the USAR under this Agreement is subject to the availability of appropriated funds, and nothing in this Agreement shall be interpreted to require obligations or payments by the Army in violation of the Anti-Deficiency Act, 31 U.S.C. 1341. If compliance with the Anti-Deficiency Act alters or impairs the Army's ability to implement the provisions of this agreement, the USAR will consult in accordance with the amendment and termination procedures found in this agreement.

IV. Status Reports

Until such time as the property has been transferred out of federal ownership, the Army will provide an annual status report to the California SHPO to review implementation of the terms of this agreement and to determine whether amendments are needed. If amendments are needed, the signatories to this agreement will consult, in accordance with Stipulation VI of this agreement, to make such revisions. The first status report will be submitted to the California SHPO one year after the effective date of this agreement.
V. Dispute Resolution

A. Should the California SHPO object within thirty (30) days to any plans or other documents provided by the USAR for review pursuant to this agreement, or to any actions proposed or initiated by the USAR pursuant to this agreement, the USAR shall consult with the SHPO to resolve the objection. If the USAR determines that the objection cannot be resolved, the USAR shall forward all documentation relevant to the dispute to the Advisory Council on Historic Preservation. Within thirty (30) days after receipt of all pertinent documentation, the Council will either:

(1) Provide the USAR with recommendations, which the USAR will take into account in reaching a final decision regarding the dispute; or

(2) Notify the USAR that it will comment pursuant to 36 C.F.R. §800.6(b)(2), and proceed to comment.

Any Council comment will be taken into account by the USAR in accordance with 36 C.F.R. §800.6 or 800.7 with reference to the subject of the dispute.

B. Any recommendations or comment provided by the Council pursuant to Stipulation V. A. above will pertain only to the subject of the dispute; the USAR's responsibility to carry out all other actions under this agreement that is not the subject of the dispute will remain unchanged.

VI. Amendments

A. The USAR or the California SHPO, or both may request that this MOA be revised, whereby the parties will consult to consider whether such revision is necessary.

B. If it is determined that revisions to this MOA are necessary, then the USAR and the California SHPO shall consult pursuant to 36 CFR §800.6(c)(7), as appropriate, to make such revisions. Except that, reviewing parties must comment on, or signify their acceptance of, the proposed changes to the MOA in writing within 30 days of their receipt.

VII. Termination of Agreement

A. The USAR, the California SHPO, or both, may terminate this MOA by providing thirty (30) days written notice to the other signatory parties. During the period after notification and prior to termination the USAR and the California SHPO will consult to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the USAR will comply with 36 CFR §800.4 through 800.6 with regard to individual undertakings associated with this action.
B. Execution and implementation of this MOA shall evidence that the USAR has afforded the Council and the SHPO a reasonable opportunity to comment on the adverse effects at Schroeder Hall USARC, and that the USAR has taken into account the effects of the undertaking on these historic properties. Execution and compliance with this MOA fulfill the USAR’s Section 106 responsibilities regarding this action at Schroeder Hall USARC.

C. The parties agree that this agreement will become null and void if ownership of the property is not transferred within 5 years from the date of the last signature.

D. The effective date of this Memorandum of Agreement shall be the date of the last signature.

UNITED STATES ARMY RESERVE

[Signature]
Jon D. Lee
Brigadier General, Commanding
United States Army Reserve
63rd Regional Support Command

CALIFORNIA OFFICE OF HISTORIC PRESERVATION

[Signature]
Milford Wayne Donaldson
California State Historic Preservation Officer

City of Long Beach, California (Concurring Party)

[Signature]
By:

APPROVED AS TO FORM

6/2/11
ROBERT E. SHANNON, City Attorney

By
HEATHER A. MAHOO
ASSISTANT CITY ATTORNEY
APPENDIX ONE

SITE LOCATION
APPENDIX TWO

3. PRESERVATION COVENANT FOR CONVEYANCE OF PROPERTY THAT CONTAINS HISTORIC BUILDINGS AND STRUCTURES

A. In consideration of the conveyance of certain real property hereinafter referred to as Schroeder Hall United States Army Reserve Center (USARC) located in Long Beach, California, which is more fully described as: “All those certain pieces or parcels of land being a 5.8-acre tract lying and situated in the city of Long Beach, Los Angeles County, California”, the City of Long Beach hereby covenants on behalf of itself, its heirs, successors, and assigns at all times to the California Office of Historic Preservation to preserve and maintain Schroeder Hall USARC in accordance with the recommended approaches in the Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings (U.S. Department of the Interior, National Park Service 1992 (This and updates can be found at www2.cr.nps.gov/tps/tax/rhb, as available on 22 November 2004)) in order to preserve those qualities that make Schroeder Hall USARC eligible for inclusion in or resulted in the inclusion of the property in the National Register of Historic Places. If the City of Long Beach desires to deviate from these maintenance standards, the City of Long Beach will notify and consult with the California Historic Preservation Officer in accordance with paragraphs 2, 3, and 4 of this covenant.

B. The City of Long Beach will notify the appropriate California Historic Preservation Officer in writing prior to undertaking any construction, alteration, remodeling, demolition, or other modification to structures or setting that would affect the integrity or appearance of Schroeder Hall USARC. Such notice shall describe in reasonable detail the proposed undertaking and its expected effect on the integrity or appearance of Schroeder Hall USARC.

C. Within thirty (30) calendar days of the California Historic Preservation Officer’s receipt of notification provided by the City of Long Beach pursuant to paragraph B of this covenant, the SHPO will respond to the City of Long Beach in writing as follows:

(1). That the City of Long Beach may proceed with the proposed undertaking without further consultation; or

(2). That the City of Long Beach must initiate and complete consultation with the California Office of Historic Preservation before it can proceed with the proposed undertaking. If the SHPO fails to respond to the City of Long Beach's written notice, as described in paragraph B, within thirty (30) calendar days of the SHPO's receipt of the same, then the City of Long Beach may proceed with the proposed undertaking without further consultation with the SHPO.

D. If the response provided to the City of Long Beach by the SHPO pursuant to paragraph C of this covenant requires consultation with the SHPO, then both parties will so consult in good faith to arrive at mutually-agreeable and appropriate measures that the City of Long Beach will implement to mitigate any adverse effects associated with the proposed undertaking. If the parties are unable to arrive at such mutually-agreeable mitigation measures,
then the City of Long Beach shall, at a minimum, undertake recordation for the concerned property in accordance with the Secretary of Interior's standards for recordation and any applicable State standards for recordation, or in accordance with such other standards to which the parties may mutually agree, prior to proceeding with the proposed undertaking. Pursuant to this covenant, any mitigation measures to which the City of Long Beach and the SHPO mutually agree, or any recordation that may be required, shall be carried out solely at the expense of the City of Long Beach. The mandatory recordation and documentation of structures proposed for demolition or substantial alteration will be archived in an appropriate repository designated by the SHPO.

E. The California Office of Historic Preservation shall be permitted at all reasonable times to inspect Schroeder Hall USARC in order to ascertain its condition and to fulfill responsibilities hereunder.

F. In the event of a violation of this covenant, and in addition to any remedy now or hereafter provided by law, the California Office of Historic Preservation may, following reasonable notice to the City of Long Beach, institute suit to enjoin said violation or to require the restoration of Schroeder Hall USARC. The successful party shall be entitled to recover all costs or expenses incurred in connection with such a suit, including all court costs and attorneys fees.

G. In the event that the Schroeder Hall USARC (i) is substantially destroyed by fire or other casualty, or (ii) is not totally destroyed by fire or other casualty, but damage thereto is so serious that restoration would be financially impractical in the reasonable judgment of the Owner, this covenant shall terminate on the date of such destruction or casualty. Upon such termination, the Owner shall deliver a duly executed and acknowledged notice of such termination to the California Office of Historic Preservation, and record a duplicate original of said notice in Los Angeles County Deed Records. Such notice shall be conclusive evidence in favor of every person dealing with the Schroeder Hall USARC as to the facts set forth therein.

H. The City of Long Beach agrees that the California Office of Historic Preservation may at its discretion, without prior notice to the City of Long Beach, convey and assign all or part of its rights and responsibilities contained herein to a third party.

I. This covenant is binding on the City of Long Beach, its heirs, successors, and assigns in perpetuity, unless explicitly waived by the California Office of Historic Preservation. Restrictions, stipulations, and covenants contained herein shall be inserted by the City of Long Beach verbatim or by express reference in any deed or other legal instrument by which it divests itself of either the fee simple title or any other lesser estate in Schroeder Hall USARC or any part thereof.

J. The failure of the California Office of Historic Preservation to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

K. The covenant shall be a binding servitude upon Schroeder Hall USARC and shall be deemed to run with the land. Execution of this covenant shall constitute conclusive evidence that the City of Long Beach agrees to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.