CONSULTING

GPA

Memorandum

Date:	May 11, 2020
For:	Meghen Quinn, Hargreaves Jones
Subject:	Silver Lake Reservoir Complex Master Plan, *Secretary of the Interior's Standards for the Treatment of Historic Properties* Analysis
From:	Teresa Grimes, Principal Architectural Historian, and Emily Rinaldi, Associate Architecture Historian

Introduction

The purpose of this memorandum is to analyze the proposed site plan for the Silver Lake Reservoir Complex Master Plan (SLRCMP or Master Plan). The Silver Lake and Ivanhoe Reservoir Complex (Complex) is a designated Los Angeles Historic-Cultural Monument (HCM No. 422). The construction history of the Complex was included in a separate report prepared by GPA. As a designated HCM, the Complex is subject to the Los Angeles Cultural Heritage Ordinance (Ordinance). The Ordinance stipulates that the Cultural Heritage Commission (CHC) and Office of Historic Resources (OHR) are responsible for reviewing alterations to historical resources listed under national, state, and local landmark programs. Alterations are reviewed by the CHC and OHR for compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards).

The Standards were issued by the National Park Service (NPS) and are accompanied by Guidelines for four types of treatments: Preservation, Rehabilitation, Restoration, and Reconstruction. The most common treatment and the one that applies to the proposed site plan is rehabilitation, which is defined by NPS as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values."[1]

Proposed Design Summary

The Master Plan design has been developed in concert with a robust community process including four large, community workshops and seven smaller meetings with the Stakeholder Working Group (SWG) to date. In total, the community workshops have had 1,570 attendees and over 7,500 responses to three questionnaires about the Master Plan goals and design.

The design of the Master Plan is rooted in the environmental and social values of sustainable design (see attached Proposed Site Plan). Feedback from the SWG and responses to

[1] "Rehabilitation as a Treatment," National Park Service, accessed May 11, 2020, https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm.

questionnaires demonstrate the community places a high value on amplifying the power of the reservoirs to attract and sustain wildlife, connect with nature and neighbors, and educate.

Habitat and wildlife goals are achieved by enhancing the habitat value of the existing wooded Knoll and Eucalyptus Grove areas and re-establishing wetland and aquatic ecologies. To improve the Knoll and Eucalyptus Grove, a tree and ground cover replanting program will gradually replace a portion of the existing Eucalyptus trees to increase plant community biodiversity and food resources for wildlife. Wetland terraces are proposed to replace portions of both reservoir embankments and are complimented by floating wetland islands. Combined, these wetlands will support a habitat and food web primarily for local and migratory birds including aquatic wildlife such as fish, as well as provide secondary water quality treatment.

Community spaces are interwoven within this ecological system, connecting Silver Lake residents to natural processes and ecological cycles. The proposed design consists of a series of six primary spaces stitched together by a tree-lined Promenade (orange line on plan) with seating terraces and ornamental plantings: Ivanhoe Overlook, The Knoll, The Meadow, The East and West Narrows, Eucalyptus Grove, and South Valley.

The most prominent community space is the Meadow. It represents an expansion and reconfiguration of an existing 3.4 acres area of open lawn and shade trees. The new area is approximately 7.5 acres. The primary design moves consist of a large lawn with shade trees that slopes down to seating terraces and walking paths, which step to the water's edge and give way to constructed wetlands and floating habitat islands. A second flat lawn is perched at the water's edge and seating terraces. Along the street frontage is a series of native gardens, walking trails, and a picnic grove.

The remaining spaces consist predominantly of a combination of walkways, overlooks seating terraces, and ornamental planting. In select areas of the Ivanhoe Overlook and Eucalyptus Grove, small foot paths lead to observation platforms within the wetland terraces. In the South Valley, the existing Recreation Center renovated dog parks, play fields, and courts are complimented by a new multi-purpose community building, which includes an indoor basketball court.

History of the Silver Lake and Ivanhoe Reservoir Complex

Throughout its history, the Silver Lake and Ivanhoe Reservoir Complex has been integrated into a larger, ever evolving water system – initially it was part of an ecological network of streams and wetlands, and most recently, a man-made feature of the City's potable water infrastructure.

A natural depression within Ivanhoe Canyon of the San Gabriel Mountain Range, the Complex was once a marshy pond historically referred to as a "meadowland" which attracted surrounding wildlife. In fact, the abundance of wildlife enticed hunters to this area for game. Wetlands mapped for the Historical Ecology of the Ballona Creek Watershed, prior to 1890, show an intermittently flowing stream from the south end of what is now Silver Lake Reservoir draining into a small wet meadow complex to the south. From here, water flowed south to a vast wetland called La Cienega, located just north of Baldwin Hills, and eventually flowed to Ballona Lagoon. The La Cienega and Ballona Lagoon complexes supported the largest wetland habitat in the watershed.

The Complex was selected by the City for its adventitious location to connect to an evolving LA water system and provide storage capacity and stable water supply needed for the growing

population of Los Angeles. The site was anticipated to have a flow line at 445 feet above sea level and once constructed would have a surface area of approximately 129 acres. In 1903 the City acquired the land necessary to build the Complex, designed and engineered by Los Angeles Water Department Superintendent, William Mulholland. Of historic significance, Mulholland was the first engineer in America to use a method of construction called hydraulic sluicing to build a dam. The two reservoirs were formed by three reinforced earthen dams, the Silver Lake and Ivanhoe Dams, and originally featured unpaved earthen embankments.

Named after the Ivanhoe Canyon, Ivanhoe Reservoir was completed first in 1906, followed by Silver Lake in 1907 which was named after Herman Silver, a member of Los Angeles' first Board of Water Commissioners. Initially, the Silver Lake Reservoir was used as a source of water for irrigation, while the Ivanhoe Reservoir provided domestic drinking water. Since its completion, Ivanhoe and Silver Lake Reservoirs have been altered over time. Notable alterations include those undertaken in 1920, 1951–1953, 1975–1976, and 2011–2017. In 1920 the reservoirs were modified so that both were used exclusively for potable domestic water supply. At this time, the embankments of the Silver Lake Reservoir were altered with a steeper slope, increasing the depth of the reservoir and portions of the embankments were also likely covered in a paving material at this time to prevent erosion.

During 1951–1953, both reservoirs underwent extensive improvements, again to meet City water demands and government water quality regulations. The Silver Lake Reservoir was enlarged by steepening the embankment slopes and paving them. Additionally, a 60-inch bypass line was installed underneath the reservoir. Much of the excess excavated soil from this work was used to fill in the east shore and a lagoon known as the East Cove. East Cove was an area prone to stagnation and algae growth which negatively impacted water quality. The Ivanhoe Reservoir was also deepened at this time and its basin and embankments were paved with asphalt.

Due to seismic concerns, the Silver Lake Dam was completely reconstructed in 1975-1976. The outlet tower was renovated, and a new 72-inch bypass pipe was installed. As a result, the southern end of the Silver Lake Reservoir was reshaped to its current configuration.

Since they were completed in 1907, the Silver Lake and Ivanhoe Reservoirs have become beloved water bodies synonymous with the Silver Lake neighborhood. In the 1920s and 1930s developers were encouraged to build by the City and were attracted by the hills and the blue jewel focal point that is the Silver Lake and Ivanhoe Reservoirs. The neighborhood attracted an eclectic mix of artists, filmmakers, actors and directors whose homes were designed by great names in architecture, such as Richard Neutra, David Hyun, Eric Lloyd Wright, Gregory Ain, John Lautner, Raphael Soriano, Rudolph Schindler, Rodney Walker, and Frank Lloyd Wright.

In 2008 the Complex was decommissioned and removed from the City's drinking water supply system due to a change in US federal regulations. The Silver Lake Reservoir was taken out of service in 2008, drained in November 2015 to construct a Bypass Project, and refilled in April 2017. The Ivanhoe Reservoir was removed from the distribution system in December 2017 and remains filled with water.

Today, the reservoirs remain a locus of the Silver Lake neighborhood and a cherished resource of the community.

Character-Defining Features

The first step in applying the Standards to a historic property is the identification of character-defining features. Character-defining features are the components that contribute to a historic property's sense of time and place. GPA identified the character-defining features of the Complex in a separate report using the *Guidelines for the Treatment of Cultural Landscapes.* Cultural landscapes are geographic areas that have been modified by human design or use. The period of significance for the Complex was established as 1906 to 1953, representing the date of construction through the improvement program of the early 1950s. The character-defining features are summarized below for convenience (see Table1 and attached Existing Site Plan).

TABLE 1: CHARACTER-DEFINING FEATURES	
Natural Systems & Features	
Character Defining	Not Character Defining
• The Knoll	
Circulation	
Character Defining	Not Character Defining
• Main Entrance* • Main Access Road* • Armstrong Avenue Entrance* • Ivanhoe Reservoir Perimeter Path • Silver Lake Reservoir Perimeter Path	• Silver Lake Dam Pedestrian Path • Ivanhoe Dam Pedestrian Path • West Pedestrian Path • East Pedestrian Path • North Pedestrian Path, • Silver Lake Boulevard Entrance • Silver Lake Drive Entrance
Land Uses	
Character Defining	Not Character Defining

• Reservoirs
  o Ivanhoe Reservoir
  o Silver Lake Reservoir
• Open Spaces
  o The Knoll
  o Eucalyptus Grove
• Park Spaces
  o Picnic Grove
• LADWP Maintenance & Operations*
	• Nursery School*
	• Park Spaces
	  o Silver Lake Dog Park
	  o Tesla Pocket Park
	  o Ivanhoe Dam Path
	• Open Spaces
	  o Silver Lake Meadow
	  o East Landscaped Area*

Topography	
Character Defining	Not Character Defining

• Basin
  o Ivanhoe Reservoir
  o Silver Lake Reservoir
• Level Areas
  o LADWP Maintenance & Operations*
  o Silver Lake Reservoir Perimeter Path
  o Ivanhoe Reservoir Perimeter Path
	• Level Areas
	  o East Landscaped Area*
	  o Tesla Pocket Park
	  o Silver Lake Dog Park
	  o Silver Lake Meadow

TABLE 1: CHARACTER-DEFINING FEATURES	

• Changes in Grade
  ○ The Knoll
  ○ Picnic Grove
  ○ Eucalyptus Grove	

Buildings and Structures	
Character Defining	Not Character Defining
• North Ivanhoe Dam* • South Ivanhoe Dam* • Ivanhoe Reservoir Chlorination Station* • Caretaker's House (Sunshine House)* • Caretaker's Garage* • Bathroom Building #1 * • Shed #1 (Old Caretaker's House) * • Landscape Building* • Silver Lake Meter House* • South Outlet Chlorination Station* • Chlorination Plant	• Silver Lake Dam* • Nursery School* • Water Quality Office (Laboratory Building)* • Bathroom Building #2* • Shed #2* • Temporary Sheds* • Silver Lake Chlorination Building*
Vegetation	
Character Defining	Not Character Defining

• Mature Trees - Pine, Eucalyptus, and Sycamore
  ○ The Knoll
  ○ Eucalyptus Grove
  ○ Picnic Grove
	• Park Spaces
	  ○ Silver Lake Dog Park
	  ○ Tesla Pocket Park
	• Open Spaces
	  ○ Silver Lake Meadow
	  ○ East Landscaped Area*
	  ○ Ivanhoe Path, Landscaping, & Fencing

Constructed Water Features	
Character Defining	Not Character Defining
• Ivanhoe Reservoir • Silver Lake Reservoir	
Small-Scale Features	
Character Defining	Not Character Defining
• Concrete Perimeter Wall • Ivanhoe Inlet Tower * • Stone Retaining Wall *	• Silver Lake Outlet Tower*
* Character-defining feature located outside of the SLRCMP study area.	

Compliance with Secretary of the Interior's Standards and Guidelines

The following is an analysis of the proposed SLRCMP site plan (Proposed Site Plan) for compliance with the Standards and Guidelines for Rehabilitating Cultural Landscapes:

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

The Complex was decommissioned and removed from the municipal domestic water distribution system between 2011 and 2017. As such, the Complex can no longer be used for its historic purpose. The SLRCMP will repurpose approximately 116 acres of the property as a public park and community gathering space, while the remaining 11 acres will be retained by LADWP. Although the Complex will no longer be used for the storage and treatment of drinking water, LADWP has active components at the Complex which will require retaining areas of the property for system operations, personnel, and future projects. LADWP's active uses are located at the northeast portion of the property and are not a part of the SLRCMP. They also include the North Ivanhoe Dam, Ivanhoe Inlet Tower, as well as the Silver Lake Reservoir bypass line, dam, and outlet tower.

Ninety-four of the 116 acres of the property are occupied by the Ivanhoe and Silver Lake Reservoirs. These constructed water features will no longer be used for the storage and treatment of drinking water. They will be retained and the cultivation of wildlife habitat will be further enhanced. The reservoirs currently provide an important year-round resource for wildlife. A number of different bird species have been observed at the reservoirs, including species of migratory birds that are protected by the Migratory Birds Treaty Act such as the great blue heron and Allen's hummingbird. As part of the SLRCMP, the embankment edges will be altered to construct habitat terraces and habitat islands installed within the bodies of water in order to increase habitat diversity, provide predator protection, and improve water quality. Wetlands and habitat islands are central to expanding wildlife habitat, which was identified as a primary goal of the SLRCMP early on in the community engagement process.

The Proposed Site Plan complies with Standard #1 because the new use will require minimal change to the defining characteristics of the property and its environment compared to other uses considered by the LADWP. In 2006, Federal Environmental Protection Agency issued new guidelines for water quality that required open reservoirs to be covered, to be removed from service, or for the water to be treated before distribution. Both the covering of the Ivanhoe and Silver Lake Reservoirs and the treatment of water before distribution would have necessitated the construction of new infrastructure that would have substantially changed the character-defining features of the Complex. In the past, the LADWP has also considered a proposal to drain the reservoirs of water and completely fill them in, which would essentially destroy the physical integrity of the Complex.

Reservoirs, like Ivanhoe and Silver Lake, are constructed for the purpose of storing water. The enhanced habitat use at the Complex will therefore require minimal

change to the reservoirs' defining features, which are their overall shape and structure designed as a repository for water. These features, which retain their 1953 configuration and appearance, will be retained and both reservoirs will continue to store water. Neither the new materials installed along embankments, including new concrete paving, boulders, and vegetation, nor the habitat islands will substantially alter the reservoirs' historic configuration, which have evolved since their construction.

Other character-defining land uses, such as the Knoll, West Landscaped Area, and Grassy Patch, will be reprogrammed for passive recreation and educational uses. New features will be added as part of the SLRCMP but the historic character of the Complex will be preserved overall. New pedestrian circulation will be added at the Knoll and Eucalyptus Grove. New structures will also be constructed at the base and summit of the Knoll, including a new shade pavilion/outdoor classroom, environmental education center, and seating terraces. New furnishings will be added to the Picnic Grove, and new native vegetation will be planted throughout. However, the impact of these alterations is minimal as new features will not substantially change, obscure, damage, or destroy these character-defining land uses. Therefore, the historic spatial organization and land use patterns will remain overall.

Features and spaces that will be substantially altered do not date from the period of significance and are therefore not character defining. These include the Silver Lake Meadow where a new slopped lawn will be constructed; the Recreation and Parks Center where a new community center, play field, and basketball court will be constructed; the Ivanhoe Path, which will be incorporated into the new park's pedestrian circulation; and the Silver Lake Dog Park, which will be renovated and expanded. Other non-character-defining features and spaces such as the Tesla Pocket Park, Nursery School, and East Landscaped Area will remain.

Standard 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.*

The Proposed Site Plan complies with Standard #2 because the historic character of the property will be retained and preserved overall. The constructed water features, the Ivanhoe and Silver Lake Reservoirs, will be retained and comprise a majority of the Complex's total acreage. Additionally, most of the remaining character-defining features are located within the LADWP-controlled areas of the Complex and are not a part of the SLRCMP. These include the majority of character-defining buildings and structures as well as vehicle entrances and circulation at the northeast corner of the property. As discussed under Standard #1, non-character-defining features such as the Silver Lake Meadow will be altered; however, these features were constructed after the end of the period of significance and therefore do not contribute to the historic character of the property.

Character-defining features that will be altered as part of the SLRCMP include the embankments and perimeter paths of the Ivanhoe and Silver Lake Reservoirs.

Alterations at the embankment edges include the construction of seating terraces, habitat terraces, and observation platforms, the installation of vegetation, boulders, as well as the repaving of the remaining embankment surfaces. The Ivanhoe and Silver Lake Reservoir perimeter paths will also be reconfigured at select locations in order to better facilitate pedestrian circulation through the new park. The alteration of these features however will not diminish the historic character of the Complex overall. The topography or shape of the reservoirs will be retained, and the general configuration of the perimeter paths will be largely preserved. Additionally, while the embankments and perimeter paths retain their 1953 configuration and appearance, both features have substantially changed over time since the Complex's original construction in 1906–1907. The reservoir embankments originally consisted of a soft, natural edge that was planted with various vegetation. Over time, the reservoirs were re-shaped and deepened and the embankments paved. The perimeter paths are also not original, and portions of the paths were constructed over time to facilitate LADWP operations.

Standard 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.*

New features in the Proposed Site Plan include pavilion/outdoor classroom structures, seating terraces, habitat terraces and islands, observation platforms, fitness circuit, living laboratory, as well as various park furnishings like seating, trash cans, and lighting. The development of construction documents for the new public park is not part of the SLRCMP process; therefore, the design of these new features has only been developed in concept. Based on the renderings dated January 23, 2020, new features appear to be adequately differentiated as new by their design, modern assembly, and hardware. They do not appear to create a false sense of historical development nor do they appear to be conjectural features. Therefore, they will be distinguishable as non-original upon close inspection. Therefore, the Proposed Site Plan complies with Standard #3.

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

None of the changes to the Complex since 1953 have acquired significance in their own right. Therefore, the Proposed Site Plan complies with Standard #4.

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

The Proposed Site Plan complies with Standard #5 because distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the property will be preserved. Features and finishes that will be removed generally consist of utilitarian and common materials, such as the concrete and asphalt paving at the embankments and perimeter paths. The concrete paving at the Ivanhoe Reservoir embankment and asphalt paving at both reservoir's perimeter paths was added after the end of the period of significance and therefore not character defining. While the asphalt paving at the

Silver Lake Reservoir embankment likely dates from the early 1950s, it is not a distinctive material nor is it an example of craftmanship that characterizes the property.

As described under Standard #2, the Ivanhoe and Silver Lake Reservoir embankments will be altered; however, neither is an example of distinctive construction techniques. The Ivanhoe and Silver Lake Reservoirs were originally constructed using a modified method of hydraulic sluicing; however, both have been so substantially modified over time that none of this original infrastructure remains extant. Each reservoir has been substantially re-shaped and deepened, and the soft, natural edges paved. The Ivanhoe and Silver Lake Dams have also been substantially altered or reconstructed entirely. The Complex has been entirely reengineered since its original construction using modern and common construction techniques.

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

The Proposed Site Plan complies with Standard #6 to the extent feasible. The replacement of missing historic features is not proposed. The only deteriorated historic features that will be removed and replaced are the mature trees located throughout the Complex that have reached the end of their natural lifespan. The Master Plan Report will recommend developing a comprehensive tree replacement plan that follows current and best practices for improving ecological function and habitat as well as maximizing biodiversity. This may necessitate replacing non-native eucalyptus tree species with native species. The *Guidelines for Rehabilitating Cultural Landscapes* note that if replacing vegetation in kind is not "not technically, economically, or environmentally feasible" then a compatible substitute may be considered.[2] The removal of non-native species of mature trees is unavoidable in order to achieve the project's goals of protecting wildlife and enhancing habitat. For species of native trees that have reached the end of their natural lifespan, the Guidelines recommend replacing them in kind with a species of similar type, form, shape, and scale. As the Complex is a designated HCM, a

[2] "Guidelines for Rehabilitating Cultural Landscapes," U.S. Department of the Interior, National Park Service, accessed March 13, 2020, https://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/rehab/vegetation.htm.

comprehensive tree replacement plan would be reviewed by the CHC and OHR for compliance with the Standards.

Standard 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 Proposed Site Plan complies with Standard #7 because no treatments that would cause damage to historic materials are proposed.

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

The Proposed Site Plan complies with Standard #8 because there are no known archeological resources within the Complex.

Standard 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 will 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.*

The Proposed Site Plan complies with Standard #9. As described above, alterations to the Ivanhoe and Silver Lake Reservoir embankments and perimeter paths will not diminish the historic character of the Complex overall. The topography or shape of the reservoirs will be retained, and the general configuration of the perimeter paths will be largely preserved.

New additions to the Ivanhoe and Silver Lake Reservoirs include the construction of habitat islands. Character-defining features will not be destroyed as a result of their construction, and both the Ivanhoe and Silver Lake Reservoirs will be preserved. The number and location of habitat islands has not been finalized. Based upon renderings dated January 23, 2020, habitat islands will be generally located within 165 feet of the embankments and only comprise approximately 6% of the total area of the water body. The habitat islands are also modest in massing, size, and scale as well as differentiated from the old by their modern design and assembly. As the Complex is a designated HCM, the design of new additions would be reviewed by the CHC and OHR for compliance with the Standards.

New construction is properly located within the Complex. The Environmental Education Center will be located at the southwest base of the Knoll, and shade pavilions/outdoor classrooms are proposed for the summit of the Knoll and the northwest corner of the Ivanhoe Reservoir. Character-defining features will not be destroyed as a result of their construction, and both the Knoll and Ivanhoe Reservoir will be preserved. Because of the variations in the topography and the overall size of the Complex, the three structures appear to be only visible from select vantages and will not dominate the Complex's significant viewsheds. As noted above, the designs of these structures will not be finalized as part of the SLRCMP process. Based upon renderings dated January 23, 2020, each structure appears to be modest in massing, size, and scale as well as differentiated from the old by its modern design

and assembly. The design of new buildings would also be reviewed by the CHC and OHR for compliance with the Standards.

Standard 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.

The Proposed Site Plan complies with Standard #10. New additions and related new construction are freestanding. Therefore, if removed at a later date, the essential form and integrity of the Complex and its environment would be unimpaired.

The habitat islands will be new features anchored to the bottom of the reservoirs, that are neither visible nor character-defining. Installing them will not require the destruction of any character-defining features and removing them in the future would not compromise the integrity of the Complex. As the habitat islands only effect approximately 6% of the total area of the water body and are modest in size, during their lifespans the new features will not diminish the historic character of the SLRCMP area overall, which encompasses a total of 116 acres. Additionally, the immediate setting of the Ivanhoe and Silver Lake Reservoirs has substantially changed over time. The water level of the reservoirs continually fluctuates due to naturally occurring evaporation and man-made alterations, including changes to the reservoirs' depth as well as local and state regulations dictating the height of the water. Views of the water within the reservoirs have also changed. The Ivanhoe Reservoir was originally constructed to supply domestic drinking water. It was covered with a wood structure from its construction through at least the 1930s when the cover was removed. Therefore, the water at the Ivanhoe Reservoir would not have been visible for approximately 30 of the 50 years that constitute the Complex's period of significance. The Silver Lake Reservoir was originally constructed as a source of water for irrigation. It had soft, natural edges and basin. Various vegetation would have been visible along the edges presumably within the reservoir itself depending on the level of water and sediment build up.

While the habitat islands will also partially obscure views of an uninterrupted body of water, views and viewsheds from within the Complex itself and from outside the boundaries of the SLRCMP are not considered character defining. The Complex is a historic designed landscape, which was engineered and constructed for the purpose of water storage. Unlike some historic landscapes, the Complex has neither natural nor designed viewsheds. An example of a natural viewshed that is character defining is Picket's Charge at Gettysburg National Military Park in Gettysburg Pennsylvania, which is characterized by an uninterrupted view of the natural topography between the historic locations of the Union and Confederate battle lines. An example of a designed viewshed is the view from Bethesda Terrace looking north in New York City's Central Park. Landscape architects Fredrick Law Olmstead and Calvert Vaux designed a layered viewshed composed of the Lake in the foreground, the Ramble in the middle ground, and Belvedere Castle in the background. Conversely, the Complex was designed for a utilitarian purpose without thought to constructing viewsheds at specific vantages. Alterations to the

views of the uninterrupted body of water from within and outside the SLRCMP area are therefore independent from the effects to the integrity of the Complex.

It is important to note that the Standards are not intended to be prescriptive, but instead provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, nor is it necessary to comply with every Standard to achieve compliance as a whole.

Recommendations

Based on the review of the Proposed Site Plan dated January 23, 2020, the SLRCMP complies with the Standards and Guidelines for Rehabilitating Cultural Landscapes. As the SLRCMP is further developed, GPA encourages the consideration of the following recommendations to ensure the proposed project complies with the Standards:

- The historic concrete retaining walls along Silver Lake Boulevard and Silver Lake Drive should be retained and incorporated into the SLRCMP site plan to the maximum extent feasible.
- A comprehensive tree replacement plan should be developed based on the *Guidelines for Rehabilitating Cultural Landscapes.*

Thank you for your consideration of this memorandum. We are happy to answer any questions you may have. You can reach us at (310) 792-2690 or by e-mail at teresa@gpaconsulting-us.com and emily@gpaconsulting-us.com.

Attachments

- Existing Site Plan
- Proposed Site Plan