

Appendix C-1

Historical Resources Assessment



21207 South Avalon Boulevard, Carson

Historical Resource Assessment

Prepared for:

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Table of Contents

Table of Contents	ii
1. Introduction	3
1.1 <i>Project Description</i>	3
2. Assessment Methodology	4
2.1 <i>Research</i>	4
2.2 <i>Field Methods</i>	4
2.3 <i>Project Team</i>	4
3. Previous Evaluations and Designations	5
4. Property History	6
4.1 <i>Site and Setting</i>	6
4.2 <i>Architectural Description</i>	7
4.3 <i>Chronology of Development and Use</i>	13
5. Historical Background and Context	14
5.1 <i>Trailer Parks and Mobile Home Parks in Southern California, 1920-1976</i>	14
5.2 <i>Residential Development in Carson</i>	17
5.3 <i>Imperial Avalon Mobile Estates, 21207 South Avalon Boulevard</i>	21
6. Regulatory Framework	26
6.1 <i>National Register of Historic Places</i>	26
6.2 <i>California Register of Historical Resources</i>	27
6.3 <i>CEQA and Historical Resources</i>	28
7. Evaluation of Eligibility	30
7.1 <i>Evaluation of Significance</i>	30
8. Conclusion	32
9. References	33

1. Introduction

At the request of Imperial Avalon LLC, Architectural Resources Group (ARG) has prepared this Historical Resource Assessment for 21207 South Avalon Boulevard (APNs 7337-001-025 through 029) in the City of Carson (the "Site"). The 27-acre site is developed with the Imperial Avalon Mobile Estates mobile home park, completed in 1975. The Site comprises 225 dwelling units, one community building/clubhouse, and several ancillary structures, all accessed via a series of internal paved roads.

The assessment presented in this report includes an evaluation of the property against federal (National Register of Historic Places) and state (California Register of Historical Resources) eligibility criteria. The City of Carson does not have a local landmark designation program. Upon thorough analysis of the Site, ARG finds that it is ineligible for listing in the National Register or California Register due to its relatively recent age, its lack of association with significant historical events or patterns of development, and its lack of architectural distinction.

As the Site is not eligible against federal or state criteria, it does not meet the definition of a historical resource for the purposes of the California Environmental Quality Act (CEQA). Therefore, the proposed project does not have the potential to impact historical resources.

1.1 Project Description

The proposed project is a mixed-use redevelopment of the Imperial Avalon site with four multi-story residential buildings, a 380-unit townhouse community, and greenspace including public park space, paseos, and plazas. Three of the residential buildings will be four stories in height over above-grade and subterranean parking, and will provide non-age-restricted housing. One will be three stories in height over subterranean and above-ground parking, and will provide age-restricted (senior) housing; this building also includes a ground-level restaurant space. The townhouse units will be housed in three-story buildings with attached garages.

2. Assessment Methodology

2.1 Research

For preparation of this assessment, ARG performed the following tasks for research, documentation, and analysis:

- Conducted a search in California's Historic Resources Inventory (HRI) for previous surveys and evaluations of the Site.
- Reviewed state and local technical bulletins, ordinances, and other materials related to the evaluation of historical resources.
- Consulted the City of Carson Building and Safety Department and the State of California Department of Housing and Community Development for historic building permits.
- Conducted primary and secondary source research related to the history of the Site.
- Evaluated the Site against eligibility criteria of the National Register and California Register, to ascertain whether it meets the definition of a historical resource per CEQA.

ARG staff consulted the following archives and repositories as part of their research for this assessment: Los Angeles Public Library (multiple collections); ProQuest, including the historic *Los Angeles Times* database; online image collections of the California State Library and USC Libraries; and ARG's in-house library collection. A complete list of references is included at the end of this assessment.

2.2 Field Methods

In addition to primary and secondary source research, ARG visited the Site on August 28, 2019. During the site visit, the Site was photographed and notes were taken on its physical appearance and condition.

2.3 Project Team

This report was prepared by Mary Ringhoff, Associate, under the supervision of Katie Horak, Principal, both of whom meet the *Secretary of the Interior's Professional Qualifications Standards* in Architectural History.

3. Previous Evaluations and Designations

The Site has not been formally designated under any federal, state, or local designation program and does not appear to have been identified or evaluated in any survey or inventory. It is not listed in the California Historic Resources Inventory for Los Angeles County (latest version 2012).

4. Property History

4.1 Site and Setting

The Site is located in the City of Carson in an area with relatively flat topography (some of which is the result of fill activity post-dating the city's 1968 incorporation). It sits to the southwest of Interstate 405, which runs southeast/northwest through this area. North of the Site, a lateral of the Dominguez Channel curves west from the north, separating the developed parcels to the south from an area of undeveloped land that includes a landfill and may also serve as an overflow basin. The Site occupies a 27-acre parcel comprising five Assessor's Parcel Numbers (7337-001-025, -026, -027, -028, and -029), all sharing the address 21207 South Avalon Boulevard and situated on the west side of South Avalon Boulevard. South Avalon Boulevard is a major north/south thoroughfare and in the vicinity of the Site primarily contains commercial properties: automobile dealerships and a vacant service station. The residential streets constituting the area west of the Site include curvilinear streets and cul-de-sacs, but generally adhere to a regular street grid oriented to the cardinal directions. The adjacent residential area contains one- and two-story single-family residences as well as some multi-family residences, most within a subdivision dating to 1964, with a handful of older houses from the 1920s and infill from the 1980s and 1990s.



Location map: the Site is outlined in red. Base image: maps.google.com.

The Site is surrounded by a concrete masonry unit (CMU) perimeter wall, which is fronted by shallow landscaped setbacks on its east and west sides: the east side, fronting South Avalon Boulevard, has lawn and areas of bark with shrubs and trees of various species, including evergreens. The west side, fronting Grace Avenue, has bare dirt and areas of creeping vines with shrubs and mature evergreens. The northwest corner of the perimeter wall is topped with chain link fencing and razor wire guarding an oversized vehicle parking lot within the Site. A rolling gate of wood and chain link with razor wire closes off a secondary entry driveway from Grace. The Site is accessed via a single, open, wide entry driveway from South Avalon Boulevard, entering at its southeast corner. The entry is marked by a freestanding pole sign bearing the name of the park on two plastic box signs (perhaps internally illuminated) topped by a torii (traditional Japanese gate)-inspired motif. Beyond the perimeter wall, the driveway is flanked by small landscaped areas featuring gravel and bark ground cover with shrubs of various types, including some tropical and Japanese garden-appropriate species. The northern landscaped area contains a path of decomposed granite with freestanding modern light fixtures, handrails, and a bench; it also houses a freestanding, gable roof-topped sign kiosk containing a map of the Site.

The 1975 mobile home park has a relatively regular internal street grid, with paved two-way roads providing access to individual units arrayed around the perimeter of the Site and in blocks of 10 to 17 properties. Most blocks are rectangular, though the Site's curve at its northeast corner is reflected by irregularly shaped blocks and lots in that area. Traffic control is provided by stop signs, and small freestanding wood signs with stenciled lettering/numbering provide directions. The roads do not have sidewalks (except around the community building complex), and there are no streetlights. Parking is restricted to the driveways of individual units, augmented by guest parking areas around the community building. Individual units are shallowly set back from the street, with front landscaping varying by unit. The typical unit is set perpendicular to its street, so the street-facing façade is the unit's side façade. The units have narrow setbacks from their adjacent properties, typically containing a driveway with overhanging canopy on one side and an entry porch on the other; a few properties have small landscaped yards or courtyards. Small dumpsters are situated in shallow setbacks on multiple blocks, shielded from the street by chain link gates with opaque material. In addition to the individual units, the Site contains guest and long-term vehicle parking areas; a community building with a swimming pool; and various ancillary structures including storage sheds, a car wash area, and dog waste stations.

4.2 Architectural Description

Typical Mobile Homes and Modular Homes

The Site contains a mix of mobile homes and modular homes,¹ with some of the latter being fairly recent (less than 20 years old), but the majority of the properties dating to the 1970s. All are one story in height and sit directly on their concrete pads or atop a low base. Units are clad in aluminum, corrugated metal, vinyl (and other unknown synthetic materials), and engineered wood cladding, with occasional stucco

¹ Section 5, **Historical Background and Context**, discusses the historical development of both of these property types and defines the differences between them.

examples. Cladding is often designed to look like wood clapboard or board-and-batten siding. Accent cladding in a contrasting pattern and/or material is common, located at the base of the unit to conceal the underside and chassis if present; observed types include cut stone, brick, concrete masonry unit, engineered wood, and artificial stone. No flat roofs are present – the oldest mobile homes have very shallowly pitched gable roofs (sometimes clad in aluminum or corrugated metal), while newer mobile homes and modular houses have slightly more steeply pitched gabled roofs typically clad with composition shingle.

On both mobile homes and modular homes, canopies shelter a driveway and rear entrance on one side, and a full- or partial-width porch fronting the primary entrance on the other side. These canopies are typically metal, with decorative metal supports and corrugated metal or aluminum roof material (sometimes composition shingle). Windows are most commonly sliding aluminum or vinyl, with rare examples of bays retaining aluminum fixed and sliding sash. Decorative shutters and aluminum awnings are common. The newer modular homes typically exhibit vinyl windows and engineered wood or synthetic cladding simulating rustic wood cladding. Some have more steeply pitched roof elements and/or partial-width porch entries fronting on the street instead of the side of a unit space. Some of the mobile homes bear manufacturers' marks, including Gold Medal, Homette, Jefferson, Silverwood, and others; all of the known marks were of manufacturers in business during the 1970s (and sometimes before and/or after that decade).

As building, alteration, and moving permits are not available for this property, it is difficult to discern exactly when each individual unit was placed on its pad. However, the Los Angeles County Office of the Assessor lists 1973-1975 placement dates for the majority of the properties, and a 1980 aerial photograph shows that the Site was fully occupied with no vacant pads at that time.² Given the number of extant mobile homes exhibiting typical 1970s mobile home configurations and details, it appears that the Site's units most commonly date to that period, with sporadic turnover and unit replacements over time.

Community Building

The community building is a one-story building constructed in 1975.³ Located in the south-central portion of the Site, it anchors a public area encircled by a sidewalk and landscaping including lawn, flowering shrubs, hedges, and mature trees. Concrete walkways provide access to the building from the sidewalk. A swimming pool and jacuzzi with a concrete patio lies north of the building, enclosed by a metal fence. North of the fenced pool is a concrete masonry unit open equipment storage shed with a hipped clay tile roof matching the main building. This shed has no fenestration or other features at its west, north, and south elevations, and is open at its east elevation. Its southern end contains a small enclosed room. Guest and temporary parking spaces are present at all sides of the public area, and a dog waste station is situated at the northeast corner.

² Los Angeles County Office of the Assessor; NETROnline, "Historic Aerials," accessed August 2021, <https://www.historicaerials.com/viewer>.

³ Los Angeles County Office of the Assessor.

The community building reflects a neo-Spanish Colonial Revival architectural style with Pueblo Revival elements. It has an irregular footprint comprising a central rectangular volume with the long axis oriented east/west, with square volumes extending to the north and south at both ends. The central volume has a shallowly pitched hipped roof covered with concrete tiles emulating clay tiles, while the square volumes have flat roofs with parapets, metal coping, and an unknown roof material. An interior stucco chimney is present at the main volume's intersection with the southwest smaller volume. Solar panels are present on the south side of the hipped roof and on the northeast flat-roofed volume. The building is clad in heavily textured stucco and has grouped fixed metal windows, primarily within arched openings, but with floor-to-ceiling rectangular openings at the west (primary) façade and smaller secondary window openings elsewhere. Decorative features include vigas and wall-mounted, lantern-style light fixtures.

The building's primary (west) façade contains the main entrance, a plain metal door. It is fronted by the projecting west end of the main roof, which is supported by stucco arches that form a small arcade. Grouped, fixed, floor-to-ceiling metal windows are present south of the door. The west façades of the flat-roofed volumes flanking the main volume have arched window openings with grouped, fixed metal windows.

The east façade's projecting, arched entry mirrors the west façade's, but is fronted by a set of concrete steps with a metal handrail. The small entry arcade leads to a set of double metal doors with vents and a corridor leading to restrooms and a secondary entry. The east façade of the north flat-roofed volume contains an arched window as on the west façade, while the south flat-roofed volume has no fenestration.

At the south façade, the roof of the central volume extends to create a full-width arcade supported by arches. Behind it are three sets of sliding glass doors and two other secondary entries with metal doors. The flat-roofed volumes at the east and west ends of the façade have arched windows. The eastern flat-roofed volume is fronted by a small private courtyard within a tall concrete masonry unit wall.

The north façade essentially mirrors the south façade, with an arcade fronting sliding glass doors and flat-roofed volumes with arched windows. The flat-roofed volumes have arched windows, though the eastern one has no fenestration at its north façade.

Ancillary Structures

In addition to the entry sign, other signage, swimming pool, jacuzzi, and open equipment shed within the community building area as described above, the Site contains several other ancillary structures. A number of smaller, portable metal sheds are present in both private and public areas; several are clustered at the end of the Site's lone cul-de-sac, in the northeast quadrant of the parcel. This area also contains a freestanding metal antenna and one of many dog waste disposal stations with a bench, astroturf area, light fixture, and bag dispenser. The northwest corner of the Site contains a fenced parking lot for long-term storage of residents' oversized and less frequently used vehicles. Immediately south of it

is a communal car wash area comprising a concrete pad sheltered by a metal canopy with simple metal supports.

Existing Conditions Photos – 21207 Avalon Blvd. (ARG, 8.28.19)



Overview of entry from Avalon Blvd., view northwest.



Sign and landscaping at north side of entry, view north.



Overview: typical streetscape with individual units.



Overview: typical streetscape with individual units.



Example of typical older unit.



Example of typical newer unit.



Overview of community building, view northeast.



Community building primary (west) façade, view southeast.



Community building east façade, view northwest.



Community building south façade, view north.



Community building north façade and portion of swimming pool, view southwest.



Open shed north of community building, view west.



Car wash area with long-term vehicle storage behind, view northwest.



Typical dog waste station, view east.



Sign and CMU perimeter wall at east side of property, view northwest.



CMU perimeter wall at west side of property, view southeast.

4.3 Chronology of Development and Use

Following is a chronology of development and use of the Site. Source materials include historic aerial photographs, data from the Los Angeles County Assessor, and newspaper articles.⁴

1972 Grading and filling takes place at the Site. Owner-Developer: Imperial Avalon (Sei Dyo). Architect: Associated Design Consultants. Builder: ABC Corp.⁵

1975 The Site is completed and opened for occupation.⁶

1975-2019 Individual mobile homes and modular homes are altered or replaced on a sporadic, ongoing basis. Dog waste stations are added. Landscaping is altered on a continual basis.

⁴ A research visit to the City of Carson Building and Safety Department on September 12, 2019 found no permits relating to the Site on file. Staff informed ARG that the City retained no materials relating to any mobile home park, as the property type is regulated by the State of California. A call to the State's Department of Housing and Community Development yielded no additional information, as staff there informed ARG that all permits related to mobile home parks were discarded after four years' storage time.

⁵ Terence M. Green, "'Eyesore' Disappearing in Carson Development," *Los Angeles Times* 9/24/72.

⁶ Los Angeles County Office of the Assessor.

5. Historical Background and Context

5.1 Trailer Parks and Mobile Home Parks in Southern California, 1920-1976⁷

While Southern California is often thought of as a landscape filled with single-family houses, multi-family properties have been a significant part of its residential development since the late 19th century. Mobile home parks and trailer parks are a prominent property type within the larger group of multi-family residential resources, resulting from a distinctive pattern of development tied directly to the rise of the automobile, and evolving over time in response to new housing demands in a rapidly growing region. Based on the existing historic context statement for trailer parks and mobile home parks in the Los Angeles area, and confirmed by supplemental research, the period of significance for this pattern of development is defined here as 1920-1969.⁸

Both trailer parks and mobile home parks evolved from auto camps, also called auto courts or motor courts, starting in the 1910s. The 1908 introduction of the mass-produced Ford Model T gave middle-class Americans the opportunity for automobile ownership for the first time; this opened new avenues for travel and recreation, inspiring drivers to take day trips and venture out on longer drives requiring overnight stays. Some opted to pitch a tent next to their car at night, which prompted some landowners (especially farmers and towns with ample open land) to offer camping space for a small fee. The City of Douglas, Arizona opened the first official municipal auto camp in 1913, and many more private camps followed – situated right next to highways, they initially offered only space for motorists to camp, but as business increased through the 1910s and 1920s they offered amenities like bathhouses, kitchen facilities, and laundry areas.⁹

Over time, auto camps replaced most of their tent space with small cabins. As the Great Depression set in during the early 1930s, auto camps also began accommodating a new type of transportable habitation – the house trailer. Typified by the Airstream trailer, house trailers were lightweight aluminum “houses on wheels” that could be hitched to an automobile and moved from place to place. Mobility was key not just to auto tourists, but also to the growing population of displaced and transient people during the Depression. Southern California saw an influx of new residents at this time, but affordable permanent housing was scarce. Trailer living provided a timely solution. The federal government, and particularly the Works Progress Administration (WPA), encouraged the use of house trailers by its mobile workforce. Trailer manufacturers quickly responded to the growing demand; in 1931, about 50 companies were in business, but by 1937 there were over 400.¹⁰ Auto camps were becoming trailer parks, though they

⁷ This context draws largely on City of Los Angeles Office of Historic Resources, *Los Angeles Citywide Historic Context Statement, Theme: Trailer Parks and Mobile Home Parks, 1920-1969* (prepared by Historic Resources Group for the City of Los Angeles, 2016), with supplemental research. As the context was developed to cover the entire City of Los Angeles, including South Bay communities like Wilmington, San Pedro, Harbor Gateway, South Los Angeles, and Southeast Los Angeles, it is highly applicable to evaluation of the property type in Carson.

⁸ Ibid.

⁹ Stephen Mark, “Save the Auto Camps!” Crater Lake Institute website, accessed September 2019, <http://www.craterlakeinstitute.com/index-of-general-cultural-history-books/park-structures/save-the-auto-camps/>.

¹⁰ Airstream Inc., “Heritage,” accessed September 2019, <https://www.airstream.com/heritage/>.

remained primarily occupied by people passing through rather than by permanent residents, and all trailers had wheels and axles for easy mobility.

The explosion of trailer living in California led the state legislature to pass the State Trailer Camp Act in 1937. Spearheaded by trailer manufacturers, the law imposed standards for trailer camp development and was amended several times through the 1940s to raise the standards.¹¹ In the Los Angeles area, a few trailer parks were developed in the city proper during the 1930s, but the beach communities seemed to “manifest the most friendly attitude toward trailers,” providing parking facilities and proximity to the coastline.¹² By 1940, the growth of pre-war defense industries in California led to an even greater demand for housing, and national defense projects saw “a great influx of trailers and trailer camps” in adjacent areas.¹³ During World War II, trailers provided expedient housing for factory workers. The federal government invested heavily in the trailer industry, ordering over 150,000 units by 1945.¹⁴ California was greatly impacted by this emphasis on trailer housing, boasting the second-highest number of trailer parks in the nation (topped only by Florida).¹⁵ Despite the government stamp of approval and the growing ubiquity of the property type, trailer parks were still commonly viewed as transient “camping” areas occupied by lower-income people. As a result, city planning departments often designated land for trailer parks in undesirable areas on the outskirts of the city, often near industrial operations.

Southern California saw the greatest demand for house trailers in the years immediately following World War II, as returning veterans and their families joined new California residents in seeking affordable housing. Materials shortages tied to the wartime building moratorium hindered a rapid or thorough response by the building industry, leading many people to turn to trailer housing either as a temporary or permanent solution. By 1949, Los Angeles County had about 40 established trailer parks, many of which had become permanent or semi-permanent housing for full-time residents rather than auto tourists.¹⁶ In 1952, the State of California’s Division of Housing published the revised State Trailer Park Act to serve as a manual guiding trailer park layout, construction, and operation. Many cities adopted the manual as local ordinances, seeing additional oversight through 1956 state code that regulated heating, plumbing, and electrical equipment in trailers.¹⁷ All of this served to improve the appearance and longevity of trailer parks, and began to shift their popular perception away from ephemeral groupings of movable vacation vehicles toward stable, full-time residential neighborhoods.

During the late 1950s-early 1960s, the design of trailers began to evolve in response, with manufacturers providing larger, more permanent options that more closely resembled conventional houses. The new

¹¹ “California Housing: Report and Recommendations of the State Commission of Housing,” State of California, Department of Industrial Relations, Division of Housing, 1954 (p. 25), cited in *Trailer Parks and Mobile Home Parks*, 6.

¹² “Rolling Homes Go Into High,” *Los Angeles Times* 6/13/37.

¹³ “California Housing: Report and Recommendations,” 27 (cited in *Trailer Parks and Mobile Home Parks* p. 6).

¹⁴ *Trailer Parks and Mobile Home Parks*, 6-7.

¹⁵ Donald Olen Cowgill, *Mobile Homes: A Study of Trailer Life* (Washington, D.C.: American Council on Public Affairs, 1941), 60.

¹⁶ “Woodall’s Trailer Park Directory, Travel Trailer Magazine, 1949 edition.”

¹⁷ *Trailer Parks and Mobile Home Parks*, 8.

designs featured a greater distinction between private and public spaces, contained bathrooms, and offered amenities like jalousie and bay windows, fold-out porches, and full-height doors.¹⁸ Perhaps the most significant innovation was the 1955 development of the “Tenwide” trailer, which was ten feet in width instead of the usual eight – this made the trailer too wide to be legally towed on many highways, but allowed room for a corridor providing more privacy and a conventional floor plan. For the first time a trailer design explicitly focused on size over mobility, leading to the re-conception of permanent and semi-permanent trailers as mobile homes. The industry soon split into two parts: the travel trailer industry and the mobile home industry. In addition to size and weight, the two property types were distinguished by their mobility equipment. Travel trailers had permanent wheels and hitches for towing, while mobile homes had a permanent chassis used only for transport to a site. Once on site, mobile home wheels were either removed or concealed behind cladding or landscaping.¹⁹

By 1960, mobile home parks were firmly established as a recognized and even desirable housing type, particularly in Southern California, and larger developers had taken notice – no longer was the mobile home park the domain solely of small private owners. Some “resort parks” located near the beach or other vacation destinations became popular with retirees as either vacation or permanent homes, and beach communities like Santa Monica and Malibu offered multiple resort park options. These types of mobile home parks sometimes offered amenities like community buildings, swimming pools, and planned activities. Other mobile home parks were more transient and less glamorous, reflecting little financial investment, landscaping, or community amenities. In many cities, the relegation of the property type to the outskirts or industrial areas continued. At least one post-war planning concept proposed peripheral placement of mobile home parks as a logical interim land use for areas that might be ripe for development in the future.²⁰ In between the two extremes were the mobile home parks that provided affordable housing along with some level of community amenities, a common manifestation seen across Los Angeles County and Southern California in general.

As manufacturers continued developing larger and more permanent mobile home designs, new mobile home parks grew and changed to accommodate them. During the 1960s, developers began establishing parks on large parcels that could fit dozens or even hundreds of mobile homes instead of handfuls, with concrete pads and patios for each individual site and readily available utilities. Some of them catered exclusively to seniors, while others actually divided their space into adult-only and family sections.²¹ Community amenities like clubhouses and pools became more common, and more attention was dedicated to landscaping. Like post-war subdivisions of conventional houses, some mobile home parks featured curvilinear street patterns and cul-de-sacs instead of a strict grid. Larger lots and better amenities meant mobile home operators could command higher space rents, which put some parks out

¹⁸ *Trailer Parks and Mobile Home Parks*, 9.

¹⁹ *Ibid.*, 10.

²⁰ “Minimum Property Requirements for Mobile Home Courts,” Federal Housing Administration, January 1957, Sec. 2102, cited in ICF International, *Village Trailer Park, 2930 Colorado Avenue, Santa Monica, California: City Landmark Assessment Report* (prepared for City of Santa Monica Planning Division, 2011), 7.

²¹ “South Grove Is Strategically Built-in City,” *Los Angeles Times* 10/25/66; “375-Space Rancho Ventura To Draw Families, Retirees,” *Oxnard Press-Courier* 11/7/70.

of reach for would-be residents. But on the whole, mobile home parks continued to offer a more affordable alternative to standard home ownership.

By the early 1970s, most mobile home parks had fully transcended their transient origins. Properties constructed during the 1970s tended to be even larger than their 1960s predecessors, with wider streets, more extensive landscaping (sometimes including extensive greenbelts, ponds, creeks, and other complex features), and wider individual sites. Some contained 300 or more individual sites. Many of the homes within the parks were not even mobile homes, with a dedicated chassis, but a new and larger type known as the modular home. These houses lacked a chassis and were instead transported in pieces via flatbed truck from the factory and assembled on site. With their affordability and standard appearance, modular homes bridged the gap between mobile homes and traditional site-built houses. In response, 1970s mobile home designs strove to look more like conventional houses, not just in terms of size and patio space, but also with architectural features like shiplap siding and gabled roofs.²² The near-ubiquity of modular homes and larger, more house-like mobile homes, along with the layout of larger parks, gave 1970s properties a much different architectural character than the older forms. In many ways, the mobile home parks of the 1970s were more comparable to new townhome and condominium developments than the mobile home parks of the 1950s and 1960s. In 1976, the Department of Housing and Urban Development (HUD) implemented new construction and safety standards for “manufactured homes,” an official change in terminology meant to cover all of the home types seen in parks like Imperial Avalon Mobile Estates. Technically, nothing constructed after 1976 should be referred to as a mobile home.²³

5.2 Residential Development in Carson

Carson is a young city, incorporated in 1968 after decades as a nebulous community in unincorporated Los Angeles County. During the first half of the 20th century, its undeveloped land and proximity to valuable oil fields and transportation corridors drew numerous industrial operations. The people working in these local industries settled around them, resulting in a “bottom-up” pattern of residential development and a built environment with a high proportion of ephemeral housing. The Carson area was loosely managed by Los Angeles County and did not see the same kind of top-down planning or zoning that neighboring cities like Los Angeles, Torrance, or Long Beach did. In terms of residential development, the cumulative result of these shaping forces was a somewhat haphazard clustering of single-family and multi-family residential properties, with little of the formal subdividing and development that shaped other areas of the South Bay and Los Angeles County as a whole in the period before World War II. Carson saw its most intense residential development after the war, and in particular after incorporation, at which time it had to come to terms with its industrial past.

Prior to the Spanish colonization of California in the 18th century, the area that would later become Carson was inhabited by the Tongva, a Native American tribe that occupied much of what is now Los Angeles County, half of Orange County, and the islands of San Clemente, San Nicolas, and Santa

²² Anne LaRiviere, “Mobile Home Life Is a Movement All Its Own,” *Los Angeles Times* 7/23/73.

²³ *Trailer Parks and Mobile Home Parks*, 12; Sarah Baird, “Mobile Homeland,” *Curbed*, accessed September 2019, <https://www.curbed.com/2017/9/13/16275948/mobile-manufactured-homes-clayton-trailers>.

Catalina.²⁴ The Tongva had frequent interactions with the groups bordering their territory, including the Chumash to the north, the Serrano to the east, and the Luiseño and Juaneño to the south. The group is commonly referred to as the Gabrielino as well as the Tongva. The name Gabrielino originally referred specifically to the people affiliated with Mission San Gabriel Arcangel. Today, the name refers to other adjacent groups as well, some of whom prefer the name Tongva, others of whom prefer the name Kizh since ethnographic research has shown the etymology of the word “Tongva” is problematic.²⁵

The Gabrielino/Tongva/Kizh used both inland and coastal food resources, living a semi-sedentary lifestyle that relied on seasonally available foods and establishing large, permanent villages near stable water sources. Temporary campsites were used seasonally for gathering plant foods like acorns, as well as for fishing, harvesting shellfish, and hunting. The village of *Suangna* was sited in the Carson area and remained an active Tongva community into the historic period. *Suangna* was included in the first Spanish land grant in California, the 75,000-acre Rancho San Pedro, given to Juan Dominguez in 1782 and thereafter commonly known as the Dominguez Rancho.²⁶ This rancho encompassed most of today’s South Bay region, stretching from the Los Angeles River west to the ocean. The city of Carson later took its name from a member of the Dominguez family – Juan Dominguez’s great-grandson, George Henry Carson.

After decades of ranching, the Dominguez family found additional profits in the late 1800s by selling off portions of its land. While other Los Angeles County rancho land filled with residential subdivisions at this time, the Dominguez land primarily saw the development of small farms, commerce, and low-scale industrial operations.²⁷ In the early 1920s, a more lucrative pursuit presented itself with the discovery of oil in several major oil fields on Rancho Dominguez lands. This transformed much of the South Bay, and the area that would become Carson was no exception. By 1926, the area contained five major oil refineries, making it the largest refinery complex in the nation at that time.²⁸ This heavy industrial use left little room for other types of development, as stated in a 1935 analysis prepared for the land company which owned most of the Carson area: “The oil refining and processing industry is not conducive to making property in the vicinity...attractive to any other type of industry for subdivision and living conditions.”²⁹ A few people settled around the refineries where they worked, and the area was served by a Pacific Electric Railway line (originally a 1903 Los Angeles Interurban Railway line). But on the whole the locale was industrial, and most workers lived in more established neighboring communities like Torrance,

²⁴ Alfred L. Kroeber, *Handbook of the Indians of California* (Washington, D.C.: Government Printing Office, 1925), 620-621; William McCawley, *The First Angelinos: The Gabrielino Indians of Los Angeles* (Banning, CA: Malki Museum Press, 1996), 3.

²⁵ E. Gary Stickel, *Why the Original Indian Tribe of the Greater Los Angeles Area Is Called Kizh Not Tongva* (San Gabriel, CA: Kizh Tribal Press, 2016).

²⁶ City of Carson, “Our City’s Spanish Rancho Heritage,” accessed September 2019, <http://ci.carson.ca.us/AboutCarson/SpanishRancho.aspx>.

²⁷ Los Angeles County Library, “Carson: Community History,” accessed September 2019, <https://lacountylibrary.org/carson-local-history/>.

²⁸ George Stein, “Carson Comes of Age,” *Los Angeles Times* 2/21/88.

²⁹ Cited in “Carson Comes of Age.”

Gardena, Lomita, Harbor City, and Compton.³⁰ Some commuted on the Pacific Electric, and it was likely the railway which sparked the eventual naming of Carson – it used that name for its local stop between Gardena and San Pedro.³¹

Like the rest of the South Bay, the Carson area experienced rapid population growth after World War II, as existing wartime industries quickly adapted to peacetime and added even more jobs to those that had drawn migrants from all over the country in the years previous. Residential development accelerated to keep up, supplanting some of the oil facility properties after more desirable land became scarce. Single-family and multi-family residences appeared in tracts of various sizes interspersed between large industrial operations and land that was at the time infeasible to develop due to flood issues in low-lying areas. By 1949, the area's Chamber of Commerce began using the name Carson to distinguish it from adjacent unincorporated communities, and by the end of the 1950s, county precinct maps recognized the area as "Carson."³²

Trailer parks (later to see more planning and development as mobile home parks) were an important part of Carson's post-war development, providing crucial and expedient housing for working-class residents. The prominence of trailer parks and mobile home parks from the 1940s through the 1970s is illustrated by the many examples still extant in Carson today – the city contains at least 21 mobile home parks, of which 18 pre-date Imperial Avalon Mobile Estates (1975).³³ **Table 1** lists all of the known properties. Four date to the 1940s, five to the 1950s, five to the 1960s, and seven to the 1970s. The earliest surviving property, Ray Mar Trailer Park at 823 Realty Street, dates to 1944. The majority of the properties, including the four dating to the 1940s and four of the five built in the 1950s, contain less than 100 sites each for trailers, mobile homes, and manufactured homes. Larger properties, containing over 100 sites, date primarily to the 1960s and 1970s. Carson's mobile home parks reflect the same general patterns seen across Southern California as described above: older (1940s and 1950s) parks tend to be small, with small individual units and few to no community amenities. Those from the 1960s show an increase in size and planning, with larger individual units and community amenities like clubhouses, swimming pools, open space, and recreational facilities. The few properties dating to the mid- to late-1970s occupy much larger parcels, have larger individual units (both mobile homes and modular homes), and have community amenities that sometimes included large greenbelts (as seen in the 1978 Carson Harbor Village).

³⁰ Based on 1937-1938 Home Owners Loan Corporation area description files, which were prepared for these surrounding communities with substantial residential populations but were not prepared for Carson. Available at R. Marciano, D. Goldberg, C. Hou, "T-RACES: a Testbed for the Redlining Archives of California's Exclusionary Spaces," accessed September 2019, <http://salt.umd.edu/T-RACES/demo/demo.html>.

³¹ "Carson Comes of Age."

³² "Carson Comes of Age."

³³ MHPHOA (Mobile Home Park Home Owners Allegiance), list and map of Carson mobile home parks, accessed September 2019, <https://mhphoa.com/ca/carson/carson-gardens-trailer-lodge>; dates from Los Angeles County Office of the Assessor.

Table 1. Known Mobile Home Parks and Trailer Parks in Carson

Name	Address	Date	# of Units
Ray Mar Trailer Park	823 Realty St	1944/1946	27
Flamingo Gardens Trailer Lodge	520 E. Carson St.	1947	39
E/L Trailer Park	807 Lincoln St.	1948	10
Laco Mobile Home Park	22325 S. Main St.	1948/1951	94
Shangri-Lodge Mobile Home Park	21834 S. Grace Ave.	1950/1957	46
Ocean Villa Trailer Park	605 W. 228 th St.	1954	21
Carson Gardens Trailer Lodge	437 W. Carson St.	1956	97
Park Avalon	750 E. Carson St.	1958/1959	133
Park Granada	218 W. Carson St.	1959	26
Bel-Aire Park	21425 S. Avalon Blvd.	1960	81
Paradise Trailer Lodge	21900 S. Martin St.	1960/1962	84
Rancho Dominguez Mobile Estates	425 E. Gardena Blvd.	1962	81
Country Estates Mobile Home Park	1502 E. Carson St.	1962/1965	139
Imperial Carson Mobile Estates	21111 Dolores St.	1965	192
Nu Way Mobile Home Park	401 W. Carson St.	1970	39
Vera Carson Mobile Home Estates	21811 S. Vera St.	1971	32
Park Villa Mobile Home Estates	21711 S. Vera St.	1971	48
Vista Del Loma Mobile Estates	20600 S. Main St.	1974	86
Imperial Avalon Mobile Estates	21207 Avalon Blvd.	1975	225
Colony Cove Mobile Estates	17700 S. Avalon Blvd.	1975	420
Carson Harbor Village	17701 S. Avalon Blvd.	1978	420

The haphazard and ephemeral nature of Carson’s post-war residential development was largely due to its status as an unincorporated community. Los Angeles County provided limited oversight and planning, and the community had limited political power to shape its growth. On the one hand, this was doubtless a factor in California’s 1965 selection of Carson for the future site of California State University, Dominguez Hills to serve the exploding South Bay population. On the other hand, lack of control meant Carson became the *de facto* dumping ground for adjacent municipalities like Torrance and Redondo Beach, seeing the establishment of undesirable facilities like waste treatment plants, auto dismantling centers, and garbage dumps.³⁴ In some cases, like the 1965 Imperial Carson Mobile Estates (21111 Dolores Street), neighborhoods and mobile home parks were built atop former dumps; this led to worrisome problems like health concerns and leakage of flammable methane gas.³⁵ Adding to Carson’s trouble, the low-lying community commonly flooded during heavy rains. By 1968, Carson had 76 junkyards, nearly two dozen abandoned landfills, several active oil refineries, and an unknown amount of residual contamination.³⁶

³⁴ City of Carson, “Growing Pains of a Young City,” accessed September 2019, <http://ci.carson.ca.us/AboutCarson/GrowingPains.aspx>.

³⁵ Mark Gladstone, “Gas Seeping Into Mobile Home Park,” *Los Angeles Times* 12/9/82.

³⁶ “Carson Comes of Age.”

In April 1968, the community of over 66,000 people voted to incorporate as an independent city and to officially name it Carson (in a narrow win over the other name option, Dominguez). After electing the first mayor and city council, the first order of business was addressing the City's undesirable mix of heavy industry and incoherent residential development patterns. Carson enacted a strict building and landscaping code, closed down most of the unwanted dumps and waste processing operations, and began working to attract new commercial options.³⁷ The new California State University, Dominguez Hills campus opened in Carson in October 1968, providing an additional boost to the new city's prospects and drawing even more new residents.

Carson's post-incorporation residential development proceeded in a more controlled fashion and continued to include a relatively high proportion of mobile home parks, some of which (like the 1975 Colony Cove Mobile Estates at 17700 S South Avalon Boulevard and the 1978 Carson Harbor Village across the street at 17701 S South Avalon Boulevard) were much larger than their predecessors, with over 400 sites each. Mobile home park residents proved to have significant political clout in local matters and used their high voter turnout to establish park-friendly city policies like rent control and assistance with resident relocation when a park closed. Carson's industrial past did not disappear entirely; it faced years of cleanup and redevelopment, hindered by a series of scandals involving City officials. A decade and a half after its incorporation, the City still had "one of the largest concentrations of abandoned landfills in Los Angeles County" and building on top of these problems had produced mixed results.³⁸ But the City persisted, and in subsequent years succeeded in constructing a shopping mall, a civic center, a library, several municipal parks, corridors, and mixed-use developments.

5.3 Imperial Avalon Mobile Estates, 21207 South Avalon Boulevard

The parcel that now contains 21207 South Avalon Boulevard appears to have been used as agricultural land prior to the early 1970s, with fields, farmhouses, and outbuildings visible on aerial photographs from 1952 and 1963.³⁹ In 1972, America's Beautiful Cities (ABC) Corp. of San Pedro began grading and filling on the 27-acre parcel, working for Los Angeles developer Sei Dyo to lay the groundwork for a 229-unit mobile home park.⁴⁰ Dyo stated that about \$1 million would be spent developing the property, which had been thought to be "economically unworthy of development" because portions of it were as much as ten feet below grade and flooded when it rained.⁴¹ ABC trucked in tons of fill from excavation sites and used an innovative approach to form the gravel base for the park's internal road network: recycling large pieces of concrete from highway improvement projects. During the prolonged grading and filling process, ABC landscaped the property boundary along South Avalon Boulevard to improve appearances. At the rear of the property, it established an *ad hoc*, "build-it-yourself" park for local children in cooperation with the Carson Parks and Recreation Department.

³⁷ "Growing Pains."

³⁸ "Gas Seeping."

³⁹ NETROnline, "Historic Aerials," accessed September 2019, <https://www.historicaerials.com/viewer>

⁴⁰ "'Eyesore' Disappearing."

⁴¹ Ibid.

Development of the new mobile home park proceeded for several years and was completed in 1975. The new Imperial Avalon Mobile Estates joined Dyo's substantial portfolio of mobile home parks constructed between the mid-1960s and late 1970s in Southern California communities including Oxnard, Ventura, Garden Grove, Chatsworth, and Carson. These included at least seven other parks bearing the developer's "Imperial" brand, including the 192-site Imperial Carson Mobile Estates (1965) under half a mile away. Designed by Associated Design Consultants, Imperial Avalon boasted over 200 individual sites, a community building/clubhouse with a swimming pool, and a Japanese torii-inspired sign at its entrance on South Avalon Boulevard. Asphalt-paved internal roads provided access to the community's mobile homes and modular homes, which sat on sites of varying sizes. Homes predominantly were oriented perpendicular to their internal street, with the street-facing side façade containing two or more windows. They were shallowly set back from the street, fronted by narrow strips that could be landscaped to the owner's liking.

Imperial Avalon Mobile Estates has been fully developed and continuously occupied since its completion in 1975. There have been multiple alterations and improvements to most of the individual units over the past 46 years, and many of the original mobile homes have been replaced by larger manufactured homes. Landscaping in common areas has changed, with xeriscaping at the park entrance and the addition of several pet-relief stations with benches, artificial grass, and waste bag dispensers. The Site's overall layout, including internal roads, appears to have remained the same since its establishment.

Owner-Developer: Imperial Avalon (Sei Dyo)

Imperial Avalon Mobile Estates was originally developed, owned, and operated by Sei Dyo. Dyo was born in El Paso, Texas in 1925 to Japanese-born parents who later moved the family to Santa Barbara, California.⁴² After the bombing of Pearl Harbor in December 1941, Dyo's father was arrested by the FBI on the accusation (later dropped) of being an enemy alien, and he and the rest of his family were forcibly moved to the Crystal City Family Internment Camp in Texas.⁴³ While interned, Dyo remained active with a Boy Scout troop and fulfilled all the requirements to become an Eagle Scout. After the war, Dyo went to college and became a landscape architect; by 1956, he had established the Dyo Brothers landscape design and building business with his brother Ken, basing it in Pasadena.⁴⁴ The business appears to have specialized in Japanese-inspired garden designs for residential properties. Dyo, his wife Yetsuko, and their family also lived in Pasadena around this time.

In the early- to mid-1960s, Dyo turned his attention to mobile home park development. He developed at least ten mobile home parks in California between 1965 and 1975, including eight in Southern California under the "Imperial" brand. Dyo used multiple business names and entities including Dyo Brothers, Inc.;

⁴² Texas birth certificate: Sei Dyo. *Ancestry.com*, accessed September 2019; Karen L. Riley, *Schools Behind Barbed Wire: The Untold Story of Wartime Internment and the Children of Arrested Enemy Aliens* (Boulder, CO: Rowman & Littlefield Publishers, Inc., 2002), 4-5.

⁴³ Ibid.

⁴⁴ "Experts to Discuss Oriental Influence," *Pasadena Independent* 2/2/56; Classified ad for Dyo Brothers, *Pasadena Independent* 4/6/56.

Imperial Mobile Estates; Imperial Avalon; and Mobileparks America Corp.⁴⁵ After 1966, all were based at 321 E. 2nd Street, a new Modern office building in the heart of Los Angeles' Little Tokyo neighborhood that served as a potent symbol of Japanese American pride in the post-war period. Dyo constructed his mobile home parks in Southern California communities including Oxnard, Ventura, Garden Grove, Chatsworth, and Carson. Aside from the Imperial name, standard 1960s-1970s mobile home park spatial layout, and similarities in size (200 to 400 properties), the Dyo properties did not appear to share many distinctive characteristics. The two in Carson had similar entrance signs, though the Imperial Carson's has been replaced, but the architecture of their clubhouses was very different and there does not appear to have been a unified landscape design for either (Japanese garden-inspired or otherwise).

It is unknown whether Dyo retained ownership of all of his mobile home park developments; he did continue to own and operate the two he established in Carson, though on-site managers conducted the day-to-day work.⁴⁶ Dyo died in 2000.

Designer: Associated Design Consultants

Little substantive information could be found on Imperial Avalon designer Associated Design Consultants, a Tarzana-based architectural firm. Its known design commissions include a 200-space mobile home park in Upland (Villa Gabriel Mobile Village) in 1971; two Los Angeles strip malls (1978); a 66-unit townhouse community in Orange County (1978); a strip mall in Agoura (1980); and a three-story store and office building in Canoga Park (1982).⁴⁷ Based on its publicized projects, the regional firm was in operation during the 1970s and 1980s, and did not specialize in one particular property type. The architectural designs of the projects above are not notable in terms of style and do not reflect innovative or influential approaches.

Builder: ABC Corp. (Henry C. Soto)

America's Beautiful Cities (ABC) Corp. completed the grading, filling, and construction of the Imperial Avalon site. ABC was run by landscape architect Henry C. Soto, born in Kingman, AZ in 1920 to Spanish-born parents who ran a cattle ranch.⁴⁸ He moved to the Los Angeles area in 1943 and established the Henry C. Soto Corp., a San Pedro landscape contracting firm which would become one of the largest in California. Soto started strong in the 1940s with landscaping projects for private residences, freeway extensions, schools, infrastructure facilities, and Los Angeles Municipal Airport before it was LAX.⁴⁹ His business exploded in the 1950s in terms of both project scales and types, completing landscapes for hospitals (Kaiser Permanente and Wilmington), Santa Monica City College, the Crown Zellerbach plant,

⁴⁵ "Mobil Home Park in Garden Grove," *Long Beach Independent Press-Telegram* 10/9/66; "375-Space Rancho Ventura."

⁴⁶ "Gas Seeping."

⁴⁷ "Completion in April Set for Village Grove," *Los Angeles Times* 3/7/71; "Small Shopping Center Due at Wilshire, Wilton," *Los Angeles Times* 7.9.78; "Project Being Planned," *Los Angeles Times* 9/10/78; "Water-Oriented Townhomes Open," *Los Angeles Times* 10/21/78; "Kanan Plaza Project," *Los Angeles Times* 8/17/80; "Valley Project Slated," *Los Angeles Times* 10/24/82.

⁴⁸ "Death Takes Landscaper Henry C. Soto," *Los Angeles Times* 5/18/86; Soto genealogical information on Ancestry.com, accessed September 2019.

⁴⁹ E.g., "Contract Awarded," *Los Angeles Times* 8/11/47; "Landscaping Contract Let," *The Valley Times* 11/22/48; "Burbank School Contracts Let," *The Valley Times* 11/4/48; Ad, *Los Angeles Times* 1/3/50.

the Hyperion Outfall, and CBS Television City.⁵⁰ Soto's residential projects included many private homes as well as model homes in multiple residential subdivisions, and his company's display ads touted its ability to create outdoor "living rooms" of patios, barbecues, shade structures, and landscaping.⁵¹

During the 1950s, Soto served as leader of the local nurserymen association and was co-founder and second president of the California Landscape Contractors Association, the first and largest landscaping contractors association in the country.⁵² In 1953, the Los Angeles Chamber of Commerce named him leader of a campaign to beautify the city's industrial areas with the aim of reviving the theme of "Old Los Angeles Landscape of Trees and Flowers."⁵³ One of the panel members named to assist Soto was iconic landscape architect Garrett Eckbo. Soto went on to head other municipal beautification campaigns at Los Angeles Harbor and elsewhere, and often advised cities on landscaping issues.

Soto's business included a wholesale nursery division which operated the Avalon Nursery at 13000 South Avalon Boulevard in South Los Angeles (just north of Carson) during the 1940s and 1950s. While his firm employed multiple landscape architects, Soto himself seemed to gravitate toward plant choices and devoted considerable time to speaking and publishing newspaper pieces about tropical species in particular. His fondness for the tropical aesthetic was reflected in his backyard design for a model home in the 1953 Encino Estates development: "a restful tropical background including beautiful naturally grouped palms and a wide assortment of rare exotic plants. Huge boulders have been used to relieve the straight lines of a cut bank and a brilliant floral area will provide dazzling color that will attract the eye to the very extremes of the property."⁵⁴ Soto nurtured a "hope of putting miniature palm trees and other tropical plants into homes all over the United States and Canada—of getting Americans to plant tropical gardens in their homes—and of making himself a mint in the process."⁵⁵ In 1962, Soto's dedication to palm trees nearly led to his ruin – after investing heavily in growing over 8 million miniature palm trees to sell in supermarkets and department stores, he lost his entire 30-acre crop after it was sprayed with weed killer.⁵⁶

Soto rebounded quickly, and he continued providing landscape design and contracting services through newly branded entities including Soto-V.C. and Valley Crest Landscaping, Inc.; Disposal Gardens; ABC Corp.; and Four Seasons Gardens.⁵⁷ If newspaper mentions are an accurate metric, he no longer operated under the Henry C. Soto Corporation name, and the Avalon Nursery was no longer in business. In addition to his typical work, Soto also turned his attention to creating new developable land by filling low-lying areas (including canyons) with trash. In 1969, he worked with property owners in the residential South Bay community of Rolling Hills Estates to fill a 50-foot canyon with "household rubbish, construction

⁵⁰ Avalon Nursery Display Ad, *Los Angeles Times* 5/17/57; "Death Takes Landscaper."

⁵¹ E.g., Henry C. Soto Corporation Display Ads, *Los Angeles Times* 2/26/50, 1/3/50.

⁵² "Death Takes Landscaper."

⁵³ "Leader Named in Drive to Beautify L.A.," *Los Angeles Times* 8/21/53.

⁵⁴ "Encino Model Homes Landscaping Unusual," *The Valley Times* 7/3/53.

⁵⁵ "Landscape Expert Sees His Dreams Fade as Trees Wilt," *San Bernardino County Sun* 4/24/62.

⁵⁶ Ibid.

⁵⁷ "Landscaping Vital to Developments," *Los Angeles Times* 3/14/65; "Landfill Job Beckons Children's Ponies Back," *San Bernardino County Sun* 10/23/69; "Landscape Contractors Honor Top Achievers," *Los Angeles Times* 8/4/85.

material and industrial waste.”⁵⁸ Soto’s Disposal Gardens got the garbage from private rubbish collection firms, who paid for the privilege to dump there, and stated that once it was covered it would be “sturdy enough to support any development except permanent dwellings and schools.”⁵⁹ In 1970, he proposed a similar plan to fill Potrero Canyon in Pacific Palisades and turn it into a municipal park; the plan fell through, though the city never gave up on the park idea and actually broke ground on the project in 2019 (using excavated dirt from a Rick Caruso project instead of trash as fill).⁶⁰

With ABC’s 1972 use of recycled highway and construction material as well as fill dirt in leveling out the site for Imperial Avalon Mobile Estates, it is clear that Soto’s landfill vision was influential in the development of this property. The landscape contractor was so dedicated to the use of recycled materials that he christened the build-it-yourself children’s park at the rear of the property “Fort Soto.”⁶¹ Soto worked continuously until his death in 1986.

Residents

Research yielded very little information about the residents and managers of Imperial Avalon. Unlike some of Sei Dyo’s other mobile home parks, the Site does not appear to have had separate sections for adults and families with children originally. Real estate listings indicate the park is currently restricted to seniors (over 55, 45 for secondary owners), and is a retirement community.

⁵⁸ “Landfill Job.”

⁵⁹ Ibid.

⁶⁰ “City Studying Plan to Use Palisades Canyon for Dump,” *Los Angeles Times* 6/11/70; “Groundbreaking Held for Potrero Canyon Park, Again,” *Circling the News*, accessed September 2019, <https://www.circlingthenews.com/groundbreaking-held-for-potrero-canyon-park-again/>.

⁶¹ “‘Eyesore’ Disappearing.”

6. Regulatory Framework

6.1 National Register of Historic Places

The National Register is the nation's master inventory of known historic resources. Created under the auspices of the National Historic Preservation Act of 1966, the National Register is administered by the National Park Service (NPS) and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. As described in National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*, in order to be eligible for the National Register, a resource must both (1) be significant and (2) retain sufficient integrity to convey its significance.

Significance is assessed by evaluating a resource against established criteria for eligibility. A resource is considered significant if it satisfies any one of the following four National Register criteria:⁶²

1. Associated with events that have made a significant contribution to the broad patterns of our history;
2. Associated with the lives of significant persons in our past;
3. Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction;
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Once significance has been established, it must then be demonstrated that a resource retains enough of its physical and associative qualities – or integrity – to convey the reason(s) for its significance. Integrity is best described as a resource's "authenticity" as expressed through its physical features and extant characteristics. Whether a resource retains sufficient integrity for listing is determined by evaluating the seven aspects of integrity defined by the NPS:

1. Location (the place where the historic property was constructed or the place where the historic event occurred);
2. Setting (the physical environment of a historic property);
3. Design (the combination of elements that create the form, plan, space, structure, and style of a property);
4. Materials (the physical elements that were combined or deposited during a particular period of time and in a particular manner or configuration to form a historic property);

⁶² Some resources may meet multiple criteria, though only one needs to be satisfied for National Register eligibility.

5. Workmanship (the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory);
6. Feeling (a property's expression of the aesthetic or historic sense of a particular period of time); and
7. Association (the direct link between an important historic event/person and a historic property).

Integrity is evaluated by weighing all seven of these aspects together and is ultimately a “yes or no” determination – that is, a resource either retains sufficient integrity or it does not.⁶³ Some aspects of integrity may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for its significance. Since integrity depends on a resource's placement within a historic context, integrity can be assessed only after it has been established that the resource is significant, and under which criteria.

Generally, a resource must be at least 50 years of age to be eligible for listing in the National Register. Exceptions are made if it can be demonstrated that a resource less than 50 years old is (1) of exceptional importance or (2) is an integral component of a historic district that is eligible for the National Register.

6.2 California Register of Historical Resources

The California Register is the authoritative guide to the State's significant historical and archeological resources. In 1992, the California legislature established the California Register “to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.” The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for historic preservation grant funding; and affords certain protections under CEQA. All resources listed on or formally determined eligible for the National Register are automatically listed in the California Register. In addition, properties designated under municipal or county ordinances, or through local historic resources surveys, are eligible for listing in the California Register.

The structure of the California Register program is similar to that of the National Register, but places its emphasis on resources that have contributed specifically to the development of California. To be eligible for the California Register, a resource must first be deemed significant at the local, state, or national level under one of the following four criteria, which are modeled after the National Register criteria listed above:

⁶³ Derived from National Register Bulletin 15, Section VIII: “How to Evaluate the Integrity of a Property.”

1. It is associated with events or patterns of 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, region, 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 to the prehistory or history of the local area, state, or the nation.

Like the National Register, the California Register also requires that resources retain sufficient integrity to be eligible for listing. A resource's integrity is assessed using the same seven aspects of integrity used for the National Register. However, since integrity thresholds associated with the California Register are generally less rigid than those associated with the National Register, it is possible that a resource may lack the integrity required for the National Register but still be eligible for listing in the California Register. There is no prescribed age limit for listing in the California Register, although California Register guidelines state that "sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource."

Resources may be nominated directly to the California Register. They are also automatically listed in the California Register if they are listed in or have been officially determined eligible for the National Register. State Historic Landmarks #770 and forward are also automatically listed in the California Register.

6.3 CEQA and Historical Resources

Enacted in 1970, CEQA is the principal statute mandating environmental assessment of discretionary land use and development projects in California. The primary goal of CEQA is to (1) evaluate a project's potential to have an adverse impact on the environment, and (2) minimize these impacts to the greatest extent feasible through the analysis of project alternatives and, if needed, implementation of mitigation measures.

Historical resources are considered to be a part of the environment and are thereby subject to review under CEQA. Section 21084.1 of the California Public Resources Code (PRC) states that for purposes of CEQA, "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."⁶⁴ This involves a two-part inquiry. First, it must be determined whether the project involves a historical resource. If it does, then the second part

⁶⁴ California Code of Regulations, Title 14, Chapter 3, Section 15064.5.

involves determining whether the project may result in a “substantial adverse change in the significance” of the historical resource.

To address these issues, guidelines relating to historical resources were formally codified in October 1998 as Section 15064.5 of the CEQA Guidelines. The guidelines state that for purposes of CEQA compliance, a “historical resource” shall be defined as any one of the following:⁶⁵

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources.
2. A resource included in a local register of historical resources, or identified as significant in a qualified historical resource survey, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrate that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing in the California Register of Historical Resources.

⁶⁵ California Code of Regulations, Title 14, Chapter 3, Section 15064.5.

7. Evaluation of Eligibility

7.1 Evaluation of Significance

As described below, the Site does not appear to be eligible for listing in the National Register or the California Register. The Site is evaluated under each applicable criterion below.

National Register and California Register

National and California Register Criteria A/1: associated with events that have made a significant contribution to the broad patterns of history.

Constructed in 1975, the Site is associated with the latter years of mobile home park development in Southern California. The establishment and early growth of trailer parks and mobile home parks, particularly during the immediate post-World War II period, reflected a regional response to the massive population expansion that shaped Southern California during this time. Changes to the property type during the 1950s and 1960s reflected both practical and cultural influences that led to the near-abandonment of the classic trailer and trailer park, and the development of new mobile home designs and new park types with more amenities. In Carson, this historically significant pattern of development from the 1940s through the 1960s resulted in the establishment of 18 of its 21 extant parks (and an unknown number of non-extant parks) between 1944 and 1971. Only three, including the Site, were established after 1971. By the mid-1970s, mobile home parks had evolved well beyond their post-war origins to include much larger properties, more units, and an architecturally heterogeneous mix of modular homes and larger mobile homes. The Site embodies all of these 1970s characteristics, and post-dates the period of significance for the historical pattern of development. As the Site is not associated with events that have made a significant contribution to the broad patterns of local, state, or national history, it does not appear eligible under Criteria A/1.

National and California Register Criteria B/2: associated with the lives of persons significant in our past.

Research did not yield information on significant individuals in direct association with the Site. Its owner-developer, Sei Dyo, did not live on site, and his association with it does not appear to have extended beyond ownership (along with ownership of multiple other mobile home properties). He and builder Henry C. Soto are addressed under Criteria C/3, below. The Site is not associated with the lives of persons significant in our past, and does not appear eligible under Criteria B/2.

National and California Register Criteria C/3: embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.

The Site is recognizable as a larger-scale 1970s mobile home park with planning features including paved internal roads; signage; a community building and other public amenities; and individual unit spaces reflecting consistent sizes, orientations, and setbacks. It contains a mix of mobile homes and modular

homes dating from the mid-1970s to the 2010s. However, as discussed under Criteria A/1 above, it represents a property type and pattern of development post-dating the established period of significance ending in 1969. It is larger in size than older examples, and its mix of unit types and sizes reflects later development of designs that devoted more attention to emulating conventional house types. Carson contains at least 18 extant examples of mobile home parks which pre-date the Site, most of which better embody the historic property type. One example lies within half a mile of the Site: Bel-Aire Park (21425 S. Avalon Blvd.), which was established in 1960 and retains many of its original mobile home units in their original, closely spaced configuration.

The Site's architect, Associated Design Consultants, was not a master practitioner known for influential or innovative work, and the Site's community building does not embody the distinctive characteristics of a historical type, period, or construction method. Neither the community building nor the Site as a whole possesses high artistic values.

The Site's owner-developer, Sei Dyo, was a Los Angeles landscape architect who focused primarily on developing mobile home parks in Southern California. He established at least ten during the 1960s and 1970s, including at least eight under his "Imperial" brand. Dyo's Imperial Avalon Mobile Estates (the Site) appears to have been the last of his developments, and he retained ownership of it and his other Carson property, Imperial Carson Mobile Estates (1965) into the 1980s. Dyo was a prominent developer who held headquarters in Los Angeles' Little Tokyo and participated in oral histories pertaining to Japanese American incarceration during World War II, but he does not appear to have been particularly widely known, influential, or prolific. Aside from the Imperial name, his properties do not seem to have any distinctive shared characteristics except for Japanese torii-inspired entry signage. Overall, the Site does not appear to be significant for its association with Dyo.

The Site's builder, Henry Soto of ABC Corp., was a San Pedro landscape architect and nursery owner who founded one of the largest landscape contracting firms in California, the Henry C. Soto Corp. He completed hundreds of landscaping projects in Southern California from the mid-1940s to the mid-1980s, including work for prominent properties like Los Angeles Municipal Airport (pre-LAX), CBS Television City, the Hyperion Outfall, and Santa Monica City College. Soto co-founded and served as second president of the California Landscape Contractors Association, the first and largest landscaping contractors association in the country, and led several municipal beautification campaigns. He spoke and published widely about landscape design, with a particular focus on introducing tropical species into residential as well as commercial, industrial, and institutional designs. After a palm tree-related near-bankruptcy in the early 1960s, Soto continued work under several other business names including ABC Corp. He pursued several unusual projects in the late 1960s and 1970s which focused on creating new developable land by filling low spots with household trash and discarded construction materials. His work developing the Site reflected this recycling ethic, which does not appear to have been particularly effective or popular – one of his completed sites, in Rolling Hills Estates, produced land which could not support conventional buildings with concrete foundations. Another proposed landfill project in Pacific Palisades was never undertaken. Soto's recycled-fill approach was suited to the development of Imperial Avalon Mobile Estates, since mobile homes and modular homes do not require substantial or subsurface foundations.

Despite his several failed experiments, Soto had a long and prolific period of productivity as a landscape contractor, and was regionally influential in the field of landscape design and construction. He appears to have been a master practitioner. However, the Site's size, orientation, and spatial configuration do not reflect innovative or unusual approaches. Its landscaping is minimal, restricted to small areas at the park entry and around the community building. There are no "greenbelt" areas or street trees along internal roads or near individual units. While tropical and Japanese garden-appropriate plantings are present in some areas, they are not part of a unified design scheme and do not appear to reflect an overarching landscape design approach by Henry Soto, Sei Dyo, or any other individual. Mature trees that likely date to the Site's original development, including those fronting the property's west perimeter wall along Grace Avenue, are evergreen species rather than the tropical species typical of Soto's designs. Furthermore, most of the landscaped areas appear to have been altered over time. Soto planted mature olive trees along the South Avalon Boulevard side of the Site during construction to obscure the activity; these trees are no longer present.⁶⁶ While the Site may be associated with Soto, it is on the later end of his work and does not exhibit any of his trademark design characteristics.

While the Site is a distinguishable entity whose components lack individual distinction, it is not historically significant due to its relatively late age, its mix of unit types, and its lack of strong association with significant landscape contractor Henry C. Soto. As a result, the Site does not appear eligible under Criteria C/3.

National and California Register Criteria D/4: has yielded or may likely yield information important in prehistory or history.

An archaeological assessment was not conducted as part of this Historical Resource Assessment Report; please refer to ASM Affiliates' Cultural Resource Assessment Report (2021) for an evaluation of the Site under Criteria D/4.

8. Conclusion

In summary, upon documentary research, site analysis, the development of historical contexts, and evaluations against federal and state eligibility criteria, ARG finds that the Site is not eligible for listing in the National Register or the California Register. As the Site is not eligible against federal or state criteria, it does not meet the definition of a historical resource for the purposes of the California Environmental Quality Act (CEQA). Therefore, the proposed project does not have the potential to impact historical resources.

⁶⁶ "Eyesore' Disappearing."

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